
Alternatives

Introduction and Overview

CEQA Guidelines require an analysis of a reasonable range of alternatives for any project subject to an EIR. The purpose of the alternatives section is to provide decision-makers and the public with a discussion of alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Evaluation of alternatives should present the proposed action and all the alternatives in comparative form to define the issues and provide a clear basis for choice among the options.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Where a lead agency has determined that even after adoption of all feasible mitigation measures, a project as proposed would still result in significant environmental effects that cannot be substantially lessened or avoided, the agency must first determine whether there are any alternatives that are both environmentally superior and feasible. CEQA provides the following guidelines for discussing project alternatives:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation (§15126.6(a)).
- An EIR is not required to consider alternatives which are infeasible (§15126.6(a)).
- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project (§15126.6(b)).
- The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (§15126.6(c)).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project (§15126.6(d)).

Accomplishing Basic Project Objectives

CEQA requires an analysis of alternatives that would feasibly attain most of the basic objectives of the project.

Community-Based Goals and Objectives

The comments received at public workshops, other community involvement efforts, and from the Steering Committee have been formulated as goals and objectives of the Specific Plan. These goals and

objectives have been identified as the most important issues related to growth, development and change to those participating community members. These goals and objectives have also been vetted through the Technical Advisory Committee. The resulting goals and objectives are the “drivers” of the West Oakland Specific Plan’s detailed recommendations. All of the strategies and implementation actions of the Specific Plan are intended to relate back to the following overall community-based goals and objectives:

- Augment West Oakland’s development capabilities by enhancing the linkages between future Army Base uses and development in West Oakland, focusing on both these areas’ economic synergies as well as physical connections.
- Encourage the growth of additional jobs and services with opportunities and training available to both existing and future residents.
- Determine the most desirable and beneficial land uses for specific areas within West Oakland, recognizing that different areas have differing needs, opportunities and constraints, and assets.
- Attract quality, compatible residential, commercial and industrial development while preserving existing established residential neighborhoods.
- Support existing investment in the area and enhance existing assets.
- Support commercial, mixed-use and transit-oriented land uses in West Oakland, particularly in collaboration with the Bay Area Rapid Transit (BART) District for transit-oriented development at the West Oakland BART Station.
- Lessen existing land use conflicts and ensure avoidance of future conflicts between residential neighborhoods and non-residential uses.
- Enhance transportation resources throughout West Oakland and between West Oakland and adjoining areas.
- Further the physical and economic revitalization of West Oakland.
- Correspond with regional development issues in accordance with the district’s Priority Development Area designation through SB 375 and AB 32.
- Minimize the potential for displacement of existing residents as new residents are accommodated.

Reducing Significant and Unavoidable Project Impacts

CEQA also requires the identification and analysis of alternatives that would avoid or substantially lessen any of the significant effects of the Project. Of the potential environmental impacts identified in this EIR, only traffic-related effects and non-CEQA related air quality effects are identified as being significant and unavoidable.

Air Quality

Air-3: Development in accordance with the Specific Plan could expose a substantial number of new people to existing and new objectionable odors.

Air-5: During construction, individual development projects will generate regional ozone precursor emissions and regional particulate matter emissions from construction equipment exhaust and will generate construction-related toxic air contaminant (TAC) emissions from fuel-combusting construction equipment and mobile sources. For most individual development projects, construction emissions will

be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval. However, larger individual construction projects could generate emissions of criteria air pollutants that would exceed the City's thresholds of significance.

Air-7: New development pursuant to the Specific Plan will generate emissions of criteria pollutants (ROG, NO_x, PM₁₀ and PM_{2.5}) as a result of increased motor vehicle traffic and area source emissions. Traffic emissions combined with anticipated area source emissions would generate levels of criteria air pollutants that would exceed the City's project-level thresholds of significance.

Air-9: Development pursuant to the West Oakland Specific Plan would include new light industrial, custom manufacturing and other similar land uses, as well as the introduction of new diesel generators that could emit toxic emissions exceeding the City's project-level thresholds of significance.

Air-10: Certain future development projects in accordance with the West Oakland Specific Plan could result in new sensitive receptors exposed to existing levels of toxic air contaminants (TACs) or concentrations of PM_{2.5} that could result in increased cancer risk or other health hazards.

Greenhouse Gas Emissions

GHG-2: It is possible that certain development project envisioned and enabled under the Specific Plan could exceed, on an individual and project-by-project basis, the project-level GHG threshold.

Traffic and Transportation

Trans-1 and -7: The addition of traffic generated by the full development of the proposed Project to both Existing conditions and Cumulative 2035 conditions would cause PM peak hour southbound left turn 95th percentile queue length at the signalized intersection of Hollis and 40th Street (#1) located in Emeryville to exceed the available queue storage. Because this intersection is within the City of Emeryville's jurisdiction, the timing and implementation of the improvements are not under the City of Oakland's control. Therefore, the improvement cannot be assured to be completed.

- **Impact Trans-1 and -3 at San Pablo Avenue and 40th Street:** The addition of traffic generated by the full development of the proposed Project to both Existing Conditions and Cumulative 20135 Conditions would cause PM peak hour traffic operations at the signalized intersection of San Pablo Avenue and 40th Street (#2) located in Emeryville to degrade from LOS D to LOS E under Existing plus Project conditions. Additionally, the eastbound left and northbound left turn 95th percentile queue length would exceed the available queue storage or would contribute to the LOS F operations and increase the average delay by more than four seconds in the AM peak hour. Because this intersection is within the City of Emeryville's jurisdiction, the timing and implementation of the improvements are not under the City of Oakland's control. Therefore, the improvement cannot be assured to be completed.
- **Impact Trans-2 and -4 at San Pablo Avenue and 40th Street:** The addition of traffic generated by the full development of the proposed Project to both Existing Conditions and Cumulative 20135 Conditions would cause PM peak hour traffic operations at the signalized intersection of San Pablo Avenue and 40th Street (#2) located in Emeryville to degrade from LOS D to LOS E under Existing plus Project conditions. Additionally, the eastbound left and northbound left turn 95th percentile queue length would exceed the available queue storage in the AM peak hour. Because this intersection is within the City of Emeryville's jurisdiction, the timing and implementation of the improvements are not under the City of Oakland's control. Therefore, the improvement cannot be assured to be completed.

- **Impact Trans-5 at Mandela Parkway and West Grand Avenue:** The addition of traffic generated by the full development of the proposed Project under Cumulative 2035 conditions would degrade AM peak hour operation from LOS E to LOS F at the signalized intersection at Mandela Parkway and West Grand Avenue (#7) located outside the Downtown Area. It would also degrade operation from LOS E to LOS F operations in the PM peak hour and would increase the volume-to-capacity ratio beyond the threshold of significance. The recommended mitigation measures would encroach into Memorial Park and the street medians, and the provision of four westbound lanes would preclude planned installation of a bicycle facility on West Grand Avenue which is a City priority (Resolution 84197, Nov 2012). Therefore, these additional improvements are not recommended.

Conclusions of the Comparative Analysis

Pursuant to CEQA Guidelines, the alternatives evaluated in this EIR were developed with the intent of potentially avoiding or substantially reducing these unavoidable significant impacts. Other than the No Project Alternative, neither of the other alternatives would fully avoid all of the significant and unavoidable impacts identified for the Project.

Alternatives Analyzed

The alternatives analyzed in this EIR are described below. These alternatives are intended to meet the CEQA requirements that an EIR describe the No Project alternative as well as a range of reasonable alternatives to the Project that would feasibly attain most of the basic objectives of the Project, but would avoid or substantially lessen the significant effects of the Project.

Alternative 1: No Project

CEQA Guidelines Section 15126.6(e)(3)(A) states that; “When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.” Under Alternative 1: No Project, the West Oakland Specific Plan would not be approved, no changes in current General Plan land use designations, zoning or other regulatory measures would occur, and all new development within West Oakland would continue to occur under existing regulations. The pace of new development within West Oakland would be expected to occur at a rate commensurate with building permit activity which has occurred over the past 10 to 15 years.

Alternative 2: Reduced Project

Throughout the time period during which the West Oakland Specific Plan has been developed, the major development concepts for each Opportunity Area have been presented at community workshops and other public venues as both a “mid-range” and a “high intensity” scenario. For purposes of defining the Project, each of the high intensity scenarios for each Opportunity Area has been relied upon, thereby presenting the “worst case” (or greatest development potential) for environmental review. Under Alternative 2: Reduced Project, each of the mid-range development scenarios have been aggregated as one overall development alternative. This Reduced Project alternative explores the extent to which less intense development within West Oakland may result in reduced environmental effects, particularly in regards to traffic, air quality and noise. It is also consistent with the Planning Commission’s direction during the Notice of Preparation of this EIR to examine a less aggressive or less optimistic development

scenario over the next 20 to 25 year planning period. Whereas the Specific Plan (the Project) envisions an ultimate buildout that would include up to approximately 5,000 new dwelling units and approximately 4 million square feet of new business, industrial and commercial building space, the Reduced Alternative would accommodate a buildout of approximately 3,400 new dwelling units and approximately 775,000 square feet of new business, industrial and commercial building space.

The Reduced Project Alternative is generally consistent with Association of Bay Area Governments (ABAG) housing projections for the year 2020, and generally consistent with employment projections for a period between year 2020 and 2035.

Alternative 3: Scenario with Commercial and Jobs Emphasis

In written responses to the Notice of Preparation (NOP) for this EIR, it was suggested by numerous commenters that the EIR should consider an alternative to the Project whereby: a) no changes or conversions of industrial lands to residential use would occur, b) commercial or business uses (rather than residential use) would be located in proximity to the freeways, c) the West Oakland BART station TOD would include a mix of uses that would include a substantial component of commercial/institutional office space, and d) retail uses would extend southward from the current West Oakland/Emeryville border to West Grand Avenue.

Alternative 3: Scenario with Commercial and Jobs Emphasis includes a mix of land uses that emphasize the retention of commercial and industrial lands, that provide a greater emphasis on business development over new residential use, and that includes a substantial component of commercial/institutional office space within the West Oakland BART station TOD development plan. Whereas the Specific Plan (the Project) envisions an ultimate buildout of up to approximately 5,000 new dwelling units and approximately 4 million square feet of new business, industrial and commercial building space, Alternative 3 would accommodate a buildout of approximately 3,500 new dwelling units and approximately 4,170,000 square feet of new business, industrial and commercial building space, emphasizing a substantial increase of nearly three-quarters of a million square feet of retail and commercial space as compared to the Project.

Alternative 4: Maximum Theoretical Buildout Alternative

Because the Specific Plan's regulations would apply to every parcel within the Plan Area, the Maximum Theoretical Buildout Alternative evaluates the theoretical possibility that every parcel would be built out to the new maximum level permissible under the General Plan and Planning Code regulations as revised through adoption of the Specific Plan. Under the Maximum Theoretical Buildout Alternative, overall development would be substantially greater than the Project's land use development program (roughly 3.3 times as much non-residential development and an approximately 8% increase in residential development as compared to the Project. The likelihood of "maximum buildout" occurring is considered highly unlikely, and is referred to as theoretical.

Summary Comparison

Table 5-1 compares the amount of development and mix of uses proposed by the Project to the five alternatives.

Table 5-1: Comparative Development Summary - Project and Alternatives

	Project	Alternative 1: No Project	Alternative 2: Reduced Project	Alternative 3: Commercial and Jobs Emphasis	Alternative 4: Max. Theoretical Buildout
New Business / Indust. (sq.ft)	3,550,000	0	625,000	2,835,000	11,181,600
New Comm. /Retail (sq.ft.)	310,000	0	0	390,000	2,996,000
New Mixed Use (sq. ft.)	<u>170,000</u>	<u>100,000</u>	<u>150,000</u>	<u>945,000</u>	<u>954,000</u>
Total New Space, Non-Residential	4,030,000	100,000	675,000	4,170,000	15,132,000
New Jobs	14,890	2,400	6,730	16,146	37,640
New Housing Units	5,000	1,810	3,705	3,535	5,140
New Population	10,988	3,982	8,200	8,017	11,320

Alternatives Considered but Rejected

“Fully Mitigated” Alternative

CEQA Guidelines, Section 15126.6(c) indicates that the range of potential alternatives to the proposed project shall include those that could feasibly accomplish *most of the basic objectives of the project* (emphasis added) and could avoid or substantially lessen one or more of the significant effects.

As more fully described under the Reduced Alternative, the increased number of vehicle trips associated with substantially less development (both residences and employment opportunities) would still result in significant and unavoidable traffic impacts as well as non-CEQA air quality effects resulting from ambient conditions. The only means of off-setting the increased vehicle trips attributed to new development within West Oakland would be to reduce the total number of vehicle trips by taking an even more aggressive approach to limiting or reducing new growth and development than indicated under the reduced Alternative.

It is possible to describe any number of alternatives that include substantially less residential and/or employment opportunities in West Oakland, but such alternatives would not be capable of encouraging growth in West Oakland jobs and services, attracting quality, compatible residential, commercial and industrial development, supporting commercial, mixed-use and transit-oriented land uses at West Oakland BART Station, or corresponding with the regional growth projections and Priority Development Area designations pursuant to SB 375 and AB 32.

Although such alternatives are physically feasible, there is no alternative that would be capable of reducing or avoiding the significant traffic impacts while still accomplishing these basic Project objectives. For this reason, a “fully mitigated” alternative was eliminated from further consideration in this EIR.

Alternative Site Location

In considering the range of alternatives to be analyzed in an EIR, the CEQA Guidelines state that an alternative site location should be considered when feasible alternative locations are available and the significant effects of the project would be avoided or substantially lessened by putting the project in another location. The West Oakland Specific Plan is specific to the geography of West Oakland. Therefore, this EIR does not consider an off-site alternative.

Overview of Alternatives Analysis

Each of the alternatives is more fully described below, and their potential environmental effects are also disclosed. The environmental effects of each alternative are compared to those of the Project and to existing conditions. As permitted by CEQA (CEQA Guidelines Section 15126.6[d]) the effects of the alternatives are discussed in less detail than the impact discussions of the Project. However, the alternatives analysis is conducted at a sufficient level of detail to provide the public, other public agencies, and City decision-makers adequate information to fully evaluate the alternatives and to enable the City to consider approval of the alternatives without further environmental review. For each of the alternatives, the significance of each impact is compared to City of Oakland thresholds of significance, as indicated in the topic heading (e.g., Aesthetics [LTS]). These significance conclusions assume implementation of Standard Conditions of Approval and/or mitigation measures. The impacts of each alternative are also compared to the impacts of the Project to indicate whether the alternative would: 1) avoid potentially significant impacts of the Project; 2) generally have the same impact as the Project; or 3) result in impacts either greater than or less than the impacts of the Project.

Alternative 1: No Project

CEQA Guidelines Section 15126.6(e) requires that a “no project” alternative be evaluated, along with its impacts. The “no project” alternative must be the *practical result* of non-approval of the project.

Description of Alternative 1: No Project Alternative

For this EIR, the No Project Alternative is defined as an alternative under which new development within West Oakland would occur in a manner fully consistent with existing plans and regulations. The West Oakland Specific Plan would not be approved, and no changes in current General Plan land use designations, zoning or other regulatory measures would occur (i.e., no conversions of industrial lands to residential use and no new land use overlays). The pace of new development within West Oakland would be expected to occur at a rate commensurate with development and building permit activity which has occurred over the past 10 to 15 years.

Residential Development and Growth Rates

According to the US Census, only 713 units, or 71 units per year, were added to the West Oakland housing stock between 1990 and 1999, including several public and affordable housing developments. However, housing development increased substantially between 2000 and 2011, when there were more housing units constructed in West Oakland than during any similar time period prior to World War II.

Growth rates varied substantially during this time period. The beginning of the decade coincided with the expansion period of the national housing bubble and the majority of housing projects built during this period, including those in West Oakland, were successfully absorbed and there was ample financing available to fund both construction and homebuyer mortgages. Beginning in 2008, housing production

slowed considerably, demonstrating the rapid and protracted collapse of the housing market. Starting again in 2010, the housing market has begun to return to pre-recession levels. During the time period from 2000 to 2011, at least 1,505 new housing units were constructed (and building permits were issued for an additional 1,662 units which have not yet been built). Although the rate of housing development rose, declined and rose again, the average housing production rate in West Oakland during this time period was 136 new units per year. Of that total, only an estimated 520 market rate units were built in West Oakland.

For purposes of this Alternative, it is assumed that the new housing construction rate will continue at a similar pace as has occurred since year 2000, at approximately 136 units per year through to the year 2035. Over this 22-year period, this would equate to a total of 2,992 total new housing units.

Without a Specific Plan to more precisely guide and direct future new development, it can only be assumed that new residential growth will occur in areas currently zoned for residential use. The precise location of individual future residential development projects is unknown, and dependent upon numerous variables including market conditions, financing availability and other project-specific parameters. For purposes of this analysis it is assumed that, similar to projections included in the Specific Plan, approximately 60% of the total new West Oakland housing units (or 1,810 units) are assumed to be constructed within the West Oakland Opportunity Areas, and the remaining 40% are assumed to be constructed throughout West Oakland's Residential Enhancement Areas. Within the West Oakland Opportunity Areas, the total 1,810 new units are assumed to occur primarily as follows:

- a continuation and completion of the remaining approximately 640 approved units in the Wood Street Development project in the Mandela/West Grand Opportunity area,
- partial buildout of the West Oakland BART station TOD, assumed for purposes of this alternative to be approximately 750 units (or 1/3 of the total 2,250 units that could theoretically be achieved under current S-15 zoning regulations), and
- development of 420 units as new infill development and new mixed use projects along the San Pablo Avenue corridor, many of which include approved but as yet un-built projects.

Non-Residential Development and Growth Rates

According to sources cited in the "West Oakland Specific Plan, Equitable Development Strategy Report",¹ total employment in West Oakland was approximately 13,000 employees in 1992, but dropped to approximately 12,000 employees by year 1997. During the period of 1997 through 2007, total employment remained relatively constant at 12,000 employees, but dropped again between 2007 and 2012 to approximately 11,500 total employees. This declining employment rate mirrors the decline in employment in Alameda County as a whole. Contributing to this decline is a significant shift in where people are employed. There were half as many people employed in West Oakland by large businesses in 2012 as there was in 1992. This change represents both a loss in total numbers of employees and an overall shift in employment to smaller businesses. In 2012, small businesses account for a much higher share of total employment in West Oakland than they did in 1997. Despite the decline in total employment, West Oakland has a thriving urban manufacturing sector with a diverse set of businesses ranging from small-batch food production to fashion manufacturing, has a strong concentration of arts-related businesses and is internationally known as a center for the industrial arts, and is a hotspot for

¹ Bay Area Economics, Existing Conditions & Initial Strategic Directions, June 18, 2013

entrepreneurial activity and new business ventures. From 2007 to 2012, 853 new small businesses were founded in West Oakland, representing more than half of current businesses.

Rather than assuming a continuation of the recent decline in total employment in West Oakland, the No Project alternative acknowledges the recent increase in new small business activity, and assumes that small business growth in West Oakland will more than off-set a continued decline in employment at large- to moderate sized West Oakland businesses. According to at least one major source,² Oakland-East Bay industrial employment is projected to grow at an annualized rate of 1%. Over a 22-year buildout, a 1% per year growth rate in employment, added to the current 9,770 jobs in West Oakland, would result in a total employment by year 2035 of approximately 12,160 jobs, or an increase of nearly 2,400 jobs. The existing building stock throughout West Oakland's Opportunity Areas provides adequate space to accommodate this amount of employment growth, generally at rates affordable and attractive to small and emerging businesses. For reference, the Specific Plan (i.e., the Project) assumes a growth of as many as 5,320 new employees within existing vacant and/or underutilized buildings. Therefore, the No Project Alternative assumes that no new building space would be required to accommodate projected employment growth. An exception is that the No Project Alternative does assume that approximately 50,000 square feet of new non-residential space would be developed as part of mixed-use developments that are fully consistent with current zoning in the West Oakland BART TOD development area and along the San Pablo Avenue corridor, respectively.

Summary of the Reduced Alternative

Buildout of this alternative is anticipated to occur over an extended period of time with incremental increases in new housing and job opportunities, but final buildout is assumed by year 2035. **Table 5-2** provides a summary of land uses, employment and population changes projected within the Planning Area at buildout of the No Project Alternative.

² Principal Real Estate Investors, Oakland Economic Base Analysis, 2012

**Table 5-2: Buildout Assumptions, No Project Alternative
(all of West Oakland Opportunity Areas)**

	Business / Indust. (sq.ft.)	Comm. /Retail (sq.ft.)	Mixed Use (sq. ft.)	Jobs	Housing Units	Pop.
<u>Existing</u>						
Mandela/Grand	4,000,000	300,000	0	5,440	110	259
7th Street	1,790,000	0	5,000	1,880	85	204
3rd Street	1,040,000	50,000	0	1,770	0	0
San Pablo	<u>0</u>	<u>90,000</u>	<u>700,000</u>	<u>680</u>	<u>70</u>	<u>165</u>
Total	6,830,000	440,000	705,000	9,770	265	628
<u>Buildout, No Project Alternative</u>						
Mandela/Grand	4,000,000	300,000	0	7,040	750	1,667
7th Street	1,790,000	0	55,000	1,975	835	1,854
3rd Street	1,040,000	50,000	0	2,380	0	0
San Pablo	<u>0</u>	<u>90,000</u>	<u>750,000</u>	<u>775</u>	<u>490</u>	<u>1,089</u>
Total	6,830,000	440,000	805,000	12,170	2,075	4,610
<u>Net Change, No Project Alternative</u>						
Mandela/Grand	0	0	0	1,600	640	1,408
7th Street	0	0	50,000	95	750	1,650
3rd Street	0	0	0	610	0	0
San Pablo	0	0	50,000	95	420	924
Total	0	0	100,000	2,400	1,810	3,982
Net Change, Project	3,550,000	310,000	170,000	14,890	5,000	10,988
Net Change, Compared to Project	-3,550,000	-310,000	-70,000	-12,490	-3,190	-7,006
Percent of Project	0%	0%	59%	16%	36%	36%

Comparative Environmental Assessment, Alternative #1: No Project Alternative

Aesthetics

There are no officially designated public scenic vistas within or near the West Oakland Planning Area. No scenic vistas or view corridors would be substantially obstructed or degraded by development in accordance with the Reduced Alternative, and the impacts of Alternative 3 on scenic vistas would therefore be less than significant.

Infill development and redevelopment of vacant and blighted properties, improvements to streetscapes and the public realm, and new landscaping and street trees to improve the quality of views throughout West Oakland from public vantage points would not be as extensive and effective under the No Project Alternative as would occur under the Project. New development would not necessarily be focused within the Opportunity Areas. At the West Oakland BART Station TOD, the No Project Alternative would lower building heights as compared to the Project, and would not necessarily provide an effective and substantial transition in building heights nearest to the South Prescott neighborhood as proposed under the Project.

Scenic Highways

New development and public realm improvements under the No Project Alternative would not substantially damage scenic resources, but would not provide as much substantial improvements in the quality of views of the Planning Area from the I-580 scenic highway. The impacts of the No Project Alternative related to scenic highways would be less than significant. **(LTS)**

Visual Character or Quality

New development and public realm improvements in accordance with the No Project Alternative would contribute to improvements in the visual character and quality of their surroundings, but to a lesser extent than as would occur under the Project. Less infill development and redevelopment would occur, therefore providing less repair to the existing inconsistent urban fabric where such inconsistencies exist, and result in a less unified and coherent development character. The No Project Alternative would not provide for the re-zoning of any areas from industrial to residential use, and the existing edge between industrial and residential areas would remain less defined and consistent. The visual character along the industrial/residential edges would continue to remain mixed in character. **(LTS)**

Shadow

The No Project Alternative would not cast shadows that substantially impair the function of a building using passive solar heat collection, solar collectors for hot water heating, or photovoltaic solar collectors; cast shadows that substantially impair the beneficial use of any public or quasi-public park, lawn, garden, or open space; or cast shadows on an historic resource such that the shadow would materially impair the resource's historic significance. The shadow impacts of the No Project Alternative would be less than significant. **(LTS)**

Adequate Lighting

The No Project Alternative would not cause a fundamental conflict with policies and regulations that address the provision of adequate light related to appropriate uses. **(LTS)**

Wind

Like the Project, the wind impacts associated with the No Project Alternative would be less than significant. (LTS)

Air Quality

CAP Consistency: VMT Increase

The growth assumptions that underlie the applicable Clean Air Plan are based on a combination of regional growth forecasts derived from ABAG, and the General Plans from each respective jurisdiction. As indicated Chapter 4.8 of this EIR, ABAG projections for year 2035 forecast significant growth in both population and jobs pursuant to the current City of Oakland General Plan. Since the No Project Alternative is defined as no changes to current General Plan land use designations, zoning or other regulatory measures, the ABAG projections underlying the CAP are representative of a No Project scenario. Therefore, the No Project Alternative would not conflict with, but would be consistent with the applicable CAP.

The projection of total vehicle miles travelled (VMTs) under a No Project scenario – a scenario under which growth occurs pursuant to the current General Plan and assuming ABAG projections - actually exceeds the VMTs projected for the Project. The PM peak hour VMTs under the 2035 plus Project scenario are estimated at 80,364 as compared to a PM peak hour projection of VMTs under a 2035 No Project Scenario of 81,370. Thus a No Project Alternative which accommodates growth as projected by ABAG but in a land use configuration consistent with the current General Plan (as opposed to a land use configuration as defined under the Project) would generate more VMTs than does the Project.

CAP Consistency: Implementation of Control Measures

Like the Project, the No Project alternative would not fundamentally conflict with the CAP's air pollution control measures. All new development pursuant to the No Project Alternative, including new industrial and commercial uses, would be required to comply with all measures that the Air District adopts and enforces to control emissions from stationary sources of air pollution. The No Project Alternative would not contain any policies or strategies that would be contrary to incentive programs to achieve voluntary emission reductions from mobile sources. The No Project Alternative would not fundamentally conflict with the CAP's transportation control strategies, even if it does not achieve to the same degree as does the Project, improvements to the efficiency of existing transit systems or the promotion of focused urban infill development. All new development pursuant to the No Project Alternative Plan would be required to comply with City of Oakland's Standard Conditions that seek to reduce energy use in new development projects. In summary, the No Project Alternative would not interfere with implementation of Clean Air Plan control measures.

Odors

Like the Project, new development in accordance with the No Project Alternative would expose a substantial number of people to objectionable ambient odors from the EBMUD WWTP and from food processing facilities, painting/coating operations, and/or green waste and recycling facilities. This impact would be **significant and unavoidable** at the Plan level. New development pursuant to the No Project Alternative could result in development of new odor-generating uses in close proximity to residential or other odor-sensitive uses within mixed-use areas, similar to that as indicated for the Project. Like the Project, this impact would be potentially significant and proper controls or setbacks, as recommended for the Project, would be required.

Construction Period Emissions

Similar to the Project, individual development projects pursuant to the No Project Alternative will generate fugitive dust from demolition, grading, hauling and construction activities, will generate regional ozone precursor emissions and regional particulate matter emissions from construction equipment exhaust, and will generate construction-related toxic air contaminant (TAC) emissions from fuel-combusting construction equipment and mobile sources.

- Fugitive dust will be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval, and
- construction-related toxic air contaminant (TAC) emissions will be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval, but
- larger individual construction projects could generate emissions of criteria air pollutants that would exceed the City's thresholds of significance and/or that could exceed thresholds for cancer risk, chronic health index, acute health index or annual average PM2.5 concentration levels and are conservatively estimated as **significant and unavoidable**.

Operational-Related Criteria Air Pollutants

Buildout of the No Project Alternative would generate total emissions of criteria pollutants (ROG, PM10 and PM2.5) from increased motor vehicle traffic and area source emissions that would exceed the City's project-level thresholds of significance. Like the Project, individual development projects, as well as the aggregate of all development assumed pursuant to the No Project Alternative is conservatively considered to generate criteria air pollutants and ozone precursor emissions at a level that would be **significant and unavoidable**.

Carbon Monoxide Concentrations

The No Project Alternative would not exposure sensitive uses and would not generate emissions leading to significant concentrations of CO that would violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation. Traffic modeling conducted for this EIR indicates that study intersections with the highest traffic volumes would not experience 24,000 vehicles per peak hour under 2035 scenarios with or without implementation of the Project.

Operational Toxic Air Emissions

Development pursuant to the No Project Alternative would include new light industrial, custom manufacturing and other similar land uses that could emit toxic emissions. The potential exists for multiple new sources of TAC emissions to be developed within a single concentrated portion of the Plan Area. Given the existing elevated cancer risk from existing local and mobile sources in the Plan Area, there is the potential for new multiple sources (even if each new source is individually less than significant) to cumulatively increase toxic air contamination to a **significant and unavoidable** level.

Exposure to Toxic Air Contaminants and PM2.5

Like the Project, certain future development projects in accordance with the No Project Alternative could expose new sensitive receptors to levels of toxic air contaminants (TACs) or concentrations of PM2.5 that could result in an unacceptable increased cancer risk or other health hazards. Pursuant to the current General Plan, the No Project Alternative would facilitate development of new land uses that serve sensitive receptors, specifically near the I-880 freeway at the West Oakland BART station, where

there is the potential to result in **significant and unavoidable** health risks to future residents due to nearby sources of toxic air contaminants (TACs) and concentrations of PM2.5. However, the No Project Alternative would not facilitate development of new sensitive receptors at several other locations that are adjacent to the I-880 freeway and which have increased cancer risk and increased health risks due to PM2.5 concentrations, as proposed under the Project. These sites include locations along the 7th Street corridor, the Phoenix Iron Works site, the Roadway site and the site at 12th and Mandela, where the No Project Alternative would not allow new residential development as proposed pursuant to the Project.

Cultural Resources

Historic Resources

The No Project Alternative does not include future demolition of any of the Local Register properties within West Oakland, the great majority of which are located in residential neighborhoods which would experience limited growth and change. Under the No Project Alternative, any future proposed change to an historic property located in West Oakland would be subject to the City's existing Historic Preservation Element (HPE) policies and actions, regulatory requirements, individual CEQA review and standard conditions of approval, to be implemented on a project-by-project basis. These existing Historic Preservation Element policies include using a combination of incentives and regulations to encourage preservation of significant older properties and areas which have been designated as Landmarks, Preservation Districts, or Heritage Properties (HPE Policy 2.1 et. seq.); avoiding or minimize adverse historic preservation impacts related to discretionary City actions (HPE Policy 3.1 et. seq.); ensuring that all City-owned or controlled historic properties will be preserved (HPE Policy 3.2 through 3.4, et. seq.) potentially including City acquisition of historic properties where other means of preservation have been exhausted, establishing Design Review findings for alterations and demolitions of Heritage Properties and PDHPs applicable to both public and privately sponsored projects (HPE Policy 3.5 et. seq.); and requiring reasonable efforts to relocate existing or Potential Designated Historic Properties as a condition of approval for all discretionary projects involving demolition (HPE Policy 3.7 et. seq.).

Individual CEQA review for projects involving historic resources requires consideration of mitigation measures. These measures may include modifying the individual project design to avoid adverse effects on character-defining elements of the property, or relocating the affected historic resource to a location consistent with its historical or architectural character. If the above measures are not feasible, then other measures may be considered, including but not limited to: modifying the project design to include restoration of the remaining historic character of the property or incorporating or replicating elements of the building's original architectural design; salvaging and preserving significant features and materials of the structure in a local museum or within the new project; protecting the historic resource from effects of on-site or other construction activities; appropriately documenting the resource; placing a plaque, commemorative, marker, or artistic or interpretive display on the site; and making a contribution to a Facade Improvement Fund, the Historic Preservation Revolving Loan Fund, the Oakland Cultural Heritage Survey, or other program appropriate to the character of the resource.

Existing regulatory requirements that would be applicable to individual projects pursuant to the No Project Alternative include Design Review referral to the Landmarks Board for project applications located within an S-7 zone or on a designated Landmark site (Planning Code chapter 17.136.060); requirements that alterations and new construction may not adversely affect the exterior features of a Landmark and should conform, if possible, with the Design Guidelines for Landmarks and Preservation Districts and/or the Secretary of the Interior's Standards for the Treatment of Historic Properties (Planning Code chapter 17.136.070); special regulations for demolition or removal of Designated Historic Properties and Potentially Designated Historic Properties (Planning Code chapter 17.136.075); and the

requirement that projects resulting in removal of a historic resource, or certain projects resulting in additions and alterations to historic resources must consult with a Historic Preservation Planner and seek LEED and Green Building certification (Planning Code chapter 18.02.100).

With implementation of these policies, actions and regulations (pursuant to individual CEQA review and applied as standard conditions of approval), individual projects pursuant to the No Project Alternative could still result in significant and unavoidable impacts to historic resources, but such impacts will have undergone detailed, project specific review and consideration prior to such effects having occurred.

Archaeological Resources, Paleontological Resources and Human Remains

Subsequent development under the No Project Alternative could cause a substantial adverse change in the significance of an archaeological resource or destroy a unique paleontological resource or site or unique geologic feature. However, each individual development project would be required to implement the City's Standard Conditions of Approval. Given the high potential for the presence of unrecorded Native American resources and moderate to high potential for the presence of unrecorded historic-period archaeological resources, new development that involves excavation would likely be subject to SCA E, Archaeological Resources – Sensitive Sites. This Standard Condition of Approval requires additional intensive pre-construction surveys or construction period monitoring, and avoidance and recovery measures. Additionally, in the event of an unanticipated discovery of prehistoric or historic-period archaeological resources or unique paleontological resources during development within the Planning Area, SCA 52, Archaeological Resources, SCA 53, Human Remains, and SCA 54, Paleontological Resources require that excavations within 50 feet of the find be temporarily halted or diverted until the discovery is examined by a qualified archaeologist or paleontologist, documented and evaluated for significance, and procedures established to consider avoidance of the resource or preparation of an excavation plan if avoidance is unfeasible. With required implementation of these standard conditions of approval, the impacts of future development on archaeological resources, paleontological resources and human remains pursuant to the No Project Alternative would be less than significant.

Greenhouse Gas and Climate Change

GHG Emissions

New development facilitated by the No Project Alternative would allow for the construction and operation of land uses that would produce greenhouse gas emissions. The level of emissions would exceed the project-level threshold of 1,100 annual tons of MTCO₂e, but would not exceed the project-level efficiency threshold of 4.6 MTCO₂e of annual emissions per service population nor would it exceed the Plan-level threshold of 6.6 MTCO₂e annually per service population. Development facilitated by the proposed Specific Plan would thus not be expected to generate greenhouse gas emissions at levels that would result, in the aggregate, in significant or cumulatively considerable GHG emissions. (LTS)

Hazards and Hazardous Materials

Hazardous Materials Release Sites

The Planning Area contains numerous sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Continued occupancy and use or future development of these hazardous materials sites under the No Project Alternative (or any alternative) could create a significant hazard to the public or the environment. However, with required implementation of City of Oakland Standard Conditions of Approval and required compliance with local,

state and federal regulations for treatment, remediation or disposal of contaminated soil or groundwater, hazards to the public or the environment from hazardous materials sites would be less than significant.

Hazardous Building Materials

Asbestos or lead based paint present within older structures in the Planning Area could be released into the environment during demolition or construction activities, even pursuant to the No Project Alternative, which could result in soil contamination or pose a health risk to construction workers or future occupants. However, with required implementation of the City's Standard Conditions of Approval and other applicable laws, regulations, standards and oversight currently in place, the potential impact related to exposure to hazardous building materials would be less than significant.

Hazardous Materials Use, Transport or Disposal

Even the modest amount of new development envisioned under the No Project Alternative could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, with required implementation of the City's Standard Conditions of Approval, as well as required compliance with hazardous materials laws, regulations, standards and oversight currently in place, potential impact related to the routine transport, use, or disposal of hazardous materials would be less than significant.

Hazardous Materials near Schools

New businesses that emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste could occur within one-quarter mile of a school under the No Project Alternative. However, with required implementation of the City's Standard Conditions of Approval, as well as required compliance with hazardous materials laws, regulations, standards and oversight currently in place, the potential impact related to emission and handling of hazardous materials near schools would be less than significant.

Land Use and Planning

Land Use Compatibility

The No Project Alternative would not change or alter current planning policy or regulations applicable to West Oakland pursuant to the current City General Plan and Planning Code. No fundamental conflicts between adjacent or nearby land uses within West Oakland were identified as part of the environmental review of the current General Plan Land Use and Transportation Element or of the nearby Oakland Army Base Redevelopment Plan EIR and Addendum. The No Project Alternative would not include those planning and zoning amendments as proposed by the Project intended to result in a gradual improvement in compatibility between residential, and industrial and business uses, nor would it include the Project's land use strategies which are intended to facilitate the transition of less compatible heavy industrial and transportation uses to more compatible light industrial and business mix use.

Conflict with Plans, Policies or Regulations

The No Project Alternative would not fundamentally conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. By definition, the

No Project Alternative would be fully consistent with all currently applicable plans, policies and regulations, and its impacts would be less than significant.

Habitat and Natural Community Conservation Plans

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other adopted habitat conservation plan applicable to the Planning Area. The No Project Alternative would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Noise

Construction Noise

The No Project Alternative does not mean that no development would occur under this scenario. Construction activities within West Oakland would still occur, including pile drilling and other extreme noise generating construction activities that would temporarily increase noise levels in the vicinity of individual project sites. Variations in construction noise levels would occur, depending on the equipment used, its duration and the time of day, the distance between noise sources and receptors, and the presence or absence of barriers between the noise source and receptor. However, significant construction-related noise impacts would not result when standard construction noise control measures are enforced and when the duration of the noise generating construction period is limited to one construction season. Implementation of City of Oakland standard conditions of approval (SCA 28: Days/Hours of Construction Operation; SCA 29: Noise Control, SCA 30: Noise Complaint Procedures, and SCA 39: Pile Driving and Other Extreme Noise Generators) would reduce construction noise levels and, for practical purposes, represent all feasible measures available to mitigate construction noise. Implementation of these SCA's on a project-by-project basis would maintain construction noise impacts at a less than significant level.

Operational Noise

Ongoing operational noise generated by new stationary sources (industrial and commercial operations) and roof-top mechanical ventilation equipment could generate noise in violation of the City of Oakland Noise Ordinance. The City's standard condition of approval (SCA 32: Operational Noise - General), requires that noise levels from any activity comply with the performance standards identified in the Planning Code and Municipal Code, and that if noise levels exceed these standards, the activity causing the noise must be abated until appropriate noise reduction measures have been installed. With required implementation of the City's Standard Condition of Approval SCA 32, operational noise impacts of the No Project Alternative would be less than significant.

Traffic Noise

Increased traffic result from new growth and development under the No Project Alternative will result in higher traffic noise along streets within West Oakland, mixing with noise from all other existing ambient noise sources (i.e., trains, BART operation, existing freeway noise, etc.). The number of new vehicle trips associated with the No Project Alternative would be significantly less than the vehicle trips associated with the Project, but the greatest increase in traffic and associated traffic noise would still occur along the Mandela Parkway, Grand Avenue and 7th Street corridors. Since traffic-related noise volumes are estimated to increase by 0.01 dBA to 3.95 dBA under Project conditions, the lower traffic volumes of the No Project Alternative would generate even less traffic noise and would remain below the 5 dBA increase threshold, and therefore less than significant.

Construction and Operational Vibration

New construction activities under the No Project Alternative could generate excessive ground-borne vibration during the construction period, and new commercial and industrial development may generate operational ground-borne vibration at levels that would be perceptible beyond the property boundary. However, with required implementation of the City's Standard Conditions of Approval and compliance with Oakland Planning Code regulations, these potential vibration impacts would be less than significant.

Noise Exposure / Land Use Compatibility

Future occupants of new residential and other noise-sensitive development pursuant to the No Project Alternative could be exposed to community noise in conflict with the Land Use Compatibility Guidelines of the Oakland General Plan, and to interior noise exceeding California Noise Insulation Standards from a variety of noise sources including freeway traffic, BART and railroad operations. However, under the No Project Alternative, no new noise sensitive receivers (i.e., residences) would be developed at either the Phoenix Iron Works Site (Opportunity Site #) or at the Roadway parcels (Opportunity Sites #8, 12 and 13), or elsewhere along the I-880 freeway within the Mandela/Grand Opportunity Area. Furthermore, all new residential development under the No Project Alternative would be required to comply with the city's Standard Conditions of Approval which require design measures capable of reducing interior noise to acceptable levels within buildings. With required implementation of the City's Standard Conditions of Approval, land use compatibility impacts would be less than significant.

West Oakland BART Station TOD

Similar to the analysis conducted for the Project, the No Project Alternative includes development of a West Oakland BART Station TOD. Under the No Project Alternative, buildout of the TOD would occur consistent with currently applicable zoning and height restrictions and is not expected to reach buildout as rapidly as projected with the Specific Plan, so its buildout numbers are lower than as represented under the Project.

Primary noise sources at the West Oakland BART Station TOD site include traffic noise on I-880, rail and passenger activity along the BART tracks and at the West Oakland BART station, and train noise on the nearby train tracks. The primary concern for noise exposure is proximity of new residents to noise from the BART train line and station. A typical BART train produces an instantaneous 85 dBA noise level at a distance of 100 feet from the tracks (Illingworth & Rodkin, 2004). Noise levels are generally lower in the immediate vicinity of the West Oakland Station due to the slower speeds of approaching and departing trains, but still exceed the 65 dBA Land Use Compatibility standard. The site is also adjacent to the I-880 freeway, which has main travel lanes on an elevated structure that is immediately adjacent to the proposed TOD. As indicated for the Project, new residences within the No Project Alternative's TOD would be subject to Title 24 of the California Code of Regulations and would require an acoustical analysis demonstrating how dwelling units are designed to meet interior standards. The TOD project would also place noise-sensitive publicly-accessible outdoor uses in a noise environment characterized as "clearly unacceptable" for such uses. Noise reduction could occur with the site design if buildings are effectively designed to act as noise barriers and break the line of sight between both I-880 and the BART tracks, and any publicly-accessible open space. As with all other new residential development under the No Project Alternative, the TOD project would be required to comply with the city's Standard Conditions of Approval which require design measures capable of reducing interior noise to acceptable levels within buildings. With required implementation of the City's Standard Conditions of Approval, land use

compatibility impacts would be less than significant and no mitigation measures would be required pursuant to CEQA.

Airport Noise

The Planning Area is located more than two miles outside of the Oakland International Airport 65 dBA Ldn/CNEL noise contour, which the Federal Aviation Administration regards as a significance threshold for noise-sensitive land uses. Therefore, impacts of aviation noise on any new development, including development pursuant to the No Project Alternative, would be less than significant.

Population, Housing and Employment

Growth Inducement

Build-out of the No Project Alternative would result in less households and employees that are included in ABAG's most recent projections for the area. Any additional induced growth would also occur as already contemplated in, and consistent with, adopted plans and the environmental documents prepared for those plans. Growth facilitated or induced by the No Project Alternative represents growth for which planning has already occurred, and the growth inducement impacts of this Alternative would be less than significant.

Displacement of Housing or People

The No Project Alternative would not directly result in displacement of housing or people. No housing would be removed or changed to a non-residential use and the limited number of existing housing units located within the Specific Plan's Opportunity Areas would be retained. Some housing areas built without required permits and which may not conform to current zoning and/or building codes, including certain residential conversion of formerly underutilized industrial spaces, could be redeveloped with resulting loss of some of these existing informal units and the associated displacement of people. However, like the Project, the potential loss of a small number of housing units and associated displacement of people would be offset by the number of new units built under the No Project Alternative. Impacts of the No Project Alternative related to the displacement of housing or people would be less than significant.

Public Services and Recreation

Fire Protection

New development pursuant to the No Project Alternative would, though to a much lesser extent than the Project, still result in an increase in OFD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. All new development under this alternative would be subject to the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements. Implementation of these requirements would reduce the impacts of this alternative on fire protection services to a level of less than significant.

Police Protection

New development under the No Project Alternative would result in an increase in OPD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's

response time goals and staffing ratios, though to a lesser degree than would the proposed Project. The impacts of the No Project Alternative related to police protection would be less than significant.

Schools

Development in accordance with the No Project Alternative would generate substantially fewer additional students attending the OUSD schools than would the Project. School impact fees from residential and non-residential development collected pursuant to California Government Code would provide full and complete mitigation for school impacts.

Parks and Recreation

Development pursuant to the No Project Alternative would generate an incremental need for additional parkland, adding to the existing deficiency of parkland acreage in West Oakland, and would increase the use of existing parks and recreational facilities. However, because the No Project Alternative would include substantially less residential development than the Project, its overall demands on parks and recreation services would be reduced as compared to the Project. The No Project Alternative would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities would occur, and the impacts of this alternative on parks and recreation services would be less than significant.

Traffic and Transportation

No Project as Identified in this EIR

Under the No Project alternative as defined in this EIR, the amount of new housing and employment-generating uses are projected to be substantially less than as projected to occur under the proposed Project. New employment would occur, but most likely would be accommodated within existing buildings throughout the Planning Area. New housing development would also occur, most of which would be developed within the Residential Enhancement areas as identified under the Specific Plan. Because the amount of new growth and development projected under the No Project Alternative is so small, the traffic impacts of that growth would be substantially less than as projected for the Project. It is unlikely that any of the significant and unavoidable traffic impacts identified under the Project would materialize under this alternative.

No Project as Envisioned under Regional Growth Allocations

ABAG periodically produces growth forecasts for public information and for use by other regional agencies, including the Metropolitan Transportation Commission (MTC). ABAG projections provide the basis for the MTC Regional Transportation Plan and are also the basis for the Alameda County Congestion Management Agency (ACCMA) regional traffic model. The General Plans and development regulations of local jurisdictions are a key basis for the ABAG projections. The forecasts reflect the anticipated impact of “smart growth” policies and incentives in shifting development patterns from historical trends toward better jobs-housing balance, cleaner air, lower greenhouse gas emissions, increased preservation of open space, and lower housing and travel costs. The Specific Plan build-out projections are consistent with the ABAG projections of household and employment growth, and therefore do not represent unexpected growth, even without the proposed Specific Plan. Therefore, it could be concluded that the amount of housing and employment growth as projected for the Project is consistent with (i.e., would occur) with or without the proposed Project.

Assuming that these regional growth projections represent a reasonable and likely projection of new development within West Oakland, with or without the Specific Plan (i.e., under a No Project scenario that accommodates regional projections), then the traffic impacts that are associated with this growth and development are similar to that forecast under the Project. Specific locational differences would be anticipated, given that this regional growth would not occur as forecast under the Specific Plan without the General Plan amendments and zoning changes that are proposed, but the overall trip generation potential of the area would be similar. The significant traffic impacts identified as resulting from the proposed Project would also likely occur under any development scenario that accommodates a similar amount of regional growth.

Alternative 2: Reduced Alternative

CEQA Guidelines Section 15126.6(c) requires that the range of potential alternatives to the proposed Project include alternatives that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. This alternative has been developed to consider an alternative capable of achieving most of the Project's major objectives, but which may be able to lessen some of its significant adverse effects, particularly on traffic congestion.

Description of Alternative 2: Reduced Alternative

The Reduced Alternative's land use and development plan is organized by Opportunity Area, similar to that indicated for the Project.

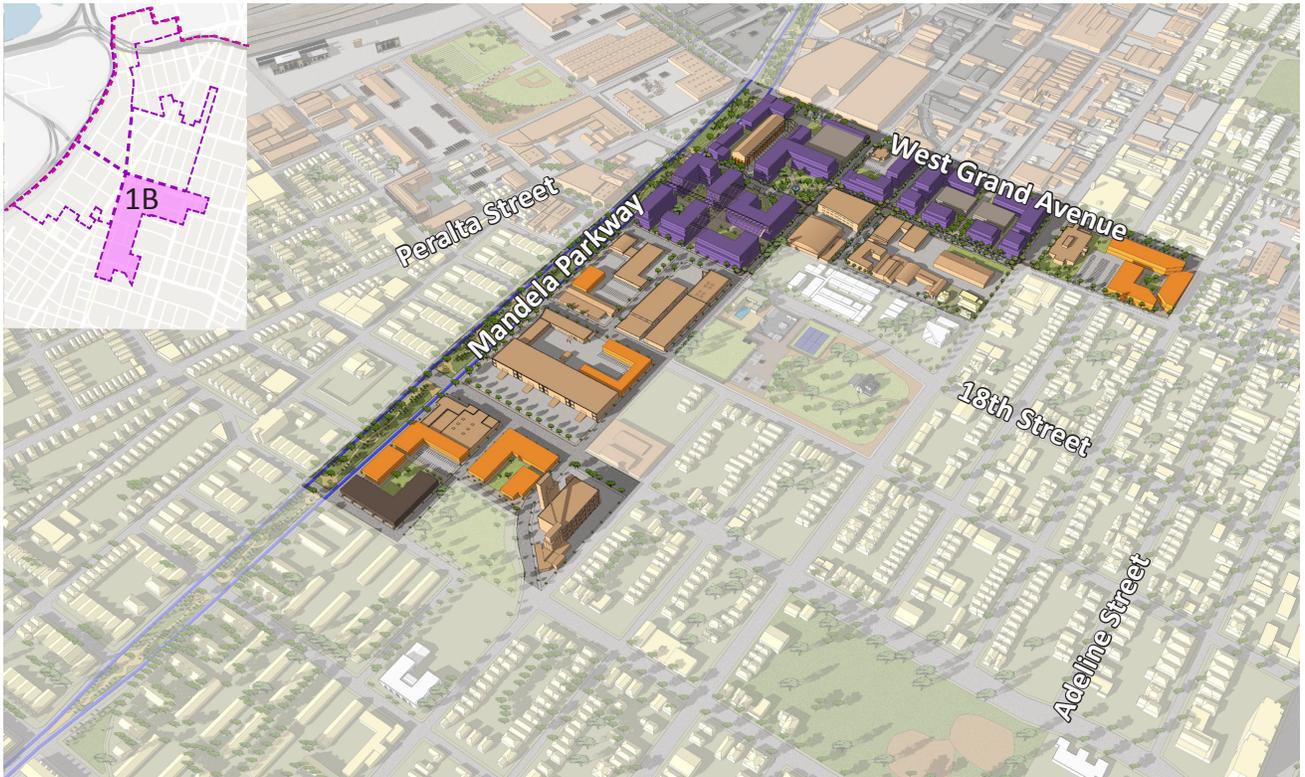
Opportunity Area 1: Mandela/West Grand

The Mandela/West Grand Opportunity Area would continue to be a business and employment center for West Oakland, including a mix of business activities and development types with a range of jobs at varying skill and education levels. This alternative would retain and expand existing commercial and compatible urban manufacturing, construction and light industrial businesses that have well-paid blue collar and green collar jobs, and would also attract new industries. However, new development would primarily occur as new lower-intensity industrial buildings and with extensive reuse of existing buildings, and would not include higher intensity business development (mid-rise buildings) as envisioned under the Project. Buildout of new non-residential space under the Reduced Alternative would be substantially less than as projected under the Project. New residential and live/work development would occur generally at the same selected sites as proposed pursuant to the Project, including infill of approximately 640 units at the approved Wood Street Development project, approximately 80 units at Mandela Parkway/14th Street, and approximately 390 units of live/work space south of Raimondi Park (where this area would be re-zoned to HBX-2 to permit live/work use).

Conceptual, schematic plans are provided on **Figures 5-1 and 5-2** for each of the four separate subareas within this Opportunity Area, illustrating densities, building massing and other physical characteristics of the Reduced Alternative.



Existing facilities to be Enhanced Low Intensity Business Mix/Light Industrial Residential Yellow



Existing facilities to be Enhanced Low Intensity Business Mix/Light Industrial Business Intensification Purple
 Mixed Use/Live Work Transit Enhancement Blue

Figure 5-1
Reduced Project Alternative, Mandela/West Grand
Opportunity Areas A and B

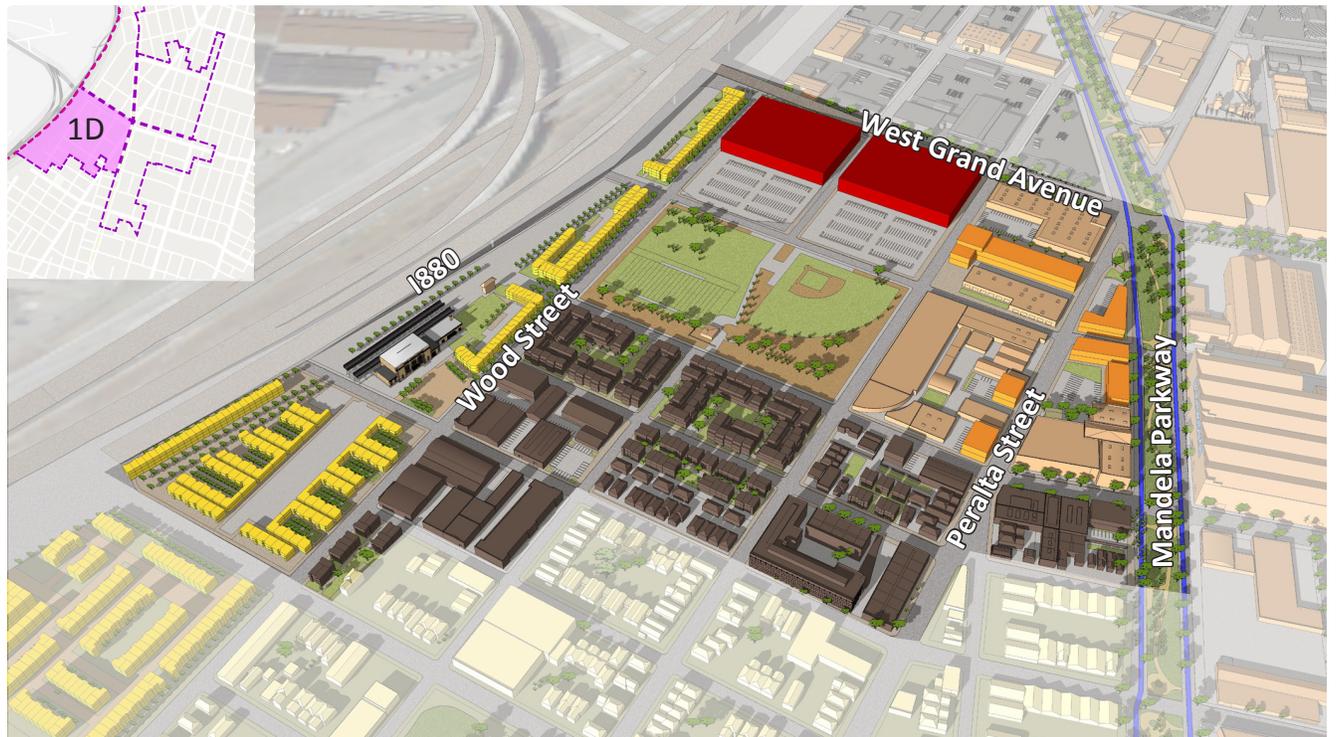




Existing facilities to be Enhanced
Transit Enhancement

Low Intensity Business Mix/Light Industrial

Retail/Commercial



Existing facilities to be Enhanced
Residential

Low Intensity Business Mix/Light Industrial

Mixed Use/Live Work

Retail Commercial

Transit Enhancement

Figure 5-2
Reduced Project Alternative, Mandela/West Grand
Opportunity Areas C and D



West Oakland Specific Plan, Draft EIR
Source: JRDV Urban International

Opportunity Area 2: 7th Street

Under the Reduced Alternative, the 7th Street Opportunity Area would include a transit-oriented development project (TOD) on vacant sites and parking lots around the West Oakland BART Station. A new BART parking garage would be developed next to the freeway, and the TOD would be primarily high- to mid-density residential development above mostly ground-floor neighborhood-serving retail and custom manufacturing /industrial arts/ artist exhibition space. However, this alternative would provide for development of approximately 1,600 housing units at the TOD site (or approximately 70% of the 2,300 units envisioned under the Project). Conceptual, schematic plans are provided on **Figure 5-3** for the Reduced Project's TOD design, illustrating both a residential emphasis and a commercial/office alternative.

Like the Project, new medium density housing with ground floor commercial uses would occur further west on 7th Street as a transition from the West Oakland BART Station TOD to the surrounding lower-density neighborhoods. Like the Project, 7th Street would continue to be planned as the neighborhood focus, with neighborhood-serving commercial establishments that enliven the street.

Opportunity Area 3: 3rd Street

The 3rd Street Opportunity Area would continue to support industrial and business activities and jobs, focusing on manufacturing and light industrial uses that benefit from adjacency to the Port. New business opportunities would reflect the existing mix of light industrial, service commercial, food and beverage production and distribution, and construction-related businesses, as well as small professional offices, import/export, communications, computer services, publishing and printing, photo/audio services, and small R&D activities. However, the amount of new business and industrial development that would occur within the 3rd Street Opportunity area would be approximately one-half of that projected to occur under the Project. Residential development in this area would continue to be prohibited. A conceptual, schematic plan for this subarea is provided on **Figure 5-4**, illustrating densities, building massing and other physical characteristics of this alternative.

Opportunity Area 4: San Pablo Avenue

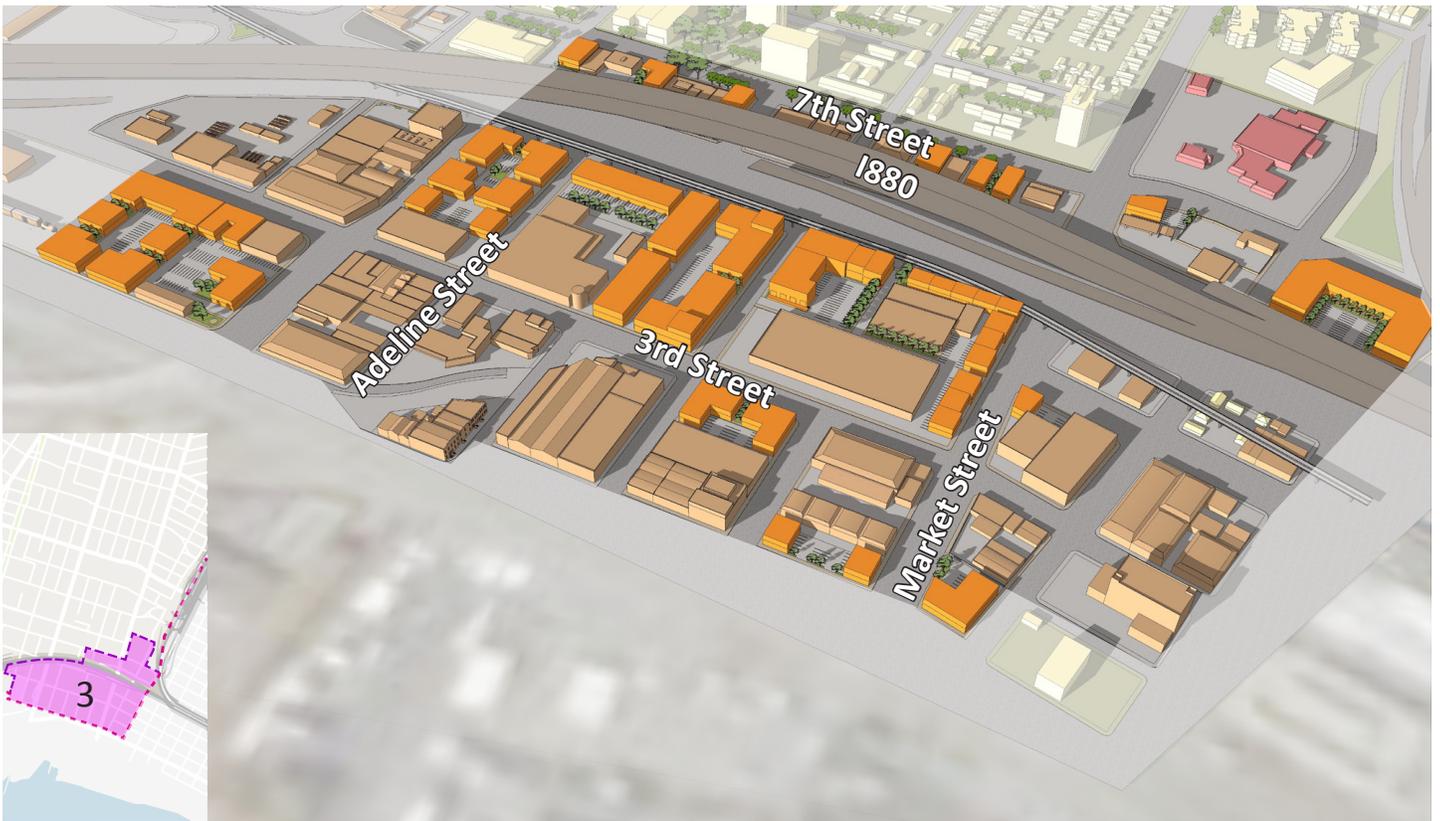
Under the Reduced Alternative, the San Pablo Avenue Opportunity Area would be developed at the same or similar densities and intensities as envisioned under the Project. The San Pablo Avenue corridor would be transformed as a major commercial corridor lined with active ground-floor commercial uses and mixed-use residential development. Similar to the Project, the block of West Grand Avenue between Myrtle Street and Market Street would be developed with a mix of uses (potentially anchored by a grocery store) with medium-density residential, street front retail and mixed use development.

Key Differences between the Project and the Reduced Alternative

The Reduced Alternative is similar to the Project, but with a few significant differences:

Non-Residential Development:

- Under the Reduced Alternative, there are no properties which have a High Intensity Business land use overlay. All business/industrial properties would either be designated with a Business Enhancement or the Low Intensity Business land use overlay. As such, there would be no mid-rise (4- to 5-story) buildings that would occur in West Oakland's Opportunity Areas, and the mix of prospective use types would be unlikely to include life sciences, information technology or clean-tech businesses that would otherwise be attracted to such building types.



facilities to be Enhanced ■ Low Intensity Business Mix/Light Industrial ■ Retail/Commercial ■



Existing facilities to be Enhanced ■ Low Intensity Business Mix/Light Industrial ■ Retail/Commercial (80,00 sq. ft.) ■
 Residential (1325 Units) ■ Transit Enhancement ■

Figure 5-3
Reduced Project Alternative, 3rd Street Opportunity
Area and West Oakland BART TOD



West Oakland Specific Plan, Draft EIR
 Source: JRDV Urban International

- Buildout of non-residential space under the Reduced Alternative would be substantially less than as projected under the Project. The Reduced Alternative would accommodate approximately 775,000 square feet of new non-residential building space providing a total of approximately 6,700 new jobs, as compared to approximately 4 million square feet of new space providing a total of over 14,900 new jobs as envisioned under the Project.

For comparison purposes, the Association of Bay Area Governments' (ABAG) *Projections '09* estimates that West Oakland will contain a total of approximately 18,500 total jobs by year 2020, and approximately 28,100 total jobs by year 2035. Assuming that approximately 2,000 new jobs would be developed in areas of West Oakland not included within an Opportunity Area,³ the Reduced Alternative would provide space for the number of jobs roughly corresponding to the year 2020 employment projections, whereas the Project would provide space for the number of jobs roughly corresponding to the year 2035 employment projections.

Table 5-3: West Oakland Employment, Reduced Alternative

Existing Jobs	9,770	
New Jobs, Reduced Project	6,730	
Other West Oakland Jobs	<u>2,000</u>	
Total West Oakland Jobs, at Buildout of Reduced Project:	18,500	
ABAG <i>Projections '09</i> , Total West Oakland Jobs by Year 2020		18,428
ABAG <i>Projections '09</i> , Total West Oakland Jobs by Year 2035		28,108

Residential and Mixed-Use Development

- The Reduced Alternative would result in development of approximately 1,600 new units at the West Oakland BART station TOD. This is approximately 70% of the residential development potential envisioned under the Project (at approximately 2,300 units). The residential development potential at the West Oakland BART station TOD would be lower yet if the TOD project were to include a substantial portion of commercial/office space.
- Residential densities elsewhere throughout the Specific Plan are would also be reduced, providing approximately 100 less units in the Mandela/West Grand Opportunity Area and nearly 200 fewer units in the remainder of the 7th Street Opportunity Area.

Buildout of residential units under the Reduced Project Alternative would be approximately two-thirds of that projected under the Project, with a total of approximately 3,400 new housing units as compared to a total of approximately 5,000 new housing units as envisioned under the Project. Assuming that other portions of West Oakland that are not included in an Opportunity Area (i.e., the Residential Enhancement Area) add new housing units at a rate consistent with ABAG projections, the amount of new housing units under the Reduced Alternative would roughly correspond to the number of new housing units as projected by ABAG's *Projections '09* estimates between the years 2025 and 2030,

³ This assumption is consistent with the geographic location of ABAG's projected new jobs based on Traffic Analysis Zone data as included in the Alameda County Transportation model, and is also consistent with assumptions under the Specific Plan.

whereas the 5,000 new units under the Project more closely corresponds to ABAG's projections for year 2035.

Table 5-4: West Oakland Population Projections, Reduced Alternative

Existing Households, Opportunity Areas	220	
Existing Households, rest of West Oakland	8,210	
New Households, Reduced Project	3,705	
Other new West Oakland Households	<u>3,421</u>	
Total West Oakland Jobs, at Buildout of Reduced Project:	15,550	
ABAG Projections '09, Total West Oakland Households by Year 2020		12,318
ABAG Projections '09, Total West Oakland Jobs by Year 2035		16,555

Summary of the Reduced Alternative

Buildout of this alternative is anticipated to occur over an extended period of time with incremental increases in new housing and job opportunities, but final buildout is assumed by year 2035. **Table 5-5** provides a summary of land uses, employment and population changes projected within the Planning Area at buildout of the Reduced Alternative.

**Table 5-5: Buildout Assumptions, Reduced Alternative
(all of West Oakland Opportunity Areas)**

	Business / Indust. (sq.ft.)	Comm. /Retail (sq.ft.)	Mixed Use (sq. ft.)	Jobs	Housing Units	Pop.
<u>Existing</u>						
Mandela/Grand	4,000,000	300,000	0	5,440	110	259
7th Street	1,790,000	0	5,000	1,880	85	204
3rd Street	1,040,000	50,000	0	1,770	0	0
San Pablo	<u>0</u>	<u>90,000</u>	<u>700,000</u>	<u>680</u>	<u>70</u>	<u>165</u>
Total	6,830,000	440,000	705,000	9,770	265	628
<u>Buildout, Reduced Alternative</u>						
Mandela/Grand	4,490,000	300,000	0	9,440	1,050	2,342
7th Street	1,590,000	0	80,000	2,530	1,785	3,981
3rd Street	1,375,000	50,000	0	2,830	0	0
San Pablo	<u>0</u>	<u>90,000</u>	<u>775,000</u>	<u>1,700</u>	<u>1,135</u>	<u>2,506</u>
Total	7,455,000	440,000	855,000	16,500	3,970	8,828
<u>Net Change, Reduced Alternative</u>						
Mandela/Grand	490,000	0	0	4,000	940	2,083
7th Street	-200,000	0	75,000	650	1,700	3,777
3rd Street	335,000	0	0	1,060	0	0
San Pablo	<u>0</u>	<u>0</u>	<u>75,000</u>	<u>1,020</u>	<u>1,065</u>	<u>2,341</u>
Total	625,000	0	150,000	6,730	3,705	8,201
Net Change, Project	3,550,000	310,000	170,000	14,890	5,000	10,988
Net Change, Compared to Project	-2,925,000	-310,000	-20,000	-8,160	-1,295	-3,588
Percent of Project	18%	0%	88%	45%	74%	67%

Comparative Environmental Assessment, Alternative #2: Reduced Alternative

Aesthetics

Scenic Vistas

There are no officially designated public scenic vistas within or near the West Oakland Planning Area. No scenic vistas or view corridors would be substantially obstructed or degraded by development in accordance with the Reduced Alternative, and the impacts of the Reduced Alternative on scenic vistas would therefore be less than significant. (LTS)

Similar to the Project, infill development and redevelopment of vacant and blighted properties, improvements to streetscapes and the public realm, and new landscaping and street trees would improve the quality of views throughout West Oakland from public vantage points. Focusing new development within the Opportunity Areas and preserving established neighborhoods would avoid substantial obstruction of the limited views of downtown Oakland and the East Bay hills from public vantage points within the adjacent residential neighborhoods. At the West Oakland BART Station TOD, the Reduced Alternative's development would have a substantially reduced height in comparison to the Project. The maximum allowed building heights would remain as per current zoning (120 feet for parcels adjacent to the I-880 freeway and 90 feet along 7th Street from Union to Chester Street) except for those parcels along 7th Street from Chester to Peralta where the building heights would be reduced from 75 feet to 60 feet (on the south) and 55 feet (on the north of 7th Street). The Reduced Alternative would also provide a substantial transition in building heights nearest to the South Prescott neighborhood, with buildings nearest to this neighborhood as low as 2-stories.

Scenic Highways

Similar to the Project, new development and public realm improvements in accordance with the Reduced Alternative would not substantially damage scenic resources, but rather would improve the quality of views of the Planning Area from the I-580 scenic highway. The impacts of the reduced Alternative related to scenic highways would be less than significant. **(LTS)**

Visual Character or Quality

Similar to the Project, new development and public realm improvements in accordance with the Reduced Alternative would not substantially degrade the existing visual character or quality of any sites and their surroundings, but would substantially improve existing visual character and quality of the area. Infill development and redevelopment would repair the existing inconsistent urban fabric where such inconsistencies exist, and result in a more unified and coherent development character. The proposed land use patterns and development types would focus change within the Opportunity Areas while preserving established residential neighborhoods.

The Reduced Alternative would potentially provide lower transitions to existing development, reinforce the existing character of non-residential areas, and harmonize with other existing land uses than would the Project. Under the Reduced Alternative, all new non-residential development would be lower intensity (i.e., typically 1- to 2-story buildings) and similar in scale to most other existing buildings, rather than higher intensity, 4- to 5-story mid-rise structures. The height and scale of these lower intensity buildings would be more similar to the existing building stock than the taller and bigger buildings as proposed under the Project. **(LTS)**

Shadow

Like the Project, the Reduced Alternative would not cast shadows that substantially impair the function of a building using passive solar heat collection, solar collectors for hot water heating, or photovoltaic solar collectors; cast shadows that substantially impair the beneficial use of any public or quasi-public park, lawn, garden, or open space; or cast shadows on an historic resource such that the shadow would materially impair the resource's historic significance. The shadow impacts of the Reduced Alternative would be less than significant. **(LTS)**

Adequate Lighting

Like the Project, the Reduced Alternative would not change any existing General Plan policies or zoning or building regulations such as to cause a fundamental conflict with policies and regulations that address the provision of adequate light related to appropriate uses. The impacts of the Reduced Alternative related to consistency with policies and regulations addressing the provision of adequate light related to appropriate uses would be less than significant. (LTS)

Wind

Since the West Oakland Planning Area does not lie within the area identified by the City as requiring modeling for evaluation of wind impacts, the wind impacts of the Reduced Alternative would be less than significant. (LTS)

Air Quality

CAP Consistency: VMT Increase

New development facilitated by the Reduced Alternative would not fundamentally conflict with the Bay Area 2010 CAP because the projected rate of increase in vehicle miles travelled and vehicle trips would be less than the projected rate of increase in population. The Reduced Project Alternative's increase in growth (population and employment) would not conflict with regional growth expectations set forth in the CAP, and the potential changes in transportation demand as expressed through vehicles miles travelled (VMT) would not outpace population growth. The projected population increase in West Oakland that is attributable to new growth and development pursuant to the Reduced Alternative (approximately 6,730 new jobs and an added population of 8,200 people) represents a growth rate of approximately 140% over the current 10,398 jobs and residents. The projected increase in PM peak hour vehicles miles travelled (approximately 25,770 VMTs) represents an increase of approximately 67% over the current estimated VMT of 38,659. Based on these comparisons, the Reduced Alternative's projected increase in VMTs would grow at a lesser rate than the service population, and this impact would be less than significant.

CAP Consistency: Implementation of Control Measures

Like the Project, the Reduced Alternative would not fundamentally conflict with the CAP's air pollution control measures. All new development pursuant to the Reduced Alternative, including new industrial and commercial uses, would be required to comply with all measures that the Air District adopts and enforces to control emissions from stationary sources of air pollution. The Reduced Project Alternative would not contain any policies or strategies that would be contrary to incentive programs to achieve voluntary emission reductions from mobile sources. The Reduced Alternative would not fundamentally conflict with the CAP's transportation control strategies, even if it does not achieve to the same degree as does the Project, improvements to the efficiency of existing transit systems or the promotion of focused urban infill development. All new development pursuant to the Reduced Alternative Plan would be required to comply with City of Oakland's Standard Conditions that seek to reduce energy use in new development projects. In summary, the Reduced Project Alternative would not interfere with implementation of Clean Air Plan control measures.

Odors

Like the Project, new development in accordance with the Reduced Alternative would expose a substantial number of people to objectionable ambient odors from the EBMUD WWTP and from food

processing facilities, painting/coating operations, and/or green waste and recycling facilities. This impact would be **significant and unavoidable** at the Plan level. New development pursuant to the Reduced Alternative could result in development of new odor-generating uses in close proximity to residential or other odor-sensitive uses within mixed-use areas, similar to that as indicated for the Project. Like the Project, this impact would be potentially significant and proper controls or setbacks, as recommended for the Project, would be required.

Construction Period Emissions

Similar to the Project, individual development projects pursuant to the Reduced Alternative will generate fugitive dust from demolition, grading, hauling and construction activities, will generate regional ozone precursor emissions and regional particulate matter emissions from construction equipment exhaust, and will generate construction-related toxic air contaminant (TAC) emissions from fuel-combusting construction equipment and mobile sources.

- Fugitive dust will be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval,
- construction-related toxic air contaminant (TAC) emissions will be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval, but
- but larger individual construction projects could generate emissions of criteria air pollutants that would exceed the City's thresholds of significance and/or that could exceed thresholds for cancer risk, chronic health index, acute health index or annual average PM2.5 concentration levels. These emissions are conservatively estimated as **significant and unavoidable**.

Operational-Related Criteria Air Pollutants

Buildout of the Reduced Alternative would generate total emissions of criteria pollutants (ROG, PM10 and PM2.5) from increased motor vehicle traffic and area source emissions that would exceed the City's project-level thresholds of significance. Although motor vehicle traffic and area source emissions would be less under the Reduced Alternative than the Project, individual development projects as well as the aggregate of all development assumed pursuant to the Reduced Alternative is conservatively considered to generate criteria air pollutants and ozone precursor emissions at a level that would be **significant and unavoidable**.

Carbon Monoxide Concentrations

The Reduced Alternative would not exposure sensitive uses and would not generate emissions leading to significant concentrations of CO that would violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation. Traffic modeling conducted for this EIR indicates that study intersections with the highest traffic volumes would not experience 24,000 vehicles per peak hour under 2035 scenarios with implementation of the Project, and the Reduced Alternative would generate fewer vehicle trips than does the Project (see Transportation discussion, below).

Operational Toxic Air Emissions

Development pursuant to the Reduced Alternative would include new light industrial, custom manufacturing and other similar land uses that could emit toxic emissions. The potential exists for multiple new sources of TAC emissions to be developed within a single concentrated portion of the Plan Area. Given the existing elevated cancer risk from existing local and mobile sources in the Plan Area,

there is the potential for new multiple sources (even if each new source is individually less than significant) to cumulatively increase toxic air contamination to a **significant and unavoidable** level.

Exposure to Toxic Air Contaminants and PM2.5

Like the Project, certain future development projects in accordance with the Reduced Alternative would expose new sensitive receptors to levels of toxic air contaminants (TACs) or concentrations of PM2.5 that could result in an unacceptable increased cancer risk or other health hazards. The Reduced Alternative would facilitate development of new sensitive-receptor land uses, specifically near the I-880 freeway at the West Oakland BART station, where there is the potential to result in **significant and unavoidable** health risks to future residents due to nearby sources of toxic air contaminants (TACs) and concentrations of PM2.5. Although the number of residents at this location would be less under the Reduced Alternative, this TOD area would still include as many as 2,300 new residential units at this location. Like the Project, the Reduced Alternative would also facilitate development of new sensitive receptors at several other locations that are adjacent to the I-880 freeway and which have increased cancer risk and increased health risks due to PM2.5 concentrations. These sites include locations along the 7th Street corridor, the Phoenix Iron Works site, the Roadway site and the site at 12th and Mandela, where the Reduced Alternative would allow for conversion of these sites to new residential development, although at lower densities than as proposed under the Project.

Cultural Resources

Historic Resources

The Reduced Alternative would not alter or change the manner in which historic resources are proposed to be addressed pursuant to the Specific Plan (the Project). Assumptions regarding the treatment of individual historic resources pursuant to the Project would be similar under the Reduced Alternative. For example:

- At the Oakland Warehouse Company - GE Mazda Lamp Works site (1600-14 Campbell Street), work already in progress will result in reuse of the existing vacant buildings for medium density residential uses pursuant to a Federal Preservation Tax Credit project adhering to the Secretary's Standards.
- At the former Coca-Cola Company Bottling Plant property (1340 Mandela Parkway), the Reduced Alternative would include retaining and reusing the 1940s building on the northern portion of the site in a manner that adheres to the Secretary's Standards, while the remainder of the property might be redeveloped for new Low Intensity Business Mix/Light Industrial uses in the middle portion, and new medium-density residential uses on the southern portion of the property. New development would be required to maintain the integrity and continued eligibility of the 1940s plant.
- At the Merco-Nordstrom Valve Company Factory (2401-49 Peralta Street), the Reduced Alternative envisions the existing building be retained and reused for compatible light industrial or business mix uses in a manner that adheres to the Secretary's Standards, similar to the development as envisioned under the Project.
- The Reduced Alternative would not directly affect the Southern Pacific 16th Street Station (1601 Wood Street/1798 16th Street). Instead, like the Project, this alternative assumes ongoing implementation of previously approved and partially constructed Wood Street Development project which includes the rehabilitation of the historic train station. That project has already undergone

environmental review, and the Reduced Project would not change any of the conditions of approval of that project.

- Similar to the Project, the Reduced Alternative would result in infill residential development at compatible scales and continued use of existing industrial/commercial buildings where the Mandela/West Grand Opportunity Area abuts the Oakland Point API. With consideration of local context as part of Design Review of subsequent projects, new development in and adjacent to the Oakland Point API would not cause substantial adverse effect on the API or individual historical resources.
- Similar to the Project, the Reduced Alternative would provide for medium-density residential and mixed-use infill development along the 7th Street historic corridor, subject to Design Review, adherence to Secretary of Interior Standards and referral to the Landmarks Board per the existing S-7 Preservation Combining Zone regulations. The Reduced Alternative would not cause a substantial adverse change in the significance of existing historical resources (i.e., the 7th Street S-7 District; the Flynn (Edward) Saloon – McAllister Plumbing at 1600-16 7th Street; the site of the former Lincoln Theater at 1620-24 7th Street; and the Arcadia Hotel – Isaacs & Schwartz Block at 1632-42 7th Street).
- Similar to the proposed Project, the Reduced Alternative would accommodate new three-story flats along Pine Street that would be similar in scale to existing housing. At the height and massing proposed, and with consideration of local context as part of Design Review of subsequent individual development projects, new development adjacent to the Oakland Point API along Pine Street would not cause a substantial adverse change in the significance of the this API or of individual historical resources within the API.
- Similar to the proposed Project, the Reduced Alternative assumes the reuse of existing buildings and new low intensity business/light industrial development within and adjacent to the Southern Pacific Railroad Industrial API. Specifically, the Reduced Alternative indicates that individual historic structures (the California Packing Corporation-Del Monte Cannery at 100-50 Linden Street; the California Packing Corporation Label Plant at 101 Myrtle Street; and the Standard Underground Cable Co. building at 101 Linden Street) would be retained and used for offices and small manufacturing (e.g., the Linden Street Brewery), and new low intensity business/light industrial development on the northern portion of the California Packing Corporation Label Plant site (now parking). Reuse of existing buildings on other properties within and adjacent to the Southern Pacific Railroad Industrial API would not cause a substantial adverse change in the significance of these historical resources.
- As proposed under the Project, the Reduced Alternative would include medium-density residential and/or mixed use development on the vacant site adjacent to the California Hotel at 3501 San Pablo Avenue. At the height and massing contemplated, and with consideration of local context as part of Design Review of subsequent individual development projects, proposed new development adjacent to the California Hotel would not cause a substantial adverse change in the significance of this historical resource.

As is the case under the Project and all alternatives to the Project, any future proposed change to other historic properties pursuant to the Reduced Project would be subject to the City's existing Historic Preservation Element (HPE) policies and actions, regulatory requirements, individual CEQA review and standard conditions of approval, implemented on a project-by-project basis (see more discussion under the No Project Alternative). With implementation of these policies, actions and regulations (pursuant to individual CEQA review and applied as standard conditions of approval), individual projects pursuant to

the Reduced Alternative could still result in significant and unavoidable impacts to historic resources, but such impacts will have undergone detailed, project specific review and consideration prior to such effects having occurred.

Archaeological Resources, Paleontological Resources and Human Remains

Similar to the Project, subsequent development under the Reduced Alternative could cause a substantial adverse change in the significance of an archaeological resource or destroy a unique paleontological resource or site or unique geologic feature. However, each individual development project would be required to implement the City's Standard Conditions of Approval. Given the high potential for the presence of unrecorded Native American resources and moderate to high potential for the presence of unrecorded historic-period archaeological resources near the former Bay shoreline, new development that involves excavation in this area would likely be subject to SCA E, Archaeological Resources – Sensitive Sites. This Standard Condition of Approval requires additional intensive pre-construction surveys or construction period monitoring, and avoidance and recovery measures. Additionally, in the event of an unanticipated discovery of prehistoric or historic-period archaeological resources or unique paleontological resources during development within the Planning Area, SCA 52, Archaeological Resources, SCA 53, Human Remains, and SCA 54, Paleontological Resources require that excavations within 50 feet of the find be temporarily halted or diverted until the discovery is examined by a qualified archaeologist or paleontologist, documented and evaluated for significance, and procedures established to consider avoidance of the resource or preparation of an excavation plan if avoidance is unfeasible. With required implementation of these standard conditions of approval, the impacts of future development on archaeological resources, paleontological resources and human remains pursuant to the Reduced Alternative would be less than significant.

Greenhouse Gas and Climate Change

GHG Emissions

New development facilitated by the Reduced Alternative would allow for the construction and operation of land uses that would produce greenhouse gas emissions. The level of emissions would exceed the project-level threshold of 1,100 annual tons of MTCO₂e, but would likely not exceed the project-level efficiency threshold of 4.6 MTCO₂e of annual emissions per service population nor would it exceed the Plan-level threshold of 6.6 MTCO₂e annually per service population. Development facilitated by the Reduced Project would thus not be expected to generate greenhouse gas emissions at levels that would result, in the aggregate, in significant or cumulatively considerable GHG emissions. (LTS)

Hazards and Hazardous Materials

Hazardous Materials Release Sites

The Planning Area contains numerous sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Continued occupancy and use or future development of these hazardous materials sites under the Reduced Alternative (or any alternative) could create a significant hazard to the public or the environment. However, with required implementation of City of Oakland Standard Conditions of Approval and required compliance with local, state and federal regulations for treatment, remediation or disposal of contaminated soil or groundwater, hazards to the public or the environment from hazardous materials sites would be less than significant.

Hazardous Building Materials

Asbestos or lead based paint present within older structures in the Planning Area could be released into the environment during demolition or construction activities pursuant to the Reduced Alternative, which could result in soil contamination or pose a health risk to construction workers or future occupants. However, with required implementation of the City's Standard Conditions of Approval and other applicable laws, regulations, standards and oversight currently in place, the potential impact related to exposure to hazardous building materials would be less than significant.

Hazardous Materials Use, Transport or Disposal

The amount of new development envisioned under the Reduced Alternative could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, with required implementation of the City's Standard Conditions of Approval, as well as required compliance with hazardous materials laws, regulations, standards and oversight currently in place, potential impact related to the routine transport, use, or disposal of hazardous materials would be less than significant.

Hazardous Materials near Schools

New businesses that emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste could occur within one-quarter mile of a school under the Reduced Alternative. However, with required implementation of the City's Standard Conditions of Approval, as well as required compliance with hazardous materials laws, regulations, standards and oversight currently in place, the potential impact related to emission and handling of hazardous materials near schools would be less than significant.

Land Use and Planning

Land Use Compatibility

The Reduced Alternative would not disrupt or divide the physical arrangement of the West Oakland community or any surrounding community, but instead (similar to the proposed Project) would improve certain existing conditions that physically divide portions of the community. The Reduced Project would encourage additional streetscape improvements and improved transit service linking West Oakland to adjacent activity centers and neighborhoods. The Reduced Project would also facilitate a transition from heavy industrial and transportation uses to more compatible light industrial, construction, urban manufacturing, clean-tech, digital media, information technology and life science uses. The Reduced Alternative would not include the high-intensity business development as envisioned under the Project. Although these high-intensity business and industrial sites as proposed under the Project are not considered incompatible with the existing community, the lower intensity of new development as would occur under a Reduced Alternative would be more similar and compatible with current uses than those higher intensity development sites as proposed under the Project.

The Reduced Alternative would encourage rehabilitation and adaptive reuse of existing, often blighted buildings and properties, and the compatible infill development of existing vacant blocks and lots. It would also target redevelopment of a number of key former heavy industrial properties next to existing residential neighborhoods with compatible new residential uses. Overall, the Reduced Alternative would not disrupt or divide the physical arrangement of the West Oakland community or any surrounding community.

Conflict with Plans, Policies or Regulations

The Reduced Alternative would not fundamentally conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect that would result in a physical change in the environment.

Habitat and Natural Community Conservation Plans

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other adopted habitat conservation plan applicable to the Planning Area. The No Project Alternative would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Noise

Construction Noise

Under the Reduced Alternative construction activities within West Oakland would occur, though less construction than as anticipated under the Project. Implementation of City of Oakland standard conditions of approval (SCA 28: Days/Hours of Construction Operation; SCA 29: Noise Control, SCA 30: Noise Complaint Procedures, and SCA 39: Pile Driving and Other Extreme Noise Generators) would reduce construction noise levels and represent all feasible measures available to mitigate construction noise. Implementation of these SCA's on a project-by-project basis would reduce construction noise impacts to a less than significant level.

Operational Noise

Ongoing operational noise generated by new stationary sources from industrial and commercial operations and from roof-top mechanical ventilation equipment associated with new development under the Reduced Alternative could generate noise in violation of the City of Oakland Noise Ordinance. The City's standard condition of approval (SCA 32: Operational Noise - General), requires that noise levels from any activity comply with the performance standards identified in the Planning Code and Municipal Code, and that if noise levels exceed these standards, the activity causing the noise must be abated until appropriate noise reduction measures have been installed. With required implementation of the City's Standard Condition of Approval SCA 32, operational noise impacts of the Reduced Alternative would be less than significant.

Traffic Noise

Increased traffic result from new growth and development under the Reduced Alternative will result in higher traffic noise along streets within West Oakland, mixing with noise from all other existing ambient noise sources (i.e., trains, BART operation, existing freeway noise, etc.). The number of new vehicle trips throughout West Oakland associated with the Reduced Alternative would be less than the vehicle trips associated with the Project. Since traffic-related noise increases are estimated to be less than significant with the traffic volumes projected for the Project, the lower traffic volumes of the Reduced Alternative would generate even less traffic noise and would remain below the 5 dBA increase threshold, and therefore less than significant.

Construction and Operational Vibration

New construction activities under the Reduced Alternative could generate excessive ground-borne vibration during the construction period, and new commercial and industrial development may generate

operational ground-borne vibration at levels that would be perceptible beyond the property boundary. However, with required implementation of the City's Standard Conditions of Approval and compliance with Oakland Planning Code regulations, these potential vibration impacts would be less than significant.

Noise Exposure / Land Use Compatibility

Future occupants of new residential and other noise-sensitive development pursuant to the Reduced Alternative could be exposed to community noise in conflict with the Land Use Compatibility Guidelines of the Oakland General Plan, and to interior noise exceeding California Noise Insulation Standards from a variety of noise sources including freeway traffic, BART and railroad operations. All new residential development under the Reduced Alternative would be required to comply with the city's Standard Conditions of Approval which require design measures capable of reducing interior noise to acceptable levels within buildings. With required implementation of the City's Standard Conditions of Approval, land use compatibility impacts would be less than significant.

West Oakland BART Station TOD

Similar to the analysis conducted for the Project, the Reduced Alternative includes development of a West Oakland BART Station TOD. However, the Reduced Alternative's version of the TOD is less dense (i.e., has fewer residential units) than as projected under the Specific Plan. Noise sources at the West Oakland BART Station TOD site, including traffic noise on I-880, rail and passenger activity along the BART tracks and at the West Oakland BART station, and train noise on the nearby train tracks, would subject new residents to ambient noise levels that would exceed the Land Use Compatibility standards. However, as indicated for the Project, new residences within the Reduced Alternative's version of the TOD would be subject to City of Oakland Standard Conditions of Approval, including compliance with Title 24 of the California Code of Regulations and the obligation to demonstrate how dwelling units would be designed to meet interior noise standards. This alternative's TOD project would also place noise-sensitive outdoor uses in a noise environment characterized as "clearly unacceptable". Noise reduction could occur with the site design if buildings are effectively designed to act as noise barriers and break the line of sight between both I-880 and the BART tracks, and any publicly-accessible open space. With required implementation of the City's Standard Conditions of Approval, land use compatibility impacts would be less than significant and no mitigation measures would be required pursuant to CEQA.

Airport Noise

The Planning Area is located more than two miles outside of the Oakland International Airport 65 dBA Ldn/CNEL noise contour, which the Federal Aviation Administration regards as a significance threshold for noise-sensitive land uses. Therefore, impacts of aviation noise on any new development, including development pursuant to the Reduced Alternative, would be less than significant.

Population, Housing and Employment

Growth Inducement

Build-out of the Reduced Alternative would result in less households and employees than are included in ABAG's most recent projections for the area. Any additional induced growth would also occur as already contemplated in, and consistent with, adopted plans and the environmental documents prepared for those plans. Growth facilitated or induced by the Reduced Alternative represents growth for which

adequate planning has already occurred, and the growth inducement impacts of this alternative would be less than significant.

Displacement of Housing or People

The Reduced Alternative would not directly result in displacement of housing or people. No housing would be removed or changed to a non-residential use and the limited number of existing housing units located within the Specific Plan's Opportunity Areas would be retained. Some housing areas built without required permits and which may not conform to current zoning and/or building codes, including certain residential conversion of formerly underutilized industrial spaces, could be redeveloped with resulting loss of some of these existing informal units and the associated displacement of people. However, like the Project, the potential loss of a small number of housing units and associated displacement of people would be offset by the number of new units built under the Reduced Alternative. Impacts of the Reduced Alternative related to the displacement of housing or people would be less than significant.

Public Services and Recreation

Fire Protection

New development pursuant to Reduced Alternative would, like the Project, result in an increase in OFD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. All new development under this alternative would be subject to the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements. Implementation of these requirements would reduce the impacts of this alternative on fire protection services to a level of less than significant.

Police Protection

New development under the Reduced Alternative would result in an increase in OPD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. The impacts of the Reduced Alternative related to police protection would be less than significant.

Schools

Development in accordance with Reduced Alternative would generate additional students attending the OUSD schools, but the number of new students would be substantially less than would be generated by the Project. School impact fees from residential and non-residential development collected pursuant to California Government Code would provide full and complete mitigation for school impacts.

Parks and Recreation

Development pursuant to the Reduced Alternative would generate a need for additional parkland, adding to the existing deficiency of parkland acreage in West Oakland, and would increase the use of existing parks and recreational facilities. However, because Reduced Alternative would include substantially less residential development than the Project, its overall demands on parks and recreation services would be reduced as compared to the Project. The reduced Alternative would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities would occur, and the impacts of this alternative on parks and recreation services would be less than significant.

Traffic

For comparative purposes, the following analysis of traffic impacts for the Reduced Alternative is conducted under Cumulative (Year 2035) conditions. This scenario represents the “worst case” traffic condition and captures the full extent of potential traffic impacts.

Trip Generation

The Reduced Alternative assumes that residential and employment growth within the West Oakland Specific Plan’s Opportunity Areas would occur at a less robust pace through year 2035 than would occur under the Project. However, it also assumes that residential and employment growth elsewhere in West Oakland would occur as predicted under ABAG’s latest *Projections ‘09* estimates.

The Reduced Alternative’ cumulative buildout includes 15,400 total households (3,970 within the Specific Plan’s Opportunity Areas and 11,440 elsewhere in West Oakland), and approximately 18,500 employees (16,500 within the Specific Plan’s Opportunity Areas and 2,000 elsewhere in West Oakland). The difference between the Project and the Reduced Alternative is approximately 1,200 fewer households and nearly 8,500 fewer jobs under the Reduced Alternative than under the Project. As a result, the Reduced Alternative would generate fewer weekday peak hour trips as compared to the Project. As shown in **Table 5-6**, the number of peak hour trips would be reduced as compared to the Project by approximately 2,300 AM peak hour trips and by 2,800 PM peak hour respectively.

Table 5-6: Vehicle Trip Generation Comparison, Reduced Alternative

	Project - Vehicle Trips				Reduced Alternative - Vehicle Trips			
	Existing	Project	Other	Total	Existing	Reduced Alternative	Other	Total
AM Peak Hour	5,735	5,537	558	11,830	5,735	3,230	558	9,523
Difference, compared to Project:						(-2,307)		
PM Peak Hour	7,025	6,698	720	14,442	7,025	3,890	720	11,643
Difference, compared to Project:						(-2,808)		

Source: Kittelson & Associates, 2013.

Intersection Impacts

A comparison of the intersection level of service for Cumulative No Project, Cumulative plus Project and Cumulative plus Reduced Alternative is presented in **Tables 5-7 and 5-8**. The Reduced Alternative would generate less total traffic than would the Project, and as a result the Cumulative plus Reduced Alternative scenario would result in significant impacts at only four (4) of the six (6) intersections indicated as being affected under Cumulative plus Project conditions. These seven intersections which would be impacted under the Cumulative plus Reduce Alternative scenario include:

- Hollis Street / 40th Street intersection (#1) in both peak hours
- San Pablo Avenue / 40th Street intersection (#2) in the AM peak hour

- Mandela Parkway / West Grand Avenue intersection (#7) in both peak hours
- Adeline Street / 18th Street intersection (#15) in the PM peak hour
- Adeline Street / 5th Street intersection (#24) in the PM peak hour

All four of these intersections would also be significantly impacted under the Project scenario.

Those intersections significantly impacted under the Cumulative plus Project scenario but not adversely affected under the Cumulative plus Reduced Alternative scenario include:

- Broadway / West Grand Avenue (#13)
- Adeline Street / 18th Street intersection (#15) in the AM peak hour

Table 5-7: Intersection LOS Summary, Reduced Alternative at Year 2035 Under Cumulative Conditions – (AM/SAT Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Reduced Alternative	
	Delay	LOS	Delay	LOS	Delay	LOS
1 Hollis Street/40th Street^	247.9	F	237.3	F	212.7	F
2 San Pablo Avenue/40th Street^	325.0	F	324.5	F	315.9	F
3 I-980 off-ramp/27th Street*	23.1	C	17.4	B	17.2	B
4 I-980 on-ramp/27th Street*	22.5	C	21.2	C	21.1	C
5 Maritime Street/West Grand Avenue	35.1	D	35.0	C	33.8	C
6 Frontage Road/West Grand Avenue	171.0	F	169.1	F	127.3	F
7 Mandela Parkway/West Grand Avenue*	40.1	D	130.3	F	86.6	F
8 Adeline Street/West Grand Avenue*	17.4	B	22.1	C	16.8	B
9 Market Street/West Grand Avenue*	39.9	D	60.4	E	27.5	C
10 San Pablo Avenue/West Grand Avenue*	45.0	D	38.9	D	31.9	C
11 Martin Luther King Jr. Way/West Grand Ave*	16.1	B	16.0	B	14.5	B
12 Northgate Avenue/West Grand Avenue*	102.3	F	100.7	F	81.8	F
13 Broadway/West Grand Avenue*	39.6	D	41.9	D	30.1	C
14 Harrison Street/West Grand Avenue*	68.8	E	68.8	E	65.4	E
15 Adeline Street/18th Street#	10.1	B	7.5	A	5.9	A
16 Market Street/18th Street	11.1	B	15.2	B	10.7	B
17 Adeline Street/14th Street#*	13.1	B	6.0	A	5.4	A

Table 5-7: Intersection LOS Summary, Reduced Alternative at Year 2035 Under Cumulative Conditions – (AM/SAT Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Reduced Alternative	
	Delay	LOS	Delay	LOS	Delay	LOS
18 Adeline Street/12th Street#	14.0	B	4.5	A	4.2	A
19 Frontage Road/7th Street	43.6	D	43.6	D	39.4	D
20 Mandela Parkway/7th Street*	22.9	C	24.1	C	24.6	C
21 Adeline Street/7th Street*	12.8	B	12.6	B	12.0	B
22 Market Street/7th Street*	35.9	D	21.9	C	19.0	B
23 Market Street/5th Street/I-880 off-ramp	19.3	B	19.1	B	18.9	B
24 Adeline Street/ 5th Street	26.4	C	53.4	D	51.2	D

Intersection delays are shown in “seconds per vehicle”.

All intersections have signalized control with the exception of locations denoted with “#” which are controlled by roundabout under plus Project/Alternative scenarios.

“*” denotes intersection located in downtown Oakland or that provide direct access to downtown.

“^” denotes intersection located in Emeryville

“~” Saturday peak hour results are shown for the two Emeryville locations; AM peak hour results are shown for all other locations

Intersection delay and LOS were calculated based on a volume-weighted average of the Mandela Parkway two-way couplet intersection.

BOLD type indicates significant impact.

Source: Kittelson & Associate, 2013.

Table 5-8: Intersection LOS Summary, Reduced Alternative at Year 2035 Cumulative Conditions (PM Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Reduced Alternative	
	Delay	LOS	Delay	LOS	Delay	LOS
1 Hollis Street/40th Street^	212.8	F	230.8	F	178.8	F
2 San Pablo Avenue/40th Street^	256.8	F	250.4	F	238.8	F
3 I-980 off-ramp/27th Street*	18.9	B	18.6	B	17.9	B
4 I-980 on-ramp/27th Street*	73.6	E	73.3	E	43.8	D
5 Maritime Street/West Grand Avenue	52.1	D	52.8	D	48.5	D
6 Frontage Road/West Grand Avenue	142.7	F	134.4	F	107.2	F
7 Mandela Parkway/West Grand Avenue*	72.8	E	215.2	F	158.1	F
8 Adeline Street/West Grand Avenue*	25.0	C	62.7	E	35.5	D
9 Market Street/West Grand Avenue*	143.5	F	61.5	E	41.8	D
10 San Pablo Avenue/West Grand Avenue*	292.1	F	270.4	F	212.3	F
11 Martin Luther King Jr Wy/West Grand Ave*	18.0	B	18.0	B	17.9	B
12 Northgate Avenue/West Grand Avenue*	40.5	D	37.5	D	23.4	C
13 Broadway/West Grand Avenue*	78.7	E	81.4	F	65.3	E
14 Harrison Street/West Grand Avenue*	54.5	D	52.9	D	50.9	D
15 Adeline Street/18th Street#	12.4	B	39.4	E	22.1	C
16 Market Street/18th Street	15.4	B	20.9	C	16.6	B
17 Adeline Street/14th Street#*	14.8	B	12.2	B	10.2	B
18 Adeline Street/12th Street#	9.2	A	6.4	A	5.8	A
19 Frontage Road/7th Street	44.6	D	44.7	D	39.3	D
20 Mandela Parkway/7th Street*	30.1	C	37.5	D	24.6	C
21 Adeline Street/7th Street*	25.3	C	26.0	C	22.6	C
22 Market Street/7th Street*	26.9	C	31.5	C	22.8	C
23 Market Street/5th Street/I-880 off-ramp	25.3	C	24.6	C	24.6	C
24 Adeline Street/ 5th Street	35.7	D	81.0	F	75.1	E

Table 5-8: Intersection LOS Summary, Reduced Alternative at Year 2035 Cumulative Conditions (PM Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Reduced Alternative	
	Delay	LOS	Delay	LOS	Delay	LOS

Intersection delays are shown in “seconds per vehicle”.

All intersections have signalized control with the exception of locations denoted with “#” which are controlled by roundabout under plus Project/Alternative scenarios.

“*” denotes intersection located in downtown Oakland or that provide direct access to downtown.

“^” denotes intersection located in Emeryville

Intersection delay and LOS were calculated based on a volume-weighted average of the Mandela Parkway two-way couplet intersection.

BOLD type indicates significant impact due to LOS, V/C, or queue length (Emeryville intersections only) reasons.

Source: Kittelson & Associate, 2013.

Mitigation Measures

The same mitigation measures recommended for the Cumulative plus Project scenario would also lessen the Cumulative plus Reduced Alternative’s traffic impact at the following intersections:

- Implement Mitigation Measure Trans-4 as recommended for the Cumulative plus Project scenario at San Pablo Avenue / 40th Street (Intersection #2).
- Implement Mitigation Measure Trans-5 as recommended for the Cumulative plus Project scenario at Mandela Parkway / West Grand (Intersection #7).
- Implement Mitigation Measure Trans-17 as recommended for the Cumulative plus Project scenario at Adeline Street / 18th Street (Intersection #15).
- Implement Mitigation Measure Trans-8 as recommended for the Cumulative plus Project scenario at Adeline Street / 5th Street (Intersection #24).

Mitigation measures for the remaining intersection adversely affected under the Cumulative plus Reduced Alternative scenario are generally less substantial than those recommended for the Cumulative plus Project scenario:

- At the intersection of Hollis Street / 40th Street (Intersection #1), implement the following improvements:
 - a) Extend the southbound queue storage pocket by 60 feet to 175 feet
 - b) Optimize signal timing parameters (i.e., adjust the allocation of green time for each intersection approach)

Resulting Level of Significance

With implementation of recommended improvements to the Hollis Street/40th Street intersection (#1) and the San Pablo Avenue/40th Street intersection (#2), the Reduced Alternative’s contribution to cumulative impacts at these locations could be reduced to a level of less-than-significant. However, because these intersections are within the City of Emeryville’s jurisdiction, the timing and

implementation of these improvements are not under the City of Oakland’s control and the improvements cannot be assured. Therefore, the Reduced Alternative’s cumulative impact at these intersections remains **significant and unavoidable**.

Implementation of identified improvements to the Mandela Parkway/West Grand Avenue intersection (#7) could reduce the Reduced Alternative’s cumulative impacts to a level of less-than-significant, but the identified improvements are in conflict with the City’s plans and policies. These improvements would encroach into Memorial Park and the medians, and would preclude planned installation of a bicycle facility on West Grand Avenue. Therefore, these improvements are not recommended and impacts at this intersection remain **significant and unavoidable**.

As indicated in Tables 5-9, the Reduced Alternative’s contribution to cumulative traffic impacts at intersection would be reduced with implementation of recommended mitigation measures to a level of less than significant.

Table 5-9: Intersection LOS Summary, With Mitigation – Cumulative plus Reduced Alternative at Year 2035

Study Intersections	Cumulative plus Reduced Alternative		After Mitigation		Resulting Level of Significance
	Delay	LOS	Delay	LOS	
<u>AM/Sat Peak Hour</u>					
1 Hollis Street/40th Street [^]	212.7	F	216.9	F	another jurisdiction, SU
2 San Pablo Avenue/40th Street [^]	315.9	F	323.1	F	another jurisdiction, SU
7 Mandela Parkway/West Grand Avenue [*]	86.6	F	25.4	C	infeasible due to significant secondary effects, SU
<u>PM Peak Hour</u>					
1 Hollis Street/40th Street [^]	178.8	F	127.0	F	another jurisdiction, SU
7 Mandela Parkway/West Grand Avenue [*]	158.1	F	28.4	C	infeasible due to significant secondary effects, SU
24 Adeline Street/ 5th Street	110.1	F	31.5	C	LTS

Intersection delays are shown in “seconds per vehicle”.

All intersections have signalized control

“*” denotes intersection located in downtown Oakland or that provide direct access to downtown.

“^” denotes intersection located in Emeryville

“~” Saturday peak hour results are shown for the two Emeryville locations; AM peak hour results are shown for all other locations

Intersection delay and LOS were calculated based on a volume-weighted average of the Mandela Parkway two-way couplet intersection.

BOLD type indicates significant impact.

Source: Kittelson & Associate, 2013.

Alternative 3: Commercial, Office and Jobs Emphasis

CEQA Guidelines Section 15126.6(c) requires that the range of potential alternatives to the proposed Project include alternatives that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. This alternative has been developed to consider an alternative capable of achieving most of the Project's major objectives, and which is also able to lessen the extent to which the Project conflicts with current City policy regarding preservation of existing industrially zoned lands, and that would minimize the extent to which new development of sensitive residential receptors would be exposed to poor air quality and noise.

Description of Alternative 3: Commercial, Office and Jobs Emphasis

The land use and development plan for Alternative #3 is organized by Opportunity Area, similar to that indicated for the Project.

Opportunity Area 1: Mandela/West Grand

Similar to the Project, the Mandela/West Grand Opportunity Area would continue to be a business and employment center for West Oakland, including a mix of business activities and development types with a range of jobs at varying skill and education levels. This alternative would retain and expand existing commercial and compatible urban manufacturing, construction and light industrial businesses that have well-paid blue collar and green collar jobs, and would also attract new industries.

New development near the Oakland/Emeryville city limit line along Mandela Parkway near the I-580 overpass would primarily occur as an extension of the Emeryville/Oakland large format retail development (i.e., an extension of the Bay Street/BayBridge Shopping Center/Target area). Buildout of this area (identified in the Project as Subarea 1C of the Mandela/Grand Opportunity Area) would include properties on either side of the overpass providing adequate space for new large-scale retail development, with the area below the underpass providing an opportunity for shared surface parking. New large-scale retail development along the northerly portion of Mandela Parkway would help strengthen connections between West Oakland and the adjacent regional-serving shopping area. Additional new regional-serving retail near the West Grand Avenue ramp (at Opportunity Sites #4, #6 or #13) would create two strong anchor points of retail between 32nd Street and West Grand Avenue. With anchors at either end, Willow Street would emerge as a retail corridor connecting between the two anchor points. A gateway entry, streetscape and pedestrian amenities, and improved roadway sections along Willow would enhance this area as a retail destination. Retail on the southern side of West Grand Avenue would include major improvements for pedestrian and bicycle access under the I-880 ramp, addressing light, openness, and other amenities that would make shoppers feel safe and secure.

New residential and live/work development would only occur as infill of properties currently zoned for residential use, including approximately 640 units at the approved Wood Street Development project. The Project's proposal to rezone several industrially zoned properties to allow for residential use would not occur, but instead these properties would remain as industrial and available for new lower-intensity industrial/business development.

A conceptual, schematic plan for the large format retail development area is provided on **Figures 5-5**, illustrating densities, building massing and other physical characteristics of the Commercial/Office/Jobs Alternative.

Opportunity Area 2: 7th Street

Similar to the Project, under the Commercial/Office/Jobs Alternative the 7th Street Opportunity Area would continue to include a transit-oriented development (TOD) project on vacant sites and parking lots around the West Oakland BART Station. A new BART parking garage would be developed next to the freeway, and the TOD would include high- to mid-density residential development above mostly ground-floor neighborhood-serving retail and custom manufacturing /industrial arts/ artist exhibition space.

However, this alternative would provide for development of one or more new office buildings at the 7th Street/Mandela Parkway entrance to the TOD, and new office towers placed atop the BART parking garage. Such a large commercial office component of the TOD would provide an ideal location for a public or quasi-public agency, and would ensure that BART ridership is two-directional (riders will be leaving the station for jobs as others are arriving for jobs). Under this alternative, approximately 670,000 square feet of commercial office space would replace approximately 1,000 of the residential units indicated in the Project's description of the residentially-based TOD (1,130 new dwelling units, as compared to over 2,300 new dwelling units under the Project). Conceptual, schematic plans are provided on **Figure 5-6** for the TOD design under the Commercial/Office/Jobs Alternative, illustrating the commercial/office alternative.

Like the Project, new medium density housing with ground floor commercial uses would occur further west on 7th Street as a transition from the West Oakland BART Station TOD to the surrounding lower-density neighborhoods. Like the Project, 7th Street would continue to be planned as the neighborhood focus, with neighborhood-serving commercial establishments that enliven the street. Similar to the Project, new building design, construction and ongoing operation and maintenance requirements will address the issues of air contaminants and noise from the freeway, and noise from BART trains.

Opportunity Area 3: 3rd Street

Similar to the Project, the 3rd Street Opportunity Area would continue to support industrial and business activities and jobs, focusing on manufacturing and light industrial uses that benefit from adjacency to the Port. New business opportunities would reflect the existing mix of light industrial, service commercial, food and beverage production and distribution, and construction-related businesses, as well as small professional offices, import/export, communications, computer services, publishing and printing, photo/audio services, and small R&D activities. The amount of new business and industrial development that would occur within the 3rd Street Opportunity area would be the same as that projected to occur under the Project. Residential development in this area would continue to be prohibited.

Opportunity Area 4: San Pablo Avenue

Under the Commercial/Retail and Jobs Focus Alternative, the San Pablo Avenue Opportunity Area would be developed at the same or similar densities and intensities as envisioned under the Project. The San Pablo Avenue corridor would be transformed as a major commercial corridor lined with active ground-floor commercial uses and mixed-use residential development. Similar to the Project, the block of West Grand Avenue between Myrtle Street and Market Street would be developed with a mix of uses (potentially anchored by a grocery store) with medium-density residential, street front retail and mixed use development.

Sub-Area 1C



Sub-Area 1D

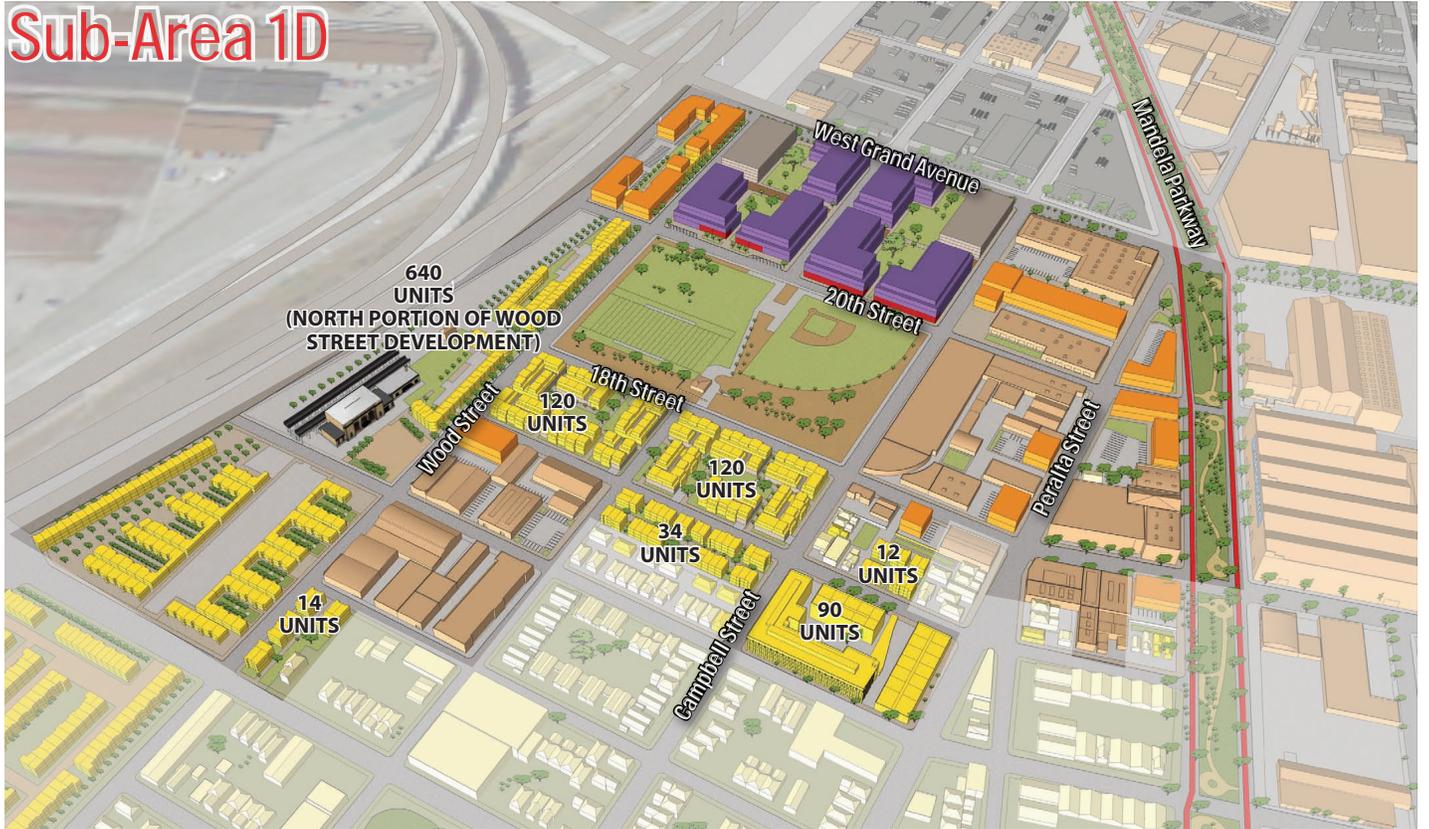


Figure 5-4
Commercial/Jobs Focused Alternative, Mandela/West Grand Opportunity Areas C and D





Existing facilities to be Enhanced		Low Intensity Business Mix/Light Industrial		Business Intensification (380,000 sq. ft.)	
Residential (1875 units)		Transit Enhancement		Retail/Commercial (80,000 sq. ft.)	



Figure 5-5
Commercial/Jobs Focused Alternative,
Commercial- Office Use at West Oakland BART TOD



Key Differences between the Project and the Commercial, Office and Jobs Alternative

Alternative #3 is similar to the Project, but with a few significant differences:

Non-Residential Development:

- Alternative #3 would prioritize new retail development as an extension of that which has occurred near the Oakland/Emeryville city limit line, with new large-format retail along Mandela Parkway near the I-580 overpass, near the West Grand Avenue ramp, and along Willow Street. This area would emerge as a retail corridor connecting between the West Grand and Emeryville, rather than as a higher intensity industrial/business development area as envisioned under the Project.
- The West Oakland BART Station TOD would include a substantial component of commercial office space, intended to better utilize the transit resource of the BART station for two-directional ridership (i.e., transit riders will be leaving the station for jobs elsewhere, as others are arriving for on-site jobs). As envisioned under this Alternative, the TOD would include a large commercial office complex of approximately 380,000 square feet located immediately adjacent to the BART station platform, as well as the potential for an additional 293,000 square feet of commercial office space atop the BART parking garage near the I-800 freeway. New commercial and office space would better establishing this area as an active, 24-hour community as opposed to a residential bedroom community with outbound commuters. Grocery stores, restaurants, night clubs, neighborhood-serving retail shops, food and beverage sales, and professional services, as well as art galleries and “making” places (uses typically viewed under land use regulations as custom manufacturing) would line the ground floor.

Residential and Mixed-Use Development:

- This alternative would result in a reduction of between 533 residential units and up 950 residential units due to developing a substantial component of commercial office space rather than housing at the West Oakland BART station.
- Alternative #3 would not include those residential units envisioned under the Project at several locations where existing industrial zoning is proposed to be converted to enable residential use. These sites, including the Phoenix Iron Works site, the Roadway parcels, as well as sites at 12th and Grand, Eddie Street and Adeline Street, would all remain industrially-zoned. No new residential development would occur at these locations; instead the existing industrial/business uses would remain or new low intensity business development would occur.

Summary of Alternative #3

Buildout of this alternative is anticipated to occur over an extended period of time with incremental increases in new housing and job opportunities, but final buildout is assumed by year 2035. **Table 5-10** provides a summary of land uses, employment and population changes projected within the Planning Area at buildout of the Commercial, Office and jobs Focused Alternative.

**Table 5-10: Buildout Assumptions, Alternative #3: Commercial and Jobs Emphasis
(all of West Oakland Opportunity Areas)**

	Business /Indust. /Inst. (1,000 sq.ft.)	Comm. /Retail (1,000 sq.ft.)	Mixed Use (1,000 sq. ft.)	Jobs	Housing Units	Pop.
<u>Existing</u>						
Mandela/Grand	4,000,000	300,000	0	5,440	110	259
7th Street	1,790,000	0	5,000	1,880	85	204
3rd Street	1,040,000	50,000	0	1,770	0	0
San Pablo	<u>0</u>	<u>90,000</u>	<u>700,000</u>	<u>680</u>	<u>70</u>	<u>165</u>
Total	6,830,000	440,000	705,000	9,770	265	628
<u>Buildout, Alternative #3</u>						
Mandela/Grand	6,305,000	685,000	105,000	16,140	931	2,067
7th Street	1,660,000	0	760,000	4,356	1,774	4,125
3rd Street	1,700,000	65,000	0	3,760	0	0
San Pablo	<u>0</u>	<u>80,000</u>	<u>785,000</u>	<u>1,660</u>	<u>1,095</u>	<u>2,453</u>
Total	9,665,000	830,000	1,650,000	25,916	3,800	8,645
<u>Net Change, Alternative #3</u>						
Mandela/Grand	2,305,000	385,000	105,000	10,700	821	1,808
7th Street	-130,000	0	755,000	2,476	1,689	3,921
3rd Street	660,000	15,000	0	1,990	0	0
San Pablo	<u>0</u>	<u>-10,000</u>	<u>85,000</u>	<u>980</u>	<u>1,025</u>	<u>2,288</u>
Total	2,835,000	390,000	945,000	16,146	3,535	8,017
Project	3,550,000	310,000	170,000	14,890	5,000	10,988
Compared to Project	-715,000	80,000	775,000	1,256	-1,465	-2,971
Percent of Project	80%	126%	556%	108%	71%	73%

Comparative Environmental Assessment, Alternative #3

Aesthetics

Scenic Vistas

There are no officially designated public scenic vistas within or near the West Oakland Planning Area. No scenic vistas or view corridors would be substantially obstructed or degraded by development in

accordance with the Reduced Alternative, and the impacts of Alternative 3 on scenic vistas would therefore be less than significant. **(LTS)**

Similar to the Project, infill development and redevelopment of vacant and blighted properties, improvements to streetscapes and the public realm, and new landscaping and street trees would improve the quality of views throughout West Oakland from public vantage points. Focusing new development within the Opportunity Areas and preserving established neighborhoods would avoid substantial obstruction of the limited views of downtown Oakland and the East Bay hills from public vantage points within the adjacent residential neighborhoods. At the West Oakland BART Station TOD, Alternative 3 would have the same or similar building height as compared to the Project, and would also provide a more effective and substantial transition in building heights nearest to the South Prescott neighborhood, with buildings nearest to this neighborhood as low as 2-stories.

Scenic Highways

Similar to the Project, new development and public realm improvements in accordance with the Alternative 3 would not substantially damage scenic resources, but rather would improve the quality of views of the Planning Area from the I-580 scenic highway. The impacts of Alternative 3 related to scenic highways would be less than significant. **(LTS)**

Visual Character or Quality

Similar to the Project, new development and public realm improvements in accordance with Alternative 3 would not substantially degrade the existing visual character or quality of any sites and their surroundings, but would substantially improve existing visual character and quality of the area. Infill development and redevelopment would repair the existing inconsistent urban fabric where such inconsistencies exist, and result in a more unified and coherent development character. The proposed land use patterns and development types would focus change within the Opportunity Areas while preserving established residential neighborhoods.

Alternative 3 would not provide for the re-zoning of any areas from industrial to residential use, and the existing edge between industrial and residential areas would remain less defined and consistent. The visual character along the industrial/residential edges would continue to remain mixed in character. **(LTS)**

Shadow

Like the Project, Alternative 3 would not cast shadows that substantially impair the function of a building using passive solar heat collection, solar collectors for hot water heating, or photovoltaic solar collectors; cast shadows that substantially impair the beneficial use of any public or quasi-public park, lawn, garden, or open space; or cast shadows on an historic resource such that the shadow would materially impair the resource's historic significance. The shadow impacts of Alternative 3 would be less than significant. **(LTS)**

Adequate Lighting

Like the Project, Alternative 3 would not change any existing General Plan policies or zoning or building regulations such as to cause a fundamental conflict with policies and regulations that address the provision of adequate light related to appropriate uses. The impacts of the Reduced Alternative related to consistency with policies and regulations addressing the provision of adequate light related to appropriate uses would be less than significant. **(LTS)**

Wind

Since the West Oakland Planning Area does not lie within the area identified by the City as requiring modeling for evaluation of wind impacts, the wind impacts of Alternative 3 would be less than significant. (LTS)

Air Quality

CAP Consistency: VMT Increase

New development facilitated by the Alternative #3 would not fundamentally conflict with the Bay Area 2010 CAP because the projected rate of increase in vehicle miles travelled would be less than the projected rate of increase in population. The Alternative #3's increase in growth (population and employment) would not conflict with regional growth expectations set forth in the CAP, and the potential changes in transportation demand as expressed through vehicles miles travelled (VMT) would not outpace population growth. The projected population increase in West Oakland that is attributable to new growth and development pursuant to Alternative #3 (approximately 16,150 jobs and a population of 8,013 people) represents a growth rate of approximately 230% over the current 10,398 jobs and residents. The projected increase in PM peak hour vehicles miles travelled (approximately 40,420 VMTs) represents an increase of approximately 105% over the current estimated VMT of 38,659. Based on these comparisons, Alternative #3's projected increase in VMTs would grow at a lesser rate than the service population, and this impact would be less than significant.

CAP Consistency: Implementation of Control Measures

Like the Project, Alternative #3 would not fundamentally conflict with the CAP's air pollution control measures. All new development pursuant to the this Alternative, including new industrial and commercial uses, would be required to comply with all measures that the Air District adopts and enforces to control emissions from stationary sources of air pollution. Alternative #3 would not contain any policies or strategies that would be contrary to incentive programs to achieve voluntary emission reductions from mobile sources. This Alternative would not fundamentally conflict with the CAP's transportation control strategies, even if it does not achieve to the same degree as does the Project, improvements to the efficiency of existing transit systems or the promotion of focused urban infill development. All new development pursuant to the Alternative #3 would be required to comply with City of Oakland's Standard Conditions that seek to reduce energy use in new development projects. In summary, Alternative #3 would not interfere with implementation of Clean Air Plan control measures.

Odors

Like the Project, new development in accordance with the No Project Alternative would expose a substantial number of people to objectionable ambient odors from the EBMUD WWTP and from food processing facilities, painting/coating operations, and/or green waste and recycling facilities. This impact would be **significant and unavoidable** at the Plan level. New development pursuant to Alternative #3 could result in development of new odor-generating uses in close proximity to residential or other odor-sensitive uses within mixed-use areas, similar to that as indicated for the Project. Like the Project, this impact would be potentially significant and proper controls or setbacks, as recommended for the Project, would be required.

Construction Period Emissions

Similar to the Project, individual development projects pursuant to Alternative #3 will generate fugitive dust from demolition, grading, hauling and construction activities, will generate regional ozone precursor emissions and regional particulate matter emissions from construction equipment exhaust, and will generate construction-related toxic air contaminant (TAC) emissions from fuel-combusting construction equipment and mobile sources.

- Fugitive dust will be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval, and
- construction-related toxic air contaminant (TAC) emissions will be effectively reduced to a level of less than significant with implementation of required City of Oakland Standard Conditions of Approval, but
- larger individual construction projects could generate emissions of criteria air pollutants that would exceed the City's thresholds of significance and/or that could exceed thresholds for cancer risk, chronic health index, acute health index or annual average PM2.5 concentration levels. These emissions are conservatively estimated as **significant and unavoidable**.

Operational-Related Criteria Air Pollutants

Buildout of Alternative #3 would generate total emissions of criteria pollutants (ROG, PM10 and PM2.5) from increased motor vehicle traffic and area source emissions that would exceed the City's project-level thresholds of significance. Although motor vehicle traffic would be less under Alternative #3 than the Project, individual development projects as well as the aggregate of all development assumed pursuant to this Alternative is conservatively considered to generate criteria air pollutants and ozone precursor emissions at a level that would be **significant and unavoidable**.

Carbon Monoxide Concentrations

Alternative #3 would not expose sensitive uses and would not generate emissions leading to significant concentrations of CO that would violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation. Traffic modeling conducted for this EIR indicates that study intersections with the highest traffic volumes would not experience 24,000 vehicles per peak hour under 2035 scenarios with implementation of the Project, and Alternative #3 would generate slightly fewer peak hour vehicle trips than does the Project (see Transportation discussion, below).

Operational Toxic Air Emissions

Development pursuant to Alternative #3 would include new light industrial, custom manufacturing and other similar land uses that could emit toxic emissions. The potential exists for multiple new sources of TAC emissions to be developed within a single concentrated portion of the Plan Area. Given the existing elevated cancer risk from existing local and mobile sources in the Plan Area, there is the potential for new multiple sources (even if each new source is individually less than significant) to cumulatively increase toxic air contamination to a **significant and unavoidable** level.

Exposure to Toxic Air Contaminants and PM2.5

Like the Project, certain future development projects in accordance with Alternative #3 would expose new sensitive receptors to levels of toxic air contaminants (TACs) or concentrations of PM2.5 that could result in a **significant and unavoidable** increased cancer risk or other health hazards. Alternative #3

would facilitate development of new sensitive-receptor land uses, specifically near the I-880 freeway at the West Oakland BART station, where there is the potential to result in health risks to future residents due to nearby sources of toxic air contaminants (TACs) and concentrations of PM2.5.

Alternative #3 would replace as many as 950 of the sensitive residential units proposed under the Project at the West Oakland Bart Station site with less-sensitive office-type uses. Furthermore, this Alternative would not facilitate development of new sensitive receptors at several other locations adjacent to the I-880 freeway and which have increased cancer risk and increased health risks due to PM2.5 concentrations. These sites, including locations along the 7th Street corridor, the Phoenix Iron Works site, the Roadway site and the site at 12th and Mandela, would not be proposed for residential conversions (as is proposed under the Project) under this Alternative. Alternative #3 would reduce the exposure of new sensitive receptors to toxic air contaminants as compared to the Project.

Cultural Resources

Historic Resources

Alternative #3 would not alter or change the manner in which the majority of historic resources are proposed to be addressed pursuant to the Specific Plan (the Project). Assumptions regarding the treatment of individual historic resources pursuant to the Project would be similar under Alternative #3 at the Oakland Warehouse Company - GE Mazda Lamp Works site (1600-14 Campbell Street); at the Merco-Nordstrom Valve Company Factory (2401-49 Peralta Street); at and in the vicinity of the Southern Pacific 16th Street Station (1601 Wood Street/1798 16th Street); where new development may abut the Oakland Point API; along the 7th Street historic corridor; within and adjacent to the Southern Pacific Railroad Industrial API; and on the vacant site adjacent to the California Hotel at 3501 San Pablo Avenue. As is the case under the Project, new development under Alternative #3 would not cause a substantial adverse change in the significance of these historic resources.

Under Alternative #3, no new residential use would be permitted on the southern portion of the Coca Cola Bottling Company property (at 1340 Mandela Parkway), but new business/light industrial development would be required to maintain the integrity and continued eligibility of the 1940s plant as is proposed under the Project. Similarly, Alternative #3 would not permit new residential or mixed-use development along Pine Street at the Phoenix Iron Works site. Instead, only new business/light industrial development could be developed, with consideration of the local context as part of Design Review of this site. This change in development types would not cause a substantial adverse change in the significance of the adjacent Oak Point API or of individual historical resources within the API.

As is the case under the Project and all alternatives to the Project, any future proposed change to other historic properties pursuant to Alternative #3 would be subject to the City's existing Historic Preservation Element (HPE) policies and actions, regulatory requirements, individual CEQA review and standard conditions of approval, implemented on a project-by-project basis (see more discussion under the No Project Alternative). With implementation of these policies, actions and regulations (pursuant to individual CEQA review and applied as standard conditions of approval), individual projects pursuant to Alternative #3 could still result in significant and unavoidable impacts to historic resources, but such impacts will have undergone detailed, project specific review and consideration prior to such effects having occurred.

Archaeological Resources, Paleontological Resources and Human Remains

Similar to the Project, subsequent development under Alternative #3 could cause a substantial adverse change in the significance of an archaeological resource or destroy a unique paleontological resource or

site or unique geologic feature. However, each individual development project would be required to implement the City's Standard Conditions of Approval. Given the high potential for the presence of unrecorded Native American resources and moderate to high potential for the presence of unrecorded historic-period archaeological resources near the former Bay shoreline, new development that involves excavation in this area would likely be subject to SCA E, Archaeological Resources – Sensitive Sites. This Standard Condition of Approval requires additional intensive pre-construction surveys or construction period monitoring, and avoidance and recovery measures. Additionally, in the event of an unanticipated discovery of prehistoric or historic-period archaeological resources or unique paleontological resources during development within the Planning Area, SCA 52, Archaeological Resources, SCA 53, Human Remains, and SCA 54, Paleontological Resources require that excavations within 50 feet of the find be temporarily halted or diverted until the discovery is examined by a qualified archaeologist or paleontologist, documented and evaluated for significance, and procedures established to consider avoidance of the resource or preparation of an excavation plan if avoidance is unfeasible. With required implementation of these standard conditions of approval, the impacts of future development on archaeological resources, paleontological resources and human remains pursuant to Alternative #3 would be less than significant.

Greenhouse Gas and Climate Change

GHG Emissions

New development facilitated by the Alternative #3 would allow for the construction and operation of land uses that would produce greenhouse gas emissions. The level of emissions would exceed the project-level threshold of 1,100 annual tons of MTCO₂e, but would likely not exceed the project-level efficiency threshold of 4.6 MTCO₂e of annual emissions per service population nor would it exceed the Plan-level threshold of 6.6 MTCOC₂e annually per service population. Development facilitated by Alternative #3 would thus not be expected to generate greenhouse gas emissions at levels that would result, in the aggregate, in significant or cumulatively considerable GHG emissions. (LTS)

Hazards and Hazardous Materials

Hazardous Materials Release Sites

The Planning Area contains numerous sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Continued occupancy and use or future development of these hazardous materials sites under Alternative #3 (or any alternative) could create a significant hazard to the public or the environment. However, with required implementation of City of Oakland Standard Conditions of Approval and required compliance with local, state and federal regulations for treatment, remediation or disposal of contaminated soil or groundwater, hazards to the public or the environment from hazardous materials sites would be less than significant.

Hazardous Building Materials

Asbestos or lead based paint present within older structures in the Planning Area could be released into the environment during demolition or construction activities pursuant to Alternative #3, which could result in soil contamination or pose a health risk to construction workers or future occupants. However, with required implementation of the City's Standard Conditions of Approval and other applicable laws, regulations, standards and oversight currently in place, the potential impact related to exposure to hazardous building materials would be less than significant.

Hazardous Materials Use, Transport or Disposal

The amount of new development envisioned under Alternative #3 could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, with required implementation of the City's Standard Conditions of Approval, as well as required compliance with hazardous materials laws, regulations, standards and oversight currently in place, potential impact related to the routine transport, use, or disposal of hazardous materials would be less than significant.

Hazardous Materials near Schools

New businesses that emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste could occur within one-quarter mile of a school under Alternative #3. However, with required implementation of the City's Standard Conditions of Approval, as well as required compliance with hazardous materials laws, regulations, standards and oversight currently in place, the potential impact related to emission and handling of hazardous materials near schools would be less than significant.

Land Use and Planning

Land Use Compatibility

Alternative #3 would not result in a fundamental conflict between adjacent or nearby land uses, but rather would result in a gradual improvement in compatibility between residential, commercial and business/industrial land uses.

In comparison to the proposed Project, Alternative #3 would reduce the number of sites where new housing units could be developed near freeways and other sources of diesel exhaust particulates and other toxic air contaminants (TACs) which pose a significant risk to human health. Alternative #3 would reduce the number of housing units near the freeway, BART and the railroads at the West Oakland BART station TOD, replacing these housing units with less sensitive commercial/office use. Alternative #3 would also expose fewer new sensitive receptors to freeway and rail noise levels that may exceed City and state standards for noise compatibility than does the proposed Project. Additionally, under Alternative #3, new residential land uses as proposed by the Project would not occur on certain properties with known previous contamination from prior industrial uses or other sources.

Conflict with Plans, Policies or Regulations

Alternative #3 would not include those General Plan amendments and rezoning as proposed under the Project that would be in direct conflict with the City's Industrial Land Use Policy. That Industrial Land Use policy indicates that West Oakland's industrially-zoned lands are to remain industrial, without amendments.

Alternative #3 would not fundamentally conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect that would result in a physical change in the environment.

Habitat and Natural Community Conservation Plans

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other adopted habitat conservation plan applicable to the Planning Area. Alternative #3 would not conflict with the provisions

of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Noise

Construction Noise

Under Alternative #3, construction activities within West Oakland would occur, though with more focus on industrial/business and commercial development and less residential development than contemplated under the Project. Implementation of City of Oakland standard conditions of approval (SCA 28: Days/Hours of Construction Operation; SCA 29: Noise Control, SCA 30: Noise Complaint Procedures, and SCA 39: Pile Driving and Other Extreme Noise Generators) would reduce construction noise levels and represent all feasible measures available to mitigate construction noise. Implementation of these SCA's on a project-by-project basis would reduce construction noise impacts to a less than significant level.

Operational Noise

Ongoing operational noise generated by new stationary sources from industrial and commercial operations and from roof-top mechanical ventilation equipment associated with new development under Alternative #3 could generate noise in violation of the City of Oakland Noise Ordinance. The City's standard condition of approval (SCA 32: Operational Noise - General), requires that noise levels from any activity comply with the performance standards identified in the Planning Code and Municipal Code, and that if noise levels exceed these standards, the activity causing the noise must be abated until appropriate noise reduction measures have been installed. With required implementation of the City's Standard Condition of Approval SCA 32, operational noise impacts of Alternative #3 would be less than significant.

Alternative #3 would not result in the addition of as many new sensitive receptors (i.e., new residences) as would the Project, nor would it enable the siting of new sensitive receptors in as close proximity to business and industrial uses as does the Project. Although operational noise impacts would be reduced to less than significant levels through implementation of City standard condition of approval, Alternative #3 would result in less operational noise impacts than would the Project

Traffic Noise

Increased traffic result from new growth and development under Alternative #3 will result in higher traffic noise along streets within West Oakland, mixing with noise from all other existing ambient noise sources (i.e., trains, BART operation, existing freeway noise, etc.). The number of new vehicle trips throughout West Oakland associated with Alternative #3 would be marginally less than the vehicle trips associated with the Project. Since traffic-related noise increases are estimated to be less than significant with the traffic volumes projected for the Project, the slightly lower traffic volumes associated with Alternative #3 would generate comparably less traffic noise and would remain below the 5 dBA increase threshold, and therefore less than significant.

Construction and Operational Vibration

New construction activities under Alternative #3 could generate excessive ground-borne vibration during the construction period, and new commercial and industrial development may generate operational ground-borne vibration at levels that would be perceptible beyond the property boundary. However, with required implementation of the City's Standard Conditions of Approval and compliance

with Oakland Planning Code regulations, these potential vibration impacts would be less than significant.

Noise Exposure / Land Use Compatibility

Future occupants of new residential and other noise-sensitive development pursuant to the Reduced Alternative could be exposed to community noise in conflict with the Land Use Compatibility Guidelines of the Oakland General Plan, and to interior noise exceeding California Noise Insulation Standards from a variety of noise sources including freeway traffic, BART and railroad operations.

Under Alternative #3, no new noise sensitive receivers (i.e., residences) would be developed at either the Phoenix Iron Works Site (Opportunity Site #) or at the Roadway parcels (Opportunity Sites #8, 12 and 13), or elsewhere along the I-880 freeway within the Mandela/Grand Opportunity Area. Furthermore, all new residential development under Alternative #3 would be required to comply with the city's Standard Conditions of Approval which require design measures capable of reducing interior noise to acceptable levels within buildings. With required implementation of the City's Standard Conditions of Approval, land use compatibility impacts would be less than significant. All new residential development under the Reduced Alternative would be required to comply with the city's Standard Conditions of Approval which require design measures capable of reducing interior noise to acceptable levels within buildings. With required implementation of the City's Standard Conditions of Approval, land use compatibility impacts would be less than significant.

West Oakland BART Station TOD

Similar to the analysis conducted for the Project, Alternative #3 includes development of a West Oakland BART Station TOD. However, TOD as envisioned under Alternative #3 the TOD would include a large commercial office complex of approximately 380,000 square feet located immediately adjacent to the BART station platform, as well as the potential for an additional 293,000 square feet of commercial office space atop the BART parking garage near the I-800 freeway. The commercial/office component to this version of the TOD would reduce the overall number of sensitive receptors exposed to ambient noise sources from traffic noise on I-880, as well as rail and passenger activity along the BART tracks and at the West Oakland BART station (commercial/office use is not considered a sensitive receptor). Additionally, it would place large, non-sensitive land uses as a buffer between these existing noise sources and new residential development, thereby attenuating noise received at the residential units. Depending upon ultimate designs, the Alternative #3 version of the TOD would likely not avoid subjecting new residents to ambient noise levels that would exceed the Land Use Compatibility standards, but would substantially reduce the extent of overall exposure. As indicated for the Project, new residences within Alternative #3's version of the TOD would still be subject to City of Oakland Standard Conditions of Approval, including compliance with Title 24 of the California Code of Regulations and the obligation to demonstrate how dwelling units would be designed to meet interior noise standards. This Alternative's TOD project would also place noise-sensitive outdoor uses in a noise environment characterized as "clearly unacceptable". Noise reduction could occur with the site design if buildings are effectively designed to act as noise barriers and break the line of sight between both I-880 and the BART tracks, and any publicly-accessible open space. With required implementation of the City's Standard Conditions of Approval, land use compatibility impacts would be less than significant and no mitigation measures would be required pursuant to CEQA.

Airport Noise

The Planning Area is located more than two miles outside of the Oakland International Airport 65 dBA Ldn/CNEL noise contour, which the Federal Aviation Administration regards as a significance threshold for noise-sensitive land uses. Therefore, impacts of aviation noise on any new development, including development pursuant to Alternative #3, would be less than significant.

Population, Housing and Employment

Growth Inducement

Build-out of Alternative #3 would result in less households but approximately the same number of employees that are included in ABAG's most recent projections for the area. Any additional induced growth would occur as already contemplated in, and consistent with, adopted plans and the environmental documents prepared for those plans. Growth facilitated or induced by Alternative #3 represents growth for which adequate planning has already occurred and/or which has been reviewed under this EIR, and the growth inducement impacts of this alternative would be less than significant.

Displacement of Housing or People

Alternative #3 would not directly result in displacement of housing or people. No housing would be removed or changed to a non-residential use, and the limited number of existing housing units located within the Specific Plan's Opportunity Areas would be retained. Some housing areas built without required permits and which may not conform to current zoning and/or building codes, including certain residential conversion of formerly underutilized industrial spaces, could be redeveloped with resulting loss of some of these existing informal units and the associated displacement of people. However, like the Project, the potential loss of a small number of housing units and associated displacement of people would be offset by the number of new units built under the Alternative #3. Impacts of Alternative #3 related to the displacement of housing or people would be less than significant.

Public Services and Recreation

Fire Protection

New development pursuant to Alternative #3 would, like the Project, result in an increase in OFD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. All new development under this alternative would be subject to the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements. Implementation of these requirements would reduce the impacts of this alternative on fire protection services to a level of less than significant.

Police Protection

New development under Alternative #3 would result in an increase in OPD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. The impacts of Alternative #3 related to police protection would be less than significant.

Schools

Development in accordance with Alternative #3 would generate additional students attending the OUSD schools, but the number of new students would be substantially less than would be generated by the

Project. School impact fees from residential and non-residential development collected pursuant to California Government Code would provide full and complete mitigation for school impacts.

Parks and Recreation

Development pursuant to Alternative #3 would generate a need for additional parkland, adding to the existing deficiency of parkland acreage in West Oakland, and would increase the use of existing parks and recreational facilities. However, because Alternative #3 would include substantially less residential development than the Project, its overall demands on parks and recreation services would be reduced as compared to the Project. Alternative #3 would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities would occur, and the impacts of this alternative on parks and recreation services would be less than significant.

Traffic

For comparative purposes, the following analysis of traffic impacts for Alternative #3 is conducted under Cumulative (Year 2035) conditions. This scenario represents the “worst case” traffic condition and captures the full extent of potential traffic impacts.

Trip Generation

Alternative #3 assumes that employment growth within the West Oakland Specific Plan’s Opportunity Areas would occur at a more robust rate through Year 2035 than would occur under the Project; while residential growth would occur at a lower rate. It also assumes that residential and employment growth elsewhere in West Oakland would occur as predicted under ABAG’s latest *Projections '09* estimates.

Alternative #3’s cumulative buildout includes 15,230 total households (3,800 within the Specific Plan’s Opportunity Areas and 11,430 elsewhere in West Oakland), and approximately 27,900 employees (25,900 within the Specific Plan’s Opportunity Areas and 2,000 elsewhere in West Oakland). The difference between the Project and Alternative #3 is approximately 1,470 fewer households and approximately 1,240 more jobs under Alternative #3 than under the Project. As a result, Alternative #3 would generate fewer weekday peak hour trips as compared to the Project. As shown in **Table 5-11**, the number of peak hour trips would be reduced as compared to the Project by approximately 150 trips during both peak hours.

Table 5-11: Vehicle Trip Generation Comparison, Alternative #3

	Project - Vehicle Trips				Alternative #3 - Vehicle Trips			
	Existing	Project	Other	Total	Existing	Alternative #3	Other	Total
AM Peak Hour	5,735	5,537	558	11,830	5,735	5,394	558	11,687
Difference, compared to Project:						(-143)		
PM Peak Hour	7,025	6,698	720	14,442	7,025	6,540	720	14,285
Difference, compared to Project:						(-158)		

Source: Kittelson & Associates, 2013.

Intersection Impacts

A comparison of the intersection level of service for Cumulative No Project, Cumulative plus Project and Cumulative plus Alternative #3 is presented in **Tables 5-12 and 5-13**. Alternative #3 would generate slightly less total traffic than would the Project, however, its traffic patterns would result in significant impacts at two more intersections than the Project scenario.) All six of the intersections indicated as being affected under Cumulative plus Project conditions would also be significantly impacted under Cumulative plus Alternative #3 including:

- Hollis Street and 40th Street intersection (#1) in both peak hours
- San Pablo Avenue and 40th Street intersection (#2) in both peak hours
- Frontage Road and West Grand Avenue intersection (#6) in the PM peak hour
- Mandela Parkway and West Grand Avenue intersection (#7) in both peak hours
- Adeline Street and West Grand Avenue intersection (#8) in the PM peak hour
- Broadway and West Grand Avenue intersection (#13) in the PM peak hour
- Adeline Street and 18th Street intersection (#15) in the PM peak hour
- Adeline Street and 5th Street intersection (#24) in the PM peak hour

Further, two (2) additional intersections have also been found to result in significant impacts with the implementation of Alternative #3 that would not result in significant impacts under the Project conditions:

- Frontage Road and West Grand Avenue intersection (#6) in the PM peak hour
- Adeline Street and West Grand Avenue intersection (#8) in the PM peak hour

Table 5-12: Intersection LOS Summary, Alternative #3 at Year 2035 Under Cumulative Conditions – (AM/Sat. Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Alternative #3	
	Delay	LOS	Delay	LOS	Delay	LOS
1 Hollis Street/40th Street^	247.9	F	237.3	F	222.3	F
2 San Pablo Avenue/40th Street^	325.0	F	324.5	F	320.5	F
3 I-980 off-ramp/27th Street*	23.1	C	17.4	B	17.6	B
4 I-980 on-ramp/27th Street*	22.5	C	21.2	C	21.2	C
5 Maritime Street/West Grand Avenue	35.1	D	35.0	C	34.6	C
6 Frontage Road/West Grand Avenue	171.0	F	169.1	F	156.2	F
7 Mandela Parkway/West Grand Avenue*	40.1	D	130.3	F	109.5	F
8 Adeline Street/West Grand Avenue*	17.4	B	22.1	C	21.7	C
9 Market Street/West Grand Avenue*	39.9	D	60.4	E	74.7	E
10 San Pablo Avenue/West Grand Avenue*	45.0	D	38.9	D	38.8	D
11 Martin Luther King Jr. Way/West Grand Ave*	16.1	B	16.0	B	15.8	B
12 Northgate Avenue/West Grand Avenue*	102.3	F	100.7	F	99.6	F
13 Broadway/West Grand Avenue*	39.6	D	41.9	D	42.3	D
14 Harrison Street/West Grand Avenue*	68.8	E	68.8	E	68.8	E
15 Adeline Street/18th Street#	10.1	B	7.5	A	22.6	C
16 Market Street/18th Street	11.1	B	15.2	B	15.0	B
17 Adeline Street/14th Street#*	13.1	B	6.0	A	5.8	A
18 Adeline Street/12th Street#	14.0	B	4.5	A	4.5	A
19 Frontage Road/7th Street	43.6	D	43.6	D	41.2	D
20 Mandela Parkway/7th Street*	22.9	C	24.1	C	24.2	C
21 Adeline Street/7th Street*	12.8	B	12.6	B	12.4	B
22 Market Street/7th Street*	35.9	D	21.9	C	19.8	B
23 Market Street/5th Street/I-880 off-ramp	19.3	B	19.1	B	19.2	B
24 Adeline Street/ 5th Street	26.4	C	53.4	D	53.4	D

Intersection delays are shown in “seconds per vehicle”.

All intersections have signalized control with the exception of locations denoted with “#” which are controlled by roundabout under plus

Table 5-12: Intersection LOS Summary, Alternative #3 at Year 2035 Under Cumulative Conditions – (AM/Sat. Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Alternative #3	
	Delay	LOS	Delay	LOS	Delay	LOS

Project/Alternative scenarios.

"*" denotes intersection located in downtown Oakland or that provide direct access to downtown.

"^" denotes intersection located in Emeryville

"~" Saturday peak hour results are shown for the two Emeryville locations; AM peak hour results are shown for all other locations

Intersection delay and LOS were calculated based on a volume-weighted average of the Mandela Parkway two-way couplet intersection.

BOLD type indicates significant impact due to LOS, V/C, or queue length (Emeryville intersections only) reasons

Source: Kittelson & Associate, 2013.

Table 5-13: Intersection LOS Summary, Alternative #3 at Year 2035 Cumulative Conditions (PM Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Alternative #3	
	Delay	LOS	Delay	LOS	Delay	LOS
1 Hollis Street/40th Street^	212.8	F	230.8	F	206.5	F
2 San Pablo Avenue/40th Street^	256.8	F	250.4	F	247.1	F
3 I-980 off-ramp/27th Street*	18.9	B	18.6	B	18.8	B
4 I-980 on-ramp/27th Street*	73.6	E	73.3	E	72.0	E
5 Maritime Street/West Grand Avenue	52.1	D	52.8	D	52.0	D
6 Frontage Road/West Grand Avenue	142.7	F	134.4	F	127.5	F
7 Mandela Parkway/West Grand Avenue*	72.8	E	215.2	F	207.5	F
8 Adeline Street/West Grand Avenue*	25.0	C	62.7	E	82.1	F
9 Market Street/West Grand Avenue*	143.5	F	61.5	E	104.0	F
10 San Pablo Avenue/West Grand Avenue*	292.1	F	270.4	F	262.7	F
11 Martin Luther King Jr Wy/West Grand Ave*	18.0	B	18.0	B	18.4	B
12 Northgate Avenue/West Grand Avenue*	40.5	D	37.5	D	33.2	C
13 Broadway/West Grand Avenue*	78.7	E	81.4	F	81.1	F

Table 5-13: Intersection LOS Summary, Alternative #3 at Year 2035 Cumulative Conditions (PM Peak Hour)

Study Intersections	Cumulative Baseline		Cumulative plus Project		Cumulative plus Alternative #3	
	Delay	LOS	Delay	LOS	Delay	LOS
14 Harrison Street/West Grand Avenue*	54.5	D	52.9	D	52.6	D
15 Adeline Street/18th Street#	12.4	B	39.4	E	91.9	F
16 Market Street/18th Street	15.4	B	20.9	C	19.0	B
17 Adeline Street/14th Street#*	14.8	B	12.2	B	13.8	B
18 Adeline Street/12th Street#	9.2	A	6.4	A	6.8	A
19 Frontage Road/7th Street	44.6	D	44.7	D	43.0	D
20 Mandela Parkway/7th Street*	30.1	C	37.5	D	30.2	C
21 Adeline Street/7th Street*	25.3	C	26.0	C	24.6	C
22 Market Street/7th Street*	26.9	C	31.5	C	27.8	C
23 Market Street/5th Street/I-880 off-ramp	25.3	C	24.6	C	24.2	C
24 Adeline Street/ 5th Street	35.7	D	81.0	F	80.5	F

Intersection delays are shown in “seconds per vehicle”.

All intersections have signalized control with the exception of locations denoted with “#” which are controlled by roundabout under plus Project/Alternative scenarios.

“*” denotes intersection located in downtown Oakland or that provide direct access to downtown.

“^” denotes intersection located in Emeryville

Intersection delay and LOS were calculated based on a volume-weighted average of the Mandela Parkway two-way couplet intersection.

BOLD type indicates significant impact due to LOS, V/C, or queue length (Emeryville intersections only) reasons.

Source: Kittelson & Associate, 2013.

Mitigation Measures

The same mitigation measures recommended for the Cumulative plus Project scenario would also lessen the Cumulative plus Alternative #3’s traffic impact at the following intersections:

- Mitigation measures for the intersection of Hollis Street/40th Street (Intersection #1) are less substantial than those recommended for the Cumulative plus Project scenario. The westbound left queue storage would not need to be extended, but the remaining improvements identified under Mitigation Measure Trans-3 (including southbound queue storage extension and signal optimization) would need to be implemented in order to reduce the impact to a less-than-significant level.

- Implement Mitigation Measure Trans-4 as recommended for the Cumulative plus Project scenario at San Pablo Avenue / 40th Street (Intersection #2).
- Implement Mitigation Measure Trans-5 as recommended for the Cumulative plus Project scenario at Mandela Parkway / West Grand (Intersection #7).
- Implement Mitigation Measure Trans-6 as recommended for the Cumulative plus Project scenario at Broadway / West Grand (Intersection #13).
- Implement Mitigation Measure Trans-7 as recommended for the Cumulative plus Project scenario at Adeline Street / 18th Street (Intersection #15).
- Implement Mitigation Measure Trans-8 as recommended for the Cumulative plus Project scenario at Adeline Street / 5th Street (Intersection #24).

For the remaining two intersections, the following mitigation measures are required to reduce the impact of Alternative #3 to less-than-significant:

- At Frontage Road / West Grand Avenue (Intersection #6), implement the following:
 - Convert the exclusive northbound through lane to a left-through share lane to provide one left-turn, one shared left-through, and one through-right turn lanes on the northbound approach.
- At Adeline Street and West Grand Avenue (Intersection #8), implement the following:
 - Modify the traffic signal to provide an actuated controller
 - Optimize cycle length of the traffic signal

Resulting Level of Significance

With implementation of recommended improvements to the Hollis Street/40th Street intersection (#1) and the San Pablo Avenue/40th Street intersection (#2), Alternative #3's contribution to cumulative impacts at these locations could be reduced to a level of less-than-significant. However, because these intersections are within the City of Emeryville's jurisdiction, the timing and implementation of these improvements are not under the City of Oakland's control and the improvements cannot be assured. Therefore, Alternative #3's cumulative impact at these intersections remains **significant and unavoidable**.

Implementation of identified improvements to the Mandela Parkway/West Grand Avenue intersection (#7) could reduce Alternative #3's cumulative impacts to a level of less-than-significant, but the identified improvements are in conflict with the City's plans and policies. These improvements would encroach into Memorial Park and the medians, and would preclude planned installation of a bicycle facility on West Grand Avenue. Therefore, these improvements are not recommended and impacts at this intersection remain **significant and unavoidable**.

As indicated in Tables 5-14, Alternative #3's contribution to cumulative traffic impacts at all other intersections would be reduced with implementation of recommended mitigation measures to a level of less than significant.

Table 5-14: Intersection LOS Summary, With Mitigation – Cumulative plus Alternative #3 at Year 2035

Study Intersections	Cumulative plus Reduced Alternative		After Mitigation		Resulting Level of Significance
	Delay	LOS	Delay	LOS	
<u>AM/Sat Peak Hour</u>					
1 Hollis Street/40th Street^	222.3	F	226.9	F	another jurisdiction, SU
2 San Pablo Avenue/40th Street^	320.5	F	326.2	F	another jurisdiction, SU
7 Mandela Parkway/West Grand Avenue*	109.5	F	29.7	C	infeasible due to significant secondary effects, SU
<u>PM Peak Hour</u>					
1 Hollis Street/40th Street^	206.5	F	154.5	F	another jurisdiction, SU
2 San Pablo Avenue/40th Street^	247.1	F	246.2	F	another jurisdiction, SU
6 Frontage Road/West Grand Avenue*	127.5	F	128.4	F	LTS
7 Mandela Parkway/West Grand Avenue*	207.5	F	37.2	D	infeasible due to significant secondary effects, SU
8 Adeline Street /West Grand Avenue*	82.1	F	67.1	E	LTS
13 Broadway /West Grand Avenue*	81.1	F	76.1	E	LTS
15 Adeline Street/18th Street#	91.9	F	26.2	C	LTS
24 Adeline Street/ 5th Street	80.5	F	27.5	C	LTS

Intersection delays are shown in “seconds per vehicle”.

All intersections have signalized control with the exception of locations denoted with “#” which are controlled by roundabout under plus Project/Alternative scenarios.

“*” denotes intersection located in downtown Oakland or that provide direct access to downtown.

“^” denotes intersection located in Emeryville

“~” Saturday peak hour results are shown for the two Emeryville locations; AM peak hour results are shown for all other locations

Intersection delay and LOS were calculated based on a volume-weighted average of the Mandela Parkway two-way couplet intersection.

BOLD type indicates significant impact due to LOS, V/C, or queue length (Emeryville intersections only) reasons.

Source: Kittelson & Associate, 2013.

Alternative 4: Maximum Theoretical Buildout Alternative

Description of Alternative 4: Maximum Theoretical Buildout Alternative

The West Oakland Specific Plan land use program (i.e., the Project) is based on a detailed analysis of available Opportunity Sites, catalyst development in surrounding Opportunity Areas, and the estimated demand for new development in the Plan Area. The amount of new growth and development projected under the West Oakland Specific Plan assumes that development and growth would not occur on all parcels. This is a reasonable assumption insofar as the Plan Area is mostly developed and the disparate, largely private ownership patterns make it highly unlikely that new development and growth would exceed the “reasonably foreseeable” amount set forth in the West Oakland Specific Plan. Thus the West Oakland Specific Plan (the Project) is the basis for analysis of environmental effects.

Although development and growth under the Project would not likely occur on every parcel, the revised land use designations, height limits and zoning regulations adopted with the Plan would in fact apply to all parcels within the Plan Area. Thus, theoretically, every parcel in the Plan Area could be “built out,” consistent with the Specific Plan regulations. However, the Specific Plan regulations would not increase the allowable density/intensity on Plan Area parcels relative to existing regulations embodied in the current General Plan and Planning Code, and in fact would serve to reduce the allowable intensity of development throughout West Oakland’s industrial areas. However, because the Specific Plan’s regulations would apply to every parcel within the Plan Area, the Maximum Theoretical Buildout Alternative 4 evaluates the theoretical possibility that every parcel would be built out to the new maximum level permissible under the General Plan and Planning Code regulations as revised through adoption of the Specific Plan. These buildout assumptions include:

- all 66 acres of property designated with a High Intensity Business overlay are redeveloped at the maximum FAR of 4.0, resulting in approximately 11.5 million square feet of building space,
- all 49 acres of property designated with a Low Intensity Business overlay are redeveloped at the maximum FAR of 2.0, resulting in nearly 4.2 million square feet of building space,
- approximately 136 acres of property containing approximately 2.3 million square feet of space designated with the Business Enhancement overlay are retained and fully occupied,
- 18 acres of property designated with a Large Format Retail overlay are redeveloped at the maximum FAR of 4.0, resulting in approximately 3.1 million square feet of commercial building space,
- approximately 31 acres of property containing approximately 300,000 square feet of existing commercial space are retained and fully occupied,
- the West Oakland BART TOD is developed as proposed under the Project, which represents the maximum residential buildout that can be achieved given the new height limits under the Specific Plan, and
- all other potential new residential sites pursuant to the Specific Plan are redeveloped at the maximum residential density within the HBX-2 zone (1 unit per 930 sf of lot area).

Under the Maximum Theoretical Buildout Alternative, overall development would be substantially greater than the Project’s land use development program (roughly 3.3 times as much non-residential development and an approximately 8% increase in residential development as compared to the Project).

This theoretical growth potential is shown in **Table 5-15**. For the reasons stated above, the likelihood of “maximum buildout” occurring is considered so highly unlikely, if not impossible, it is referred to as theoretical.

Table 5-15: Development Buildout Assumptions, Maximum Theoretical Buildout Alternative

	Land Area (net acres)	Building Area (sq. ft.)	Jobs	Housing Units	Pop.
<u>Business/Industrial/Institutional</u>					
Existing	293	6,830,000	8,500		
Buildout	<u>244.5</u>	<u>18,011,600</u>	<u>37,290</u>		
Net Change	-48.5	11,181,600	28,790		
<u>Commercial/Retail</u>					
Existing	35	440,000	660		
Buildout	<u>49</u>	<u>3,436,320</u>	<u>7,010</u>		
Net Change	+ 14	2,996,320	6,350		
<u>Mixed Use – Comm./Res.</u>					
Existing	36	705,000	610	65	155
Buildout	61	<u>1,659,080</u>	<u>3,110</u>	3,729	8,450
Net Change	+25	954,080	2,500	+3,664	+8,295
<u>Residential</u>					
Existing	22			200	474
Buildout, Total	<u>31.5</u>			<u>1,674</u>	<u>3,499</u>
Net Change	+9.5			1,474	3,025
<u>Open Space</u>	<u>27</u>				
Total, Existing	413	7,975,000	9,770	265	629
Total, at Buildout	413	<u>21,538,840</u>	<u>47,410</u>	<u>5,403</u>	<u>11,949</u>
Net Change	0	13,563,840	37,640	5,138	11,320

The Maximum Theoretical Buildout Alternative assumes an increment of growth, particularly in non-residential use, that is substantially greater than the Project and therefore would result in greater environmental effects for nearly every environmental topic considered. Most of the Project’s significant and unavoidable (SU) impacts would be substantially increased in intensity under Alternative 4 when compared with the Project.

Comparative Environmental Assessment, Alternative #4

Aesthetics

Similar to adoption and development under the Project, individual developments that would occur under the Maximum Theoretical Buildout Alternative would be required to incorporate all the City's SCAs, as well as adhere to the City's design review process. Development under the Maximum Theoretical Buildout Alternative would be substantially greater than with the Project. However, with adherence to the City's SCA's and design review process, new development likely would continue to have similar, less than significant aesthetic effects as found for the Project.

Overall, the Maximum Theoretical Buildout Alternative would result in the similar, less than significant aesthetics, shadow and wind impacts (at project-level and cumulative) as identified for the Project. However, because the Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Project, the aesthetic changes in West Oakland would be substantially increased.

Air Quality

Given the substantially greater development and related construction activity that would occur under the Maximum Theoretical Buildout Alternative compared with the Project and the greater increase in residents and workers that would occur in the Plan Area, air quality emissions and the potential for exposing new residents to air pollutants would be greater than that identified for the Project. The Maximum Theoretical Buildout Alternative would result in greater levels of construction, average daily operational, and maximum annual operational emissions when compared with the Project. Therefore:

- the conservatively assumed significant and unavoidable (SU) air quality impact associated with emissions of criteria air pollutants during construction and operations as identified for the Project would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative, since new development would result in emission levels that exceed thresholds;
- under the Maximum Theoretical Buildout Alternative there still would be the potential for multiple new sources of TACs, each with a cancer risk less than 10 in one million, to cumulatively increase cancer risks to greater than 100 in one million. Therefore, the conservative SU air quality impact identified for the Project would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative;
- the Maximum Theoretical Buildout Alternative also would result in similar, same less than significant air quality impacts related to construction period dust and construction period TAC emissions, since all new development pursuant to the Maximum Theoretical Buildout Alternative would be subject to the same SCAs that would apply to the Project.

Overall, the Maximum Theoretical Buildout Alternative would result in similar significant and unavoidable air quality impacts as identified for the Project. Because the Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Project, these SU impacts related to air quality would be substantially increased under Alternative 4 when compared with the Project.

Cultural Resources

Under the Maximum Theoretical Buildout Alternative, all sites containing existing historic resources within the Plan Area would be redeveloped, and it would be unlikely that such intense development

would be able to avoid, adaptively reuse or appropriately relocate all historically significant structures. Therefore, the less than significant historic resource impact identified for the Project (because no demolition of historic resources is proposed or would be necessary to build out the Plan) would instead become a significant and unavoidable impact under the Maximum Theoretical Buildout Alternative.

All other cultural resources impacts under the Maximum Theoretical Buildout Alternative would be similarly less than significant as identified for the Project.

Greenhouse Gases and Climate Change

The increased development and related construction, operations and vehicle trips that would occur under the Maximum Theoretical Buildout Alternative would generate more annual greenhouse gas emissions compared to the Project. However, the Maximum Theoretical Buildout Alternative would result in a larger service population relative to the estimated annual greenhouse gas emissions. As such, the Maximum Theoretical Buildout Alternative would result in GHG emissions on a per service population ratio that falls below the threshold, similar to the conclusions reached for development pursuant to the Project. All applicable SCAs, including SCA F: GHG Reduction Plan still would be incorporated in future developments, as applicable.

As with the West Oakland Specific Plan, the Maximum Theoretical Buildout Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions.

Hazardous Materials

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area and construction activities involving demolition, soil disturbance and excavation could continue to potentially expose construction workers and residents to potential hazards and hazardous materials as identified for adoption and development under the Project. These potential hazardous materials include asbestos, PCBs, lead-based paint, contents of underground and aboveground storage tanks, and potentially contaminated soil and water. As with the Project, any new construction would incorporate applicable City SCAs, and therefore would result in similar, less-than-significant impacts associated with hazardous materials and hazards even though the extent of exposure would be greater given the increased development that would occur under the Maximum Theoretical Buildout Alternative.

Land Use, Plans and Policies

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area, but, development would be at a substantially greater scale compared with the Project. All new development would be required to be consistent with the General Plan and Oakland Zoning designations, as amended under the Plan. The increased development would not introduce land uses unlike those identified with in the Specific Plan, or locate these uses in a manner that would adversely affect existing communities or natural resources more than would the Project.

Noise

Given the substantially increased scale of development and related construction activity that would occur under the Maximum Theoretical Buildout Alternative compared with the Project, construction and operational noise impacts would be greater. However, any new construction would be required to comply with applicable City SCAs and would therefore have similar, less-than-significant construction noise impacts as would occur pursuant to the Project.

The Maximum Theoretical Buildout Alternative would result in substantially greater number of new vehicle daily trips as compared with the Project, and could result in new significant traffic noise and cumulative traffic noise impacts.

Population, Housing, and Employment

Under the Maximum Theoretical Buildout Alternative there would be substantially greater development in the Plan Area compared with the Project. As a result, there would be slightly greater total potential population and substantially greater employment under this Alternative. This level of development, if absorbed within West Oakland, would comprise a greater portion of the region's anticipated employment growth within the Plan Area than does the Project. This level of development is greater than the level of employment growth anticipated (but not theoretically possible) under the current General Plan. Therefore, the Maximum Theoretical Buildout Alternative would have new, significant population, housing and employment impacts as compared to the Project.

Public Services and Recreation Facilities

When compared with to the Project, substantially greater population growth and associated generation of new students would occur as a result of development under the Maximum Theoretical Buildout Alternative. The demand for public services, school facilities, and recreation facilities, and the use of such facilities, also would be greater under the Maximum Theoretical Buildout Alternative. Although all new development would be required to be consistent with the General Plan and to incorporate the City's SCAs, the potential remains that new or expanded public services and facilities may be required to maintain acceptable public service standards, given the increased demand associated with the Maximum Theoretical Buildout Alternative. However, future development would incorporate all City SCA's related to construction activity to ensure less than significant effects, therefore, it is not assumed the potential construction of new facilities that could be needed would result in adverse environmental effects.

Transportation and Circulation

The Maximum Theoretical Buildout Alternative would generate between 70% and 114% more traffic than would be generated by the Project. The Maximum Theoretical Buildout Alternative would continue to cause similar significant impacts as identified for the Project. Although specific intersection evaluation was not conducted, since the Maximum Theoretical Buildout Alternative would generate more traffic than the Project, it can be reasonably assumed that it would cause additional significant, and significant and unavoidable impacts not identified for the Project, and would increase the magnitude of the already identified significant and unavoidable impacts of the Project. The Maximum Theoretical Buildout Alternative is expected to have similar effects on non-traffic operation topics such as transportation safety and consistency with adopted policies, plans, or programs supporting alternative transportation, because the Maximum Theoretical Buildout Alternative would continue to provide similar policies as the West Oakland Specific Plan.

Utilities and Service Systems

Under the Maximum Theoretical Buildout Alternative, the demands for utilities and service systems would be greater than with the Project, given the increased development that would occur. There would be a greater demand for water and energy services, and for increased wastewater and solid waste disposal. Therefore, it is possible that construction of new facilities could be needed to accommodate the substantial level of increased development and demand. The level of development and population

growth under the Maximum Theoretical Buildout Alternative could result in the need to construct new or expanded utilities, including in particular water or wastewater facilities. All new development would be required to be consistent with the General Plan and to incorporate the City's SCAs, including in those intended to reduce adverse effects of construction activity to less than significant. New development under this alternative would also be required to adhere to all applicable federal, state and local statutes and regulations that would avoid adverse environmental effects related to energy and solid waste service demands.

Environmentally Superior Alternative

CEQA Guidelines require that the EIR identify an environmentally superior alternative (CEQA Guidelines, Section 15126.6), which is the CEQA alternative that reduces or avoids the environmental impacts identified for adoption and development under the Project to the greatest extent. Consideration of the environmentally superior alternative is based on the extent to which each of the CEQA alternatives reduces or avoids the significant and unavoidable impacts identified for the Project. The extent to which an alternative reduces or avoids less-than-significant impacts identified for the Project is also considered, balanced by consideration of the extent to which the impact affects the physical environment.

Summary of Comparative Assessment

No Project: Alternative 1

Under the No Project Alternative, the pace of new development within West Oakland would be expected to occur at a rate commensurate with development and building permit activity which has occurred over the past 10 to 15 years. It assumes that no new building space would be required to accommodate projected employment growth, that only about 100,000 square feet of mixed-use development would occur along prominent roadway corridors, and that residential growth would continue at a pace of approximately 136 units per year through to the year 2035 resulting in a total of approximately 3,000 total new housing units.

As described in the analysis above, the relatively small amount of new development under the No Project Alternative would substantially reduce the magnitude of potential environmental effects as compared to the Project, including a reduction in the frequency and scale of impacts for which the Project would already have less than significant effects, or for which SCAs would be capable of reducing impacts to a less than significant level. No impacts would be greater than those identified for the Project.

The No Project Alternative would also substantially reduce some of the significant and unavoidable impacts identified for the Project, but not necessarily to a level of less than significant. Impacts related to the exposure of sensitive receptors to excessive odors, the emission of construction-period criteria pollutants, the long-term emission of criteria pollutants and toxic air contaminants during operations, and the exposure of new sensitive receptors to gaseous toxic air contaminants would remain significant and unavoidable even though the extent to which these impacts would occur, and/or the number of new sensitive receptors exposed to these effects would be substantially less under this alternative as compared to the Project.

Because the amount of new growth and development projected under the No Project Alternative is so small, the traffic impacts of that growth would be substantially less than as projected for the Project. It

is unlikely that any of the significant and unavoidable traffic impacts identified under the Project would materialize under this alternative.

Because it would reduce the extent of significant air quality impacts and would likely avoid many, if not all of the significant traffic impacts as compared to the Project, the No Project is considered environmentally superior to the Project. However, Section 15126.6(e)(2) of the CEQA Guidelines requires that if the No Project Alternative is identified as the environmentally superior alternative, then the EIR shall identify another alternative as the environmentally superior alternative.

Reduced Project: Alternative 2

This Reduced Project Alternative presents a less intense development plan for West Oakland than as envisioned under the Project. It does not include any of the High Intensity Business overlay designations and assumes a much less intensive “mid-range” level of development throughout the Plan Area. Whereas the Project envisions an ultimate buildout of approximately 5,000 new dwelling units, the Reduced Alternative would accommodate a buildout of approximately 3,400 new dwelling units. Similarly, whereas the Project assumes a growth of approximately 4 million square feet of new business, industrial and commercial building space, the Reduced Alternative assumes development of less than 1 million square feet of new building space. This amount of new growth (by year 2035) is generally equivalent to ABAG’s projections for West Oakland by year 2020.

Under the Reduced Alternative, the lesser amount of new development would reduce the magnitude of potential environmental effects across the spectrum of topics analyzed, as compared to the Project. It would further reduce the frequency and scale of impacts for which the Project would already have less than significant effects, and would reduce the extent to which City of Oakland SCAs would be relied upon to reduce impacts to a less than significant level. No impacts would be greater than those identified for the Project.

The Reduced Alternative would also reduce the magnitude of some of the significant and unavoidable impacts identified for the Project, but not necessarily to a level of less than significant. Impacts related to the exposure of sensitive receptors to excessive odors, the emission of construction-period criteria pollutants, the long-term emission of criteria pollutants and toxic air contaminants during operations, and the exposure of new sensitive receptors to gaseous toxic air contaminants would remain significant and unavoidable, even though the extent to which these impacts would occur, and/or the number of new sensitive receptors exposed to these effects would be less under this alternative.

The number of peak hour vehicle trips generated by the Reduced Alternative would be approximately 2,300 AM peak hour trips less than that generated by the Project, and 2,800 PM peak hour trips less than that generated by the Project. Because the Reduced Alternative would generate less total traffic than would the Project, it would result in fewer significant traffic impacts. Of the 7 intersections found to be adversely affected by the Project’s traffic, 4 of these intersections would be adversely affected by the Reduce Alternative.

Because it would lower the extent of environmental impacts overall (even those indicated a being less than significant) as compared to the Project, reduce the extent of significant and unavoidable air quality impacts (even though not to a less than significant level), and would avoid several of the traffic intersection impacts as identified under the Project, the Reduce Project is considered environmentally superior to the Project.

Scenario with Commercial and Jobs Emphasis: Alternative 3

Alternative #3 is different than the Project in that Alternative #3 does not include many of the changes or conversions of industrial lands to mixed-use (which may include residential use) as proposed under the Project. Under Alternative #3, commercial or business uses (rather than residential use) are located in proximity to the freeways; the West Oakland BART station TOD would include a greater mix of uses including a substantially greater component of commercial/institutional office space; and retail uses (rather than high intensity business and industrial uses), would extend southward from the current West Oakland/Emeryville border to West Grand Avenue. Generally, Alternative #3 includes less residential development (3,500 new dwelling units versus 5,000 units) and more non-residential building space (nearly 4.2 million square feet versus 4.0 million square feet) as compared to the Project.

Alternative #3 would result in a generally similar amount of new development as would the Project, and would have a generally similar overall magnitude of potential environmental effects across the spectrum of topics analyzed as compared to the Project. The City of Oakland SCAs would be relied upon to reduce most of these impacts to a less than significant level.

Most strikingly, Alternative #3 would reduce the number of new sensitive receptors exposed to excessive odors and would reduce the number of new sensitive receptors exposed to diesel particulate matter and gaseous toxic air contaminants, especially at the West Oakland BART station TOD and at infill sites near the freeway. It would not substantially reduce the significant and unavoidable air quality effects associated with emissions of construction-period criteria pollutants, or reduce long-term emission of criteria pollutants and toxic air contaminants during operations

The difference between the Project and Alternative #3 is approximately 1,470 fewer households and approximately 1,240 more jobs under Alternative #3 than under the Project. As a result, Alternative #3 would generate approximately 150 fewer weekday peak hour trips as compared to the Project during both the AM and PM peak hours; however, its traffic patterns would result in significant impacts at two more intersections than the Project scenario. Since this Alternative would generate the same significant traffic impacts at the 6 intersections adversely affected by the Project and a 2 additional intersections, it would have slightly greater traffic impacts than does the Project.

Because it would, reduce the number of new sensitive receptors exposed to diesel particulate matter and gaseous toxic air contaminants), but would increase the number of traffic intersection adversely affected by increased traffic, Alternative #3 is considered environmentally balanced as compared to the Project and not environmentally superior to the Reduced Alternative.

Theoretical Maximum Buildout: Alternative #4

The Maximum Theoretical Buildout Alternative's overall development would be substantially greater, roughly 3.3 times as much non-residential development and an approximately 8% increase in residential development, as compared to the Project. Given the substantially greater development and related construction activity that would occur under the Maximum Theoretical Buildout Alternative compared with the Project, and the greater increase in residents and workers that would occur in the Plan Area, the Maximum Theoretical Buildout Alternative would result in greater impacts across the spectrum of issues analyzed in this EIR, would result in greater air quality emissions, would expose more new residents to air pollutants, and would generate more traffic than would the Project. Alternative #4 is not considered environmentally superior to the Project or to any of the other alternatives.

Identification of Environmentally Superior Alternative

In summary, the Reduced Alternative is considered the environmentally superior alternative, as it would avoid and/or substantially reduce impacts to the greatest extent as compared to the Project or to any of the other alternatives.

When considering the merits of the Project as compared to other alternatives, the City will also weigh and assess the degree to which the Project and these alternatives also achieve the basic objectives of the Project, as briefly summarized below:

- augment West Oakland's development capabilities;
- encourage growth of additional jobs and services;
- establish the most desirable and beneficial land uses within West Oakland;
- attract quality, compatible residential, commercial and industrial development while preserving existing established residential neighborhoods;
- support existing investment in the area and enhance existing assets;
- support commercial, mixed-use and transit-oriented land uses in West Oakland, especially including at the West Oakland BART Station;
- lessen existing land use conflicts and ensure avoidance of future conflicts between residential neighborhoods and non-residential uses;
- enhance transportation resources;
- further the physical and economic revitalization of West Oakland;
- correspond with regional development plans in accordance with West Oakland's Priority Development Area designation; and
- minimize the potential for displacement of existing residents.