

6. Alternatives to the Proposed Project

6.1 INTRODUCTION

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the 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. An EIR is not required to consider alternatives, which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

A “No Project” Alternative is required as part of a “reasonable range of alternatives” that could feasibly attain most or all of the project’s objectives.

As described above, other alternatives chosen as part of the reasonable range of alternatives should be chosen due their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project’s significant impacts. The proposed project would result in eight significant and unavoidable impacts. Some of these impacts, including Impacts AQ-2a and AQ-2b, would be reduced to the extent feasible with mitigation but cannot be reduced to less-than-significant levels because additional measures to reduce impacts would need to be considered during individual project-level review based on site-specific and project-specific characteristics. Because those projects and measures cannot be known at this time, these impacts are considered significant and unavoidable. Due to the programmatic nature of this Draft EIR, there are no alternatives that would lessen these impacts to a less-than-significant level.

Other significant and unavoidable impacts, including Impacts AQ-5, GHG-2, NOI-3, NOI-7, and TRAF-1, would be attributable to the combination of growth in San Leandro as well as regional, cumulative growth and measures outside of the City’s control. These impacts would not be substantially reduced through alternatives that adjust the intensity or location of land uses within San Leandro. For these reasons, it is difficult to develop a wide range of alternatives to the proposed project that would substantially lessen the significant impacts identified in the analysis in Chapter 4 of this Draft EIR. This chapter evaluates one alternative in addition to the No Project Alternative.

Each alternative is analyzed against the significance thresholds considered in Chapter 4, Environmental Analysis, of this Draft EIR. This chapter assesses whether the impacts of the alternatives would be greater than, less than, or similar to those of the proposed project.

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6.2 OVERVIEW OF PROJECT ALTERNATIVES

The alternatives to the proposed project are described below. Table 6-1 provides a summary of development program for each alternative.

- **No Project Alternative.** Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, under the No Project Alternative, neither the proposed General Plan Update nor the proposed Zoning Code amendments would not be adopted, and future development in the city would continue to be subject to existing policies, regulations, development standards, and land use designations under the existing San Leandro General Plan and Zoning Code. The General Plan land use map for the No Project Alternative would be the same as the City's current General Plan land use map. Total acreages of various land use designations would not differ drastically between the proposed project and the No Project Alternative. However, the No Project Alternative would not include the new higher density residential land use or transit-oriented development designations of the proposed project, nor would it include the increases in allowable residential densities associated with proposed Zoning Code amendments. Therefore, the No Project Alternative would result in less residential development than the proposed project. In terms of job growth, the No Project Alternative would not include the proposed Industrial Transition designation or the proposed Economic Development Element, with its job-generating focus on innovation, and local manufacturing and technology sector growth. Therefore, while the No Project Alternative might result in a similar amount of non-residential square footage by 2035, that square footage would be more likely to be warehousing or traditional manufacturing, containing a lower proportion of employees per square foot and therefore fewer jobs.
- **Reduced Industrial Development Alternative.** In the Reduced Industrial Development Alternative, portions of the General Industrial land use designation of the proposed project would be converted to residential uses. This would have the benefit of reducing new sources of Toxic Air Contaminants (TACs) from industrial uses, such as chemical processing, chrome-plating, plastics manufacturing, printing and photography, auto painting, food packaging, and decreasing facilities that would potentially be located near new sensitive receptors. Under this Alternative, proposed residential densities throughout the city would be slightly decreased overall, resulting in the same total number of housing units as the proposed project, yet spread over greater area of San Leandro. The reduced potential for new industry associated with this Alternative means that job growth would be less than that of the proposed project, and more consistent with 2035 ABAG projections (see Table 6-1). In addition, the proposed Zoning Amendments, in particular the proposed zoning map amendments, would be tailored to be consistent with a General Plan land use map that supports the Reduced Industrial Development Alternative.

6.3 ALTERNATIVES CONSIDERED INFEASIBLE

Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

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TABLE 6-1 COMPARISON OF THE PROPOSED PROJECT AND ALTERNATIVE HORIZON YEAR DEVELOPMENT PROJECTIONS

	Housing Units			Residents	Jobs
	Single-Family	Multi-Family	Total		
Proposed Project	755	4,840	5,595	14,790	12,130
No Project Alternative	Fewer than the proposed project				Fewer than the proposed project
Reduced Industrial Development Alternative	Same as proposed project				7,710

Source: Association of Bay Area Governments, Plan Bay Area, Projections 2013, City Table, Alameda County; City of San Leandro; PlaceWorks, 2015 (see Appendix B).

The City of San Leandro and community members indicated support for slow growth and minimal change. An alternative that would result in less overall growth was also considered in order to reduce project impacts associated with construction-related air quality and noise impacts. To accomplish a Lower Growth Alternative, the total area of higher-density land use designations would need to be reduced and the development intensities allowed under various other residential designations would need to be lowered. However, this Alternative was ultimately deemed infeasible because it prevented the City from meeting its Regional Housing Needs Allocation (RHNA), the affordability-based housing minimum mandated by the California Department of Housing and Community Development. In addition, reduced residential growth potential, combined with the high potential for job growth associated with proposed commercial, industrial, mixed-use, and transit-oriented development land use designations, would have increased jobs growth while dampening housing growth, preventing a healthy jobs/housing balance in the city. As such, the Lower Growth Alternative would not achieve many of the objectives of the proposed project, including those related to sustainable growth, provision of housing opportunities, and enhancement of local quality of life. Moreover, to the extent that many of the impacts identified in this Draft EIR are impacts resulting from both residential *and non-residential* growth in San Leandro, in combination with regional growth (transportation, air quality, greenhouse gases, and noise), a Lower Growth Alternative would not avoid those impacts, even with drastically lowered residential growth. The Lower Growth Alternative therefore was not further analyzed in this chapter.

6.4 OBJECTIVES ASSESSMENT

The overall direction of the proposed project is based on the overarching vision established by community members and City leaders early in the project process. That vision calls for a General Plan that establishes a foundation for ongoing opportunity for all residents, economic innovation, fiscal sustainability, and a diverse mix of neighborhoods. As listed in Chapter 3, Project Description, of this Draft EIR, the specific objectives of the proposed project are to:

- Preserve and enhance the high quality of life enjoyed by San Leandro residents.
- Create a positive environment for local business, and foster business retention and attraction.
- Grow more sustainably, and in a manner that reduces non-renewable resource consumption and greenhouse gas (GHG) emissions.

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- Reduce vehicle miles traveled (VMT) by creating “complete streets” that enhance opportunities for pedestrians, bicyclists, and transit users.
- Improve transportation safety and reduce the adverse effects of vehicle traffic on neighborhoods.
- Promote public health and safety.
- Create San Leandro’s fair share of new housing opportunities for persons of all incomes and special needs.
- Respond to demographic and economic changes.
- Promote and meet the needs of a diverse population.
- Direct future growth to appropriate locations and implement adopted transit-oriented development plans.
- Ensure that infill development, including major residential alterations and additions, is sensitive to and compatible with surroundings.
- Create a stronger sense of place, and improved connectivity between neighborhoods and shopping.
- Continue to provide high-quality parks and recreational facilities.
- Reduce the potential for loss of life and property due to a natural or man-made disaster.
- Improve access to the shoreline while protecting and restoring the waterfront environment.
- Adapt to the impacts of climate change.
- Improve open space in the city, including San Leandro Creek and the East Bay Greenway.
- Reduce conflicts between industrial and residential uses.
- Provide outstanding public services.
- Preserve historic resources.

6.4.1 NO PROJECT ALTERNATIVE

The proposed General Plan Update would carry forward many of the goals and policies of the existing General Plan. Thus the No Project Alternative would meet many of the objectives of the proposed project. However, the No Project Alternative would not include key changes to the City’s land use map that facilitate strategic, high-density, mixed-use, and transit-oriented development. These changes include the proposed Medium-High Residential and Bay Fair Transit-Oriented Development land use designations, the folding of the Office designation into the Transit-Oriented Development Mixed-Use and Neighborhood Commercial designations, and the increased density allowed in High Density Residential areas. Without these changes, the No Project Alternative would not fully achieve the City’s objectives to create a positive environment for local business, grow sustainably in a manner that reduces VMT and GHG emissions, direct future growth to transit-oriented locations, create housing opportunities for persons of all incomes and special needs, or respond to current demographic changes.

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The No Project Alternative would adhere to the current General Plan focus on preservation of land for warehousing and distribution, as opposed to the proposed project goals of creating innovation districts, placing San Leandro on the leading edge of the Bay Area’s manufacturing and technology economy, and reducing conflicts between industrial and residential uses. These deficiencies would further prevent this Alternative from meeting the objective of creating a positive business environment that sustains economic growth and fosters fiscal health.

6.4.2 REDUCED INDUSTRIAL DEVELOPMENT ALTERNATIVE

The policy foundation of the Reduced Industrial Development Alternative is similar to the proposed project. However, the key characteristic of this Alternative—replacement of some areas of General Industrial land use with residential land use—would affect the degree to which it would achieve certain project objectives.

Because this Alternative would reduce the potential for land uses that emit dangerous, industrial-based TACs and other pollutants as compared to the proposed project, it would better work to preserve the quality of life of San Leandro residents, support growth that reduces air pollution emissions, and promote general public health and safety, all key project objectives. However, the same loss of industrial land would prevent this Alternative from fully meeting the objectives of job generation and industry retention in San Leandro.

6.5 IMPACT ASSESSMENT

In the following sections, each alternative is analyzed against the impact factors considered for the proposed project, according to whether it would have effects similar to, greater, or less than the proposed project. An Environmentally Superior Alternative is selected in Section 6.6.

6.5.1 NO PROJECT ALTERNATIVE

As noted above, CEQA Guidelines Section 15126.6(e) requires that an EIR analyze a “No Project” alternative. Under the No Project Alternative, the proposed project would not be adopted, and future development in the city would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing San Leandro General Plan and Zoning Code.

6.5.1.1 AESTHETICS

As explained in Chapter 4.1, Aesthetics, the proposed project would result in three less-than-significant impacts and one no impact to aesthetics.

The proposed project would not significantly impact any scenic vistas because in areas of the city with designated scenic views, including views west to the Bay from the Shoreline and hills above Interstate 580 (I-580), development patterns are built out and proposed land use designations are consistent with existing development patterns. Most of those proposed designations—garden residential, commercial and open space—are consistent with the existing General Plan, and thus with the No Project Alternative.

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However, the No Project Alternative would not include a series of land use policies developed to strengthen waterfront and shoreline views, as included in the proposed project.

There are no highways in San Leandro officially designated as Scenic by Caltrans Highway. Therefore, like the proposed project, the No Project Alternative would have no impact on such an aesthetic resource.

The proposed project would not significantly degrade the existing character of the site and its surroundings. As explained in Chapter 4.1, this is because the preservation of significant natural areas, views, gateways and scenic natural resources identified by the City is accounted for in a series of proposed goals, policies and actions developed specifically to protect aesthetic resources. While the No Project Alternative would include site preservation and design policies of the existing Historic Preservation and Community Design Element, it would not include those proposed policies to strengthen Downtown beautification and design guidelines, promote quality industrial area urban design, promote visual arts and placemaking, target public improvements in specific locations, and improve street beautification efforts.

Finally, the proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area. Although the development of commercial and business/industrial uses in certain areas of the city associated with the proposed Plan may have the potential to substantially increase lighting and glare levels, both the existing State regulation of light pollution and proposed policy in the Land Use and Open Space and Conservation elements would reduce the impact of those increases to less-than-significant levels. While the No Project Alternative would allow for less commercial, urban style development with the potential to significantly increase light and glare, it would not include new General Plan actions targeting light control. Thus, it would have a similar impact in comparison to the proposed project.

Overall, the No Project Alternative would have a *greater* impact to aesthetics as compared to the proposed project.

6.5.1.2 AIR QUALITY

As shown in Chapter 4.2, Air Quality, the proposed project would result in two less-than-significant impacts, two significant and unavoidable impacts, and one significant but mitigable impact to air quality. Under the proposed project, VMT per population and per service population would be reduced from existing levels, and proposed General Plan policies would not conflict with an applicable air quality plan, including the Bay Area Air Quality Management District's (BAAQMD) 2010 Bay Area Clean Air Plan.

The No Project Alternative would result in an overall lower level of growth than the proposed project, with fewer projected residents and jobs. This lower growth and balance in jobs and housing would be expected to reduce VMT, and thus result in fewer emissions than the proposed project. However, the No Project Alternative would not include transit-oriented land use designations and several new land use and transportation policies that would promote transit use and non-auto trip patterns. The proposed project would also achieve the BAAQMD efficiency target of 6.6 metric tons of GHG emissions per service population (residents plus employees) for 2020, and would also be on a trajectory to achieve the 2035 target recently identified in Executive Order B-30-15 (see Section 6.5.1.6, below). The No Project Alternative would not include the same GHG emissions reductions policies and transit-oriented land uses

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that would be adopted under the proposed project, and would therefore achieve less consistency with the above regulations.

As explained in Chapter 4.2, despite implementation of the policies in the proposed project, criteria air pollutant emissions associated with the proposed project and proposed project construction activities would cause a substantial net increase in emissions that exceeds the BAAQMD regional significance threshold. These two impacts would remain significant despite mitigation measures. The proposed project includes policies to reduce criteria air pollutants to the maximum extent practicable, several of which would not be adopted under the No Project Alternative. However, the No Project Alternative would produce less transportation-related emissions. Under both the proposed project and No Project Alternative, subsequent environmental review of development projects would be required to assess potential operational emissions impacts under BAAQMD's project-level thresholds. Measures to reduce criteria air pollutant emissions would be considered during individual project-level review under both the proposed project and No Project Alternative. However, those projects and measures cannot be known at this time. Therefore, the No Project Alternative would not avoid this significant and unavoidable impact.

Implementation of the proposed project would expose sensitive receptors to new sources of substantial concentrations of TACs, an impact deemed significant. New industrial development allowed under the proposed project, such as chemical processing, chrome-plating, plastics manufacturing, printing and photography, auto painting, food packaging, and decreasing facilities, would have the potential to generate substantial stationary and transportation-related sources of emissions near housing and other sensitive receptors. Mitigation in the form of a required health risk assessment (HRA) for non-residential land uses within 1,000 feet of a sensitive land use would reduce the impact to less than significant. The No Project Alternative would include the existing General Plan focus on retention of general industry and manufacturing, and thus would also result in significant emissions of TACs.

As stated in Chapter 4.2, odor impacts of the proposed project would be minimized by review of projects using BAAQMD's odor screening distances during future CEQA review, implementation of a series of land use and environmental hazards policies, and compliance with BAAQMD Regulation 7 to a less than significant level and no mitigation measures are required. The No Project Alternative would include relevant General Plan policies and would be subject to the same regulation.

Overall, the No Project Alternative would have *similar* air quality impacts to the proposed project.

6.5.1.3 BIOLOGICAL RESOURCES

As shown in Chapter 4.3, Biological Resources, the proposed project would result in less-than-significant impacts to biological resources.

Under the No Project Alternative, new development would continue throughout the city under existing plans and regulations. As under the proposed project, future development and land use activities would occur primarily in urbanized areas where biological resources are limited. The potential for occurrence of special-status species, sensitive natural communities, wetlands, riparian habitat, or wildlife corridors in these areas is generally remote in comparison to undeveloped lands with natural habitat accommodating the range of species known to occur within the EIR Study Area. Regardless, like the proposed project, the No Project Alternative would include policies involving preservation of open space, expansion of

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parklands, creek stewardship, ecosystem management and restoration of the San Leandro Creek Corridor and shoreline marshlands, as well as an existing General Plan action which calls for site-specific biological assessments. As such, like the proposed project, the No Project Alternative would have less-than-significant impacts to special-status species or sensitive communities, nor would it interfere substantially with the movement of resident or migratory species.

Similar to the proposed project, the No Project Alternative would have less-than-significant impacts to federal wetlands. This is because potential impacts to resources such as San Leandro Creek would be mitigated by implementation of the site assessments called for by the action identified above, as well as environmental review and oversight by regulatory agencies entrusted with enforcement of State and federal regulations addressing the protection and management of wetlands. As noted in Chapter 4.3, no conservation plans have been adopted encompassing all or portions of San Leandro, and thus neither the proposed project nor the No Project Alternative could conflict with such a plan.

Finally, like the proposed project, the biology and conservation related policies identified in Chapter 4.3 and described above mean the No Project Alternative would result in less-than-significant cumulative impacts to biological resources.

Overall, the No Project Alternative would have a *similar* impact to biological resources as the proposed project.

6.5.1.4 CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources, the proposed project would result in less-than-significant impacts to cultural resources.

Under the No Project Alternative, new development would continue throughout the city under existing plans and regulations. As explained in Chapter 4.4, there are 54 identified historic resources, ten archaeological sites, and assumed potential for paleontological resources in the city. These could all be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or No Project Alternative. However, the potential impact of the proposed project to these resources was found to be less than significant, due to implementation of proposed General Plan policies and application of existing federal, State, and local laws and regulations. Because the No Project Alternative would include General Plan policies for cultural and historical resource preservation, and remain subject to the same laws and regulations, it would also have less-than-significant impacts on those resources.

Like the proposed project, the No Project Alternative would be subject to the procedures for conduct following the discovery of human remains set forth in California Health and Safety Code, Public Resources Code and the California Code of Regulations. As such, the alternative would also have a less-than-significant impact related to disturbance of human remains.

The No Project Alternative would not include proposed policies to protect tribal cultural resources and paleontological resources, and therefore may result in adverse effects that would not occur under the proposed project.

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Overall, the No Project Alternative would have a *greater* impact to cultural resources as compared to the proposed project.

6.5.1.5 GEOLOGY, SOILS, AND SEISMICITY

As described in Chapter 4.5, Geology, Soils, and Seismicity, the proposed project would result in less-than-significant impacts related to geology, soils and seismicity.

The proposed project would not result in substantial soil erosion or loss of topsoil. Compliance with existing regulatory requirements, such as implementation of erosion control measures specified in the City's Municipal Code and the City's grading and drainage requirements for new developments, would ensure that impacts associated with substantial erosion and loss of topsoil would be less than significant. Because the No Project Alternative would be required to comply with those regulations, it too would avoid significant impacts from soil erosion or loss of topsoil.

Like the proposed project, the No Project Alternative would not result in a significant impact related to development on unstable geologic units or result in lateral spreading, subsidence, liquefaction, or collapse. Development under both scenarios would have to comply with California Building Code (CBC) requirements adopted in the San Leandro Municipal Code, which require detailed geotechnical studies in areas of suspected geologic hazards. Both would also be subject to proposed project policies requiring submittal of geologic studies prior to development in hazardous areas, further mitigating potential significant impacts.

Although the shrink-swell potential for some of the dominant soil types in San Leandro has been found to be high, the proposed project would not create substantial risks to property as a result of its location on expansive soil. Compliance with existing State and local laws and regulations, such as the CBC, and proposed General Plan Action EH-1.1-A would ensure that the impacts associated with development on expansive soil are minimized, by requiring the submittal and review of detailed soils and/or geologic reports prior to construction. The No Project Alternative would include this General Plan action and remain subject to CBC requirements. Consequently, it too would have a less-than-significant impact related to expansive soils.

Finally, like the proposed project, development under the No Project Alternative is not expected to require the use of septic tanks or alternative wastewater disposal systems, as wastewater would be discharged into the existing public sanitary sewer system. Therefore, the impact of the No Project Alternative from the use of septic tanks or alternative wastewater disposal systems would be less-than-significant as well.

Overall, the No Project Alternative would have a *similar* geology, soils, and seismicity-related impact as the proposed project.

6.5.1.6 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.6, Greenhouse Gas Emissions, the proposed project would result in one less-than-significant impact and one significant and unavoidable impact associated with GHG emissions.

The climate change analysis in Chapter 4.6 found that, compared to the existing baseline emissions inventory, the City would experience a decrease of GHG emissions in 2020 as a result of State and federal

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regulations adopted to reduce GHG emissions. The analysis reveals that under the proposed project, the City would achieve BAAQMD's year 2020 efficiency metric of 6.6 MTCO₂e/SP, which is consistent with the GHG reduction targets of AB 32. The analysis also shows that the proposed project would achieve the BAAQMD efficiency metric for year 2035, which would ensure the City maintains a trajectory consistent with the GHG reduction target of Executive Order B-30-15. The impact of GHG emissions to the environment (GHG-1) was found to be less than significant.

Development under the No Project Alternative would be subject to the same State and CEQA requirements and permitting processes as the proposed project. However, the No Project Alternative would not include the General Plan land use designations and policies of the proposed project, nor the proposed Zoning Code amendments. These include transit-oriented and high-density land uses and development policies, as well as new policies in support of Complete Streets and non-automobile trip patterns. Therefore, the No Project Alternative would not achieve the equivalent future reduction in VMT and GHG emissions from on-road transportation sources as the proposed project would.

The analysis in Chapter 4.6 concluded that the proposed project would have a significant and unavoidable impact due to a conflict with one element of AB 32 (GHG-2). The *First Update to the Scoping Plan* requires local governments to adopt emissions reduction targets consistent with the statewide goal of reducing emissions 80 percent below 1990 levels by 2050. While the proposed project would achieve efficiency targets for 2035 and support progress toward long-term goals, additional GHG reductions from new technologies and/or State and federal measures outside the City's control would be necessary to achieve the more aggressive target of an 80 percent reduction below 1990 levels by 2050. However, the proposed project was deemed consistent with, and supportive of, *Plan Bay Area* by encouraging development in identified Priority Development Areas (PDAs). It was also found to be consistent with the goals and actions of the City's 2009 Climate Action Plan (CAP), with policies related to energy upgrades, mobility choices, and waste reduction.

The existing General Plan, which would be carried forward under the No Project Alternative, was developed before the adoption of AB 32, *Plan Bay Area*, or the City's CAP. It follows that it would be less responsive to, and more inconsistent with, those plans and regulations than the proposed project, and therefore would make even less progress toward CARB's 2050 GHG emissions reductions targets than the proposed project.

Overall, the No Project Alternative would have a *greater* GHG-related impact than the proposed project.

6.5.1.7 HAZARDS AND HAZARDOUS MATERIALS

As shown in Chapter 4.7, Hazards and Hazardous Materials, the proposed project would result in less-than-significant impacts associated with hazards and hazardous materials.

As described in the analysis in Chapter 4.7, future development in the city would be subject to or could involve the use or handling of hazardous materials. These hazards would apply to the No Project Alternative as they would to the proposed project. Hazardous materials are routinely used, transported, and handled throughout the city. Commercial and industrial land uses under either the proposed project or No Project Alternative could use, store, or generate hazardous materials. It is possible that some of these uses could occur within a quarter mile of an existing or proposed school. Under both the proposed

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project and No Project Alternative, new development could occur on properties that possibly are contaminated and inactive, undergoing evaluation, and/or undergoing corrective action. Construction activities could have the potential to release potentially hazardous soil-based materials into the environment, and demolition of existing structures could potentially result in release of hazardous building materials. Use of hazardous materials on newly-developed properties could include cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the uses that could occur under either the proposed project or No Project Alternative.

These activities are subject to a variety of federal, State, and local laws, policies, and regulations. In addition, the proposed project contains policies that would further ensure that new development would not create a significant hazard through routine transport, use, or handling of hazardous materials. These policies would remain in place under the No Project Alternative, with the exception that some proposed policy revisions (including new actions related to the Alameda County Hazardous Waste Management Plan, ensuring pipeline safety, and monitoring rail transport of hazardous materials; as well as enhancements to existing hazardous waste policies) would not be adopted.

Development under the proposed project does not contemplate land use changes within the Airport Land Use Compatibility Plan (ALUCP) or Airport Influence Areas for the Oakland International or Hayward Executive Airports. Future development primarily allows varying levels of residential and commercial development and does not change current General Plan land use designations. The proposed project also includes policies intended to minimize risk to all San Leandro residents and employees. These land use designations and policies would be included under the No Project Alternative as well.

As stated in Chapter 4.7, there are no private airstrips in the vicinity of the locations where future development could occur as a result of implementation of the proposed project. Therefore, neither the proposed project nor the No Project Alternative would expose people to hazards associated with private airstrips.

The proposed project contains revised policies that would ensure that new development would not conflict with emergency operations in San Leandro. These policies would not be adopted under the No Project Alternative.

Finally, much of the area surrounding San Leandro east of I-580 is considered to have a moderate and high risk of wildland fire. However, in both the case of the proposed project and No Project Alternative, development would occur mostly in the urbanized center of the city. In addition, both scenarios would include a series of policies and actions to minimize risks involving wildland fires to the maximum extent practicable. Neither the proposed project nor the No Project Alternative would exacerbate existing wildland fire hazards.

Overall, because the No Project Alternative would not include the adoption of several proposed policies and policy upgrades related to hazards, its impact related to hazards and hazardous materials would be *greater* in comparison to the proposed project.

6.5.1.8 HYDROLOGY AND WATER QUALITY

As shown in Chapter 4.8, Hydrology and Water Quality, the proposed project would result in less-than-significant impacts associated with hydrology and water quality.

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Construction and operation of development projects allowed by either the proposed project or No Project Alternative would have the potential to impact water quality and cause erosion and siltation. However, development under both scenarios would be required to comply with existing regulations and guidance documents that would minimize these impacts. The proposed project includes policies that would ensure potential impacts to water quality would not occur with its implementation. Most of these policies would remain in place under the No Project Alternative, with the exception of some proposed policy revisions and new policies. However, compliance with applicable regulations would be expected to prevent significant water quality impacts under the No Project Alternative.

As under the proposed project, much of the future development permitted by the No Project Alternative would be located on sites that have already been developed and have a high percentage of impervious surfaces. However, infill development could take place on undeveloped and unpaved sites and development would be allowed in some areas that currently contain only sparse development. Overall, development allowed under either the proposed project or No Project Alternative would be expected to increase impervious surfaces above the current amount, which could result in a change in drainage patterns that would interfere with groundwater recharge, exceed the capacity of existing or planned stormwater drainage systems, or contribute to on-site or off-site flooding. Applicants for new development and redevelopment under either the proposed project or No Project Alternative would be required to implement design measures and best management practices, as well as meet City Municipal Code requirements, to contribute to groundwater recharge and minimize stormwater runoff and water degradation to less than significant levels.

As discussed in Chapter 4.8, the proposed project would not deplete groundwater resources, as water supplied to the City of San Leandro from the East Bay Municipal Water District (EBMUD) is currently 100 percent from surface water supplies. Additionally, impacts to groundwater would be minimized by a series of groundwater and water conservation policies in the proposed project. Both the surface source of the City's water and most of these policies would remain in place under the No Project Alternative. As such, the No Project Alternative would not deplete groundwater resources either.

Development under the proposed project could result in the placement of residential structures in existing FEMA-designated 100-year Special Flood Hazard Areas (SFHAs). However, compliance with adopted standards for construction in flood hazard zones would ensure that flood flows are not impeded or redirected. As detailed in Chapter 4.8, portions of the Shoreline Development project east of the marina are within the 100-year floodplain, as are parts of the Bay Fair area, with potential flooding in and around the Bayfair Center and the residential area south of Coelho Drive. Although some residential development would occur within floodplains under the No Project Alternative, this alternative would not include the proposed intensification of residential development potential, through new transit-oriented and residential land use designations, in the Bay Fair area. However, since the Shoreline project is already approved, it would occur under either the No Project Alternative or the proposed project. Existing standards to prevent the impedance of redirection of flood flows would apply to development under both the proposed project and the No Project Alternative.

There are isolated pockets of San Leandro east of I-580 that may be susceptible to debris flows/mudslides, but the City has specific development and permit requirements for building in these, and the proposed project includes policies that would reduce potential impacts regarding landslides and other hazards. These policies would remain in place under the No Project Alternative.

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The No Project Alternative would allow less overall development than the proposed project, thereby exposing fewer people and structures to flooding risks, increasing water demands by a lesser amount, and decreasing potential water quality impacts. It would also result in less intense residential development within 100-year floodplains. As a result, even though the No Project Alternative would not involve the same beneficial new and upgraded hydrology-related policies that are included in the proposed project, the impact of the No Project Alternative would be *less* than the proposed project.

6.5.1.9 LAND USE AND PLANNING

As concluded in Chapter 4.9, Land Use and Planning, the proposed project would result in less-than-significant impacts associated with land use and planning.

Like the proposed project, the No Project Alternative does not propose any new major roadways or physical features, or propose development that would conflict with land uses in existing neighborhoods. It also includes the goals, policies and actions to promote cohesive neighborhoods included in the proposed project, with the exception of one addition. As such, like the proposed project, it would not physically divide an established community.

The proposed project was found to not conflict with any land use plans adopted for the purpose of avoiding or mitigating an environmental effect. It was found to be consistent with MTC's *Plan Bay Area* as a result of proposed development that is consistent with the three PDAs (including the Bay Fair Potential PDA) identified in the city, as well as land use and transportation policies that promote non-vehicular travel. While overall development patterns in the city would be similar under the No Project Alternative, the existing General Plan was developed before the adoption of *Plan Bay Area* and identification of PDAs. Although the PDA designations are separate from the General Plan and would remain in place under the No Project Alternative, the No Project Alternative would also lack a series of new and enhanced transit-oriented development- and Complete Streets-related policies and actions included as part of the proposed project, as well as transit-oriented and high-density land use and zoning changes. Therefore, the No Project Alternative would be less consistent with *Plan Bay Area*.

Similarly, the No Project Alternative would not include a series of new and updated open space policies designed to protect and enhance the shoreline and Bayfront areas of San Leandro. For that reason, while it does share some related policies with the proposed project, it would be less consistent with the shoreline-focused *San Francisco Bay Plan* and BCDC's Public Access Design Guidelines. On the other hand, similarities in policies between the proposed project and No Project Alternative mean that both are consistent with ABAG's Bay Trail Plan, as well as the Oakland Airport Land Use Compatibility Plan.

Overall, the No Project Alternative would have a *greater* land use and planning-related impact than the proposed project.

6.5.1.10 NOISE

As concluded in Chapter 4.10, Noise, the proposed project would result in one potentially significant but mitigatable impact and two significant and unavoidable impacts associated with noise.

Under both the proposed project and No Project Alternative, groundborne vibration generated by construction equipment would have the potential to be substantial. Overall, vibration impacts under both

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the proposed project and No Project Alternative related to construction would be short-term, and restricted to areas in the immediate vicinity of construction equipment. Proposed policies and actions under the proposed project would serve to avoid significant vibration impacts from construction. Not all of these policies and actions would be maintained under the No Project Alternative. Therefore, the No Project Alternative could result in a significant impact that would not occur under the proposed project.

Under both the proposed project and the No Project Alternative, as a result of implementation of the General Plan and ongoing regional growth, it is anticipated that there would be substantial permanent increases to the ambient noise levels throughout San Leandro. These increases would primarily result from increases to transportation-related noise, especially that of automobile traffic. Although there would be less growth under the No Project Alternative, the proportional decrease in traffic, compared to the overall increases from regional growth, would likely not be substantial enough to significantly decrease ambient noise levels below the proposed project. Policies under the proposed project would serve to reduce noise from vehicles at the source and to otherwise shield sensitive uses from excessive noise. Under the No Project Alternative, most of these policies would be maintained, although some relevant revisions would not be adopted. Even with existing regulations and proposed policies, this would be a significant and unavoidable impact for both the project-specific and cumulative setting under both the proposed project and No Project Alternative.

None of the policies in the existing or amended General Plan address noise generated by construction. Therefore, in the case of both the proposed project and No Project Alternative, noise from construction equipment and various construction-related activities could be a frequent cause of temporary or periodic increases in ambient noise levels, resulting in a potentially significant impact from both. However, this impact could be mitigated to a less-than-significant level by incorporating a review of project-level noise impacts into the City's environmental evaluation and approval process.

No land within the city limit is located within Oakland International Airport's 65 A-weighted decibel (dBA) noise contour. As the proposed project and No Project Alternative would contain the same city boundary, the impact due to noise levels produced by public airports would be less than significant in both cases. Similarly, due to their distance from San Leandro and minimal operations, the noise impacts of the nearest heliport and private airstrip were deemed less than significant from the proposed project. These conditions would remain in the case of the No Project Alternative.

Chapter 4.10 concludes with a statement of significant and unavoidable cumulative noise impacts, stating that all conceivable mitigations would be, in some circumstances, economically impractical and scientifically unachievable outside the City's jurisdiction, and/or inconsistent with City planning goals and objectives. The infeasibility of these mitigations would remain in the case of the No Project Alternative, and thus have a similar impact.

Overall, the No Project Alternative would have a *greater* noise impact as the proposed project.

6.5.1.11 POPULATION AND HOUSING

As concluded in Chapter 4.11, Population and Housing, the proposed project would result in less-than-significant impacts to population and housing.

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Chapter 4.11 explains that implementation of the proposed project would be largely consistent with ABAG's 2013 projections for population and housing, but exceed projections for jobs within San Leandro. However, implementation of the proposed project would guide development through the horizon year of 2035. Current Housing Element policies and proposed policies within the Economic Development and Land Use Elements, would ensure that adequate diversity and supply of housing is maintained to sustain a healthy jobs-to-household balance within the city. Furthermore, the General Plan serves as the Constitution for the City's physical development, thus, the aforementioned policies would provide the framework to adequately plan orderly development under the proposed project through the 2035 horizon year. The No Project Alternative would not include many of the proposed policies in support of strategic and transit-oriented housing. However, as the continuation of the existing General Plan, it would also not include the proposed Economic Development Element, with its focus on job-generating innovation, and local manufacturing and technology sector growth. As a result, job growth under the No Project Alternative would remain consistent with ABAG projections, which are based on the existing General Plan.

Implementation of the proposed project would result in an increase of 5,595 new residential units within San Leandro over a 19-year period. Future housing would be concentrated primarily in PDAs, particularly the Downtown Area, along with the Shoreline Development Plan Area. Proposed density requirements create a strong incentive to develop larger parcels with higher allowed density, thereby reducing the risk of displacing existing residential housing on the smaller lots. In addition, if already-developed parcels are targeted for redevelopment within the Downtown Area, the density requirements established by the proposed Zoning Code amendments would ensure that an adequate amount of housing units are replaced. While there is still the potential that the proposed project policies and programs could encourage increased residential growth that temporarily displaces existing housing units, compliance with the San Leandro Zoning Code and Housing Element policies would ensure that adequate housing is preserved and replaced. Thus the impact of the proposed project on displacement was deemed less than significant. Under the No Project Alternative, future development would continue to be subject to existing development standards and land use designations of the existing San Leandro General Plan and Zoning Code, which do not include proposed high-density residential and transit-oriented development land use designations, or associated Zoning Code amendments. As such, the increase in housing units under the No Project Alternative would be less than the proposed project, and the impact would also be less than significant.

Overall, the No Project Alternative would have a *similar* impact on population and housing as the proposed project.

6.5.1.12 PUBLIC SERVICES AND RECREATION

As concluded in Chapter 4.12, Public Services and Recreation, the proposed project would result in less-than-significant impacts to public services and recreation.

Although growth associated with the proposed Plan could result in the need for expansion or construction of fire protection facilities, significant environmental impacts would be prevented by compliance with State and local building standards and codes, and adherence to a series of goal, policies, and actions in the Community Services and Facilities and Environmental Hazards Elements that would ensure adequate fire protection services are available for residents. The No Project Alternative would result in less population growth than the proposed project, and thus generate fewer new calls for fire protection and

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emergency services. The physical expansion of facilities would also be required to be compliant with the same building standards and codes. The No Project Alternative would also include most of the proposed General Plan policies targeting fire protection. As such, it would have a slightly less significant impact on fire services as the proposed project.

Similarly, the proposed project would not result in the need for new or physically altered police protection facilities. This is because although the SLPD has indicated that it is currently not meeting its preferred service ratio formula of 10.4 officers per 10,000 residents, it anticipates addressing an increase in population under the proposed project through increased staffing rather than facility expansion. In addition, compliance with the General Plan goals and policies would ensure adequate police protection services are available for residents of San Leandro. Because the No Project Alternative would result in fewer residents than the proposed project, and the SLPD would be assumed to address growth via staffing increases as well, the impact on the SLPD would be less severe than the proposed project.

Chapter 4.12 also found that the proposed project would not result in the need for new or physically altered school facilities. The mandatory payment of developer impact fees pursuant to SB 50, together with the adoption and implementation of the proposed project policies and actions that support the schools in San Leandro, would ensure that impacts to the San Leandro and San Lorenzo Unified School Districts would be less than significant. Again, because SB 50 would remain in place under the No Project Alternative, and this alternative would result in less population growth than the proposed project, it would also have a less-than-significant impact.

Adherence to Section 7-13-100 of the City's Municipal Code would require the payment of park impact fees for public parks and recreational facilities, thereby mitigating any potential impacts to parks in San Leandro by both the proposed project and No Project Alternative. In addition, both the proposed project and No Project Alternative include goals, policies, and actions in the Land Use and Open Space, Parks and Conservation Elements that would minimize potential impacts to parks. The potential impacts to parks under both scenarios would be less than significant.

Finally, the San Leandro Public Library (SLPL) has indicated that they would need to increase the hours of operation in order to accommodate future demand under the proposed project. However, there are current plans to construct a new modern facility at the existing Mulford-Marina Branch location, even under the existing General Plan. In addition, the SLPL offers a wide range of materials available through its online databases. Thus, an increase in a service population does not necessarily result in an additional book or magazine collection, which often requires additional library space. The SLPL is primarily funded by County property taxes, which new development in San Leandro would have to pay. As a result, the impact associated with new or physically altered library facilities would be less than significant in the case of both the proposed project and No Project Alternative.

Overall, although the No Project Alternative would result in less housing growth than the proposed project, and would therefore create less demand for public services, neither the proposed project nor the No Project Alternative would result in significant impacts to public services. Therefore, the No Project Alternative would have a *similar* impact on public services and recreation as the proposed project.

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As concluded in Chapter 4.13, Transportation and Traffic, the proposed project would result in two significant and unavoidable impacts, one no impact, and three less-than-significant impacts to transportation and circulation.

Implementation of the proposed project would result in a significant and unavoidable impact associated with increased vehicle traffic which would affect the operations of local intersections and freeway segments. The proposed project would cause 15 intersections to degrade below unacceptable level of service (LOS) standards. It would also contribute to eight freeway segments to operate at unacceptable levels under the cumulative plus project condition. Regardless of mitigation, including the introduction of traffic improvements at problem areas and coordination with Caltrans to identify potential improvements, these would remain significant. By the horizon year of 2035, the No Project Alternative would result in less development than the proposed project, and therefore may result in fewer impacts to roadway intersections and segments. However, the No Project Alternative would not include the series of proposed policies related to and in support of transit oriented, non-auto trip patterns, and Complete Streets. As such, the impacts of this alternative and the proposed project would be different, but of similar severity.

A second significant and unavoidable impact to the Metropolitan Transportation System (MTS) roadway network and the MTS transit operators was also identified. The proposed project would cause the volume-to-capacity (v/c) ratio on the northbound segment of Doolittle Drive, which would operate at LOS F, to increase by more than 0.03, and it was concluded that neither widening Doolittle Drive nor providing strategic shuttle services would mitigate this impact. As shown in Table 4.13-20, this segment of Doolittle would remain at LOS F under the No Project Alternative.

Neither the proposed project nor No Project Alternative would result in a change to air traffic patterns, as in both cases the planning area is not located near any airport approaches or departure zones, and development within the city boundary would not be expected to have a potentially significant impact to air traffic. Similarly, neither the proposed project nor No Project Alternative would substantially increase hazards due to circulation-related design features. Both are program-level planning efforts that do not directly address project-level design features. Additionally, any roadway construction associated with new development would be designed and reviewed in accordance with the City of San Leandro Standard Details, administered by the City Engineering & Transportation Department.

The proposed project was found to not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. The City of San Leandro's Bicycle and Pedestrian Master Plan identifies and prioritizes improvements to enhance the pedestrian and bicycle environment. This Plan accords with The Alameda Countywide Pedestrian Plan and Countywide Bicycle Plan, as well as MTC's 2040 Regional Transportation Plan, *Plan Bay Area: Strategy for a Sustainable Region*. The San Leandro Bicycle and Pedestrian Master Plan would remain active under the No Project Alternative.

Although the No Project Alternative would result in less development than the proposed project, and would therefore generate fewer vehicle trips, the No Project Alternative would not include the same policies and land uses in support of transit-oriented, non-auto trip patterns and Complete Streets that would reduce VMT per capita and offset increased trips with shorter trip lengths. Overall, the No Project Alternative would have *similar* transportation and circulation-related impacts as the proposed project.

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6.5.1.14 UTILITIES AND SERVICE SYSTEMS

As concluded in Chapter 4.14, Utilities and Service Systems, the proposed project would result in less-than-significant impacts to utilities and service systems.

Chapter 4.14 states that the proposed project would be served by a sufficient water supply and water facilities, and would have no cumulative water impacts with respect to water service. The No Project Alternative is anticipated to result in less residential units and fewer new jobs in San Leandro by the horizon year of 2035, as compared to the proposed project. As such, it would also be served by existing East Bay Municipal Utility District (EBMUD) supply. The No Project Alternative would also include water conservation and infrastructure policies included in the Open Space and Conservation, and Community Services and Facilities Elements of the existing General Plan. Under this alternative, smaller water infrastructure improvements would also be subject to City regulation and BMPs.

The proposed project was found to have no significant impacts related to wastewater treatment or wastewater treatment facilities. The San Leandro sewer collection system directs wastewater from the northern two-thirds of the city to the San Leandro Water Pollution Control Plant (SLWPCP). The Oro Loma sewer collection system serves the southern one-third of the city and direct wastewater to the Oro Loma plant. As explained in Section 4.14.2.3, the amount of wastewater projected to be generated by the proposed project and directed to the two plants are not significant increases compared to the excess permitted capacity available. Given that wastewater increases are associated with increases in overall water demand, and the increases in water demand of the No Project Alternative is less than the proposed project, the No Project Alternative would also not exceed wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board. Nor would it require the construction of a new treatment facility.

The proposed project was also found to be served by a landfill of adequate capacity, and comply with all regulations related to solid waste. As explained in Section 4.14.3.3, the total solid waste generated by the Project's residents and workers is estimated to be 179,630 pounds per day, or 90 tons per day in 2035. This is less than 5 percent of the smallest daily capacity of the four main landfills providing disposal services to the city. The section concluded that although three of these landfills are likely to reach their permitted maximum capacities between 2019 and 2025, 16 others utilized by the City provide adequate alternatives. As a result of these landfill conditions, combined with the fact it would result in fewer new residents and jobs, the No Project Alternative would also be served by adequate landfill capacity. Both the proposed project and the No Project Alternative would comply with State requirements to reduce solid waste, and both include goals, policies, actions and strategies that promote recycling and conservation.

Similar to the above services, the proposed project was found to not require the construction or expansion of stormwater drainage facilities that would cause significant environmental effects. In the case of the both the proposed project and No Alternative, most of the future development sites are in infill or already developed areas that are paved. New development on these sites should not create a substantial increase in the amount of impervious surfaces. In addition, projects that involve the disturbance of one acre or more of land would be subject to NPDES construction permit requirements, including preparation of a Stormwater Pollution Prevention Plan (SWPPP). Projects that involve the creation and/or replacement of more than 10,000 square feet of impervious surfaces would also trigger the implementation of source control measures and site design measures to address stormwater runoff, as per the C.3 provisions of the

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Alameda County Clean Water Program. These requirements would remain in place under the No Project Alternative.

Finally, as explained in Section 4.14.5.3, the proposed project would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. This is the result of adherence to relevant regulations, including the energy efficiency standards of Title 24 of the California State Building Code, and other State and local energy efficiency standards and guidelines. The City's Green Building Ordinance promotes healthy and efficient City facilities through design, construction, and operation, and compliance with the City's CAP and GHG reduction measures further work to conserve energy. New development under the No Project Alternative would also be subject to this regulation, resulting in a similar impact.

Overall, although the No Project Alternative would result in less housing growth than the proposed project, and would therefore create less demand for utilities, neither the proposed project nor the No Project Alternative would result in significant impacts to utilities. Therefore, the No Project Alternative would have a *similar* impact to utilities and service systems as the proposed project.

6.5.2 REDUCED INDUSTRIAL DEVELOPMENT ALTERNATIVE

As summarized in Section 6.2, under the Reduced Industrial Development Alternative, portions of the General Industrial land use designation of the proposed project would be converted to residential uses, and residential density reduced an equal amount in other areas. All other elements of the alternative would remain identical to the proposed project.

6.5.2.1 AESTHETICS

As explained in Chapter 4.1, Aesthetics, the proposed project would result in three less-than-significant impacts and one no impact to aesthetics.

As explained in Section 6.5.1.1, the proposed project would not significantly impact any scenic vistas because in areas of the city with designated scenic views development patterns are built out and proposed land use designations are consistent with existing development patterns. This remains true with the Reduced Industrial Development Alternative.

There are no highways in San Leandro officially designated as Scenic by Caltrans Highway. Therefore, like the proposed project, the Reduced Industrial Development Alternative would have no impact on such an aesthetic resource.

As explained in Section 6.5.1.1, the proposed project would not significantly degrade the existing character of the site and its surroundings with the adoption of proposed goals, policies and actions to protect aesthetic resources. The Reduced Industrial Development Alternative would also include these policies.

As explained in Section 6.5.1.1, the proposed project would not expose people on- or off-site to substantial light or glare because existing State regulations and proposed policy in the Land Use and Open

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Space and Conservation elements would ensure less-than-significant impacts. This is also true in the case of the Reduced Industrial Development Alternative.

Overall, the Reduced Industrial Development Alternative would have a *similar* aesthetic impact as the proposed project.

6.5.2.2 AIR QUALITY

As described in Section 6.5.1.2, the proposed project would result in two less-than-significant impacts, two significant and unavoidable impacts, and one significant but mitigatable impact to air quality.

The Reduced Industrial Development Alternative would result in the same growth by the horizon year of 2035 as the proposed project, and contain the same transit-oriented land use designations and transportation policies. It would therefore achieve the same consistency with the above regulations.

As explained in Section 6.5.1.2, the proposed project would result in two significant and unavoidable impacts despite implementation of the policies in the proposed project. The Reduced Industrial Development Alternative would result in less construction and operation emissions, since it would replace industrial uses with lower-intensity residential uses. However, this reduction would not be expected to avoid these impacts altogether. In addition, the Reduced Industrial Development Alternative would include the same policies and emissions projections. Therefore, this alternative would thus result in the same significant and unavoidable impacts.

As explained in Section 6.5.1.2, implementation of the proposed project would expose sensitive receptors to new sources of substantial concentrations of TACs, an impact deemed significant. Under the Reduced Industrial Development Alternative, a key aspect of the City's development pattern would be altered from the proposed project, reducing the extent of the General Industrial designation and decreasing the interface between industrial uses and sensitive receptors. As a result of this difference, the air quality impacts of the Reduced Industrial Development Alternative would be less than the proposed project.

As explained in Section 6.5.1.2, odor impacts of the proposed project would be less than significant and no mitigation measures are required. The Reduced Industrial Development Alternative would include relevant General Plan policies and would be subject to the same regulation.

Overall, the Reduced Industrial Development Alternative would have *less* air quality impacts than the proposed project.

6.5.2.3 BIOLOGICAL RESOURCES

As shown in Chapter 4.3, Biological Resources, the proposed project would result in less-than-significant impacts to biological resources.

Future development and land use activities under the proposed project and Reduced Industrial Development Alternative would occur primarily in urbanized areas where biological resources are limited and the potential for occurrence of special-status species, sensitive natural communities, wetlands, riparian habitat, or wildlife corridors is remote in comparison to undeveloped lands with natural habitat accommodating the range of species known to occur within the EIR Study Area. Both would include

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policies involving preservation of open space, expansion of parklands, creek stewardship, ecosystem management and restoration of the San Leandro Creek Corridor and shoreline marshlands, as well as a General Plan action which calls for site-specific biological assessments. As such, like the proposed project, the Reduced Industrial Development Alternative would have less-than-significant impacts to special-status species or sensitive communities, nor would it interfere substantially with the movement of resident or migratory species.

Similar to the proposed project, the Reduced Industrial Development Alternative would have less-than-significant impacts to federal wetlands. This is because potential impacts to resources such as San Leandro Creek would be mitigated by implementation of the site assessments called for by the action identified above, as well as environmental review and oversight by regulatory agencies entrusted with enforcement of State and federal regulations addressing the protection and management of wetlands. As noted in Chapter 4.3, no conservation plans have been adopted encompassing all or portions of San Leandro, and thus neither the proposed project nor the Reduced Industrial Development Alternative could conflict with such a plan.

Overall, the Reduced Industrial Development Alternative would have a *similar* impact to biological resources as the proposed project.

6.5.2.4 CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources, the proposed project would result in less-than-significant impacts to cultural resources.

Under the Reduced Industrial Development Alternative, new development would continue throughout the city in nearly the exact same manner as the proposed project. As explained in Chapter 4.4, there are 54 identified historic resources, ten archaeological sites, and assumed potential for paleontological resources in the city. These could all be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or Reduced Industrial Development Alternative. However, the potential impact of the proposed project to these resources was found to be less than significant, due to implementation of proposed General Plan policy and application of existing federal, State, and local laws and regulations. Because the Reduced Industrial Development Alternative would include the same General Plan policies for cultural and historical resource preservation, and remain subject to the same laws and regulations, it would also have less-than-significant impacts on those resources.

Like the proposed project, the Reduced Industrial Development Alternative would be subject to the procedures for conduct following the discovery of human remains set forth in California Health and Safety Code, Public Resources Code and the California Code of Regulations. As such, the alternative would also have a less-than-significant impact related to disturbance of human remains. Similarly, the Reduced Industrial Development Alternative would have less-than-significant impacts on tribal cultural resources, as it would be subject to the same General Plan archeological resource policies and actions included in the proposed project.

Overall, the Reduced Industrial Development Alternative would have a *similar* impact to cultural resources as the proposed project.

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6.5.2.5 GEOLOGY, SOILS, AND SEISMICITY

As described in Chapter 4.5, Geology, Soils, and Seismicity, the proposed project would result in less-than-significant impacts related to geology, soils and seismicity.

As described in Section 6.5.1.5, the proposed project would not result in substantial soil erosion or loss of topsoil due to compliance with existing regulatory requirements. Because the Reduced Industrial Development Alternative would be required to comply with those regulations, it too would avoid significant impacts from soil erosion or loss of topsoil.

Like the proposed project, the Reduced Industrial Development Alternative would not result in a significant impact related to development on unstable geologic units or result in lateral spreading, subsidence, liquefaction, or collapse. Development under both scenarios would have to comply with CBC requirements adopted in the San Leandro Municipal Code, which require detailed geotechnical studies in areas of suspected geologic hazards. Both would also be subject to proposed project policies requiring submittal of geologic studies prior to development in hazardous areas, further mitigating potential significant impacts.

As described in Section 6.5.1.5, the proposed project would not create substantial risks to property as a result of its location on expansive soil due to compliance with existing State and local laws and regulations, and proposed General Plan Action EH-1.1-A. The Reduced Industrial Development Alternative would include this General Plan action and remain subject to CBC requirements. Consequently, it too would have a less-than-significant impact related to expansive soils.

Finally, like the proposed project, development under the Reduced Industrial Development Alternative is not expected to require the use of septic tanks or alternative wastewater disposal systems, as wastewater would be discharged into the existing public sanitary sewer system. Therefore, the impact of Reduced Industrial Development Alternative from the use of septic tanks or alternative wastewater disposal systems would be less-than-significant as well.

Overall, the Reduced Industrial Development Alternative would have a *similar* geology, soils, and seismicity-related impact as the proposed project.

6.5.2.6 GREENHOUSE GAS EMISSIONS

As shown in Chapter 4.6, Greenhouse Gas Emissions, the proposed project would result in one less-than-significant impact and one significant and unavoidable impact associated with GHG emissions.

As described in Section 6.5.1.6, the proposed project would achieve BAAQMD's year 2020 efficiency metric of 6.6 MTCO₂e/SP, which is consistent with the GHG reduction targets of AB 32. In addition, the proposed project would achieve the BAAQMD efficiency metric for year 2035, which would ensure the City maintains a trajectory consistent with the GHG reduction target of Executive Order B-30-15. Development under the Reduced Industrial Development Alternative would be subject to the same state and CEQA requirements and permitting processes as the proposed project, and this alternative would include the transit-oriented and high-density development policies, as well as new policies in support of complete streets and non-automobile trip patterns, of the proposed project. Therefore, the Reduced

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Industrial Development Alternative would achieve the equivalent future reduction in VMT and GHG emissions from on-road transportation sources as the proposed project.

As described in Section 6.5.1.6, while the proposed project would achieve efficiency targets for 2035, additional GHG reductions would be necessary to achieve the more aggressive target of an 80 percent reduction below 1990 levels by 2050. However, the proposed project was deemed consistent with *Plan Bay Area* and the goals and actions of the City's 2009 CAP. The Reduced Industrial Development Alternative would include the same policies as the proposed project, and thus result in consistent development. It follows that it would be similarly consistent with relevant plans.

Overall, the Reduced Industrial Development Alternative would have a *similar* GHG-related impact as the proposed project.

6.5.2.7 HAZARDS AND HAZARDOUS MATERIALS

As shown in Chapter 4.7, Hazards and Hazardous Materials, the proposed project would result in less-than-significant impacts associated with hazards and hazardous materials.

As described in the analysis in Chapter 4.7, future development in the city would be subject to or could involve the use or handling of hazardous materials. These hazards would apply to the Reduced Industrial Development Alternative as they would to the proposed project, although in to a slightly less degree due to the reduction in General Industrial land. Hazardous materials are routinely used, transported, and handled throughout the city. Commercial and industrial land uses under either the proposed project or Reduced Industrial Development Alternative could use, store, or generate hazardous materials. It is possible that some of these uses could occur within a quarter mile of an existing or proposed school. Under both the proposed project and Reduced Industrial Development Alternative, new development could occur on properties that possibly are contaminated and inactive, undergoing evaluation, and/or undergoing corrective action, although more residential uses would be developed on previously industrial sites under the Reduced Industrial Development Alternative. Construction activities could have the potential to release potentially hazardous soil-based materials into the environment, and demolition of existing structures could potentially result in release of hazardous building materials. Use of hazardous materials on newly developed properties could include cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the uses that could occur under either the proposed project or Reduced Industrial Development Alternative.

These activities are subject to a variety of federal, State, and local laws, policies, and regulations. In addition, the proposed project contains policies that would further ensure that new development would not create a significant hazard through routine transport, use, or handling of hazardous materials. All of these policies would remain in place under the Reduced Industrial Development Alternative.

Development under the proposed project does not contemplate land use changes within the ALUCP or AIA areas for the Oakland International or Hayward Executive Airport. Future development primarily allows varying levels of residential and commercial development and does not change current General Plan land use designations. The proposed project also includes policies intended to minimize risk to all San Leandro residents and employees. These land use designations and policies would be included under the Reduced Industrial Development Alternative as well.

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As stated in Chapter 4.7, there are no private airstrips in the vicinity of the locations where future development could occur as a result of implementation of the proposed project. Therefore, neither the proposed project nor the Reduced Industrial Development Alternative would expose people to hazards associated with private airstrips.

The proposed project contains a series of new and upgraded policies that would ensure that new development would not conflict with emergency operations in San Leandro. All of these policies would be adopted under the Reduced Industrial Development Alternative.

Finally, much of the area surrounding San Leandro east of I-580 is considered to have a moderate and high risk of wildland fire. However, in both the case of the proposed project and Reduced Industrial Development Alternative, development would occur mostly in the urbanized center of the city. In addition, both scenarios would include a series of policies and actions to minimize risks involving wildland fires to the maximum extent practicable. Neither the proposed project nor the Reduced Industrial Development Alternative would exacerbate existing wildland fire hazards.

Overall, the impact of the Reduced Industrial Development Alternative would be *less* in comparison to the proposed project.

6.5.2.8 HYDROLOGY AND WATER QUALITY

As shown in Chapter 4.8, Hydrology and Water Quality, the proposed project would result in eight less-than-significant impacts and one significant but mitigatable impact associated with hydrology and water quality.

Construction and operation of development projects allowed by either the proposed project or Reduced Industrial Development Alternative would have the potential to impact water quality and cause erosion and siltation. However, development under both scenarios would be required to comply with existing regulations and guidance documents that would minimize these impacts. The proposed project includes policies that would ensure potential impacts to water quality would not occur with the implementation of the proposed project. All of these policies would remain in place under the Reduced Industrial Development Alternative, and would be in compliance with applicable regulations.

As under the proposed project, much of the future development permitted by the Reduced Industrial Development Alternative would be located on sites that have already been developed and have a high percentage of impervious surfaces. Yet overall, development allowed under either the proposed project or Reduced Industrial Development Alternative would be expected to increase impervious surfaces above the current amount, which could result in a change in drainage patterns that would interfere with groundwater recharge, exceed the capacity of existing or planned stormwater drainage systems, or contribute to on-site or off-site flooding. Applicants for new development and redevelopment under either the proposed project or Reduced Industrial Development Alternative would be required to implement design measures and best management practices, as well as meet City Municipal Code requirements, to contribute to groundwater recharge and minimize stormwater runoff and water degradation to less than significant levels.

As discussed in Section 6.5.1.8, the proposed project would not deplete groundwater resources and impacts to groundwater would be minimized by a series of groundwater and water conservation policies

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in the proposed project. Both the surface source of the City's water and most of these policies would remain in place under the Reduced Industrial Development Alternative. As such, the Reduced Industrial Development Alternative would not deplete groundwater resources either.

As discussed in Section 6.5.1.8, the proposed project could result in the placement of residential structures in existing FEMA-designated 100-year SFHAs. However, compliance with adopted standards for construction in flood hazard zones would ensure that flood flows are not impeded or redirected. Portions of the Shoreline Development project east of the marina are within the 100-year floodplain, as are parts of the Bay Fair area, with potential flooding in and around the Bayfair Center and the residential area south of Coelho Drive. This is considered a significant impact that could be reduced to less-than-significant with a series of mitigation measures targeting pre-construction project review, site assessment and special permitting. Under the Reduced Industrial Development Alternative, residential development potential in these flood-prone areas would remain the same. Existing standards to prevent the impedance of redirection of flood flows would apply to development under both the proposed project and the Reduced Industrial Development Alternative.

There are isolated pockets of San Leandro east of I-580 that may be susceptible to debris flows/mudslides, but the City has specific development and permit requirements for building in these, and the proposed project includes policies that would reduce potential impacts regarding landslides and other hazards. These policies would remain in place under the Reduced Industrial Development Alternative.

The overall hydrology and water quality-related impact of the Reduced Industrial Development Alternative would be *similar* to the proposed project.

6.5.2.9 LAND USE AND PLANNING

As concluded in Chapter 4.9, Land Use and Planning, the proposed project would result in less-than-significant impacts associated with land use and planning.

Like the proposed project, the Reduced Industrial Development Alternative does not propose any new major roadways or physical features, or propose development that would conflict with land uses in existing neighborhoods. It also includes the goals, policies, and actions to promote cohesive neighborhoods included in the proposed project, with the exception of one addition. Like the proposed project, it would not physically divide an established community, although it would extend some existing residential neighborhoods into what are currently industrial areas.

As described in Section 6.5.1.9, the proposed project was found to not conflict with any land use plans adopted for the purpose of avoiding or mitigating an environmental effect. The Reduced Industrial Development Alternative assumes that overall residential densities would be reduced in the city, which would be counter to SB 375, *Plan Bay Area*, and other initiatives that call for regional development to achieve sustainability goals. This would be a policy conflict that would not occur under the proposed project.

The Reduced Industrial Development Alternative would include the series of new and updated open space policies designed to protect and enhance the shoreline and Bayfront areas of San Leandro. For that reason, it would result in the same consistency with the shoreline-focused *San Francisco Bay Plan* and BCDC's Public Access Design Guidelines as the proposed project. Other identical policies between the

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proposed project and Reduced Industrial Development Alternative would mean that both are consistent with ABAG's Bay Trail Plan, as well as the Oakland Airport Land Use Compatibility Plan.

Overall, the Reduced Industrial Development Alternative would have a *greater* land use and planning-related impact than the proposed project.

6.5.2.10 NOISE

As concluded in Chapter 4.10, Noise, the proposed project would result in one potentially significant but mitigatable impacts and two significant and unavoidable impacts associated with noise.

Under both the proposed project and Reduced Industrial Development Alternative, groundborne vibration generated by construction equipment would have the potential to be substantial. Overall, vibration impacts under both the proposed project and Reduced Industrial Development Alternative related to construction would be short-term, and restricted to areas in the immediate vicinity of construction equipment. Policies and actions under the proposed project would serve to avoid significant vibration impacts from construction, and these policies and actions would be maintained under the Reduced Industrial Development Alternative. Therefore, neither the proposed project nor the Reduced Industrial Development Alternative would result in a significant impact.

Under both the proposed project and the Reduced Industrial Development Alternative, as a result of implementation of the General Plan and ongoing regional growth, it is anticipated that there would be substantial permanent increases to the ambient noise levels throughout San Leandro. These increases would primarily result from increases to transportation-related noise, especially that of automobile traffic. Policies under the proposed project would serve to reduce noise from vehicles at the source and to otherwise shield sensitive uses from excessive noise. Under the Reduced Industrial Development Alternative, all of these policies would be maintained.

In the case of both the proposed project and Reduced Industrial Development Alternative, noise from construction equipment and various construction-related activities could be a frequent cause of temporary or periodic increases in ambient noise levels, resulting in a potentially significant impact from both. However, as in the case of the noise impact described above, this impact could be mitigated to a less-than-significant level by incorporating a review of project-level noise impacts into the City's environmental evaluation and approval process.

No land within the city limit is located within Oakland International Airport's 65 dBA noise contour. As the proposed project and Reduced Industrial Development Alternative would contain the same city boundary, the impact due to noise levels produced by public airports would be less than significant in both cases. Similarly, due to their distance from San Leandro and minimal operations, the noise impacts of the nearest heliport and private airstrip would be less-than-significant in both cases.

As described in Section 6.5.1.10, Chapter 4.10 concludes with a statement of significant and unavoidable cumulative noise impacts, stating that all conceivable mitigations would be infeasible. The infeasibility of these mitigations would remain in the case of the Reduced Industrial Development Alternative, and thus a similar impact.

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Overall, the Reduced Industrial Development Alternative would have a *similar* noise impact as the proposed project.

6.5.2.11 POPULATION AND HOUSING

As concluded in Chapter 4.11, Population and Housing, the proposed project would result in less-than-significant impacts to population and housing.

As described in Section 6.5.1.11, the proposed project would be largely consistent with ABAG's 2013 projections for population and housing, but exceed projections for jobs. However, current Housing Element policies, and proposed policies within the Economic Development and Land Use Elements, would ensure that adequate diversity and supply of housing is maintained to sustain a healthy jobs-to-household balance within the city and would provide the framework to adequately plan orderly development under the proposed project through the 2035 horizon year. The Reduced Industrial Development Alternative would include all of the same policies as the proposed project. As a result, growth under the Reduced Industrial Development Alternative would be the same as the proposed project, as would the resulting in strategic policy guidance to accommodate that growth.

As described in Section 6.5.1.11, while there is a potential for the proposed project to temporarily displace existing housing units or people, compliance with the San Leandro Zoning Code and Housing Element policies would ensure that the displacement impacts of the proposed project are less than significant. Because the Reduced Industrial Development Alternative would convert industrial lands to residential uses, it would provide more opportunities for residential development, which could have a beneficial effect on the City's ability to provide housing opportunities.

The Reduced Industrial Development Alternative would have somewhat less job growth because it would convert industrially-designated land to residential designations in order to reduce overall TAC emissions, but it would also include lowering residential densities throughout the city in order to achieve a similar amount of residential growth while increasing the supply of residential land. However, because the city currently has slightly more jobs than housing, even with a decrease in job growth proportional to housing growth, San Leandro's jobs/housing balance would remain relatively consistent.

Overall, neither the Reduced Industrial Development Alternative nor the proposed project would result in significant impacts; therefore, this alternative would have a *similar* impact on population and housing as the proposed project.

6.5.2.12 PUBLIC SERVICES AND RECREATION

As concluded in Chapter 4.12, Public Services and Recreation, the proposed project would result in less-than-significant impacts to public services and recreation.

The Reduced Industrial Development Alternative is identical to the proposed project in every way except for the relocation of some housing potential from floodplains to transit oriented areas. The resulting similar horizon year development projections, parallel policy framework and adherence to existing regulations mean that impacts to fire, police, school, parks, and library services would be *similar* to those of the proposed project.

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6.5.2.13 TRANSPORTATION AND TRAFFIC

As concluded in Chapter 4.13, Transportation and Traffic, the proposed project would result in two significant and unavoidable impacts, one no impact, and three less-than-significant impacts to transportation and circulation.

As described in Section 6.5.1.13, the proposed project would result in a significant and unavoidable impact associated with increased vehicle traffic, which would affect the operations of local intersections and freeway segments. By the horizon year of 2035, the Reduced Industrial Development Alternative would result in substantially similar level and type of growth as the proposed project, and therefore result in a similar impact.

As described in Section 6.5.1.13, a second significant and unavoidable impact to the MTS roadway network and the MTS transit operators was also identified. The Reduced Industrial Development Alternative would result in a similar significant and unavoidable impact.

Neither the proposed project nor the Reduced Industrial Development Alternative would result in a change to air traffic patterns, as in both cases the planning area is not located near any airport approaches or departure zones, and development within the city boundary would not be expected to have a potentially significant impact to air traffic. Similarly, neither the proposed project nor Reduced Industrial Development Alternative would substantially increase hazards due to circulation-related design features. Both are program-level planning efforts that do not directly address project-level design features. Additionally, any roadway construction associated with new development would be designed and reviewed in accordance with the City of San Leandro Standard Details, administered by the City Engineering & Transportation Department.

As described in Section 6.5.1.13, the proposed project was found to not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. The San Leandro Bicycle and Pedestrian Master Plan would remain active under the Reduced Industrial Development Alternative. However, the Reduced Industrial Development Alternative would both convert existing industrial lands to residential uses and lower residential densities citywide. Because most existing industrial areas are located west of I-880 and farther from BART and other transit networks, and because lower densities are associated with decreased public transit use, the Reduced Industrial Development Alternative would likely reduce alternative transportation use in comparison to the proposed project.

Overall, the Reduced Industrial Development Alternative would have slightly *greater* transportation and circulation-related impacts than the proposed project.

6.5.2.14 UTILITIES AND SERVICE SYSTEMS

As concluded in Chapter 4.14, Utilities and Service Systems, the proposed project would result in less-than-significant impacts to utilities and service systems.

The Reduced Industrial Development Alternative would convert some industrial areas to residential development but would maintain a similar policy framework as the proposed project. This shift in land use mix would likely result in some differences to utility demands; although specific future industrial uses cannot be known at this time, many industrial uses have substantially higher water, wastewater, solid

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waste, and energy demands than residential uses. Therefore, decreasing industrial uses and increasing residential uses would tend to decrease demand for utilities. Although the proposed project would have less-than-significant impacts to utilities, the Reduced Industrial Development Alternative would have slightly *less* impacts to water supply, water facilities, wastewater treatment, solid waste, stormwater infrastructure, or natural gas and electricity supply.

6.5.3 ALTERNATIVES COMPARISON

Table 6-2 compares the impact of each alternative to impacts of the proposed project.

TABLE 6-2 COMPARISON OF PROJECT ALTERNATIVES

Topic	No Project	Reduced Industrial Development Alternative
Aesthetics	+	0
Air Quality	0	-
Biological Resources	0	0
Cultural Resources	+	0
Geology, Soils, and Seismicity	0	0
Greenhouse Gas Emissions	+	0
Hazards and Hazardous Materials	+	-
Hydrology and Water Quality	-	0
Land Use and Planning	+	+
Noise	+	0
Population and Housing	0	0
Public Services and Recreation	0	0
Transportation and Traffic	0	+
Utilities and Service Systems	0	-

Note: + Indicates that the alternative impact is greater when compared to the proposed project
0 Indicates that the alternative is similar to the proposed project
- Indicates that the alternative impact is less when compared to the proposed project.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. The environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of San Leandro.

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As shown in Table 6-2, Comparison of Project Alternatives, above, the Reduced Industrial Development Alternative would have fewer environmental impacts as compared to the other alternative, and would therefore be the environmentally superior alternative. This alternative would outperform the proposed project in meeting some project objectives identified in Section 6.4, by better working to preserve the quality of life of San Leandro residents, supporting growth that reduces pollutants, and promoting general public health and safety, all key project objectives. However, the loss of industrial land would prevent this alternative from fully meeting the objectives of job generation and industry retention in San Leandro.