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## **4.0 PROJECT ALTERNATIVES**

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### 4.1 INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a) states that an environmental impact report (EIR) is to describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic project objectives, while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives must focus on alternatives capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6[b]).

According to the CEQA Guidelines, an EIR need only examine in detail those alternatives that could feasibly meet most of the project objectives. When addressing feasibility, CEQA Guidelines Section 15126.6 states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative; however, they need not be presented in the same level of detail as the assessment of the proposed project.

The CEQA Guidelines indicate that several factors need to be considered in determining the range of alternatives to be analyzed and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen the project's significant impacts; (3) the ability of the alternatives to meet the project objectives; and (4) the feasibility of the alternatives. These factors would be unique for each project.

The project's significant environmental impacts that the alternatives will seek to eliminate or reduce were determined and based on the findings in each technical topic evaluated in Sections 3.0 and 3.1 of this Draft EIR.

The objectives of the proposed project are to:

- Create a high-quality, regionally significant development that enhances the project site and aids in the revitalization of downtown Hayward by creating a project that is socially vibrant and economically viable.
- Provide development of high-quality retail, commercial, and residential uses that are consistent with existing General Plan land use designations and densities envisioned on the project site.
- Foster economic, employment, and residential opportunities in Hayward through the revitalization of a currently vacant, underutilized property.
- Create a mixed-use development that provides a combination of retail and residential uses to serve a wide range of users in close proximity to BART, Amtrak, and downtown Hayward.
- Create a development that is financially feasible and that will contribute to Hayward's economic base without negatively affecting existing City resources.

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- Create a regional destination that will enhance Hayward's reputation in the larger Bay Area and signal increased investment and opportunities in the city.
- Create a development that is consistent with and promotes the City's Economic Development Strategic Plan, which identified this property as a key retail and catalyst site as appropriate for a large-scale mixed-use development.

### ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

#### Reduction of Residential Parking Alternative

An alternative site plan for the project site was submitted as a comment on the Notice of Preparation for the project. This alternative proposes a reconfiguration of land uses on the site, but would result in the same intensity of land uses (i.e., same residential count and retail square footage) as the proposed project, except for a reduction in the number of parking spaces. The recommended alternative would reduce the 845 spaces proposed for the residential uses (a ratio of 1.8 off-street parking spaces per residential unit) to 589 spaces (a ratio of 1.2 parking spaces per residential unit). The commenter states that the reduction in parking could reduce the height of the residential structure along Hazel Avenue (referred to as the north tower) by limiting it to three stories. In addition, the commenter asserts that the reduction in parking and offering parking that is unbundled from the residential units would attract tenants without cars,<sup>1</sup> thus resulting in greater use of alternate modes of transportation and reduced traffic.

A reduction in structured parking on the site would reduce the overall size and scale of the development. However, as discussed in Section 3.0, Impacts Found Not Significant, because the proposed project is within the height limits allowed pursuant to the zoning for the site and the photo-simulations of the development showed that it was integrated into the setting and surrounding development, the project's visual impacts were found to be less than significant. Thus, any reduction in the size of the structures on the site that would be achieved with this proposed alternative would not reduce any identified significant visual impacts related to the project.

With regard to traffic, reducing on-site parking spaces would at least reduce the amount of traffic on project driveways, but this impact was also found to be less than significant. The proposed alternative would reduce the number of parking spaces by 30 percent from the proposed project; however, the ability to achieve a proportionate reduction in traffic depends on the extent to which tenants who claim to have no cars actually are not car owners. In fact, the commenter acknowledges the potential for noncompliance while referencing the potential for spillover parking to affect local residential areas. Nonetheless, even assuming that residents who do not have on-site parking spaces will not have vehicles, the maximum reduction in traffic would account for 30 percent of the residential units. As discussed in the reduced development alternatives below, the project would need to be reduced to 200 residential units and 30,500 square feet of retail to eliminate the significant project-specific traffic impacts and to 100 residential units and 30,500 square feet of retail to eliminate the significant cumulative traffic impacts.

Although this alternative could theoretically result in a reduction of traffic impacts and potential air quality emissions related to mobile sources, it would not eliminate any significant and

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<sup>1</sup> Unbundling is separating the cost of the unit and associated parking; thus, tenants without cars can pay a lower rate for a unit without parking included.

unavoidable impacts identified for the project because the unit count and the square footage of commercial uses would remain unchanged from the proposed project. Further, it is not possible to measure the extent to which traffic impacts would be reduced at this particular site with any certainty, even if enforcement programs are adopted, such as a parking permit program and other time-restricted on-street parking regulations.

It is also important to consider the economic feasibility of the proposed parking for both the retail and residential portions of the site. According to a parking demand analysis prepared by Retail West, the parking provided for the retail portion of the site is "barely adequate to service retailers' needs." Specifically, the development proposes 279 parking stalls (or 3.46 parking stalls per 1,000 square feet of retail space) where 303 parking stalls (or 3.76 per 1,000 square feet of retail space) is industry standard. Any reduction in this parking or sharing with residential uses could jeopardize the feasibility of the retail space for future commercial tenants.

With regard to the residential parking demand, the analysis notes that the proposed development is slightly overparked at the southern residential tower along City Center Drive (offering 2.2 parking spaces where 1.5 parking spaces per unit are required) because the developer is reusing the existing parking garage. Reuse of the parking garage is more environmentally beneficial than demolishing the garage to rebuild it to a lesser parking standard. The northern tower (along Hazel Avenue) is parked at 1.36 parking spaces per residential unit, which is slightly less than the standard of 1.5 parking spaces per residential unit. The developer has indicated that it is necessary to provide this level of parking (slightly more than one parking space per unit) in the same building as the residential units the parking would serve to ensure marketability of those units. Specifically, people would be less inclined to rent a unit in a building where the allocated parking for that unit is approximately 800 feet away from the residential building.

Therefore, because this alternative would not eliminate any of the significant impacts identified for the project and it could result in spillover parking affecting nearby residential neighborhoods and negatively affect the viability of the project's retail and residential components, this alternative is not further analyzed.

### **Off-Site Alternatives Considered and Rejected from Further Analysis**

City of Hayward General Plan Policy LU-1.3, Growth and Infill Development, is intended to direct local population and employment growth toward infill development sites in the city, especially the catalyst and opportunity sites identified in the Economic Development Strategic Plan. A number of key retail areas and catalyst sites were identified in the City's Economic Development Strategy Plan (FY 2014–2018) that could accommodate development of the project, including the Southland Mall site, Carlos Bee site, Auto Row site, Kmart site, South Hayward BART site, and Holiday Bowl site. However, while these sites could accommodate the project, one of project's objectives is to promote growth in the downtown and none of these sites are in the downtown area. Thus, these sites would be too far away to meet this project objective. In addition, while development on any of these sites would not negatively affect traffic at the intersections that would be affected by the proposed project, given the level of traffic carried by Mission Boulevard and Hesperian Boulevard, there is the potential for localized traffic impacts with a development of the project's intensity at those sites. Because these sites are located outside the downtown area, these alternative sites are not further addressed. Alternative 4, Off-Site Alternative, discusses an alternative site in the downtown area.

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### 4.2 ALTERNATIVES UNDER CONSIDERATION

Three alternatives were identified for examination and analysis in this Draft EIR:

- Alternative 1 – No Project/Building Reuse
- Alternative 2 – Reduced Development
- Alternative 3 – Significantly Reduced Development
- Alternative 4 – Off-Site Alternative

These alternatives constitute an adequate range of reasonable alternatives as required under CEQA Guidelines Section 15126.6. **Table 4.0-1** summarizes the development assumptions for the alternatives.

**TABLE 4.0-1  
DEVELOPMENT SUMMARY COMPARISON OF ALTERNATIVES**

	Proposed Project	Alternative 1: No Project/ Building Reuse	Alternative 2: Reduced Development	Alternative 3: Significantly Reduced Development	Alternative 4: Off-Site Alternative
Residential units	476	0	200	100	386
Commercial square footage	80,500	340,310	45,500	45,500	80,500

### 4.3 ALTERNATIVE 1 – NO PROJECT/BUILDING REUSE

#### DESCRIPTION OF ALTERNATIVE

Under this alternative, the proposed project would not be implemented. The existing buildings would remain and a mixed-use development with housing and retail would not be developed on the site. The project site would not undergo site improvements, like landscaping and repaving of the parking lot. Under this alternative, the project site would remain occupied by the two currently vacant buildings, and the buildings would remain vacant. Assuming no development, the project site's existing visual character would be maintained and there would be no change in the need for public services, utilities, or water service, and no traffic would be generated at the site. However, because it is not reasonable to assume the site would remain vacant indefinitely, it is assumed for this alternative that the existing buildings would be reused for office use. This constitutes the No Project/Building Reuse Alternative.

Under a No Project/Building Reuse Alternative, it is assumed that the existing buildings would be occupied with uses similar to the previous use on the site. Thus, this alternative assumes 335,000 square feet of office use and 5,310 square feet of commercial with reactivation of the existing 579-stall garage. The alternative would require some retrofitting of the buildings, but there would be no building demolition, construction would be reduced compared to the project, and no ground disturbance would be required.

**ENVIRONMENTAL ANALYSIS**

Assuming a trip generation rate of 11.03 daily trips per 1,000 square feet of office and 42.7 daily trips per 1,000 square feet of retail, the No Project/Building Reuse Alternative would result in 3,922 total daily trips. As discussed in Section 3.1, Transportation, the proposed project's gross daily trip generation would be 8,687 trips per day or a net of 7,271 daily trips accounting for internal and Transportation Demand Management reductions due to the mixed-use nature of the proposed project. Therefore, this alternative would result in approximately 3,348 fewer daily trips than the proposed project.

For comparison, as discussed under the Reduced Development Alternative below, a reduction to 2,651 net trips is required for a mixed-use project to not significantly affect the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive under Background plus Project conditions. As discussed under the Significantly Reduced Development Alternative for cumulative conditions, a reduction to 2,112 net trips would be required to not significantly affect the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive, but even this reduction would result in a significant and unavoidable impact at the intersection of Mission Boulevard and Sunset Boulevard.

The No Project/Building Reuse Alternative would maintain the project site's existing visual character, and demand for public services and utilities would be reduced compared to the proposed project. This alternative would generate less traffic at the site, so the alternative's traffic-related emissions would be reduced proportionately. While the No Project/Building Reuse Alternative would result in an approximately 40 percent reduction in daily trips compared to the proposed project, it would not achieve the reductions achieved by either of the reduced development alternatives. Therefore, this alternative would generate less traffic than the proposed project and reduce impacts on intersections compared to the proposed project, but it would not eliminate any of the significant and unavoidable impacts identified for the project. Thus, the No Project/Building Reuse Alternative would still result in significant and unavoidable traffic impacts, but would not provide any of the benefits of the proposed project, such as transit-oriented development. In addition, this alternative would not be consistent with the project objectives, which call for a mix of retail and residential uses, the addition of new residents within walking distance of downtown Hayward and the creation of a socially vibrant destination that is active in the daytime and evening, as well as promoting the City's Economic Development Strategic Plan policies.

**4.4 ALTERNATIVE 2 – REDUCED DEVELOPMENT****DESCRIPTION OF ALTERNATIVE**

TJKM conducted a sensitivity analysis to determine the level at which the development under the project would have to be reduced to eliminate the significant intersection impacts identified for the proposed project under Background plus Project conditions. Based on that analysis, it was determined that a mixed-use project consisting of 200 apartments and 45,500 square feet of retail could be developed without resulting in significant impacts at the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive under Background plus Project conditions.

The Reduced Development Alternative would include 200 apartments and approximately 45,500 square feet of retail space, which represents a reduction from the proposed project of 276 residential units and 35,000 square feet of commercial space. This alternative would

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eliminate the entire 35,000-square-foot anchor retailer use assumed in the traffic analysis for the proposed project.

The buildings for Alternative 2 would be of smaller scale and size to accommodate the smaller development footprint. It is assumed that Alternative 2 would be approximately two to three stories in height, with some residential over retail and some ground-floor residential. Ground-floor residential is conditionally permitted for the site, so this alternative would require approval of a conditional use permit. The existing buildings on the site would need to be demolished to accommodate this alternative's buildings.

### ENVIRONMENTAL ANALYSIS

Alternative 2 would introduce a new visual element in the project area. Aesthetic impacts would differ from the existing condition, although on a smaller scale than the proposed project. With the reduction in the number of apartments and the amount of commercial space, this alternative would have a lower water demand and waste generation rate than the proposed project. This alternative would be required to comply with the National Pollutant Discharge Elimination System (NPDES) regulations of capturing runoff through the implementation of a stormwater pollution prevention program (SWPPP). Stormwater capture and bioretention areas would be sized appropriately to accommodate the alternative's needs. Alternative 2 would require the implementation of mitigation measures identified for the project in Section 3.0: **MM BIO-1a** and **MM BIO-1b**, **MM CUL-2**, **MM GEO-6**, and **MM HAZ-2a**, **MM HAZ-2b**, and **MM HAZ-6**. With implementation of these mitigation measures, potential environmental impacts from implementation of Alternative 2 would be less than significant, similar to the proposed project in all impact areas except for traffic, which is discussed in detail below.

The traffic analysis determined that the proposed project would have a significant and unavoidable impact at the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive under Background plus Project conditions. Alternative 2 was devised based on a screening analysis to determine the level of mixed-use development that could be developed on the site without negatively affecting level of service at these intersections. Therefore, the impact of Alternative 2 on these intersections under Background plus Project conditions would be less than significant.

Under cumulative conditions, the proposed project was determined to result in significant and unavoidable impacts at the following intersections:

- Foothill Boulevard/Hazel Avenue during the AM and PM peak hours
- Foothill Boulevard/City Center Drive during the PM peak hour
- Mission Boulevard/Sunset Boulevard during the AM and PM peak hours

While the reductions in development density for Alternative 2 would reduce impacts at all study intersections under Background plus Project conditions, all three intersections significantly impacted by the project under cumulative conditions would also be significantly impacted by Alternative 2, though to a lesser degree. Therefore, this alternative's contribution to the traffic impacts at these intersections would be cumulatively considerable and significant and unavoidable.

Alternative 2 would be generally consistent with the General Plan designation for the site, though densities would be at the lower end. Because of the substantial reduction in density

compared to the proposed project, this alternative would provide less retail and residential activity on the site and less of a financial advantage in that it would result in fewer residents patronizing downtown and other local commercial businesses. Further, this alternative would not take full advantage of the site's proximity to downtown and transit, such as BART. Thus, while Alternative 2 is generally consistent with the project objectives, its ability to fulfill the objectives is less than the proposed project, and it represents a missed opportunity to capitalize on the size and allowable densities under current zoning. Similarly, this alternative's consistency with the City's Economic Development Strategic Plan would be less than the proposed project.

#### **4.5 ALTERNATIVE 3 – SIGNIFICANTLY REDUCED DEVELOPMENT**

##### DESCRIPTION OF ALTERNATIVE

Alternative 3 would include 100 apartments and approximately 45,500 square feet of retail space. The alternative was devised to reduce the traffic impacts identified under cumulative conditions. This alternative represents a reduction from the proposed project of 376 residential units and elimination of the entire 35,000-square-foot anchor retailer.

Like Alternative 2, the buildings for Alternative 3 would be of smaller scale and size to accommodate the smaller development footprint. It is assumed that Alternative 3 would also be two to three stories in height, with some residential over retail and some ground-floor residential. As with Alternative 2, ground-floor residential is conditionally permitted for the site, so this alternative would also require approval of a conditional use permit. The existing buildings on the site would need to be demolished to accommodate development of Alternative 3.

##### ENVIRONMENTAL ANALYSIS

Alternative 3 would introduce a new visual element in the project area. Aesthetic impacts would differ from the existing condition, although on a smaller scale than the proposed project. With the reduction in the number of apartments and the amount of commercial space, Alternative 3 would have a lower water demand and waste generation rate than the proposed project. This alternative would be required to comply with the NPDES regulations of capturing runoff through the implementation of a SWPPP. Stormwater capture and bioretention areas would be sized appropriately to accommodate the alternative's needs. Alternative 3 would require the implementation of mitigation measures identified for the project in Section 3.0: **MM BIO-1a** and **MM BIO-1b**, **MM CUL-2**, **MM GEO-6**, and **MM HAZ-2a**, **MM HAZ-2b**, and **MM HAZ-6**. With implementation of these mitigation measures, potential environmental impacts from implementation of Alternative 3 would be less than significant, similar to the proposed project in all impact areas except for traffic, which is discussed in detail below.

The traffic analysis determined that the proposed project would have a significant and unavoidable impact at the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive under Background plus Project conditions. Alternative 3 was devised based on a screening analysis to determine the level of mixed-use development that could be developed on the site to reduce impacts to less than significant at these intersections under Background plus Project conditions and to reduce impacts to the extent feasible under cumulative conditions. The impact of Alternative 3 on these intersections under Background plus Project conditions would be less than significant.

Under cumulative conditions, the proposed project was determined to result in significant and unavoidable impacts at the following intersections:

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- Foothill Boulevard/Hazel Avenue during the AM and PM peak hours
- Foothill Boulevard/City Center Drive during the PM peak hour
- Mission Boulevard/Sunset Boulevard during the AM and PM peak hours

Based on the sensitivity analysis prepared by TJKM for the project, with the reduction to 100 apartments and 45,500 square feet of retail (with elimination of the 35,000-square-foot major retailer), the impacts under Cumulative plus Project conditions at the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive would be reduced to less than significant. However, because there are no left turn lanes on Mission Boulevard at the intersection with Sunset Boulevard, which is very sensitive to left turning vehicles, only two southbound left turn trips could be added to ensure a less than significant impact at this intersection. Because of the minimal capacity at this intersection in the cumulative condition prior to resulting in a significant impact, there is no practical reduction in project development density to eliminate the significant impacts under Cumulative plus Project conditions at this location.

In summary, while this alternative would eliminate the intersection impacts at the Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive intersections under Background plus Project conditions and under cumulative conditions, the significant and unavoidable cumulative impact at intersection of Mission Boulevard and Sunset Boulevard would remain. Nonetheless, this alternative would result in a substantial reduction in development on the site, which would result in a corresponding reduction in demand for utilities and services, and effects related to traffic, such as vehicle emissions of criteria pollutants and greenhouse gases.

Like Alternative 2, Alternative 3 would be generally consistent with the General Plan designation for the site, though densities would be at the lower end. Because of the substantial reduction in density compared to the proposed project, this alternative would provide less retail and residential activity on the site and less of a financial advantage in that it would result in fewer residents patronizing downtown and other local commercial businesses. Further, this alternative would not take full advantage of the site's proximity to downtown and transit, such as BART. Thus, while Alternative 3 is generally consistent with the project objectives, its ability to fulfill the objectives is less than the proposed project, and it represents a missed opportunity to capitalize on the size and allowable densities under current zoning. Similarly, this alternative's consistency with the City's Economic Development Strategic Plan would be less than the proposed project.

### 4.6 ALTERNATIVE 4 – OFF-SITE ALTERNATIVE

#### DESCRIPTION OF ALTERNATIVE

Alternative 4 would entail the implementation of the project on an alternate site. The City's Economic Development Strategic Plan is intended to make Hayward the most desirable and business-friendly place in the East Bay; the plan outlines visions, goals, and actions that the City will undertake to fulfill this vision. The plan identifies Opportunity Sites for the industrial areas and Catalyst Sites for the service and retail sector. The sites represent areas of either vacant or underutilized land that would provide development opportunities in the city. The proposed project site at 22301 Foothill Boulevard is identified as a catalyst site in the downtown area. The site was selected as a catalyst site because of its vacant and underused status, its high visibility in the downtown core, and its size. Alternative 4 would entail the development of the other

catalyst site in the downtown core that could accommodate development which approaches the level proposed for the project.

The City Center site, located across Foothill Boulevard from the proposed project site, is 5.94 acres, comprising three parcels (2.19 acres, 1.4 acres, and 2.3 acres). The 1.4-acre parcel is privately owned and contains a vacant, 11-story, 143,683-square-foot building that was built in 1968. The building was determined to be not structurally sound, so it would need significant retrofitting or demolition. The 2.19-acre parcel is City-owned and is vacant, and the 2.3-acre parcel is City-owned and contains a three-story parking garage. All parcels are designated Central City-Retail and Office Commercial (CC-ROC) and are zoned City Center-Commercial (CC-C), like the proposed project site.

Given the condition of the existing building and the potential constraints with adapting the existing building to the proposed project's uses, this alternative assumes the existing building and parking structure would be demolished to allow a development to take advantage of the entire site, which is partially vacant on the north and fully developed on the southern half. There are no restrictions on floor area ratio for this site, so it could accommodate the 80,500 square feet of retail and shopping center uses proposed for the project. However, the maximum residential density is 65 dwelling units per acre, so this alternative site could only be developed with 386 residential units if the site were developed at the top of the allowable density range. This alternative represents an approximately 45 percent increase in residential units over Phase 1 of the proposed project, which includes 80,500 square feet of retail and shopping center uses and 267 residential units, and an approximately 20 percent decrease in residential units from the entire proposed project.

As noted above, feasibility of an off-site alternative must also consider the ability of an applicant to reasonably acquire, control, or otherwise have access to the alternative sites in question. In this case, two parcels are City-owned; thus, it is reasonable to assume that they could be acquired by the applicant. However, the two City-owned parcels are separated by the privately held 1.4-acre parcel that is the site of the large-scale office building. Thus parcel aggregation could be difficult and expensive, depending on the willingness of the private party to sell the central parcel.

### ENVIRONMENTAL ANALYSIS

Alternative 4 would require demolition of the existing structures on the alternative site, but the square footage of structures to be demolished would be roughly half of that of the proposed project, so emissions associated with demolition would be reduced proportionately. Demolition would require mitigation measures **MM BIO-1b** and **MM BIO-1b** to ensure bird nests and bat roosts are not negatively affected. Subsurface construction for foundations and utilities would also require mitigation measures **MM CUL-2** and **MM GEO-6** to reduce potential impacts on unknown cultural or paleontological resources to less than significant. Because this alternative would include fewer residential units, the amount of construction would also be reduced, so construction emissions would also be reduced compared to the proposed project. However, to accommodate this alternative on a smaller site, the buildings may be taller than the proposed project. The maximum height allowed on the 1.4-acre parcel is 173 feet, while the height on the other parcels is limited to 104 feet. It is assumed that full development of this alternative could be accommodated in buildings that do not exceed this height. Although buildings would be taller than with the proposed project and therefore result in a greater change in visual character in the area, because they would be within the height limits allowed by zoning, this alternative would not result in a significant visual impact. Alternative 4 would generate less demand for public services and utilities. This alternative would be required to comply with the NPDES

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regulations of capturing runoff through the implementation of a SWPPP. Stormwater capture and bioretention areas would need to be sized appropriately to accommodate the alternative's needs.

With respect to traffic, as noted above, this alternative represents an increase in the number of residential units compared to the Phase 1 portion of the proposed project. As discussed in Section 3.1, Transportation and Circulation, the proposed project would result in significant and unavoidable impacts at the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive during the PM peak hour. This alternative would result in approximately 790 more gross daily trips than Phase 1 of the proposed project due to the additional 119 residential units. Because this alternative site would rely heavily on access from the intersections of Foothill Boulevard/Hazel Avenue and Foothill Boulevard/City Center Drive, Alternative 4 would result in a significant and unavoidable impact at these intersections. With respect to cumulative traffic conditions, this alternative includes 186 more residential units than the Reduced Development Alternative as well as 35,000 more square feet of shopping center use than Alternative 2. The trips associated with these additional units, and more importantly those associated with the shopping center use, would substantially exceed the trip reductions required to reduce the cumulative impacts identified for the project to a less than significant level for this alternative. Therefore, although Alternative 4 would be reduced compared to the proposed project, its reductions are not sufficient to eliminate the significant and unavoidable impacts of the project. Its proximity to the project site also means it would likely result in impacts at the same intersections as the proposed project.

This alternative would generally be consistent with the project objectives, though to a lesser degree than the proposed project because the amount of development is reduced. This site is farther from the BART station than the proposed project site, portions of which are within one-half mile of the station. Further, while this alternative would reduce the significant and unavoidable intersection impacts identified for the project, the reduction would be largely attributable to the reduction in development intensity, rather than the location. Consequently, this alternative site would not represent a substantial advantage over the project site with respect to reducing project impacts.

### 4.7 COMPARISON OF ALTERNATIVES

**Table 4.0-2** summarizes the potential impacts of the alternatives evaluated in this section for those topics where mitigation was identified for the project, as compared with the project's impacts. The resource areas where mitigation would be necessary for the project were included for comparison. Pursuant to CEQA Guidelines Section 15126.6(e)(2), an environmentally superior alternative must be identified from among the other alternatives if the "no project" alternative would otherwise be the environmentally superior alternative. The environmentally superior alternative is the alternative that would result in the fewest or least significant environmental impacts. As described above, under a No Project/Building Reuse Alternative, there would be no significant and unavoidable impacts, since the project site would remain unchanged. Therefore, the project's significant and unavoidable impacts would be avoided under the No Project/Building Reuse Alternative since there would be no addition of traffic. The No Project/Building Reuse Alternative impacts would be reduced compared to the proposed project, but it would generate more vehicle trips than either of the reduced development alternatives.

Alternative 3 (Significantly Reduced Development) would result in fewer environmental impacts than the proposed project and would generally meet the project objectives. However, Alternative 3 would still have significant and unavoidable impacts at the intersection of Mission Boulevard and Sunset Boulevard under Cumulative plus Project conditions. As discussed

previously, due to the sensitivity of this intersection and the lack of left turn lanes on Mission Boulevard, only two southbound left turn trips could be added to keep the impacts to a less than significant level, which does not allow for development on the project site. Nonetheless, Alternative 3 is considered the environmentally superior alternative.

While the Significantly Reduced Development Alternative meets some project objectives to create a mixed-use development, it represents a missed opportunity to capitalize on the large size of the site, its proximity to downtown and BART, and the allowable densities under current zoning. Project objectives specifically call for creation of a regionally significant development that is consistent with the densities envisioned in the General Plan, which include a range of 40 to 65 units per acre. A reduction in density on a site that is located in an identified Priority Development Area (PDA), where higher-density, higher-intensity development in proximity to a transit station is deemed appropriate, represents a significant missed opportunity to provide much needed housing in a city and region that are experiencing a documented housing affordability crisis. Other project sites that are smaller or located farther away from downtown businesses, services, and transit will not result in the benefits to the community and the region that would be accomplished with development at the scale, intensity, and density described for the proposed project. Further, the Significantly Reduced Development Alternative may result in a financial infeasibility where minimum densities are required to justify land acquisition and construction costs associated with high-density, mixed-use development.

**TABLE 4.0-2  
IMPACT SUMMARY COMPARISON OF ALTERNATIVES**

Resource Category	Proposed Project	Alternative 1: No Project/ Building Reuse	Alternative 2: Reduced Development	Alternative 3: Significantly Reduced Development	Alternative 4: Off-Site Alternative
Biological Resources	LTSM	LTS	LTSM	LTSM	LTSM
Cultural Resources	LTSM	LTS	LTSM	LTSM	LTSM
Geology and Soils	LTSM	LTS	LTSM	LTSM	LTSM
Hazards and Hazardous Materials	LTSM	LTS	LTSM	LTSM	LTSM
Transportation and Circulation	SU	SU	SU	SU	SU
Background Conditions	SU	SU	LTS	LTS	SU
Cumulative -Foothill Boulevard/Hazel Avenue	SU	SU	SU	LTS	SU
Cumulative - Foothill Boulevard/City Center Drive	SU	SU	SU	LTS	SU
Cumulative -Mission Boulevard/Sunset Boulevard	SU	SU	SU	SU	SU

Notes:

SU: Significant and Unavoidable Impacts  
 LTSM: Less Than Significant with Mitigation  
 LTS: Less Than Significant

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