

Alternatives Analysis

In accordance with Section 15126.6 of the State CEQA Guidelines, an EIR must evaluate a “range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project.” The discussion of alternatives should focus on “alternatives capable of eliminating any significant adverse impacts or reducing them to below a level of significance, even if these alternatives could impede to some degree the attainment of the project objectives or would be more costly.” CEQA further directs that “the significant effects of an alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” The factors that may be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The decision to select alternative locations needs to be based on whether off-site locations would avoid or substantially lessen any of the significant effects of the project. The lead agency also must determine if no feasible alternative locations exist and disclose the reasons for this assessment. The final decision regarding the feasibility of alternatives lies with the decision-maker for a given project who must make the necessary findings addressing the potential feasibility of reducing the severity of significant environmental effects (PRC 21081; see also State CEQA Guidelines 15091).

State CEQA Guidelines define “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” When making the decision as to whether an alternative is feasible or infeasible, the decision-making body may consider the stated project objectives in an EIR in light of any relevant economic, environmental, social, and technological factors.

Project Objectives

As discussed in Chapter 2.0, “Project Description”, the Proposed Project has the following objectives:

- Create a major architectural landmark and a sense of place for Union City while preserving views to and from the hillsides;
- Contribute to the vitality of the Station District area through the introduction of up to 973 units of housing with a mix of ground-level commercial uses;
- Ensure that the first phase of development is of sufficient size and scale to establish a positive sense of place and identity for the new district;
- Provide a range of commercial opportunities including ground-level space suitable for retail and restaurant uses, as well as office and workspace for small businesses, artisans, and entrepreneurs;
- Provide a range of living opportunities including for-sale and rental units including apartments, condominiums, and townhouses;
- Create public-spirited and pedestrian-friendly environment that reinforces a pleasant and safe environment along all of the key street frontages and public spaces within the area, including 11th Street, Berger Way, Galliano Way, and Cheeves Way;
- Orient parking to Cheeves Way as well as the internal street network, where they would have the least impact on the more pedestrian – intensive areas of the planned community;
- Provide complimentary spatial definition of the Station district area with a composition of low-, mid-, and high-rise buildings that are carefully scaled to create an interesting and diverse “townscape”;
- Apply cost-effective techniques and practices in green building, sustainable design, energy conservation, and comfortable pedestrian environments that discourage automobile use and reinforce transit.

Proposed Project

Project Features

The key features of the Proposed Project, as described in Chapter 2, include:

- **Housing**—Up to 973 residential units, some of which would be within up to three strategically located towers. Two towers would be included in Block 2 and one tower would be included in Block 3. The tower portions of the projects would range from 10 to 24 stories in height;
- **Retail/Commercial**—Up to 37,500 square feet of retail-ready/commercial space;

- **Business Condominiums**—Up to 6,200 square feet of business condominiums (office);
- **Parking**—Up to 1,563 parking stalls (underground and within the podium levels) for residential (1.6 parking stalls per residential unit) and public uses; and,
- **Utilities**—Connections and necessary improvements to public services and utilities.

Impacts of the Proposed Project

State CEQA Guidelines 15126.6 (f) states “alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” As such, alternatives that do not avoid or substantially lessen significant effects of the Project do not need to be analyzed in an EIR.

The analysis in this EIR identifies the following environmental effects.

- **Aesthetics**—The Proposed Project would change the visual character and quality of the area from a mostly vacant, currently undeveloped lot with no built structures to a high-density high-rise residential and low-rise retail/commercial/office development. These uses would contribute new sources of light and glare. Potential light and glare impacts from the Proposed Project would be reduced to a less-than-significant level with mitigation identified in Section 3.1. Impacts related to changes in the visual character are considered significant and unavoidable.
- **Air Quality**—The Proposed Project would result in increased PM10 and construction emissions, increase ozone precursors (ROG and NOx), expose sensitive receptors to carbon monoxide (CO), pollutants, and odors. However, these air quality impacts would be less than significant or reduced to a less-than-significant level with mitigation identified in Section 3.2
- **Biological Resources**—The Proposed Project site is disturbed and does not contain any habitat to sustain special-status plants or wildlife. Therefore, the Proposed Project would have no impacts related to biological resources.
- **Climate Change**—The Proposed Project would contribute to the emission of greenhouse gases (GHGs) during construction and operation. However, the Proposed Project would develop high-density high-rise residential units in proximity to an existing BART station and other alternative modes of public transit. Although high-density residential, retail/commercial/office development would generate increases in GHGs, on a regional scale, by locating these uses in proximity to alternative modes of transportation, the Proposed Project would reduce the overall regional potential for GHG emissions by placing residents and customers close to transit, their homes, and places of business. Furthermore, the Proposed Project would have a less than significant impact related to consistency with AB32. Climate change impacts related to GHG emissions are considered to be less than significant.

- **Cultural Resources**—No cultural resources were identified at the Proposed Project site. However, there is the potential to uncover previously undiscovered archeological resources or human remains. Potential cultural resources impacts from the Proposed Project would be reduced to a less-than-significant level with mitigation identified in Section 3.5.
- **Geology Soils, and Seismicity**—The Proposed Project would be built in accordance to the requirements of the California Building Standards Code and would be required to implement the measures outlined in the 2007 Geotechnical Report prepared by Cornerstone Earth Group. Potential geology, soils, and seismicity impacts from the Proposed Project would be reduced to a less-than-significant level with mitigation identified in Section 3.6.
- **Hazards and Hazardous Materials**—The Proposed Project could result in exposure of future residents, workers, and patrons to potential hazardous conditions associated with the upset and accidental release of hazardous materials, potential spills, and hazards associated with construction and operation. Potential hazards and hazardous materials impacts related to these issues would be reduced to a less-than-significant level with mitigation identified in Section 3.7. However, potential exposure to fire and explosion as a result of proximity to the Air Liquide facility, cannot be mitigated to a less-than-significant level, and would remain a significant and unavoidable impact.
- **Hydrology and Water Quality**—The Proposed Project is not located in the floodplain and is not subject to impacts related to altered site drainage. Potential hydrology impacts related to construction activities and increased amounts of surface runoff would be reduced to a less-than-significant level with mitigation identified in Section 3.8.
- **Land Use**—The Proposed Project is generally consistent with area plans, programs, and the Design Guidelines, but is not consistent with the identified land use scenario for the area and certain provision associated with the CSMU (Station Mixed Use Commercial) General Plan Land Use and Zoning designations. This is a land use impact that can be remedied through amendment of the General Plan and a zoning text amendment as described under Project Approvals in Chapter 2, Project Description. Land use impacts related to construction activities are addressed in Section 3.2 Air Quality and Section 3.10 Noise. Therefore, impacts related to land use are considered to be less than significant.
- **Noise**—The Proposed Project would generate temporary construction noise and permanent increases in operation noise (traffic). However, the potential impacts related to exposure of new land uses to transportation noise levels in excess of City standards and exposure of off-site noise sensitive land uses to construction noise can be reduced to a less-than-significant level with mitigation identified in Section 3.10.
- **Population and Housing**—The Proposed Project would result in population growth which is greater than what was anticipated in the 2002 General Plan for the Intermodal Station District. However, the overall population growth for the Intermodal Station District is consistent with current regional

population projections (ABAG, Projections 2009). In addition, the project is likely to displace housing in other parts of the Bay Area and thus overall growth is expected to be within what was projected in the region by the Association of Bay Area Governments (ABAG). Therefore, impacts related to population and housing are considered to be less than significant.

- **Public Services, Utilities, and Recreation**—The Proposed Project would increase demand for public services, utilities, and recreation facilities including police and fire protection, schools, landfills, wastewater treatment, and parks. As discussed in Section 3.12, public service, utility, and recreation facility demands would be accommodated by existing infrastructure and service providers without resulting in the need for new or expanded off-site facilities. Utilities for the site would be via existing utility lines and any necessary improvements would be incorporated into the Proposed Project design. Therefore, impacts related to public service, utility, and recreation facility impacts are considered to be less than significant.
- **Transportation and Circulation**—The Proposed Project would result in an increase in traffic because it includes new residential housing and retail/commercial/office uses. Potentially significant traffic impacts include degradation in levels of service (LOS) as a result of construction, project operation, and in the future, as well as and interference with emergency access and circulation. Mitigation included in Section 4.13 would reduce impacts to LOS from construction and related to emergency access and circulation to a less-than-significant impact. However, impacts related to degradation of LOS as a result of project-generated and future traffic would remain a significant and unavoidable impact.

Alternatives Analyzed in the Draft EIR

Alternatives considered in this Draft EIR are discussed below. The following alternatives were evaluated for their feasibility and ability to achieve most of the project objectives while avoiding, reducing, or minimizing significant impacts identified for the Proposed Project. As discussed above, the Proposed Project would result in significant impacts (before mitigation) in the areas of: aesthetics, air quality, cultural resources, geology, soils, and seismicity, hazards and hazardous materials, hydrology and water quality, noise, public services, utilities, and recreation, and traffic and circulation. The Proposed Project would result in significant and unavoidable impacts in the areas of aesthetics, hazards and hazardous materials and traffic and circulation. Some of these impacts could be reduced or avoided by consideration of the alternatives presented below.

All of these alternatives were determined to be feasible (or potentially feasible) and would meet at least some of the project objectives (though not necessarily all of the objectives). All subject areas are analyzed for each alternative determined to be potentially feasible, though at a much more general level than in Chapter 3.

Other alternatives considered but dismissed from further evaluation are discussed at the end of this Chapter.

Alternative 1—No Project

Alternative Characteristics

CEQA requires analysis of a No-Project Alternative. Under this alternative, no improvements to the 6-acre site are proposed. The Proposed Project site would remain in its current state, as an undeveloped lot.

Feasibility

The retention of the site in its current state as an undeveloped lot is feasible.

Ability to Meet Project Objectives

This alternative would not meet any of the objectives or goals of the Proposed Project. This alternative also does not meet the goals or objectives as stated in the Intermodal Station District and Transit Facility Plan or the General Plan.

According to CEQA Guidelines section 15126.6 (a), alternatives evaluated in an EIR need to attain “most of the basic objectives of the project.” According to CEQA Guidelines section 15126.6 (b), discussion of the alternatives can include analysis of alternatives that “would impede to some degree the attainment of the project objectives, or would be more costly.”

Therefore, this alternative is considered feasible to avoid or substantially lessen significant effects of the Proposed Project at the site, but would not meet the project objectives or goals.

Impact Analysis

- **Aesthetics**—This alternative would not change the existing site aesthetics. The site would remain as is with the newly constructed, lighted and landscaped 11th Street and the lighted parking lots for approximately 689 cars. No new sources of light and glare would be introduced to the site. Views of and from the site would remain unchanged. *Therefore, visual impacts would be less with this alternative than the Proposed Project, and this alternative would avoid a significant and unavoidable impact identified for the Proposed Project. (Less Impact)*
- **Air Quality**—Air quality would remain unchanged, as no new emission sources would be introduced to the site. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. Thus, for the same population accommodated by the Proposed Project, regional criteria pollutant emissions with this alternative would be higher than with the Proposed Project. *Therefore, there would be less local air quality impacts but more regional air quality impacts with this alternative than the Proposed Project. (Less Local Impact/More Regional Impact)*

- **Biological Resources**—There are no biological impacts related to this alternative, similar to the Proposed Project. *Therefore, biological resource impacts would be the same with this alternative as the Proposed Project. (Same)*
- **Climate Change**—No new GHG emissions would directly occur as there would be no new development (stationary sources) or changes in traffic patterns (mobile sources) that could contribute to GHG emissions. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. Thus, for the same population accommodated by the project, GHG emissions would be higher than with the Proposed Project. *Therefore, there would be more regional climate change impacts with this alternative than the Proposed Project. (More Impact)*
- **Cultural Resources**—Existing cultural resources would not be disturbed. *Therefore, cultural resources impacts would be less with this alternative than the Proposed Project. (Less Impact)*
- **Geology, Soils, and Seismicity**—No changes would be made to the project site, and therefore no geology, seismicity, or soils impacts would occur. *Therefore, geology, soils, and seismicity impacts would be less with this alternative than the Proposed Project. (Less Impact)*
- **Hazardous Materials**—No new sources of hazards or hazardous materials would occur and no new residents would be exposed to potential safety impacts. *Therefore, hazards and hazardous materials impacts would be less with this alternative than the Proposed Project. (Less Impact)*
- **Hydrology and Water Quality**—The site would remain undeveloped and no new impervious surfaces would be created. Runoff from the site would be less locally. However, alternative locations are likely to be less compact and thus result in greater impervious spaces and greater impact on water quality and flooding. *Therefore, hydrology and water quality impacts would be more with this alternative than the Proposed Project. (Less Local Impact; More Regional Impact)*
- **Land Use**—No changes in land use designation or zoning would occur. The site would not be developed with residential or commercial/retail/office uses as planned. Although a No Project Alternative would not require changes to current land use and zoning, it would be inconsistent with the goals and objectives of the Proposed Project, and the spirit of the General Plan and Station District Plan which strive to develop the Station District area (albeit at a smaller density) with a high-density mix of residential, commercial/retail, and business uses. Use of alternative sites for this type of development at lower densities and greater distances from the Station District would result in greater environmental impacts compared to those discussed in Section 3.1 through 3.13. *Therefore, the secondary physical impacts of this inconsistency with local land use planning by not utilizing the project site for mixed-use development would be greater with this alternative than with the Proposed Project. (More Impact)*

- **Noise**—No new sources of noise (stationary or mobile sources) would be introduced on site, but traffic noise would be higher due to greater traffic levels with less dense, less transit-oriented development. *Therefore, local noise impacts would be less with this alternative but regional noise would be more than the Proposed Project. (Less Local Impact; More Regional Impact)*
- **Population and Housing**—No increase in population or housing would occur beyond background growth. The site would not be developed with residential units, and projected population requiring housing would not be accommodated (and housing targets for the City would not be met). However, population and housing is likely to be dispersed elsewhere in the Bay Area. *Therefore, population and housing impacts would be locally greater with this alternative than with the Proposed Project but regionally similar to the project. (More Local Impact; Same Regional Impact)*
- **Public Services, Utilities, and Recreation**—No increase in public service, utilities or recreation demands would result from the site but these demands would be similar at the alternative housing locations regionally. *Therefore, public services, utilities, and recreation impacts would be less locally with this alternative but regionally the same as the Proposed Project. (Less Local Impact; Same Regional Impact)*
- **Transportation and Circulation**—No new traffic would be introduced and existing circulation at the site would remain unchanged. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. *Therefore, for the same population accommodated by the project, local traffic impacts would be fewer with this alternative but regional traffic impacts would be greater with this alternative than with the Proposed Project. (Less Local Impact/More Regional Impact)*

Alternative 2—General Plan Buildout (Station District Plan)

Alternative Characteristics

This alternative would build out development on the Proposed Project site as previously described in the Intermodal Station District and Transit Facility Plan (Appendix C of the General Plan). Based on the existing land use designation in the General Plan, the density of the development would range from 45 to 80 residential units per acre.

In order to present a comparable alternative to the Proposed Project, this alternative includes both a residential and retail/commercial/office component. This alternative was developed to avoid inconsistency with the existing land use designation and zoning for the site and to examine the potential for avoiding traffic and circulation impacts.

Under the General Plan Buildout Alternative, the 6-acre site would be built out up to the maximum density allowed in the General Plan. This would include 480

residential units (assumes 80 units per acre over 6.0 acres), 37,500 square feet of retail/commercial uses and 6,200 square feet of business condominiums. This alternative would also accommodate up to 840 parking stalls (1.75 parking stalls per residential unit).

Feasibility

The buildout of residential units, retail/commercial/office uses, and parking stalls as proposed in the Station District Plan is feasible, in that there are sufficient undeveloped lands to construct such a project. Construction of the project in accordance with the General Plan density for the CSMU (Station Mixed Use Commercial) General Plan designation would result in a development with similar uses to the Proposed Project but with less residential units. The Proposed Project would have up to 493 more residential units, 723 more parking stalls, and the same amount of retail/commercial, and business condominium square footage.

Ability to Meet Project Objectives

This alternative would not meet the project objective of constructing 973 units of housing. However, it would still contribute residential, retail/commercial/office uses to the area; maintain and potentially have incrementally greater views of the hillsides from nearby viewpoint locations (such as Kennedy Park) when compared to the Proposed Project; provide a range of living opportunities (for-sale and rental units). Thus, the General Plan Buildout Alternative is considered to meet some, but not all, of the project goals and objectives.

Impact Analysis

- **Aesthetics**—Under this alternative, less residential and an equivalent amount of retail/commercial/business condominium square footage would be constructed in comparison to the Proposed Project. This could result in shorter towers or mid-rise buildings (fewer stories) or fewer overall residential towers being built. Alternative 2 would not avoid the significant and unavoidable impact identified for the Proposed Project due to the substantial change in visual character on the site that would result, even from a smaller development. However, less overall development would likely result in less of a visual impacts as it relates to obstruction of views of the distant East Bay Hills which are considered to be a scenic resource. *Although this alternative would not adhere to the Design Guidelines (related to the design of towers and building massing), because the overall building density (mass) would be reduced, it is still anticipated that visual impacts would be less with this alternative than the Proposed Project. (Less Impact)*
- **Air Quality**—Air quality impacts as a result of construction activities would likely be similar to those that would occur under the Proposed Project. However, direct local operational air quality impacts would be less than the Proposed Project because there would be less overall traffic generated locally. However, increased residential development would occur in other

parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. *Therefore, there would be less local air quality impacts but more regional air quality impacts with this alternative than the Proposed Project. (Less Local Impact/More Regional Impact)*

- **Biological Resources**—There are no biological impacts related to this alternative, similar to the Proposed Project. *Therefore, biological resources impacts would be the same with this alternative as the Proposed Project. (Same)*
- **Climate Change**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project which would likely result in less overall GHG emissions locally. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. Greenhouse gas emissions is a global concern, thus the lowering of local emissions is irrelevant if total emissions are increased. *Therefore, there would be more regional climate change impacts with this alternative than the Proposed Project. (More Impact)*
- **Cultural Resources**—This alternative would likely require similar excavation and ground disturbing activities as the Proposed Project, and would have similar cultural resource impacts. *Therefore, cultural resources impacts with this alternative would be similar to the Proposed Project. (Same)*
- **Geology and Soils**—Development of this alternative would likely require similar grading and filling related to construction activities as the Proposed Project. *Therefore, geology, soils, and seismicity impacts with this alternative would be similar to the Proposed Project. (Same)*
- **Hazards and Hazardous Materials**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Overall, it would likely expose fewer people to potential hazards and hazardous conditions. *Therefore, hazards and hazardous materials impacts would be less with this alternative than the Proposed Project. (Less Impact)*
- **Hydrology and Water Quality**—Development of this alternative would likely have similar hydrology and water quality impacts as the Proposed Project, including water quality impacts related to construction, increased storm runoff, increase in impervious surfaces on the site. Site drainage design and stormwater runoff best management practices would also be required. However, there would be additional regional impacts due to housing growth not accommodated at the site on a compact basis. *Therefore, hydrology and water quality impacts with this alternative would be similar to the Proposed Project locally but greater regionally. (Same Local Impact; More Regional Impact)*
- **Land Use**—This alternative would likely have buildings with fewer stories and of greater massing. The design would not adhere to the Design Guidelines. However, unlike the Proposed Project, development of this

alternative would be consistent with existing General Plan Land Use and Zoning designations for the site and would not require any amendments. *Therefore, land use impacts would be less with this alternative than the Proposed Project. (Less Impact)*

- **Noise**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Overall, it would generate less local traffic than the Proposed Project but more regional traffic. Traffic is the major contributor to local noise levels during operation. Impacts related to noise as a result of construction would likely be similar to the Proposed Project. Mitigation measures related to best management practices during construction would also apply to this alternative. *Therefore, noise impacts would be less locally with this alternative than the Proposed Project but greater regionally. (Less Local Impact; More Regional Impact)*
- **Population and Housing**—This alternative would build fewer residential units than the Proposed Project. Fewer units would result in less population generated and less housing locally provided when compared to the Proposed Project but this will likely only displace growth to other regional locations. However, population generation in and of itself is not necessarily an adverse physical environmental impact (the difference between the residential units planned for the Proposed Project and the alternative would be 493 units). Furthermore, the existing Proposed Project site is not developed, so this alternative (similar to the Proposed Project) would not result in the displacement of any existing housing or people. *Therefore, population and housing impacts with this alternative are considered to be similar to the Proposed Project. (Same)*
- **Public Services, Utilities, and Recreation**—Existing utility infrastructure is already located in proximity to the Proposed Project site. Similar to the Proposed Project, this alternative would require the extension of existing transmission lines for utility services (water, sewer, electricity/gas, and telecommunications). This alternative would result in a smaller number of residential units and equivalent retail/commercial/business condominium development. It is likely that this alternative would result in less local demand on service providers, schools, and recreation facilities. However, there will be these demands at alternative locations where regional demand would be met. *Therefore, public services, utilities, and recreation impacts with this alternative would be less locally with this alternative but the same regionally as the Proposed Project. (Less Local Impact; Same Regional Impact)*
- **Transportation and Circulation**—This alternative would include fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Fewer residential units would likely result in less overall population generated, which would in turn result in less overall traffic. Because of the overall reduction in local traffic, it is reasonable to assume that the impact to local LOS and volumes would be less than with the Proposed Project. Therefore, this alternative is considered to have less local traffic impacts when compared to the Proposed Project. However, residential development would

occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. *Therefore, local impacts would be less but for the same population accommodated by the project, regional traffic impacts would be higher with this alternative than with the Proposed Project. (Less Local Impact/More Regional Impact)*

Alternative 3—Townhouse Alternative

Alternative Characteristics

This alternative would develop the approximately 6-acre site with row townhomes (similar to existing development adjacent to the Proposed Project site) and retail/commercial and office/condominium development with a FAR between 1.0 and 4.0. In order to present a comparable alternative to the Proposed Project, this alternative includes both a residential and commercial component. In general, townhome development in Union City occurs at a rate of up to 17 townhomes per acre, which would be 78 townhomes on the project site. In addition, this alternative would include 37,500 square feet of retail/commercial square footage and 6,200 square feet of business condominiums (equivalent to what is considered in the Proposed Project). This alternative would also accommodate up to 156 parking stalls (two parking spots per townhome).

Feasibility

The buildout of townhomes and retail/commercial/office is feasible, in that there is sufficient undeveloped lands to construct such a project. This alternative would construct residential development consistent with existing residential development in the immediate vicinity of the Proposed Project site.

Ability to Meet Project Objectives

This alternative would not meet the objective of constructing 973 units of housing and due to its limited number of residential units, could prove difficult to establish a clear identity for the new district. Further, it would not meet the General Plan land use density minimum of 45 dwelling units per acre. However, it would be consistent with existing adjacent residential land uses to the east, but could result in an oversaturation of this type of housing for the area depending on demand. Construction of townhomes of two to three -stories instead of residential towers would maintain long-range views of the hillsides. Development of only 78 townhomes would also result in a significant reduction in the degree of localized traffic impacts in comparison to the Proposed Project (and therefore air quality and noise impacts). However, to the growth that would not be accommodated, regional traffic and air quality impacts would be higher than the Proposed Project.

Impact Analysis

- **Aesthetics**—This alternative would include fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. No residential towers would be built. This would result in substantially less visual impact related to obstruction of views of the distant East Bay Hills which are considered a scenic resource. *Visual impacts would be less with this alternative than the Proposed Project due to the overall reduction in building mass. However, this alternative would not adhere to the Design Guidelines related to the design of towers and building massing. Implementation of this alternative would result in visual impacts that are less than significant. (Less Impact)*
- **Air Quality**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Air quality impacts as a result of construction activities would likely be less than those that would occur under the Proposed Project. Direct local operational air quality impacts would be less than the Proposed Project because there would be less overall traffic generated. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. *Therefore, there would be less local air quality impacts but more regional air quality impacts with this alternative than the Proposed Project. (Less Local Impact/More Regional Impact)*
- **Biological Resources**—There are no biological impacts related to this alternative, similar to the Proposed Project. *Therefore, biological resources impacts would be the same with this alternative as the Proposed Project. (Same)*
- **Climate Change**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project which would result in less direct GHG emissions. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit and thus result overall in higher GHG emissions than the Proposed Project. *Therefore, there would be more climate change impacts with this alternative than the Proposed Project. (More Impact)*
- **Cultural Resources**—This alternative would likely require similar excavation and ground disturbing activities as the Proposed Project, and would have similar cultural resource impacts. *Therefore, cultural resources impacts with this alternative would be similar to the Proposed Project. (Same)*
- **Geology and Soils**—Development of this alternative would likely require grading and filling related to construction activities. However, these construction activities are not anticipated to be as extensive as the Proposed Project and General Plan Buildout Alternative, which both include construction of residential towers. *Therefore, geology, soils, and seismicity*

impacts with this alternative would likely be less than the Proposed Project. (Less)

- **Hazards and Hazardous Materials**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Overall, it would likely expose fewer people to potential hazards and hazardous conditions. *Therefore, hazards and hazardous materials impacts would be less with this alternative than the Proposed Project. (Less Impact)*
- **Hydrology and Water Quality**—Development of this alternative would likely have similar hydrology and water quality impacts as the Proposed Project, including water quality impacts related to construction, increased storm runoff, increase in impervious surfaces on the site. Site drainage design and stormwater runoff best management practices would also be required. However, it is possible that based on the substantially reduced number of residential units, that there would be a reduced developed footprint. Assuming that townhomes could have front and/or back yards with greater areas of pervious surfaces (lawns and landscaped areas) the impacts related to hydrology and water quality could be less in comparison to the Proposed Project. However, regional hydrology and water quality impacts will be greater with regionally less compact development *Therefore, hydrology and water quality impacts would be less or similar locally with this alternative than the Proposed Project but regionally greater. (Same or Less Local Impact; More Regional Impact)*
- **Land Use**—This alternative would build townhouses instead of residential units within towers. Development of this alternative would be inconsistent with the existing the Design Guidelines, General Plan Land Use and Zoning designations for the site as well as the Design Guidelines prepared for the area. Planned uses for this parcel included densities of between 45 and 80 units per acre, which is greater than the 17 units per acre that would occur with townhomes. *Therefore, land use impacts would be greater with this alternative than the Proposed Project. (More Impact)*
- **Noise**—This alternative would build fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Overall, it would generate less local traffic than the Proposed Project but more regional traffic. Traffic is the major contributor to local noise levels during operation. Impacts related to noise as a result of construction would likely be similar to the Proposed Project. Mitigation measures related to best management practices during construction would also apply to this alternative. *Therefore, noise impacts would be less locally with this alternative but more regionally than the Proposed Project. (Less Local Impact; More Regional Impact)*
- **Population and Housing**—This alternative would build fewer residential units than the Proposed Project. Fewer units would result in less population generated and less housing provided when compared to the Proposed Project but this will likely only displace growth to other regional locations. However, population generation in and of itself is not necessarily an adverse physical environmental impact (the difference between the residential units planned

for the Proposed Project and the alternative would be 895 units). Furthermore, the existing Proposed Project site is not developed, so this alternative (similar to the Proposed Project) would not result in the displacement of any existing housing or people. Regional population and housing are not expected to change compared to the Proposed Project. *Therefore, population and housing impacts with this alternative are considered to be similar to the Proposed Project. (Same)*

- **Public Services, Utilities, and Recreation**—Existing utility infrastructure is already located in proximity to the Proposed Project site. Similar to the Proposed Project, this alternative would require the extension of existing transmission lines for utility services (water, sewer, electricity/gas, and telecommunications). This alternative would result in a smaller number of residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. It is likely that this alternative would result in less local demand on service providers, schools, and recreation facilities but the demand for services and utilities would be displaced to other regional housing locations. *Therefore, public services, utilities, and recreation impacts with this alternative would be less locally with this alternative but regionally the same as the Proposed Project. (Less Local Impact; Same Regional Impact)*
- **Transportation and Circulation**—This alternative would include fewer residential units and an equivalent amount of retail/commercial/business condominium square footage in comparison to the Proposed Project. Fewer residential units would likely result in less overall population generated, which would in turn result in less overall traffic. Because of the overall reduction in traffic, it is reasonable to assume that the impact to local LOS and volumes would be less than with the Proposed Project. Therefore, this alternative is considered to have less local traffic impacts when compared to the Proposed Project. However, residential development would occur in other parts of Union City, the Bay Area or beyond, likely in areas with lower density and not in proximity to transit. *Therefore, for the same population accommodated by the project, regional traffic impacts would be higher with this alternative than with the Proposed Project. (Less Local Impact/More Regional Impact)*

Environmentally Superior Alternative

Identification of an Environmentally Superior Alternative results from a comparison of impacts that would result from each alternative as shown in Table 5-1. All things being equal, regional impacts were considered more heavily than local impacts in the evaluation of the comparative merits of the different alternatives due to the scale of regional impacts affecting more people than local impacts.

Although the No Project Alternative has the fewest identified local impacts, it has the greatest regional impacts and does not meet any of the project goals and objectives. Per CEQA, the environmentally superior alternative must meet most of the project goals and objectives.

As such, Alternative 2—General Plan Buildout would be the Environmentally Superior Alternative because it would have fewer impacts compared to the Alternative 3—Townhouse in the environmental areas of aesthetics, air quality (regionally), climate change, land use, noise (regionally), and transportation and circulation (regionally). However, implementation of this alternative would not meet the goals or objectives of the Proposed Project and would not adhere to the standards identified in the Design Guidelines. Although this alternative would have fewer localized impacts relative to aesthetics, air quality, hazards and hazardous materials, noise, public services and utilities and transportation and circulation relative to the Proposed Project, it would have greater regional air quality, hydrology/water quality and traffic impacts and greater impacts on climate change (due to higher GHG emissions overall).

Table 5-1. Comparison of Alternative Impacts Relative to the Proposed Project

Issue Area	Proposed Project Impact	Alternative 1 (No Project)	Alternative 2 (General Plan Buildout)	Alternative 3 (Townhouse)
Aesthetics	S	Less impact	Less impact	Less impact
Air Quality	LTS/M	Less local impact/more regional impact	Less local impact/more regional impact	Less local impact/more regional impact
Biological Resources	LTS	Same	Same	Same
Climate Change	LTS	More impact	More impact	More impact
Cultural Resources	LTS/M	Less impact	Same	Same
Geology, Soils, Seismicity	LTS	Less impact	Same	Same
Hazards and Hazardous Materials	S	Less impact	Less impact	Less impact
Hydrology and Water Quality	LTS/M	Less local impact/more regional impact	Same local impact/more regional impact	Less local impact/more regional impact
Land Use	LTS/M	More impact	Less impact	More impact
Noise	LTS/M	Less local impact/more regional impact	Less local impact/more regional impact	Less local impact/more regional impact
Population and Housing	LTS	More impact locally/same regional impact	Same	Same
Public Services, Utilities, Recreation	LTS/M	Less local impact/same regional impact	Less local impact/same regional impact	Less local impact/same regional impact
Transportation and Circulation	S	Less local impact/more regional impact	Less local impact/more regional impact	Less local impact/more regional impact

Alternatives Considered but Dismissed from Further Analysis

The following alternatives were considered but ultimately were dismissed from further analysis because they were determined to be infeasible, did not meet most of the project objectives, or did not avoid or substantially reduce one or more significant impacts of the Proposed Project.

CEQA defines “feasibility” as follows: “*capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.*” Project objectives and Proposed Project impacts were described above at the beginning of this Chapter.

Residential Development Only

This alternative would involve construction of residential development only (ranging from single-family residential to high-density condominiums). This alternative was considered but dismissed because development of a residential development only alternative would not meet the project goals or objectives.

Retail/Commercial/Business Condominium Development Only

This alternative would involve construction of retail/commercial/business condominium development only (ranging from small retail/commercial uses to large, big-box retail/commercial usage and high-density business office condominiums). This alternative was considered but dismissed because development of a retail/commercial/business condominium only alternative would not meet the project goals or objectives.

Affordable Housing Alternative

Although development of the project with 100 percent affordable housing could be considered a beneficial alternative, increasing the number of affordable housing units would not result in a physical reduction in environmental impacts when compared with the Proposed Project. Furthermore, an Affordable Housing project on Block 4, immediately adjacent to the project site has been environmentally cleared by the City of Union City and is currently under construction. Therefore, this alternative does not meet the standard for consideration as a project alternative and would provide affordable housing in an area where that need is already adequately served.

Off-Site Alternative

In theory, a mixed-use project of similar design and size could be proposed at an off-site location close to the Intermodal Station. There is currently undeveloped property to the southeast of the project site between the two railroad lines, but this land is designated for office/commercial use. There is also currently undeveloped property to the northeast of the project site, northeast of the Niles Subdivision railway tracks, but this area is designated for research and development campus.

If a mixed-use project were proposed in one of these areas, such a project would displace the planned uses at that site, while not avoiding the significant unavoidable visual aesthetic or traffic impacts. While portions of these adjacent vacant lands are further from the Air Liquide facility and thus potential safety risks could be reduced by locating housing further from that facility, this would displace the safety risk from the residential component to the alternative use of the project site, which would likely be commercial to replace the lost commercial opportunity at the relocated residential site. Regardless, the placement of the mixed use further away from the Intermodal Station is not consistent with a fundamental objective of the project and is not consistent with the intent of prior district planning. As such, off-site alternatives in the general proximity of the Proposed Project are not considered to meet most of the project objectives and were rejected from further consideration.

A mixed-use project of similar design and size could be proposed at undeveloped land in other parts of Union City. However, such a project would also not meet most of the project objectives in that they would not present a transit-oriented development opportunity like that present adjacent to the Intermodal Station. As such, off-site alternatives in other parts of Union City are not considered to meet most of the project objectives and were rejected from further consideration.