
19. ALTERNATIVES TO THE PROPOSED PROJECT

The potential environmental consequences of the proposed Hercules Bayfront Project ("the project") have been analyzed in detail in this EIR. Five alternatives to the proposed project are discussed in this chapter to provide a basis for further understanding of the environmental effects of the proposed project and possible approaches to reducing identified significant impacts.

CEQA Guidelines section 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project) requires an EIR to "...describe a range of reasonable alternatives to the project, or to 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." CEQA Guidelines section 15126.6(b) states that, because the EIR must identify ways to mitigate or avoid significant effects of the proposed project on the environment, "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

CEQA Guidelines section 15126.6(d) indicates that the EIR comparison of the impacts of the identified alternatives is intended to be less detailed than the discussion of the impacts of the proposed project.¹ Following that guideline, the discussions in this chapter of the comparative impacts of five identified alternatives are intentionally less detailed than the discussions in EIR chapters 4 through 16 of the significant effects of the proposed project.

19.1 IDENTIFIED ALTERNATIVES

Pursuant to the CEQA Guidelines cited above, this EIR chapter generally compares the environmental impacts anticipated with each of the following five alternatives with those of the proposed project:

- **Alternative 19.1: No Project--Existing Conditions.** CEQA Guidelines section 15126.6(e)(1) requires the specific alternative of No Project to "be evaluated along with its impact...to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." CEQA Guidelines section 15126.6(e)(2) requires the No Project analysis to "discuss the existing conditions at the time the (EIR) notice of preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans."

¹CEQA Guidelines section 15126.6(d) states, "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

Pursuant to these requirements, the Alternative 19.1 (No Project--Existing Conditions) evaluation in this chapter compares the effects of the proposed project with the existing environmental "Setting" as described in chapters 4 through 16 of this EIR; and the Alternative 19.2 (Waterfront District Master Plan [WDMP] Scenario Without Project-Proposed Amendments) evaluation in this chapter compares the effects of the proposed project with "what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans" (CEQA Guidelines section 15126.6[e][2]).

Alternative 19.1, maintaining the status quo (i.e., a substantially vacant site with two vacant historic buildings) would not meet the project objectives (see EIR section 3.3 in chapter 3, Project Description) of developing a transit-oriented, mixed-use neighborhood that includes walkable streets, a variety of dwelling types and businesses, and public plazas with views of San Pablo and San Francisco Bays, with the overall intent of implementing the Waterfront District Master Plan (WDMP). Alternative 19.1 would not be consistent with the goals and objectives of the planned Intermodal Transit Center (ITC) project, whose successful implementation would depend on the "critical mass" of residents, workers, and visitors in the City, nearby areas, and the Bayfront Project.

- **Alternative 19.2: No Project--Waterfront District Master Plan (WDMP) Scenario Without Project Proposed Amendments.** Under this alternative, the project-proposed amendments to the WDMP would not be approved or implemented. Future development on the project site would continue to be controlled by the adopted WDMP. In summary, the currently adopted WDMP buildout scenario (Alternative 19.2) compares with the proposed project buildout scenario (i.e., the WDMP plus project amendments) as follows:
 - the maximum residential buildout total estimated for the WDMP for the Historic Town Center and Transit Village Sub-District is 1,392 units; the maximum residential buildout total for the project is the same--i.e., 1,392 units;
 - the maximum estimated office (non-flex) floor space total for the WDMP for the Historic Town Center and Transit Village Sub-Districts is 81,000 square feet, which is 34,000 square feet less than the proposed project maximum office (non-flex) space total of 115,000 square feet;
 - the maximum estimated retail (non-flex) floor space total for the WDMP for the Historic Town Center and Transit Village Sub-Districts is 74,500 square feet, which is 15,500 square feet less than the proposed project maximum retail (non-flex) total of 90,000 square feet; and
 - the maximum flex-space (residential, office and/or retail) buildout total estimated for the WDMP for the Historic Town Center and Transit Village Sub-Districts is 134,000 square feet; the maximum flex-space buildout total for the project is the same--i.e., 134,000 square feet.

Alternative 19.2 would generally reduce environmental impacts correspondingly to the reductions in buildout potential identified above. While the alternative would substantially achieve the project objectives (see EIR section 3.3 in chapter 3, Project Description) of developing a transit-oriented, mixed-use neighborhood that includes walkable streets, a variety of dwelling types and businesses, and public plazas with views of San Pablo and

San Francisco Bays while implementing the WDMP, the approximately 49,5000 (34,000 and 15,500 respectively) reduction in office (non-flex) and retail (non-flex) development potential would result in reduced commercial (office and retail) amenities within the project area and an associated reduction in project trip internalization, plus a reduced number of project employees potentially using the adjacent planned Intermodal Transit Center (ITC) facilities.

- **Alternative 19.3: Reduced Development Scenario.** Under this alternative, a development program and mix of land uses similar to the proposed project would be approved and implemented, but with a 20 percent reduction in maximum allowable number of residential units and square footage of office floor area and flex space, and a 30 percent reduction in retail floor area. These reductions could result in lower building heights and/or more open space. This alternative would also result in the following development caps on the project site:
 - 1,114 multi-family residential units (non-flex) (versus 1,392 units for the proposed project),
 - 92,000 square feet of office (non-flex) floor area (versus 115,000 square feet for the proposed project),
 - 63,000 square feet of retail (non-flex) floor area (versus 90,000 square feet for the proposed project), and
 - 107,200 square feet of flex-space, of which no more than 53,600 square feet could be retail (versus 134,000 for the proposed project, of which no more than 67,000 square feet could be retail).

The "20 to 30 percent reduction" under the Reduced Development alternative represents only one hypothetical example of how environmental impacts could be reduced compared to the proposed project. The 30 percent reduction in retail space was assumed primarily to reduce daily and PM peak hour vehicle trips, whose trip generation rates for retail are higher than for the other proposed land uses. Alternative development caps on particular land uses, or alternative caps on different combinations of land uses, could also be considered by decision-makers.

This alternative generally would reduce environmental impacts at levels correspondingly to the reductions in buildout potential identified above. The alternative would partially achieve the project objectives (see EIR section 3.3 in chapter 3, Project Description) of developing a transit-oriented, mixed-use neighborhood that includes walkable streets, a variety of dwelling types and businesses, and public plazas with views of San Pablo and San Francisco Bays while implementing the WDMP; the reduction in mixed-use development potential would result in substantially fewer residents, workers, and visitors having direct access to these Hercules Bayfront Project amenities, as well as to the adjacent planned Intermodal Transit Center (ITC) facilities.

- **Alternative 19.4: Reduced Biological Resources Impact Layout.** This alternative would incorporate revisions to Hercules Bayfront Project site plan in order to avoid or substantially lessen potential impacts on biological resources identified in this EIR. The buildout potential of the proposed project would remain the same, but the project site plan would be revised to avoid identified significant biological resource vulnerabilities (e.g., wetlands, possible special-status wildlife species habitat) identified in EIR chapter 6 (Biological Resources). For example, the proposed buildings on Block N (see EIR Figure 3.3, Illustrative Site Plan) could be reduced in size and/or set back farther from the edge of the restored Refugio

Creek. If these buildings were reduced in size, other on-site locations could be identified to accommodate the displaced Block N building floor area. This variation could require additional allowable building height on another project block, such as Block O, which might allow buildings of up to six stories (instead of the currently proposed maximum of four stories). The displaced building floor area could also potentially be accommodated within the currently proposed building heights, once specific building designs are proposed. Similarly, the proposed buildings on Blocks Q and R could potentially be reduced in size or set back farther from the biological resources of the North Channel.

The EIR identifies mitigations (including wetland replacement) to reduce the project's identified potentially significant impacts on unique biological resources to less-than-significant levels. Potential project impacts on biological resources could also be substantially reduced under Alternative 19.4. At a minimum, project buildings would be set back farther from identified biological resources. Other identified environmental impacts (land use, utilities, etc.) would remain similar under Alternative 19.4 to the proposed project, although as described above, allowable building heights in some locations could be increased, potentially resulting in additional or a substantial increase in visual impacts.

- **Alternative 19.5: Alternative Project Location.** Section 15126.6 of the CEQA Guidelines indicates that the EIR evaluation of alternatives may include alternatives to the project's proposed location. CEQA Guidelines section 15126.6(f)(2)(A) states, "[The] question and first step in the analysis of whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR."

Mitigation measures have been identified to reduce identified significant and potentially significant effects associated with the proposed project to less-than-significant levels, with the exception of the following significant unavoidable impacts:

- **Impact 4-1: Project Impact on Scenic Vistas** (see chapter 4--Aesthetics--of this EIR);
- **Impact 4-2: Project Impact on the Existing Visual Character of the Site and its Surroundings** (see chapter 4--Aesthetics--of this EIR);
- **Impact 5-2: Long-Term Regional Emissions Increases** (see chapter 5--Air Quality--of this EIR);
- **Impact 13-1: Project-Facilitated Construction Period Noise** (see chapter 13--Noise--of this EIR);
- **Impact 16-1: Existing Plus Project Impacts on Freeway Facilities Operations** (see chapter 16--Transportation and Circulation--of this EIR);
- **Impact 16-2: Cumulative Plus Project Impacts on Intersection Operations** (see chapter 16--Transportation and Circulation--of this EIR); and
- **Impact 16-3: Cumulative Plus Project Impacts on Freeway Operations** (see chapter 16--Transportation and Circulation--of this EIR).

These identified unavoidable significant impact findings in particular warrant consideration of alternative locations that may avoid or substantially avoid such effects.

The possibility of alternative sites for the proposed project has been evaluated and a determination made that there are no specific sites of adequate size (approximately 40 acres of developable land area) and general character (e.g., adjacent to existing or planned intermodal transit facilities) available in West Contra Costa County where: (1) such a project could be undertaken to attain the fundamental project objectives of developing a transit-oriented, mixed-use neighborhood that includes walkable streets, a variety of dwelling types and businesses; and (2) identified significant environmental impacts, including the four identified significant unavoidable impacts listed above, could be avoided or substantially lessened.

Development of the proposed high-density, large-scale, mixed-use project on other vacant or undeveloped sites in West Contra Costa County would result in similar or greater land use impacts on surrounding neighborhoods (the surrounding Hercules waterfront vicinity of the proposed project site has already been substantially built out with medium-to-high-density, mixed-use development under the adopted Hercules Waterfront District Master Plan [WDMP]), similar or greater traffic impacts on the local roadway network (the proposed project site is integrated with a planned intermodal transit center, and close to the I-80 freeway and a new park-n-ride facility, substantially reducing its impacts on local and regional roadway operation), similar impacts on public services and utilities (based primarily on the number of new residents and employees), similar or greater air quality and climate change impacts (i.e., other possible sites would have less access to a major transit corridor and an intermodal transit center), and similar or greater traffic-related noise impacts on adjoining and nearby neighborhoods.

Substantial biological habitat values unique to the proposed project site and vicinity, including Refugio Creek, would be adversely affected by the proposed project; alternative locations more removed from these features would reduce these impacts. However, the EIR does identify mitigations to reduce the project's identified potentially significant impacts on these unique biological resources to less-than-significant levels.

Also, the project applicant, Hercules Bayfront LLC, owns the project site. The applicant has no controlling interest in any other property capable of meeting most of the project objectives.

For the reasons described above, the possibility of locating the proposed project on an alternative site that would avoid or substantially lessen potentially significant environmental impacts identified in this EIR while attaining most of the project objectives is remote, and

has been eliminated from further detailed consideration. No further environmental analysis of alternative sites is required under CEQA.¹

19.2 COMPARATIVE ENVIRONMENTAL EVALUATION

CEQA Guidelines section 15126.6(d) states, "A matrix displaying the major characteristics may be used to summarize the comparison [of alternatives]." Accordingly, Table 19.1 (Alternatives Comparison to Proposed Project: Summary Overview) provides a summary comparison of the environmental impacts of identified alternatives 19.1 through 19.4 with those of the proposed project (Hercules Bayfront Project). Table 19.2 (Trip Generation Comparison--Project vs. Project Alternatives) compares forecasted trip generation of the proposed project with identified alternatives 19.1 through 19.4. This EIR has concluded that the possibility of locating the proposed project on an alternative site that would avoid or substantially lessen potentially significant environmental impacts identified in this EIR while attaining most of the project objectives is remote (see Alternative 19.5, above). Therefore, Alternative 19.5 is not included in Tables 19.1 and 19.2.

¹CEQA Guidelines section 15126.6(c) explains that alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic project objectives, are infeasible, or do not avoid any significant environmental effects. CEQA Guidelines section 15126.6(f) indicates that the Lead Agency should consider site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitation, jurisdictional boundaries, and the proponents control over alternative sites in determining the range of alternatives to be evaluated in an EIR. With respect to alternative locations, CEQA Guidelines section 15126.6(f) indicates that alternative locations need not be evaluated in every case. The key question in determining whether to evaluate alternative locations is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any significant effects need be evaluated in the EIR. CEQA Guidelines section 15126(f)(2) indicates that alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered.

Table 19.1
 ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

Alternatives	
Impact	Alternative 19.1: No Project-- Existing Conditions
(a) Aesthetics	<p>Alternative 19.1: No Project-- Existing Conditions</p> <p>No new environmental impacts. No implementation of proposed Form-Based Code.</p>
	<p>Alternative 19.2: No Project--Initiative Without Proposed Amendments</p> <p>Reduced impacts on scenic vistas (e.g., of San Pablo Bay) and from light/glare and shadows. Remaining significant unavoidable impact.</p>
	<p>Alternative 19.3: Reduced Development Scenario</p> <p>Reduced impacts on scenic vistas (e.g., of San Pablo Bay) and from light/glare and shadows. Remaining significant unavoidable impact.</p>
	<p>Alternative 19.4: Reduced Biological Impact Layout</p> <p>Possible increases in some building heights (to accommodate displaced, potential development) could increase impacts on scenic vistas and public views (e.g., of San Pablo Bay) and from shadows. Remaining significant unavoidable impact.</p>
(b) Air Quality	<p>No new environmental impacts.</p> <p>Reduced amount of office/retail development, and associated reductions in trip generation and traffic impacts, would reduce associated regional emissions. Remaining significant unavoidable impact.</p> <p>Reduced overall development, and associated reductions in trip generation and traffic impacts, would reduce associated regional emissions. Remaining significant unavoidable impact.</p>
(c) Biological Resources	<p>No new environmental impacts.</p> <p>Reduced impacts if development located more distant from biological resources. All mitigable.</p>
(d) Climate Change	<p>No new environmental impacts.</p> <p>No potentially significant GHG emissions impacts. Reduced office/retail development, and associated reductions in trip generation, traffic impacts, and energy use, would reduce associated GHG emissions.</p> <p>Reduced impacts if development located more distant from biological resources. All mitigable.</p> <p>No potentially significant GHG emissions impacts. Reduced overall development, and associated reductions in trip generation, traffic impacts, and energy use, would reduce associated GHG emissions.</p>
(e) Cultural and Historic Resources	<p>No new environmental impacts.</p> <p>Similar or slightly reduced potentially significant impacts. All mitigable.</p>
	<p>Substantially reduced impacts on biological resources. All mitigable.</p> <p>Less-than-significant GHG emissions impacts similar to proposed project.</p> <p>Reduced potentially significant impacts. All mitigable.</p>

SOURCE: Wagstaff/MIG

Table 19.1 (continued)
 ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

Impact	Alternatives			
	Alternative 19.1: No Project-- Existing Conditions	Alternative 19.2: No Project--Initiative Without Proposed Amendments	Alternative 19.3: Reduced Development Scenario	Alternative 19.4: Reduced Biological Impact Layout
(f) Geology and Soils	No new environmental impacts.	Similar potentially significant impacts. All mitigable. Fewer people exposed to geologic hazards (e.g., earthquake).	Similar potentially significant impacts. All mitigable. Fewer people exposed to geologic hazards (e.g., earthquake).	Similar potentially significant impacts. All mitigable.
(g) Hazards and Hazardous Materials	No new environmental impacts.	Less-than-significant impacts similar to proposed project.	Less-than-significant impacts similar to proposed project.	Less-than-significant impacts similar to proposed project.
(h) Hydrology and Water Quality	No new environmental impacts.	Similar potentially significant impacts. Fewer people exposed to potential flood hazards.	Reduced potentially significant impacts. All mitigable. Fewer people exposed to potential flood hazards.	Similar potentially significant impacts. All mitigable.
(i) Land Use and Planning	No new environmental impacts. No implementation of adopted WDMP/WDMP Initiative land use controls or proposed Form-Based Code. No integration with ITC project.	No potentially significant environmental impacts. Reduced beneficial effects (e.g., fewer employees proximate to planned Intermodal Transit Center).	No potentially significant environmental impacts. Reduced beneficial effects (e.g., fewer residents and employees proximate to planned Intermodal Transit Center).	Impacts and benefits similar to proposed project. More biological resources would remain in natural state.
(j) Noise	No new environmental impacts.	Impacts less than proposed project. All mitigable.	Impacts less than proposed project. All mitigable.	Similar potentially significant impacts. All mitigable.
(k) Population and Housing	No new environmental impacts.	No potentially significant environmental impacts. Fewer employees proximate to planned Intermodal Transit Center.	No potentially significant environmental impacts. Fewer residents and employees proximate to planned Intermodal Transit Center.	No potentially significant environmental impacts.
(l) Public Services and Utilities	No new environmental impacts.	Reduced less-than-significant impacts.	Reduced less-than-significant impacts.	Less-than-significant impacts similar to proposed project.

SOURCE: Wagstaff/MIG

Table 19.1 (continued)
 ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

<u>Alternatives</u>			
<u>Impact</u>	<u>Alternative 19.1: No Project-- Existing Conditions</u>	<u>Alternative 19.2: No Project--Initiative Without Proposed Amendments</u>	<u>Alternative 19.3: Reduced Development Scenario</u>
<i>(m) Transportation and Circulation</i>	No new environmental impacts.	Reduced trip generation and traffic impacts. Remaining significant unavoidable impacts.	Reduced trip generation and traffic impacts. Remaining significant unavoidable impacts.
<i>(n) Attainment of Project Objectives</i>	No attainment. Transit-oriented, mixed-use neighborhood not implemented.	Substantial attainment. Transit-oriented, mixed-use neighborhood substantially implemented.	Partial attainment. Benefits of transit-oriented, mixed-use neighborhood reduced.
			<u>Alternative 19.4: Reduced Biological Impact Layout</u> Similar potentially significant impacts. Remaining significant unavoidable impacts. Full attainment. Transit- oriented, mixed-use neighborhood implemented.

SOURCE: Wagstaff/MIG

Table 19.2
 TRIP GENERATION COMPARISON--PROJECT VS. PROJECT ALTERNATIVES

Alternative	New Trips		
	Daily	AM Peak Hour	PM Peak Hour
Proposed Project			
Residential	5,860	407	467
Office	2,120	303	283
Retail	9,100	201	861
Hotel	750	54	74
Total Net New Trips	17,830	965	1,685
Alternative 19.1: No Project--Existing Conditions			
Residential	0	0	0
Office	0	0	0
Retail	0	0	0
Total Net New Trips	0	0	0
Alternative 19.2: Initiative Without Proposed Amendments			
Residential	6,445	448	514
Office	1,724	246	230
Retail	8,201	181	776
Total Net New Trips	16,370	875	1,520
Alternative 19.3: Reduced Development Scenario			
Residential	5,158	358	411
Office	1,696	242	226
Retail	6,758	149	639
Total Net New Trips	13,612	749	1,276
Alternative 19.4: Reduced Biological Impact Layout			
Residential	5,860	407	467
Office	2,120	303	283
Retail	9,100	201	861
Hotel	750	54	74
Total Net New Trips	17,830	965	1,685

SOURCE: *Trip Generation, 7th Edition* (2003); Fehr & Peers (2010) (see Table 16.10 of this EIR); Wagstaff/MIG (2010).

Note: Similar to the proposed project traffic generation calculations, flex space has been analyzed as 50% office use and 50% retail use. Trip reduction formulas (internal and transit) have not been incorporated into this table. Because hotel use is a higher daily, AM peak hour, and PM peak hour traffic generator than multi-family residential use, the hotel option has been replaced with 125 multi-family residential units in Alternatives 19.1, 19.2, and 19.3, consistent with the WDMP.

19.3 CONCLUSION: ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (section 15126[e][2]) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Table 19.1 provides a summary comparison of the environmental implications of the various identified project alternatives for all of the environmental issues considered in this EIR. Particular to traffic concerns, Table 19.2 lists trip generation forecasts for the proposed project and the alternatives. As noted above, this EIR has concluded that the possibility of locating the proposed project on an alternative site that would avoid or substantially lessen potentially significant environmental impacts identified in this EIR while attaining most of the project objectives is remote (see Alternative 19.5, above). Therefore, Alternative 19.5 is not included in Tables 19.1 and 19.2.

When viewed together, Table 19.1 indicates that, of the various alternatives evaluated in this chapter, **Alternative 19.3: Reduced Development Scenario**, the alternative with 20-to-30 percent reductions in land use types, would result in the least adverse combination of environmental impacts and would therefore represent the "environmentally superior alternative" under CEQA. However, this "environmentally superior alternative" would be less effective than the proposed project in attaining the project objectives of developing a transit-oriented, mixed-use neighborhood that includes walkable streets, a variety of dwelling types and businesses, and public plazas with views of San Pablo and San Francisco Bays while implementing the WDMP, primarily because the resulting reduction in mixed-use development potential would result in fewer residents, workers, and visitors having direct access to these Hercules Bayfront Project amenities, as well as to the adjacent planned Intermodal Transit Center (ITC) facilities.

