
OTHER CEQA CONSIDERATIONS

This chapter of the Draft Supplemental EIR contains discussion regarding a number of CEQA-mandated topics as well as separate discussion of several issues that were raised by public agencies, members of the public or the City Planning Commission during the public scoping session and/or in response to the City's Notice of Preparation for this Draft SEIR. Specifically, the following issues are contained in this chapter of the Draft SEIR:

- Summary of Project impacts, including significant and unavoidable impacts and an expanded discussion of land use compatibility and truck parking issues that were identified in the January 19, 2006 Initial Study as being less than significant impacts,
- Identification of project alternatives, including those alternatives previously considered and rejected as part of the 2002 OARB Redevelopment EIR, development under the existing Redevelopment Plan and Reuse Plan, and one additional Ancillary Maritime Support alternative identified for this Draft SEIR,
- Explanation of the cumulative scenario as used in this Draft SEIR for analysis of cumulative traffic and air quality impacts, and
- Conclusions regarding other CEQA required topics including growth inducing effects.

SUMMARY OF PROJECT IMPACTS

SIGNIFICANT AND UNAVOIDABLE IMPACTS

Cumulative Traffic Impacts

(Impact Traf-6): At the West Grand Avenue / Maritime Street intersection, Option B would increase traffic in 2025 and would cause the average vehicle delay to increase by more than two (2) seconds where the future baseline level of service would be LOS F during the p.m. peak and Saturday peak hours. Implementation of recommended mitigation measures would reduce the potentially significant cumulative impacts at the West Grand Avenue / Maritime Street intersection but would not reduce cumulative impacts to a level that is less than significant. No feasible mitigation measures have been identified that would reduce cumulative impacts to a level that is less than significant; therefore, residual cumulative impacts at the West Grand Avenue / Maritime Street intersection would be *significant and unavoidable*.

- This cumulative impact was also considered *significant and unavoidable* in the OARB Redevelopment Plan EIR.

(Impact Traf-7): At the West Grand Avenue / I-880 Frontage Road intersection, both the Project and Option B would increase traffic in 2025 and both development options would cause the average vehicle delay to increase by more than two (2) seconds where the future baseline level of service would be LOS F during the a.m. peak, p.m. peak, and Saturday peak hours. Implementation of recommended mitigation measures would reduce the potentially significant cumulative impacts at the West Grand Avenue / I-880 Frontage Road intersection but would not reduce cumulative impacts to a level that is less than significant. No feasible mitigation measures have been identified that would reduce cumulative impacts to a level that is less than significant; therefore, residual cumulative impacts at the West Grand Avenue / I-880 Frontage Road intersection would be ***significant and unavoidable (NEW)***.

- This cumulative impact was considered ***significant but mitigated*** in the OARB Redevelopment Plan EIR. However, subsequent City of Oakland EIRs (Uptown and Wood Street Project) have re-examined the feasibility of the mitigation necessary at this location and concluded that costs of the identified improvements were so prohibitively high that the mitigation was not feasible and the impacts was considered ***significant and unavoidable***.

(Impact Traf-10): At the 7th Street / Maritime Street intersection, both the Project and Option B would increase traffic in 2025 and would cause the average vehicle delay to increase by more than two (2) seconds where the future baseline level of service would be LOS F during both the a.m. and p.m. peak hours. Implementation of recommended mitigation measures would reduce the potentially significant cumulative impacts at the 7th Street / Maritime Street intersection but would not reduce cumulative impacts to a level that is less than significant. No feasible mitigation measures have been identified that would reduce cumulative impacts to a level that is less than significant; therefore, residual cumulative impacts at the 7th Street / Maritime Street intersection would be ***significant and unavoidable (NEW)***.

- This cumulative impact was considered ***significant but mitigated*** in the OARB Redevelopment Plan EIR. The mitigation called for the Port to provide modifications to the 7th/Maritime Street intersection as part of the design for realignment of Maritime Street. However, as the realignment of Maritime Street cannot be assumed to proceed at this time, this Draft SEIR calls for fair share contribution toward necessary modifications of this intersection.

(Impact Traf-17): Both the Project and Option B would increase traffic on study area freeways in 2025 and would cause degraded traffic operations to LOS F at 1) I-80 westbound between I-880 and I-580 during the a.m. peak hour, 2) I-80 westbound east of the I-80/I-580 split during the p.m. peak hour. In addition, Option B would degrade traffic operations to LOS F on I-880 northbound south of the I-80/I-580 split during the p.m. peak hour. Implementation of recommended mitigation measures would reduce the potentially significant cumulative impacts on study area freeways, but would not reduce cumulative impacts to a level that is less than significant. No feasible mitigation measures have been identified that would reduce cumulative impacts to a level that is less than significant; therefore, residual cumulative impacts on study area freeways would be ***significant and unavoidable***.

- This cumulative impact was also considered ***significant and unavoidable*** in the OARB Redevelopment Plan EIR.

Project-Specific Air Quality Impacts

(Impact Air-1, Option B only): The additional vehicle trips to and from the project site under Option B would result in new air pollutant emissions within the air basin. Implementation of recommended mitigation measures, including implementation of all BAAQMD-recommended Transportation Control Measures (TCMs) for reducing vehicle emissions from commercial, institutional, and industrial operations, would reduce this impact. However, it is not possible to accurately estimate the extent of this reduction. Therefore, it is conservatively assumed that these measures would not reduce this impact to a level that is less than significant and air pollution emissions under Option B would be *significant and unavoidable*.

- This impact was also considered *significant and unavoidable* in the OARB Redevelopment Plan EIR.

Cumulative Air Quality Impacts

(Impact Air-5, Option B only): With respect to cumulative impacts, Bay Area Air Quality Management District Guidelines provide that a proposed action resulting in significant impacts to air quality is also considered to have a significant cumulative impact to air quality. Because emissions from Option B are considered significant and unavoidable, it is considered that cumulative emissions from Option B as well as other approved and future cumulative projects in the area, would contribute to continued exceedance of applicable ozone and PM₁₀ standards. While mitigation measures would reduce significant impacts, they would not reduce air quality impacts on a project-specific or cumulative basis for Option B to a less than significant level and the cumulative impact is considered to be *significant and unavoidable*.

- This cumulative impact was also considered *significant and unavoidable* in the OARB Redevelopment Plan EIR.

SIGNIFICANT IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

As specifically described in Chapters 3 (Traffic) and 4 (Air Quality) of this Draft SEIR, a number of potentially significant impacts have been identified that can be reduced to less than significant levels through implementation of recommended mitigation measures. These impacts and mitigation measures are also summarized in Table 1-1 of the Executive Summary of this Draft SEIR.

LESS THAN SIGNIFICANT IMPACTS

An Initial Study was prepared and distributed for this Project with a Notice of Preparation (NOP) on January 19, 2006 (see Appendix B). The Initial Study determined that the previous 2002 OARB Redevelopment EIR analyzed, disclosed and mitigated where possible the majority of environmental impacts that would result from the Project. Because the proposed Project (and Option B) could result in higher levels of traffic than assumed under the previous OARB Redevelopment EIR, and because some of the assumptions regarding development of the surrounding areas have changed, the City determined that a Supplemental EIR needed to be prepared, but focused solely on the issues of traffic and air quality. All other environmental issues were assumed to have been adequately analyzed, disclosed, and mitigated pursuant to the OARB Redevelopment EIR.

The OARB Redevelopment EIR did include an evaluation of the land uses contemplated in the OARB Redevelopment/Reuse Plan and concluded that those land uses would not divide an established community, would not conflict with any applicable land use plan, nor are there any habitat conservation plans applicable to the site or that would be in conflict with those uses. The auto mall land uses as contemplated under the Project and those land use contemplated under Option B are not so dissimilar to those anticipated under the Redevelopment Plan as to change this conclusion. However, during the public scoping meeting and during the public response period for the January NOP, comments were raised suggesting that additional analysis should be conducted for this project, or more information than was included in the Initial Study should be provided, specifically in regard to the topics of:

- land use compatibility with adjacent industrial/Port-related uses,
- land use compatibility with the adjacent odor-producing EBMUD Wastewater Treatment Plant, and
- provision of adequate parking for ancillary maritime uses.

These topics are more fully discussed below.

Land Use Compatibility with Adjacent Industrial Uses

OARB Redevelopment EIR Conclusions

The Project site and the expanded Option B area are adjacent to the Port Development Area. The types of land uses planned for the Port Development Area and the City's Gateway Development Area are distinctly different from one another. The Port Development Area is planned for port-related industrial and transportation-type uses and the City's Gateway Development Area is planned for more of a mix of business and office land uses. This issue was addressed in the Land Use chapter of the OARB Redevelopment EIR (pp. 4.2-10 to 4.2-13) as excerpted below:

The types of land uses planned for the Gateway and the Port development areas are distinctly different—the former is proposed to be a mix of business and office uses, and the latter would be entirely heavy industry. In some instances these dissimilar uses would be separated and buffered from one another by major infrastructure. For example, Maritime Street would separate a major industrial rail facility from the Gateway development area. However, at the interface of the Gateway development area and the Port development area near New Berth 21, potential exists for heavy industrial maritime land uses to be located immediately adjacent to dissimilar job training, Office, R&D, or Light Industrial uses. The Port maintains that this situation is similar to the Howard Terminal, which is immediately adjacent to the Jack London Square development and which has not experienced land use conflicts. However, because occurrence of this impact depends on site-specific design not currently defined, the impact is considered potentially significant. With implementation of Mitigation Measures 4.2-1, 4.2-2 and 4.2-3, the potential impact would be avoided or minimized, and the residual impact is considered less than significant.

Mitigation 4.2-1: The City shall ensure that Gateway development area redevelopment activities adjacent to Port of Oakland industrial maritime facilities are designed to minimize any land use incompatibilities to the extent feasible.

Mitigation 4.2-2: If any land use incompatibility is subsequently identified, the Port of Oakland shall use its best efforts, consistent with meeting cargo throughput demand, to locate maritime activities that could result in land use incompatibilities as far away from the property boundary as feasible.

Mitigation 4.2-3: The City and Port shall coordinate to implement Mitigation Measures 4.2-1 and 4.2-2; if despite these efforts, subsequent land use incompatibilities are identified, the Port and City shall jointly develop, implement, and fund on a fair share basis additional strategies to reduce incompatibilities.

Residual Significance: Less than significant

The OARB Redevelopment EIR notes that when proposed, projects are expected to be designed to avoid or minimize land use incompatibilities. In many instances, these dissimilar uses would be separated by major infrastructure. Where not buffered by major infrastructure such as Maritime Road, the design of each adjacent site must include strategies to reduce any incompatibility, as per the OARB Redevelopment EIR mitigation measures. The OARB Redevelopment EIR notes that the City shall take compatibility of uses into consideration during planning and design review.

Auto Mall Project - Initial Study Conclusions

As noted in the Initial Study (see Appendix B), according to City thresholds the Auto Mall Project and/or Option B would have a significant environmental effect if it would result in a fundamental conflict between adjacent or nearby land uses.

The Initial Study found no insurmountable conflict of land uses between the proposed automobile dealerships and/or potential big box retail uses and adjacent rail yards. Nor was any insurmountable conflict found between the proposed uses and existing and foreseeable industrial, warehousing, and ancillary Port-related uses to the south and west.

The Project as proposed does include certain design strategies that seek to further minimize potential land use incompatibilities with adjacent Port-related uses. These design strategies include:

- Placement of the least sensitive Project elements (such as auto storage and parking) toward Port facilities
- Port policy which provides for a 25-foot setback from their property line to the nearest rail line (such as those proposed along the Project's eastern boundary), and a fence at the property line
- Additional strategies may be used to reduce other potential incompatibilities. These strategies may include, but are not limited to internal setbacks from the property line, landscape buffering, and additional fencing or walls. Such specific design considerations will be reviewed for each parcel when detailed development plans are submitted, and may become conditions of subsequent approvals.

Implementation of these design strategies as part of subsequent, detailed development plan submittals for the Auto Mall Project and/or Option B would result in the implementation of OARB Redevelopment EIR mitigation measures 4.2-1 through 4.2-3, and the impact from adjacency of Port and Project uses would be less than significant.

Land Use Compatibility with Adjacent Odor-Producing Use

OARB Redevelopment EIR Conclusions

The nearby East Bay Municipal Utility District (EBMUD) wastewater treatment plant (WWTP) could cause odor impacts at adjacent land uses. The OARB Redevelopment EIR discussed the potential odor impacts in its Air Quality chapter as follows (on pp.4.4-23, 4.4-24):

Examination of the annual wind directions shown in Figure D-1 of the BAAQMD CEQA Guidelines (1996, revised 1999) illustrates that the prevailing wind direction in the area is from the west and west-northwest most of the year. Winds sometimes blow from the southwest to southeast, in part due to passing frontal systems. Winds seldom blow from the northeast quadrant. The wind directions shown for the area were developed from data collected at the EBMUD Main WWTP. The EBMUD Main WWTP is located northeast of the OARB sub-district. Odor thresholds of airborne compounds from WWTPs are very low (primarily hydrogen sulfide, with a characteristic "rotten egg" odor). Because of this, there is a possibility that new employee population at the OARB sub-district could experience odor events. Because the wind is seldom from the northeast, the likelihood of odor events at the OARB is low, although such events would be possible under stable, calm air conditions. Because the expected frequency of odor events at the OARB sub-district is low, the impact is considered less than significant.

The OARB Redevelopment EIR also discussed the potential odor impacts in the Land Use chapter as follows (on pp.4.2-10, 4.2-11):

Due to its industrial nature and potential for odors, the EBMUD Main WWTP, located east of the Gateway development area, represents a potential incompatibility with people-attracting land uses. That portion of the Gateway development area slated for the greatest people-attracting uses (Office, R&D, the Gateway Park) is separated from the WWTP by elevated West Grand Avenue. The portion of the Gateway development area above Grand Avenue nearest the EBMUD WWTP would include industrial-type land uses such as Ancillary Maritime Support at the Baldwin Yard, and Warehouse/Distribution or Light Industrial at the Subaru site. These land uses are more industrial in nature and less people-attracting than those proposed for the Gateway development area below West Grand Avenue. In addition, due to their industrial nature, the sensitivity of these uses to potential occasional odor events is low.

Auto Mall Project - Initial Study Conclusions

As noted in the Initial Study (see Appendix B), according to City thresholds for air quality, the Auto Mall Project and/or Option B would have a significant effect if it would frequently create substantial objectionable odors affecting a substantial number of people. The Project would not generate such odors, but may raise a significant land use compatibility issue if it were to be significantly affected by the adjacent WWTP such that the adjacent use would frequently create substantial objectionable odors affecting a substantial number of new people associated with the project.

The dominant weather factor in the vicinity of the Project site is the flow of marine air traveling through the Golden Gate, across San Francisco and through the San Bruno Gap. It would take a disruption of great magnitude to change this regional wind current. The BAAQMD CEQA Guidelines as referenced in the OARB Redevelopment EIR remain the most recent information on this topic, with no updated wind direction data now or expected in the foreseeable future. There is no reason to doubt the continued validity of the OARB Redevelopment EIR conclusion that the impact of odors resulting from proximity to the EBMUD WWTP would be less than significant, with no mitigation warranted.

Under the proposed Auto Mall Project or Option B, the more industrial land uses anticipated under the Redevelopment/Reuse Plan would be replaced by new auto dealerships immediately south of the EBMUD WWTP and potentially “big box” retail south of the elevated West Grand Avenue. These auto dealerships and retail uses would attract more people than would warehouse or light industrial land uses, and attract shoppers in particular to the area. While odor incidents may occasionally occur at the Project site and such incidences may be more noticeable and aesthetically unpleasant with the proposed Project land uses, such incidents are not expected to occur with such frequency or severity that odors would result in a fundamental land use incompatibility.

The Initial Study concluded that the potential land use incompatibilities caused by adjacency to the odor-causing WWTP had been adequately analyzed in the previous OARB Redevelopment EIR. No new evidence has since been provided. Therefore, odor impacts related to adjacency to the WWTP are considered less than significant, with no further mitigation necessary.

Cumulatively Inadequate Truck Parking

OARB Redevelopment EIR Conclusions

The effect of redevelopment in combination with already approved Port maritime development and the probable development of ancillary maritime support facilities to serve the expanded Port could have an increased cumulative effect on the potential for truck operators to park outside the OARB Redevelopment project area. The possible deficit in truck parking would be potentially significant. This issue was addressed in the OARB Redevelopment EIR in the Cumulative Impacts chapter as follows (from pp.5-14 through 5-17):

Approximately 105 acres have been reserved exclusively for ancillary maritime support (AMS) uses as part of the redevelopment program. Such support is essential to efficient port operation, however, most ports do not provide for truck parking within their port area, as the redevelopment program proposes. Consequently, the Port’s allocation of 90 acres and the City’s allocation of an additional 15 acres has been considered by BCDC staff as a “laudatory achievement,” and that this amount of land, adjacent to the marine terminals and UP Intermodal railyard, is a reasonable amount of land to accommodate AMS. Nevertheless, BCDC staff, the City, Port, and trucking industry agree the City and Port should continue to work with the trucking industry and the West Oakland community to find appropriate amounts and locations of land near but outside the Port to serve trucking needs and minimize the impact of Port-related trucking on the West Oakland community.

The 105 permanent acres currently planned for such uses will accommodate much — but not all — demand under efficient operating conditions. Additional interim space available during

terminal development will help accommodate most Port services to approximately 2010. Starting in about 2010, there will be a shortfall or “gap.” Not all Port services will fit on redevelopment project area land, and some will have to be housed at suitable sites elsewhere.

Mitigation 5.3-7: The City and Port shall cooperatively develop a program that combines multiple strategic objectives and implementation tools designed to reduce cumulative truck parking and other AMS impacts. This program should consider strategies that may include, but should not be limited to the following:

- Pursue truck traffic mitigation steps, information strategies, and rail intermodal strategies.
- Identify potential land swaps and utilize additional small parcels of land in the vicinity of the port, especially for truck parking and support services.
- Prioritize the use of harbor-area land for core services, maximize the efficient use of harbor-area land and facilities, and reduce the impacts in adjacent neighborhoods.
- Promote intensive land use (doing more with less) and extended terminal gate hours.
- Actively encourage relocation of selected services to other Oakland, East Bay, or Northern California (Hinterland Loop) locations.
- Develop multi-user facilities in Oakland or in corridor locations (e.g., Richmond and San Leandro) for both core and non-core services.

Residual Significance: Implementation of such a program may take many years, and the success of the program cannot be ascertained at this time. Therefore, this cumulative impact remains significant and unavoidable.

Auto Mall Project - Initial Study Conclusions

As noted in the Initial Study (see Appendix B), according to City thresholds used for the OARB Redevelopment EIR, the Auto Mall Project and/or Option B would have a significant environmental effect if it would result in inadequate parking capacity or increase the number and incidence of large vehicles parking within surrounding communities or on streets not designated for such uses.

The Auto Mall Project and/or Option B would not increase the number or incidence of large vehicles parking within surrounding communities or on streets not designated for such uses in comparison to the Redevelopment /Reuse Plan. It would, however, necessitate relocation of 15 acres of land programmed under the Reuse Plan for Ancillary Maritime Support use. This use is

required to be located within the City's Gateway Development Area according to the Bay Conservation and Development Commission's Bay and Seaport Plan. Under the proposed Project, there is no reduction in the amount of ancillary maritime support uses, simply relocation of this use from one site to another. The OARB Reuse Plan addresses the location of the Ancillary Maritime Support Services (on p.14) as follows:

BCDC has required that the OBRA and Port commit a total of 30 acres to the ancillary maritime support uses which includes trucking activities. The OBRA has agreed to designate OARB's Baldwin Yard area to remain Port Priority Use for this activity, and the Port is securing 15 acres of non-OARB property. However, the decision to devote the Baldwin Yard to these activities was rendered in response to BCDC's mandate that a specific site for maritime activities be identified at the time of its January 4 [2001] decision on the Port Priority Use amendment application. The decision was made independent of the OARB land reuse planning process. Subsequent evaluation may reveal other more suitable locations for these activities. BCDC has agreed that should OBRA's master planning process identify an alternative location, it will facilitate and expedited process for further amending its Plans to reflect the new location.

BCDC will evaluate and must approve this change in location for the Project to proceed. This relocation, as anticipated in the Reuse Plan, moves the ancillary maritime support uses to a location adjacent to the Port-controlled area where the Port will be able to plan how the surrounding uses will relate and possibly combine with this 15 acre site. This new location was incorporated in the traffic analysis included in this EIR (Chapter 4) and the related traffic-based emissions analysis for the air quality chapter of this EIR (Chapter 5). The relocation of this use from 15 acres within the Project site to 15 acres along the southern border of the Central Gateway area is not a significant impact, nor a significant change from that analyzed in the OARB Redevelopment EIR.

Recent Developments

An 11-acre portion of the Project site, the Subaru lot, had been used for truck parking in the past. The truck parking lease with the Port was terminated on February 28, 2006. The 11-acre Subaru Lot lease was replaced with an 11-acre interim lease operated by the Port on West Maritime property.

The City has begun negotiations with Oakland Maritime Support Services to lease the 11 acre site plus an additional 4 acres to create a 15-acre truck parking site that will commence operation in August 2006.

The 15-acre lease site is expected to remain until such time as the BCDC 15-acre site is designated and developed sometime in the future. Currently, the 15-acre BCDC designated ancillary maritime support site is located on the Project site. With reconsideration of this site for auto mall uses, the AMS land use designation will need to be relocated. The City of Oakland envisions transferring this AMS land use requirement to a 15-acre portion of the Central Gateway, at the southern boundary adjacent to the Port's Development Area or elsewhere in the Gateway Development Area.

CUMULATIVE IMPACTS

CUMULATIVE SCENARIO

CEQA Guidelines Section 15130(b) enables the Lead Agency to define cumulative conditions as either (a) a list of past, present and probable future projects producing related or cumulative impacts; or (b) a summary of projections contained in an adopted general plan or related planning document. For this Supplemental EIR for the OARB Auto Mall, the cumulative condition is described as a combination of these methodologies.

Updated Summary of Projections

The Alameda County Congestion Management Agency (ACCMA) produces a countywide travel demand traffic model. As input into this model, the City of Oakland has developed a comprehensive set of land use assumptions based on its projections of General Plan buildout assumptions and Association of Bay Area Governments (ABAG) projections. The most recent versions of this land use projection for the OARB vicinity are the land use data base developed for the West Oakland Redevelopment Plan EIR (City of Oakland, 2003) and the land use database developed for the Wood Street project (City of Oakland, 2005). Under these recent land use database updates, all portions of West Oakland not located in a previously established redevelopment area or the OARB Redevelopment Area has since been included into a new West Oakland Redevelopment Area, and additional information regarding other cumulative development activity in West Oakland has been incorporated into this projection.

Updated List of Projects

There have been a number of specific projects and other circumstances related to cumulative conditions in the area that have changed since certification of the OARB Redevelopment EIR in 2002. These changes include:

- The U.S. Army has completed transfer of the former OARB to the Oakland Base Reuse Authority (OBRA)
- The U.S. Army Reserves have completed transfer of their former land ownerships within the former OARB to OBRA
- The City of Oakland and State Lands Commission are in the process of addressing issues related to the designation of lands subject to Tidelands Trust
- OBRA and the Port of Oakland have conducted other minor land transfers in the vicinity of the Project for purposes of facilitating more accessible access and rail yard configurations. The City of Oakland has approved a General Plan amendment to change the land use designation of these Port-owned properties to the General Industrial/Transportation land use designation, better reflecting the use of these properties as envisioned under the Redevelopment/Reuse Plan
- Hazardous materials clean-up operations have been completed or initiated in several portions of the OARB, including the removal of Building #1 and the hazardous substances

at that site pursuant to the approved OARB Remedial Action Plan/Risk Management Plan (RAP/RMP)

- A major portion of the OARB Redevelopment District's 16th and Wood Street subarea has since been approved for development of the Wood Street project.
- City staff has held discussions with potential developers that have interest in developing projects in portions of the OARB Gateway other than at the project site. Although no final plans for these areas have been developed and no applications filed, City staff does consider the potential for these projects as reasonable and feasible such that they should be included in a new cumulative projection of land uses for the area.

Remainder of the OARB

Although still in the conceptual stages, the City has been in discussion with two major developers/development projects for the remainder of the Gateway area not included in the Project site. No specific details for these projects had yet been proposed prior to publication of the NOP/Initial Study for this SEIR, nor have any proposals or applications been identified or filed with the City during preparation of this EIR. However, these potential development scenarios are substantially different than the assumptions underlying the land use program for the current OARB Redevelopment Plan/Reuse Plan. In the interest of being conservative in the cumulative analysis for this Auto Mall project (i.e., to ensure that the potential worst-case condition has been adequately described), the City has elected to include an updated land use assumption for the remainder of the former OARB Gateway area not included within the project or Option B sites.

Two potential scenarios were created for the buildout of the remainder of the Gateway Development Area not included in the Project site:

1. Scenario #1 is a High Intensity/Retail-Oriented Scenario that could include as much as 1.2 million square feet of retail (shopping center); 200,000 square feet of Office/R&D, and 500,000 square feet of Light Industrial use. This amount of development is generally consistent with the assumptions of the Redevelopment Plan/Reuse Plan but the mix of uses assumed under this scenario are much more heavily balanced toward retail than the Reuse Plan assumes.
2. Scenario #2 is an Entertainment/Studio Complex Scenario that could include two TV studios, a movie studio, a 200-student educational film school and as much as 400,000 square feet of retail/restaurant/shopping center uses.

Although it is not clear which scenario may ultimately be constructed or if a combination of the two scenarios may even evolve, the cumulative condition assumed for this SEIR was chosen based on the "worst case" traffic impacts (i.e., the scenario that generated the most vehicle trips). Scenario #1, the High Intensity/Retail-Oriented scenario generates more average daily trips than would Scenario #2 so it was used for this cumulative analysis. However, Scenario #2 or any combination of the two scenarios would also be fully covered by this "worst-case" analysis.

Under either of these scenarios it is assumed that the 17-acre Gateway Park along the water's edge would occur (pursuant to Tidelands Trust agreements), and that 15 acres of ancillary

maritime support uses would be relocated from the Project site to another City Gateway location.

CUMULATIVE IMPACT ANALYSIS

The OARB Redevelopment EIR found several cumulatively considerable impacts associated with redevelopment activities at the former Oakland Army Base. Most cumulative effects were fully and adequately addressed in the OARB Redevelopment EIR and need no further environmental review.

However, the potential cumulative traffic and air quality effects associated with the Project and/or Option B are more fully addressed in Chapters 3 (Traffic) and Chapter 4 (Air Quality) of this SEIR.

PROJECT ALTERNATIVES

At the public scoping meeting in February 2006, the Oakland Planning Commission requested that this SEIR provide more information about project alternatives than that contained in the Initial Study.

The previously certified OARB Redevelopment EIR identified a reasonable range of project alternatives that were defined for the entirety of the OARB Redevelopment Area, including the Project site and the additional Option B Site. Not all alternatives previously evaluated in the OARB Redevelopment EIR are applicable or relevant for a comparison to the currently proposed project. However, much of this previous alternatives analysis remains applicable and is described and summarized below.

The OARB Redevelopment EIR explained the screening process to evaluate alternatives and found three (3) infeasible alternatives and five (5) alternatives warranting further study.

ALTERNATIVES PREVIOUSLY RECOGNIZED AS INFEASIBLE

The OARB Redevelopment EIR identified three alternatives to the proposed Redevelopment Plan that were rejected as infeasible and not warranting further study. Two of these alternatives, the No New Intermodal Facility and the No New Berth 21 Alternatives are not applicable to consideration of the project at hand. However, the conclusions of the OARB Redevelopment EIR regarding the Full Adaptive Reuse Alternative are relevant. The Adaptive Reuse Alternative would have preserved all historic structures within the Redevelopment Area including buildings and wharves, for reuse and would have maintained the integrity of the National Register-eligible OARB Historic District. However, the OARB Redevelopment EIR concluded that this alternative would prevent key redevelopment components from being developed, would fail to meet basic project objectives, and would fundamentally conflict with the BCDC Bay and Seaport Plans. For these reasons this alternative was rejected as infeasible.

ALTERNATIVES FURTHER EVALUATED IN THE OARB REDEVELOPMENT EIR

The OARB Redevelopment EIR identified five alternatives that represented a reasonable range of feasible alternatives to the OARB Redevelopment Plan/Reuse Plan. The five potentially feasible alternatives considered were:

- No Project Alternative
- Reduced Intensity Alternative
- Full Maritime Alternative
- Gateway Adaptive Reuse/Eco-Park Alternative
- High Intensity Alternative

The following table shows a comparison of each of these alternatives, with estimates for land uses in the Project area (as opposed to the entire Redevelopment Area reported in the OARB Redevelopment EIR).

**TABLE 5-1
PROJECT AREA BUILD-OUT, 2002 THROUGH 2020
BY OARB REDEVELOPMENT EIR ALTERNATIVES**

Potential Land Uses	Proposed Project	Reuse Plan Buildout	No Project Alt.	High Intensity Alt.	Reduced Intensity Alt.	Full Maritime Alt.	Gateway Reuse/Eco-Park
Project Site:							
Lt. Industry/"Flex"				980,000			
Retail							
Auto Dealerships	390,000						
Warehouse/Dist.		300,000			200,000		300,000
AMS (acres)		15		15	15	30	15
Project Total square feet	390,000	300,000	0	980,000	200,000	0	300,000
acres of AMS	0	15	0	15	15	30	15
Option B Expanded Site:							
Lt. Industry/"Flex"		390,000		2,600,000	260,000		
Auto Dealerships	50,000						
Retail	150,000						
Warehouse/Dist			444,000				444,000
AMS (acres)						30	
Sub-total square feet	200,000	390,000	444,000	2,600,000	260,000	0	444,000
acres of AMS	0	15	0	0	0	30	0
Option B Total^b square feet	590,000	690,000	440,000	3,490,000	460,000	0	740,000
acres of AMS	0	15	0		15	60	15

Notes:

^a sq. ft. = square feet; ac. = acres

^b Project site plus expanded Option B area

The No Project Alternative (No Redevelopment)

The No Project alternative of the OARB Redevelopment EIR assumed no conveyance of the OARB from the Army to OBRA, and no subsequent land transfers to the City and the Port. The Gateway and Port Development Areas would not undergo substantial physical change.

For the current Project site and the Option B site, the No Project Alternative assumed maintenance of the status quo, including continued vacant use of the Project site and on-going use of approximately 444,000 square feet of warehouse and distribution uses within the additional Option B site (see **Table 5-1**).

The significantly reduced redevelopment and correspondingly reduced employment and economic activity under this alternative were found to result in lower traffic, lower air emissions and greater preservation of historic resources. However, the No Project Alternative would have failed to achieve most benefits of reuse and would not have met most objectives of the Reuse Plan. The No Project Alternative was rejected by the City of Oakland when it approved the Redevelopment and Reuse Plan for the following reasons:

- It would not meet the basic project objective of conveyance of the OARB from the Army to the Oakland Redevelopment Agency (ORA) and the Port. It would not increase and sustain job creation nor would it contribute to expanded low/moderate-income housing. There would be no agreement to accommodate the Homeless Assistance program and no contributions to tax increment funding for affordable housing as required in a redevelopment district.
- It would not allow the Port of Oakland to develop sufficient acreage to handle its share of Bay Area 2020 cargo throughput projections. In the absence of adequate Port of Oakland throughput, the Port would not remain competitive with other West Coast ports and more goods would likely arrive via truck from the Los Angeles/Long Beach cargo gateway, with attendant increases in traffic, noise, and air pollution.
- It would fail to meet numerous General Plan policies of the Land Use and Transportation Element, the Open Space, Conservation and Recreation Element and the Oakland Estuary Plan. It would also fail to meet policies of the Regional Water Quality Control Board's Basin Plan.

Reduced Intensity Alternative

The Reduced Intensity Alternative of the OARB Redevelopment EIR was developed to consider the effects of a lower-intensity development. Under this alternative, land use types in the OARB would remain the same as anticipated under the Reuse Plan, but the intensities of future development activities would be reduced by thirty percent (30%). There would be no change in the uses or intensities of use in the Port Development Area.

For the Project site, this alternative assumed development of approximately 200,000 square feet of new warehouse/distribution use and dedication of 15 acres for ancillary maritime support (AMS) use. For the additional Option B site, this alternative assumed development of approximately 260,000 square feet of "flex" office/light industrial use (see Table 5-1).

Based on the reduced FAR which would similarly reduce employment and economic activity, this alternative would have resulted in a reduction of cumulative traffic impacts to a less-than-significant level. Otherwise, it would have resulted in similar significant and unavoidable impacts as the Reuse Plan. This alternative would not have achieved all objectives of reuse to the same extent as proposed in the Reuse Plan. The Reduced Intensity Alternative was rejected by the City of Oakland when it approved the Redevelopment and Reuse Plan for the following reasons:

- It would likely not meet the basic project objective of strengthening the economic base and allowing for sustainable job creation. Due to high land development costs, the reduced amount of development potential may not demonstrate a sufficient return to meet the U.S. Army's economic development conveyance qualifications.
- It would result in approximately one-third fewer jobs than the proposed Reuse Plan due to the reduced development potential in the Gateway Development Area.
- It would result in construction of less low/moderate-income housing, since the tax-increment funding required in the redevelopment district would be reduced with the reduced FAR.
- It would result in reduced revenues from property tax, sales tax and utility user tax that would have a lower "multiplier effect". It would create fewer employment opportunities in construction jobs, and would generate less revenue for site remediation and necessary infrastructure improvements than the Reuse/Redevelopment Plan.

Full Maritime Alternative

Under this OARB Redevelopment EIR alternative, all existing facilities within the Gateway Development Area would have been demolished or de-constructed, and the area would be developed as a Maritime Support Center for ancillary maritime uses (AMS). There would have been no change in use or intensities of use in the Port Development Area.

This alternative assumed the total 30-acre Project site and the additional 30-acre Option B site would be redeveloped with ancillary maritime uses (see Table 5-1).

Full use of the OARB for AMS was expected to reduce the cumulative impact related to the deficit in truck parking facilities to a less-than-significant level. This alternative may have resulted in greater environmental impacts related to air quality and traffic. It would also have failed to meet basic project objectives, and would not have achieved all objectives of reuse to the same extent as the proposed redevelopment in the Reuse/Redevelopment Plan. The Full Maritime Alternative was rejected by the City of Oakland when it approved the Redevelopment and Reuse Plan for the following reasons:

- It would not meet the basic project objective of creating a vibrant and balanced land use pattern or improving the existing visual environment, since all uses would be maritime uses.
- It would result in approximately one-third fewer jobs than the proposed Reuse Plan due to the lower level of economic activity.
- Beyond the 2020 buildout date, the Full Maritime Alternative provides the opportunity, if demand warrants, to increase maritime activities and result in more ship, rail and truck trips.

Increasing these activities could result in commensurate worsening of impacts related to air quality and traffic.

Gateway Adaptive Reuse/Eco-Park Alternative

Under this OARB Redevelopment EIR alternative the Gateway Development Area would have provided for retaining and adaptively reusing eight buildings contributing to the National Register-eligible OARB Historic District, portions of two other contributing buildings, portions of five contributing warehouses, and about two-thirds of the linear frontage of historic wharves. The remainder of land within the Gateway Development Area would have been developed with industrial, light industrial, R&D and supporting uses, consistent with Eco-park development concepts. There would have been no change in use or intensities of use in the Port Development Area.

For the current Project site, this alternative assumed development of approximately 300,000 square feet of new warehouse/distribution use (as per the Reuse Plan) and dedication of 15-acres for AMS use. For the additional Option B site this alternative assumed adaptive reuse of the approximately 444,000 square feet of existing warehouse structures that contribute to the OARB Historic District (see Table 5-1).

Based on the lower density of development in the Gateway Development Area, this alternative was found to result in a reduction of cumulative traffic impacts at the Maritime/West Grand intersection to a less-than-significant level. While it would have reduced impacts to historical resources within the Gateway Development Area, development of Port-related uses would still have required demolition of over half of the contributing structures. Thus, this alternative would not have preserved the Historic District and would not have avoided or substantially reduced the significant direct and cumulative effects to cultural resources. The Gateway Adaptive Reuse/Eco-Park Alternative was rejected by the City of Oakland when it approved the Redevelopment and Reuse Plan for the following reasons:

- It would not meet the Reuse Plan objective of providing “the flexibility to balance economic and community interests for the Gateway Development Area over time,” since the Eco-park development concepts (described as a variety of linked manufacturing and service businesses that integrate all aspects of environmental management into one site) would serve to limit the overall flexibility of the “Flexible Alternative”.
- It would likely not meet the basic project objective of strengthening the economic base and allowing for sustainable job creation. Economic factors indicate that preservation and reuse of historic district contributor buildings within the Gateway Development Area may be infeasible.
- It would result in approximately one-quarter fewer jobs than the proposed Reuse Plan due to the lower level of economic activity.
- It would result in reduced revenues from property tax, sales tax and utility user tax that would have a lower “multiplier effect”. It would create fewer employment opportunities in construction jobs and would generate and less revenue for site remediation and necessary infrastructure improvements than the proposed project.

- It would result in construction of less low/moderate-income housing, since the tax-increment funding required in the redevelopment district would be reduced.
- It would increase environmental impacts relating to geology, seismicity and soils since while some seismic upgrades may occur for reuse of existing buildings, correction of underlying strata would not occur.

High Intensity Alternative

Although not specifically required under CEQA, a High Intensity Alternative was also evaluated as part of the OARB Redevelopment EIR. The High Intensity alternative described an upper range of potential development intensities within the Gateway Development Area and provided an understanding of potential “worst-case” environmental impacts that may be associated with such redevelopment. Under this alternative, the types of land uses for the OARB would have remained the same as the Reuse Plan but the intensity of development in the Gateway Development Area would have increased from an average gross FAR of 0.35 to an average FAR of 1.5.

Although not specifically defined in the OARB Redevelopment EIR, it is assumed that the 30-acre Project site and the 30-acres Option B site would have been developed with their proportionate share of the total development assumed for the Gateway Development Area, or approximately 4.1 million square feet of “flex” office/light industrial/retail space (see Table 5-1).

Although the High Intensity Alternative could have achieved all benefits of the Reuse/Redevelopment program, the resulting traffic levels and other associated impacts could have preclude achievement of many of these benefits. Although it could have generated over twice the number of jobs and increased housing from tax increment financing, it would also generate about 330 percent more daily vehicle trips as compared to the Reuse Plan. Due to the very high amounts of traffic this alternative would generate, the LOS of numerous area intersections would likely have been substantially degraded, and the local roadway system overwhelmed. The High Intensity Alternative was rejected by the City of Oakland when it approved the Redevelopment and Reuse Plan because:

- This alternative generated such greater impacts on traffic, air quality, public services, aesthetics and other environmental concerns as compared to the Reuse/Redevelopment Plan.

ALTERNATIVES ANALYSIS

The OARB Redevelopment EIR identified the Gateway Adaptive Reuse/Eco-Park alternative (aside from the No Project Alternative) as the environmentally superior alternative.

COMPARISON OF THE PROJECT TO AN ANCILLARY MARITIME SUPPORT (AMS) ALTERNATIVE (NEW)

As described in the previous section of this SEIR, the OARB Redevelopment EIR considered a “Full Maritime” alternative in which nearly the entire Gateway Development Area would be redeveloped to include a total of 163 acres of ancillary maritime support (AMS) uses such as truck services and parking, container stations and storage. This alternative was rejected by OBRA, the City of Oakland and the Port of Oakland for a number of reasons including; a) this alternative would not meet the basic objective of creating a vibrant and balanced land use pattern; b) it would not improve the existing visual environment since all uses would be maritime uses, and c) it would result in approximately one-third fewer jobs than anticipated under the Reuse Plan. Instead, OBRA, the City and the Port adopted the Redevelopment Plan and the Reuse Plan as a more appropriate balance between the redevelopment interests of the City to create jobs and increase tax revenue, and the interests of the Port to expand and improve their operations.

However, during the EIR scoping for this Supplemental EIR, several comments were voiced that the issue of reserving or using more of the Gateway Development Area for Port-related trucking uses should be revisited. The opinion was expressed that the Project site and/or the Option B site could provide increased opportunities for AMS industries and businesses. These types of businesses and industries could include inter-modal trucking companies, container freight stations, trans-load facilities, refrigerated container depots, container cleaning, repair and storage, and truck repair and fueling. Information from the 2002 OARB Redevelopment EIR is still relevant and useful to this alternative, as summarized and discussed below.

Demand for Ancillary Maritime Support Use

The Port commissioned a study (Tioga Group 2001) to explore ways to accommodate truck services that must be located near the Port, while assuring that the adjacent communities are relieved of unnecessary truck traffic. This study concluded that demand for ancillary maritime support uses within or near the Port of Oakland’s operations is expected to grow proportionately with cargo volume and reach a demand for approximately 178 acres by year 2020.¹ Such support is essential to efficient Port operation.

A survey of the Port vicinity conducted in the year 2000 (BCDC 2000) identified more than 48 Port-related trucking businesses occupying a total of 128 acres in West Oakland, the OARB and within the Port’s maritime area. However, some of these existing businesses within the OARB are expected to be displaced by new uses as a result of the Reuse Plan, and the City of Oakland has imposed controls on the issuance of new permits for such businesses in West Oakland in an attempt to alleviate noise, air quality, and traffic impacts on the neighborhood. Even if all of the

¹ This estimate is based on forecasts of cargo segment growth, typical facility design, industry standards and working assumptions to estimate usable acres for efficient, single-purpose core service facilities. This process is necessarily imprecise, and the resulting estimates are most suitable for planning purposes rather than detailed land allocation or facility design decisions. These figures should therefore be interpreted as approximate minimums that could be achieved under reasonably efficient conditions (the Tioga Group 2001).

year 2000 sites remained viable and operational through to 2020, there would be an identified shortfall in truck parking and AMS uses.

In an attempt to provide a reasonable accommodation of these uses, the Reuse/Redevelopment Plan provides for a total of 105 acres of land within the former OARB and Port area to support AMS uses. Sites include the Port's proposed 75-acre Maritime Support Center at the location of the current JIT, 15 acres at the Baldwin Yard (Project site), and an additional 15 acres to be provided by the Port. The 105 permanent acres currently planned for such uses will accommodate much, but not all demand under efficient operating conditions. Although interim space available during terminal development will help accommodate most Port services to approximately 2010, starting in about 2010 it is projected that there will be a shortfall in available land. If additional lands within the former OARB were to be dedicated for AMS uses to off-set this shortfall, then land needed for these uses would either be taken out of the Gateway Development Area or the Port Development Area.

Potential AMS Use of the Project Site and Option B Area

This AMS Alternative is based in part on the Full Maritime Alternative analyzed in the OARB Redevelopment EIR. It assumes that the Project site and the additional Option B site (a total of approximately 60 acres) would not be developed as currently proposed nor as anticipated under the Reuse/ Redevelopment Plan, but instead would be developed with AMS uses. All existing facilities within the Project site and within the Option B site would be demolished or de-constructed, and the area would be developed as an approximately 60-acre maritime support center. This center could include inter-modal trucking companies, container freight stations, trans-load facilities, refrigerated container depots, container cleaning, repair and storage, and truck repair and fueling.

Comparison of Environmental Effects

The Full Maritime Alternative analyzed in the alternatives chapter of the OARB Redevelopment EIR contains conclusions about that potential development alternative that can be drawn from to compare the effects of this AMS Alternative.

Traffic: In absolute terms, the AMS Alternative would result in an increase in vehicle trips over existing conditions. Compared to the proposed Project and Option B, this alternative would result in more than a fifty percent (50%) reduction in traffic, thereby reducing traffic impacts on surrounding intersections and main roads and freeways. A comparison of trip generation rates for the Project as compared to this alternative is shown in **Table 5-2**. This alternative would result in substantially degraded LOS at the Maritime Street/West Grand Avenue intersection under the cumulative condition, as would the proposed Project.

**Table 5-2
Comparison of Average Daily Trip Generation, Project v. AMS Alternative**

	Proposed Project			Ancillary Maritime Support Alternative		
	units	trips/unit	Daily Trips	units	trips/unit	Daily Trips
Project						
Auto dealerships	390 ksf	33.34/ksf ¹	13,003			
Ancillary Maritime Support				30 ac	82/ac ²	4,920
Total Daily Trips, Project			13,003			4,920
Option B						
Auto dealerships	440 ksf	33.34/ksf ¹	14,670			
Big Box retail	150 ksf	49.21/ksf ¹	7,382			
Ancillary Maritime Support				60 ac	82/ac ²	9,840
Total Daily Trips, Option B			22,052			9,840

Notes: 1: see Chapter 3; Traffic, Trip Generation Table

2: Derived from OARB Redevelopment EIR, Table 4.3-6. Each truck trip is considered as the equivalent of two passenger car trips. Therefore the total number of daily truck trips generated by this alternative would be 4,920 – the equivalent of 9,840 automobile trips.

Truck Parking: This alternative provides substantially greater acreage in the immediate vicinity of the Port available to meet truck parking and other ancillary maritime support use demands. This alternative would substantially reduce the impact as identified in the OARB Redevelopment EIR regarding a cumulative deficit in truck parking facilities. However, adding 45 acres to the current assumption of 15 acres at the Baldwin yard would only achieve a total of 150 acres within the gateway and Port area, compared to the projected 2020 demand for such uses within or near the Port of Oakland's operations of approximately 178 acres (Port commissioned study by the Tioga Group, 2001).

Air Quality: Compared to the proposed Project and Option B, this alternative would result in a decrease in activity of mobile pollutant sources and could be expected to generate pollutant emissions less than those of the proposed Project. Nevertheless, this alternative would generate amounts of criteria pollutants in excess of significance thresholds. The alternative would not avoid or substantially reduce the impact of the proposed Project regarding long-term direct and cumulative term increases in criteria pollutants and diesel emissions.

Cultural Resources: Under this alternative, all structures within the project area that contribute to the National-register eligible OARB Historic District would be demolished or de-constructed. This alternative would not avoid or substantially reduce the significant direct and cumulative impacts as previously identified in the OARB Redevelopment EIR.

Conclusions

The new Ancillary Maritime Support Alternative (redevelopment of the Project site and the expanded Option B area with AMS uses only) would generate less traffic and consequently less mobile source emissions than the proposed Project or Option B but would not wholly avoid or reduce these impacts to levels of less than significant. The AMS Alternative would result in a less balanced land use with a moderate decrease in economic activity including less jobs and less tax revenue than under the proposed Project or Option B. It would, however, provide substantially more land area to offset the anticipated cumulative deficit in available truck parking at or near the Port. However, one of the reasons that the Full Maritime Alternative was rejected by the City of Oakland when it approved the Redevelopment/Reuse Plan was because, beyond the 2020 buildout date, the Full Maritime Alternative would have provided the opportunity, if demand warrants, to increase maritime activities resulting in more ship, rail and truck trips. Increasing these activities could result in commensurate worsening of impacts related to air quality and traffic.

COMPARISON OF THE PROJECT WITH THE ADOPTED REUSE PLAN

The adopted Reuse Plan represents the reasonably expected outcome for land use of the area in the absence of the proposed Project or the expanded Option B. In this case, the Project site and Option B site would still be expected to undergo substantial physical change consistent with the Redevelopment Plan and Reuse Plan assumptions regarding new warehouse/distribution and ancillary maritime support uses at the Project site, and additional light industrial/“flex” office uses at the Option B site.

The adopted Reuse Plan assumes build-out of the Project area consistent with expected land use designations and zoning as anticipated under the Redevelopment Plan and the Reuse Plan. Assuming build-out of the OARB consistent with the current Reuse Plan, the following could be expected to occur, as also shown in Table 5-3:

- Use of 15 acres within the Project area for ancillary maritime support uses
- Development of 300,000 square feet of warehouse/Distribution uses in the remaining 15 acres of the Project area
- For Option B, the above plus 390,000 square feet of Light Industrial/“Flex” office use in the expanded Option B area

Table 5-3
Build-out of the Adopted Reuse Plan at the Project Site

<u>Use</u>	<u>Total Floor Area (sq.ft.)</u>	<u>Area Size (acres)</u>
Project Area		
Warehouse distribution	300,000	15
Ancillary Maritime Support		15
Total	300,000	30
Option B (Project Area and Expanded Area)		
Warehouse distribution	300,000	15
Ancillary Maritime Support		15
Light Industrial/Flex Office	390,000	30
Total	690,000	60

Comparison of Environmental Effects

The adopted Reuse Plan was analyzed in the 2002 OARB Redevelopment EIR. That previous EIR contains conclusions about potential environmental impacts that can be drawn from to compare the effects of changing the uses in the Project and Option B areas.

Traffic: Redevelopment of the entire OARB Redevelopment area was found to generate approximately 44,600 daily automobile trips, of which approximately 7,420 would be attributed to the Project and Option B areas, as shown in **Table 5-4** below. These trips would contribute traffic to roadway segments on the Metropolitan Transportation System that would contribute to LOS F conditions on I-80 east of the I-80/I-580 split, I-880 connector to I-80 east, I-880 from 7th Street to the segment south of I-238, I-580 east and west of I-980/SR-24, and SR-24 east of I-580. Additionally the adopted Reuse Plan would contribute traffic to the cumulative conditions that would cause the level of service (LOS) at the West Grand Avenue/Maritime Street intersection to degrade to worse than LOS D during the a.m. and p.m. peak hours.

Compared to the proposed Project and Option B, the adopted Reuse Plan would result in approximately thirty percent (30%) of the average daily trips, thereby reducing traffic impacts on surrounding intersections and main roads and freeways as compared to the Project and Option B. A comparison of trip generation rates for the Project as compared to this alternative is shown in Table 5-4.

**Table 5-4
Comparison of Average Daily Trip Generation, Project v. Adopted Reuse Plan**

	Proposed Project			Adopted Reuse Plan		
	units	trips/unit	Daily Trips	units	trips/unit	Daily Trips
Project						
Auto dealerships	390 ksf	33.34/ksf ¹	13,003			
Warehouse/Distribution				300 ksf	5/ksf ²	1,450
Ancillary Maritime Support				15 ac	82/ac ²	2,460
Total Daily Trips			13,003			3,910
Option B						
Auto dealerships	440 ksf	33.34/ksf ¹	14,670			
Big Box retail	150 ksf	49.21/ksf ¹	7,382			
Warehouse/Distribution				300 ksf	5/ksf ²	1,450
Lt. Industrial/Flex Office				390 ksf	9/ksf ²	3,510
Ancillary Maritime Support				15 ac	82/ac ²	2,460
Total Daily Trips			22,052			7,420

Notes: 1: see Chapter 4; Traffic, Trip Generation Table

2: Derived from OARB Redevelopment EIR, Table 4.3-6. Each truck trip is considered as the equivalent of two passenger car trips. Therefore the total number of daily truck trips generated by this alternative would be 1,230 – the equivalent of 2,460 automobile trips.

Truck Parking: The adopted Reuse Plan provides the same acreage, 15 acres, in the immediate vicinity of the Port that would be available to meet truck parking and other ancillary maritime support use demands. However, under the Project those 15 acres would be relocated to the Central Gateway adjacent to Port operations or to other sites in the Gateway Development Area. The adopted Reuse Plan would have the same effect as the Project and the same effect as identified in the OARB Redevelopment EIR regarding a cumulative deficit in truck parking facilities.

Air Quality: Compared to the proposed Project and Option B, the adopted Reuse Plan would result in a decrease in activity of mobile pollutant sources and could be expected to generate pollutant emissions nearly thirty percent (30%) less than those of the proposed Project. Nevertheless, this alternative would generate amounts of criteria pollutants in excess of significance thresholds. The adopted Reuse Plan would not avoid or substantially reduce the impact of the proposed Project regarding long-term direct and cumulative term increases in criteria pollutants and diesel emissions.

Cultural Resources: Under the adopted Reuse Plan, all structures within the project area that contribute to the National-register eligible OARB Historic District would be demolished or de-constructed. This alternative would not avoid or substantially reduce the significant direct and cumulative impacts as previously identified in the OARB Redevelopment EIR.

Conclusions

The adopted Reuse Plan would have lower cumulative impacts related to traffic on MTS system freeways and at local intersections,

Based on a comparison of environmental factors, redevelopment of the Project site and the expanded Option B area as assumed under the adopted Reuse Plan would generate less traffic and consequently less mobile source emissions than the proposed Project or Option B but would not wholly avoid or reduce these cumulative impacts to levels of less than significant.. The adopted Reuse Plan would not be substantially different than the Project or Option B in regard to providing land to address the anticipated cumulative deficit in available truck parking at or near the Port. However, the adopted Reuse Plan would result in moderately lower economic activity including less jobs and less tax revenue than under the proposed Project.

OTHER CEQA CONSIDERATIONS

DEGRADING THE QUALITY OF THE ENVIRONMENT

There are no biology, hydrology or water quality impacts associated with the proposed Project or Option B that would substantially degrade the quality of the environment. There is no evidence to indicate that there are any fish or wildlife populations that would be significantly affected by the proposed Project. Implementation of the Project would not threaten to eliminate a plant or animal, nor reduce the number nor restrict the range of a rare or endangered plant or animal species. However, implementation of Option B would result in the elimination of several buildings that are important examples of California history (i.e., buildings associated with the OARB National Register Historic District).

GROWTH INDUCING IMPACTS

Growth inducement is an inherent effect of redevelopment. The basic premise of the OARB Area Redevelopment Plan is to foster economic growth by improving business and employment opportunities. As described in the OARB Redevelopment EIR, the surrounding area has historically suffered from blighted conditions and associated economic depression, and these conditions could worsen as a result of the closure of the OARB. Redevelopment activities such as the proposed Project have the potential to generate substantial numbers of jobs and therefore to improve the physical and economic condition of West Oakland and of the City and its citizens as a whole. The OARB Redevelopment EIR concluded that job and population growth associated with the Redevelopment Plan was well within that projected by ABAG for the build-out period. The extent of job growth projected under the Project is consistent with that assumed in the OARB Redevelopment EIR. Therefore, consistent with the conclusion of the OARB Redevelopment EIR, potential growth inducing impacts are considered less than significant.