

VI. ALTERNATIVES

The *CEQA Guidelines* require the analysis of a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the Project's basic objectives and avoid or substantially lessen any of the significant effects of the Project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.¹ CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative."

The proposed Project has been described and analyzed in the previous chapters and, based on this analysis, would not result in significant impacts, and no mitigation measures would be required. Therefore, the Project alternatives analyzed in this chapter incorporate changes to the Project suggested by community members, decision-makers, and City staff to reduce the less-than-significant impacts of the Project, particularly impacts to the local roadway system. The following discussion is intended to inform the public and decision-makers of the relative impacts of four potentially feasible alternatives to the proposed Project. A discussion of the environmentally superior alternative is also provided.

The following Project objectives were initially listed in Chapter III, Project Description of this EIR and are repeated here to inform this evaluation of Project alternatives:

- Obtain a new Major Conditional Use Permit (CUP) that reflects the existing enrollment and operational characteristics of the school.
- Conduct school operations in a way that is compatible with the surrounding neighborhood and existing circulation patterns.
- Support the use of transit and alternative transportation methods.
- Respect the sanctity of the Firestorm Memorial Garden.
- Legalize the lower parking lot.
- Protect the safety of Bentley School students, staff, parents, and neighbors.
- Continue to offer high quality day care to address child care needs.
- Continue to offer a renowned education to Oakland and the Bay Area

The four alternatives to the proposed Project discussed in this chapter include the following:

- The **No Project alternative**, which assumes that the student enrollment at Bentley School would be subject to the conditions of the original 1969 Major CUP. Student enrollment would be limited to 200, and the school's operations would be consistent with what was approved in 1969.

¹ *CEQA Guidelines*, 2006. Section 15126.6.

- The **Reduced Enrollment alternative**, which assumes that the student enrollment at Bentley School would be limited to 280 students, and that school operations would be the same as those that would occur as part of the Project.
- The **Public Transit alternative**, which assumes that Bentley School would have a maximum enrollment of 360 students, 160 of which would be required to use alternative forms of transportation. In addition, this alternative assumes that all other school operations (i.e., other than mode to and from school) would be the same as those that would occur as part of the Project.
- The **Tunnel Road Drop-Off alternative**, which assumes that Bentley School would have a maximum enrollment of 360 students, and that approximately one-third of the student body would be dropped off along Tunnel Road instead of on Hiller Drive. This alternative also assumes that all other school operations would be consistent with those that would occur as part of the Project.

Following is a description of each alternative and an analysis of associated environmental impacts. This analysis compares the anticipated impacts of each alternative to the impacts associated with the proposed Project. In the case of the proposed Project analyzed in this EIR, there would be no significant impacts. As such, this Alternatives chapter represents an exploration of ways to further reduce the Project's already less-than-significant effects on the neighborhood. The environmental impacts in the topical areas not discussed below (e.g., Geology, Biological Resources) would be less than significant and similar to those associated with the proposed Project.

A. NO PROJECT ALTERNATIVE

1. Principal Characteristics

The No Project alternative assumes that student enrollment at Bentley School would be limited to 200 students and that the school would be operated in the manner originally permitted under the 1969 Major Conditional Use Permit. The 200-student enrollment limit would require the relocation of nearly 160 students that currently attend the school. The permitted number of staff is not specified under the 1969 CUP. Based on the current ratio of students/staff, it is assumed that less than 40 faculty and staff would be required to support a student body of 200 students. In the immediate future, the number of staff employed by the school as part of the proposed Project is not expected to change, but it is possible that staffing could increase in the future without a revision to the 1969 CUP. Under the No Project alternative, the school would operate academic activities from 8:00 a.m. to 3:00 p.m. Likewise, physical education would be allowed from 8:00 a.m. to 3:00 p.m., instead of the extended hours of 7:30 a.m. to 3:30 p.m., as proposed under the revised Major CUP. The hours of operation for extracurricular sports activities were not specified under the 1969 CUP and without a revision to the Major CUP, the school would not be allowed to operate such after-school activities.

The 1969 CUP does not permit any before- or after-school childcare activities, and as such, the school would be required to discontinue all childcare activities. Approximately 175 to 210 students currently participate in childcare. Without a new Major CUP, guardians desiring childcare would have to find other off-campus childcare arrangements.

Under the No Project alternative, evening, weekend, or summer activities would not be permitted on the Hiller campus. In addition, the No Project alternative would not include any of the transportation-

and parking-related changes that would occur with implementation of the proposed Project. In particular, the school would not implement the rules and guidelines outlined in the Bentley School Traffic and Parking Handbook for the Hiller Campus. Drop-off and pick-up activities would occur in the circular driveway off Hiller Drive, as opposed to the Hiller Drive frontage adjacent to the Firestorm Memorial Garden, which would reduce the space available for queuing vehicles. However, school staff and volunteers would continue to assist pick-up and drop-off activities during peak hours.

As part of the No Project alternative, the school would not subsidize alternative transportation (including through the provision of free AC Transit passes and funding the administrative costs of operating the private bus service). Under the alternative, it is likely that use of alternative transportation by students would diminish, and if ridership goals are not met, AC Transit bus service to the site could be discontinued. If the school continues to use the lower parking lot along Tunnel Road, it would need to be legalized. In addition, under the No Project alternative, Middle School students (grades 6-8) would not be transferred to the Lafayette Campus. The school would be expected to maintain an emergency plan as part of the No Project alternative, but the plan would be crafted around a maximum enrollment of 200 students instead of 360 students.

The No Project alternative would achieve some of the proposed Project's desired objectives, including: operate the school in a way that is compatible with the surrounding neighborhood and existing circulation patterns; protect the safety of Bentley School students, staff, parents, and neighbors; and respect the sanctity of the Firestorm Memorial Garden. However, the No Project alternative would not meet the school's objectives of obtaining a new Major CUP (to legalize current student enrollment and expand school operations); legalizing the lower parking lot adjacent to Tunnel Road; and actively supporting students' use of public transportation.

2. Analysis of the No Project Alternative

The No Project alternative is evaluated for all the environmental topics analyzed in detail in this EIR (including Planning Policy).

a. Land Use. Similar to the proposed Project, the No Project alternative would not change the land uses on the Project site. The site would continue to function as a Kindergarten through 8th Grade school, containing existing classrooms, administration buildings, and play areas. As discussed in Section IV.A., Land Use, the current land uses on the project site do not substantially conflict with the surrounding residential, civic, and institutional land uses. Under the No Project alternative, fewer students would occupy the site and fewer school related activities would take place adjacent to the Firestorm Memorial Garden (because pick-up and drop-off activities would occur within the school's circular driveway) than under the Project conditions. Like the Project, activities under the No Project alternative would not be considered incompatible with the use of the Firestorm Memorial Garden as a place to honor those who died in the 1991 fire. In addition, under the No Project alternative, the site would support a student population smaller than that of Kaiser Elementary School, which enrolls approximately 250 students and is located one block northeast of the site.

b. Planning Policy. The proposed Project would not substantially conflict with local planning policies such that an environmental impact would result. Policy N2.1 of the Land Use and Transportation Element states that Oakland schools should be operated in a manner that is sensitive to surrounding residential uses. While the proposed Project would not result in any significant physical impacts based on the City's significance criteria, the school has been unable to operate in a way that

is acceptable to some neighborhood residents. Under the No Project Alternative, enrollment would be limited to 200 students, which could address neighborhood concerns regarding traffic and emergency access issues. However, the No Project alternative would not conform to City of Oakland General Plan policies that encourage the provision of after-school programs and expanded recreational activities in all Oakland schools (Policy REC-5.1.3 and REC-7.2.1). Under the No Project Alternative, the school would not be permitted to operate after-school extracurricular activities or provide childcare. As such, the No Project alternative would not be fully consistent with the City's General Plan. However, these inconsistencies would not result in significant environmental impacts.

c. Transportation and Circulation. Since the No Project alternative assumes the continuation of the conditions approved under the 1969 Major CUP, implementation of this alternative would not result in a substantial increase in traffic in the foreseeable future. Like the proposed Project, the No Project alternative would result in less-than-significant impacts to existing intersection and roadway levels of service, traffic hazards, and public transit. The No Project alternative would reduce any minor impacts that the proposed Project would have on peak congestion. The reduced student enrollment of the No Project alternative would marginally reduce traffic volumes (some of these reductions could be offset through reduced use of public transit), but would not substantially improve traffic operations compared to the Project because: 1) the Project itself would not result in significant levels of congestion and 2) the space for the pick-up/drop-off queue would be reduced because these activities would take place only in the school's circular driveway. In the No Project scenario, all of the study intersections would operate at LOS C or better during the peak hours, except for the minor stop control at Vicente Road, which would operate at LOS E during the AM peak period, and LOS D during the PM peak period. Under cumulative conditions for the alternative, all of the study intersections would operate at LOS C or better except for the minor stop control at Tunnel Road/Vicente Road. For all intersections except for Tunnel Road/Vicente Road, delays in the cumulative condition associated with the No Project alternative would improve by less than 3 seconds compared to delays that would result from the proposed Project. However, at Tunnel Road/Vicente Road, the No Project alternative would reduce delays during the AM peak hour (which experiences the most substantial delays) by approximately 44 seconds.

d. Air Quality. The No Project alternative, like the Project, is not expected to generate a level of vehicle trips that would result in significant emissions. Compared to the Project, the No Project alternative would reduce the number of vehicle trips generated by the school, but this trip reduction would result in only marginal reductions in associated emissions. For instance, compared to the Project, the No Project alternative would reduce carbon monoxide concentrations at intersections by less than 1 part per million. As such, regional emissions would be reduced by a less-than-significant amount. Similar to the proposed Project, the No Project alternative would be consistent with the Clean Air Plan, would not violate the BAAQMD's air quality standards, expose the public to objectionable odors, or substantially increase public exposure to toxic air contaminants in excess of established standards. Under the No Project alternative there would be fewer greenhouse gas emissions due to a reduced number of vehicle trips. Impacts of the No Project alternative would be less than those of the Project as proposed.

e. Noise. The No Project alternative would result in marginally decreased noise levels during times when students are playing outdoors, compared to the Project. Under current conditions, noise levels have increased by less than 2 dBA from No Project (baseline) conditions, which is well below the City's established significance criteria of 5 dBA. As such, the No Project alternative would reduce

existing noise levels in outdoor uses areas and would not exceed City standards. In addition, the No Project alternative would marginally decrease vehicle-related noise, as compared to the Project. The No Project alternative would result in lower traffic-related noise levels than current conditions. Similar to the proposed Project, the No Project alternative would not substantially increase noise levels in or around the Project site.

f. Hazards. Like the Project, any hazards impact is considered less than significant because students would occupy permitted buildings that have been built to seismic standards, and the school would operate under an emergency plan that would safely evacuate students from the site in the event of a fire or after an earthquake. In addition, the No Project alternative would reduce the amount of students that would be exposed to earthquake and wildfire hazards and would limit the hours and days that they are on campus. This would reduce the number of people exposed to earthquake and wildfire hazards, compared to existing conditions. Like the proposed Project, the No Project alternative would not interfere with an emergency response plan. All students would be evacuated from the site on-foot, reducing vehicle congestion in the event of an emergency.

g. Public Services. Compared to the Project, the No Project alternative would marginally reduce the demand for public services, such as police, fire, library, and recreation services (but could increase enrollment at other local public or private schools). Like the Project, the No Project alternative would not require the construction of new police, fire, library, school, or recreation facilities.

B. REDUCED ENROLLMENT ALTERNATIVE

1. Principal Characteristics

Under the Reduced Enrollment alternative, student enrollment at Bentley School would be limited to 280 students, and the school would operate under all of the operational changes that would be legalized as part of the Project. These changes would be codified in a new Major CUP. The Reduced Enrollment alternative would permit student enrollment to increase by 80 students, from the enrollment permitted under the 1969 CUP, and would be 80 less than would be permitted if existing conditions were legalized as part of the Project. While enrollment would be limited to 280, the school would be permitted to keep the existing hours of operations for school activities, run a childcare program before and after school, extend the hours for sports and other extracurricular activities, and hold a limited number of weekend and evening events (consistent with the proposed operational standards listed in Table III-1 of this EIR). Like the Project, this alternative would require the school to implement a comprehensive Transportation Program that would include a pick-up/drop-off zone along Hiller Drive, adjacent to the Firestorm Memorial Garden. All other components of the Reduced Enrollment alternative (e.g., subsidization of public transportation for students, legalization of the lower parking lot near Tunnel Road, and the transfer of Middle School students to the Lafayette Campus) would be the same as the proposed Project.

The Reduced Enrollment alternative would achieve all the proposed Project's desired objectives, except the objective of seeking a new Major CUP that would permit the school to increase its enrollment to 360 students.

2. Analysis of the Reduced Enrollment Alternative

The Reduced Enrollment alternative is evaluated for all the environmental topics analyzed in this EIR. The impacts associated with these topics would be similar to those that would result from implementation of the proposed Project, although in some cases impacts would be marginally reduced.

a. Land Use. The Reduced Enrollment alternative would result in the same less-than-significant land use impacts (including neighborhood compatibility impacts) as the proposed Project. The only difference between the proposed Project and the Reduced Enrollment alternative is that the alternative would reduce current enrollment by 80 students, while the Project would legalize current enrollment levels, and allow for a maximum enrollment of up to 360 students. The reduced enrollment would slightly reduce activity next to the Firestorm Memorial Garden and within the Bentley School campus itself, as compared to the proposed Project, and marginally increase activity compared to the No Project alternative. The Reduced Enrollment alternative would also be consistent with land use plans and General Plan and zoning designations.

b. Planning Policy. Like the proposed Project, the Reduced Enrollment alternative would not conflict with any local policies or plans adopted for the purpose of environmental protection. Similar to the No Project alternative, the Reduced Enrollment alternative's comprehensive Transportation Program would increase the efficiency of the morning/afternoon pick-up and drop-off activities, and would reduce congestion on neighborhood roadways. At the same time, this alternative would also meet key Oakland General Plan policies, such as encouraging the operation of after-school extracurricular activities.

c. Transportation and Circulation. The Reduced Enrollment alternative would generate fewer vehicle trips than the proposed Project, but more trips than the No Project alternative. Similar to the Project, the Reduced Enrollment alternative would result in less-than-significant impacts at the study intersections analyzed in Section IV.B, Transportation and Circulation. Traffic queues at the Tunnel Road and Hiller Drive intersection and at the school entrance would be shorter compared to current Project conditions.

Under the alternative, student drop-off and pick-up activities would function similarly to the Project: all vehicles would drive through the school's loop driveway and pull over by the curbside along the Firestorm Memorial Garden for student pick-up and drop-off. However, unloading and loading activities would decline by approximately 22 percent compared to the proposed Project. The Reduced Enrollment alternative would also reduce the number of school employees compared to the proposed Project. This reduction in staff, along with the anticipated reduction in number of parents that would park along Hiller Drive (and walk students to class), would result in a net decrease in parking demand for school uses. However, this reduction in parking demand would not result in substantial environmental benefits. The number of bus riders would also decrease compared to the proposed Project. Because AC Transit requires a minimum level of ridership to maintain its bus operations, the school would need to ensure that students use transit in sufficient numbers so that AC Transit service to the school would continue.

d. Air Quality. The Reduced Enrollment alternative, like the proposed Project, is not expected to generate a level of vehicle trips that would result in significant emissions. In addition, the Reduced Enrollment alternative would not generate localized carbon monoxide emissions in excess of

established standards, result in vehicle-related emissions that would exceed BAAQMD thresholds of significance, or expose persons to objectionable odors. The additional 80 students associated with the Reduced Enrollment alternative would generate slightly more emissions than the No Project alternative, and slightly fewer emissions than the proposed Project. However, these emission levels would not be considered significant as they would be far below the significance criteria established by the City. Under the Reduced Enrollment alternative there would be fewer greenhouse gas emissions due to a reduced number of vehicle trips. However, there would be slightly more vehicle emissions than the No Project alternative. While this alternative would generate fewer vehicle trips than the proposed Project, its contribution to cumulative global climate change impacts would be similar to that of the Project. Both the Project and the Reduced Enrollment alternative would not have significant global climate change impacts. Impacts of the Reduced Enrollment alternative would be less than those of the Project as proposed.

e. Noise. Like the proposed Project, the Reduced Enrollment alternative would not involve the use of construction equipment and would not expose individuals to excessive noise levels caused by heavy machinery. Due to additional traffic on Hiller Drive and increased use of the Bentley School campus by additional students, the Reduced Enrollment alternative would result in an incremental noise increase compared to the No Project alternative, but would generate less noise than the current Project conditions. This noise increase on Hiller Drive and on the school grounds would be marginally less than the increase that would result from the proposed Project, and slightly more than what would occur under the No Project alternative. Similar to the Project, any increase would be considered less than significant.

f. Hazards. Compared to the No Project alternative, the Reduced Enrollment alternative would increase the student population at Bentley School by 80, and as such, would expose more students to wildfire and earthquake hazards, but would reduce the number exposed to these hazards compared to the proposed Project. Because students would be evacuated from the site on-foot, changes in the numbers of enrolled students would not be expected to have a substantial effect on vehicle congestion during emergencies (e.g., wildland fires or earthquakes). The school's emergency plan calls for the evacuation of students and staff along Tunnel Road so as to avoid extra congestion on Hiller Drive (the plan also requires the school to maintain adequate supplies to allow students to remain on-campus during an extended emergency). As such, the Reduced Enrollment alternative, like the proposed Project, is not expected to generate significant hazards impacts.

g. Public Services. Similar to the proposed Project, the Reduced Enrollment alternative would marginally increase demand for public services over the No Project alternative, such as police, fire, library, and recreation services. The demand generated by this alternative would not be expected to result in physical environmental impacts, and would be less than the demand resulting from the current Project conditions.

C. PUBLIC TRANSIT ALTERNATIVE

1. Principal Characteristics

Under the Public Transit alternative, Bentley School would be permitted to have a maximum enrollment of 360 students, and would require 160 students to use alternative transportation, prohibiting them from being driven in single-occupancy vehicles (e.g., for the purpose of this

analysis, a “single-occupancy vehicle” would be a vehicle driven by a guardian which carries one student as a passenger). The intent of this alternative is to explore ways in which the effects of the Project would change by reducing the number of vehicles that use local and regional roadways to drop-off and retrieve students at Bentley School.

In order for this alternative to be successful, the school would be required to increase use of public transit by providing additional shuttle service, working with AC Transit to ensure continued operation of existing routes, and making other comparable transportation options available to students, and offering larger incentives for carpooling. Public transit could be required of all students in certain grades. Ensuring that 160 students do not use single-occupancy vehicles would require an enforcement mechanism. Enforcement could rely on the tags that are required to be displayed on all vehicles that drive into the Bentley School campus. Special tags could be granted to those vehicles permitted to drive into the campus pick-up/drop-off zone. As part of this alternative, the school would be required to identify ways to enforce the public transit policy, including limiting parking on Hiller Drive for non-residents (so that guardians without school access tags are discouraged from picking-up and dropping-off students immediately outside the campus – where the school’s vehicle tag policy does not apply). The public transit implementation and enforcement mechanisms (including the pick-up and drop-off locations of any new shuttle service) would be incorporated into the school’s comprehensive Transportation Program.

In addition, under the Public Transit alternative, all of the operational changes that would occur as part of the proposed Project would be implemented (see Table III-1 of this EIR for a complete list). The school would be permitted to change the hours of operations for school activities, run a childcare program before and after school, extend the hours for sports and other extracurricular activities, and hold a limited number of weekend and evening events. In addition, the lower parking area would be legalized as part of the alternative.

The Public Transit alternative would achieve all of the proposed Project’s desired objectives.

2. Analysis of the Public Transit alternative

The Public Transit alternative is evaluated for all the environmental topics analyzed in this EIR.

a. Land Use. Similar to the proposed Project, the Public Transit alternative would not result in any significant land use impacts. This alternative would legalize existing on-site land uses, and just as with the proposed Project, the Public Transit alternative would not cause the site to become intrinsically incompatible with surrounding land uses. Under this alternative, the streets around the Project site would likely experience increased bus/shuttle use, but this type of traffic would not be incompatible with the residential character of the neighborhood. The increase in student enrollment and changes in the hours of operation on the site would not permanently interfere with the daily operations of surrounding land uses, including Kaiser School to the northeast of the site, residential uses to the north and east, and the Firestorm Memorial Garden to the south.

b. Planning Policy. Compared to the proposed Project, the Public Transit alternative is somewhat more consistent with applicable policies and plans. The alternative would reduce traffic congestion, and could address neighborhood concerns about increased enrollment at the school. The alternative would require that 160 students take alternative transportation to and from school, thus reducing traffic on Hiller Drive, especially during the peak drop-off and pick-up times. In addition, the Public

Transit alternative would better promote the objective of Policy CO-12.1 of the OSCAR element, which recommends land use patterns and densities that help improve regional air quality conditions by minimizing dependence on single passenger autos. While the Public Transit alternative would not change land use patterns or densities, compared to the No Project alternative, it would increase the density of students on the Hiller campus, while at the same time requiring that approximately 45 percent of the students take an alternative form of transportation.

The Public Transit alternative would also be consistent with other applicable policies of the Oakland General Plan, such as the one promoting the operation of after-school extracurricular activities. The alternative would also be consistent with the City's "Transit First!" policy, which expresses a preference in transportation planning for transit over single-occupancy motor vehicles.

c. Transportation and Circulation. In terms of traffic operations, the Public Transit alternative would generate a similar number of vehicle trips as the No Project alternative, and would therefore result in less-than-significant impacts to the study intersections (as would the proposed Project). This alternative would require additional provision of bus transit and/or shuttle services with broader geographical coverage to pick-up and drop-off students. The average per-vehicle time required for loading and unloading activities would be increased compared to the Project due to expanded use of public transit. However, because this alternative would result in a smaller number of vehicle trips compared to the proposed Project, the alternative could marginally reduce total loading and unloading times for the entire student body. Therefore, queues behind the pick-up/drop-off area along Hiller Drive would not result in significant levels of congestion.

To ensure efficient operations, the arrival times of the shuttles would require staggering to avoid a situation where more than two buses arrive at the school simultaneously. For instance, the school could schedule bus/shuttle pick-ups/drop-off 10 minutes apart between 7:45 and 8:20. The 10-minute separation would provide adequate time for loading and unloading without causing substantial congestion. Because total vehicle trips associated with the alternative would be reduced compared to the Project, traffic queues at the Tunnel Road and Hiller Drive intersection, and at the school entrance would also be shorter compared to Project conditions. Because 160 students would be required to take transit or shuttle services, the Public Transit alternative would reduce the number of parents that would park along Hiller Drive, and the overall parking demand generated by school activities.

d. Air Quality. Like the proposed Project, and all of the other alternatives, the Public Transit alternative would not substantially increase pollutant or odor concentrations, and would not conflict with BAAQMD standards. Since this alternative requires 160 students to take alternative forms of transportation to and from school, increases in emissions would likely be marginally lower than those associated with the proposed Project and the Reduced Enrollment Alternative (although emissions reductions would depend on the number and type of transit vehicles that would serve the school, and the utilized capacity of these vehicles). Similar to the proposed Project, the Public Transit alternative would not have significant air quality impacts and would not require any mitigation measures. Under the Public Transit alternative, 160 students would be required to use public transportation. On a per capita basis, the Public Transit alternative would result in the lowest emissions of greenhouse gases compared to the Project and the other alternatives analyzed in this chapter (assuming that transit vehicles are mostly or fully utilized).

e. Noise. Like the proposed Project, the Public Transit alternative would not involve the use of construction equipment and would not expose individuals to excessive noise levels caused by heavy machinery. In addition, since the alternative would require 160 students to take alternative transportation to and from school (and the total number of vehicle trips would be reduced), traffic noise could be marginally reduced compared to the proposed Project. However, this noise reduction would likely be imperceptible, similar to the noise levels generated by the Project. Noise associated with students occupying outdoor areas would be higher than under the No Project and Reduced Enrollment alternatives, but would be the same as that associated with the proposed Project, and would be considered less than significant.

f. Hazards. Because the Public Transit alternative would legalize the current enrollment of 352 students, allow for a maximum enrollment of up to 360 students, and legalize the current days and hours of operation, this alternative would have the same less-than-significant hazards-related impacts as the proposed Project. The alternative would expose the same number of students as the Project to wildfire and earthquake hazards. However, the increased risk associated with these hazards would be less than significant because the School has an emergency response plan in place that would evacuate students from the school on-foot and would not increase vehicle congestion on local roads during an emergency, and school buildings have been built or retrofitted to reduce the risk of collapse during an earthquake. As such, this alternative would expose more students to wildfire hazards than the No Project and Reduced Enrollment alternatives, but, like the proposed Project, would not interfere with any adopted emergency response plans and would result in less-than-significant hazards impacts.

g. Public Services. Compared to the No Project alternative, the Public Transit alternative would marginally increase the demand for fire, police, and library services due to the increase in students on the campus, but is not expected to result in significant impacts. Because the alternative requires 160 students to use alternative transportation, there could be marginally lower demand for police services than would occur under the proposed Project and the Reduced Enrollment alternative (if reduced vehicle congestion on Hiller Drive results in fewer calls to the Police Department).

D. TUNNEL ROAD DROP-OFF ALTERNATIVE

1. Principal Characteristics

Under the Tunnel Road Drop-Off alternative, Bentley School would have a maximum enrollment of 360 students, and approximately one-third of the student body would be dropped off along the east side of Tunnel Road instead of on Hiller Drive. The purpose of this alternative is to reduce the number of trips that use Hiller Drive for student loading and unloading. Protocol for using the Tunnel Road loading/unloading area would be outlined in the school's comprehensive Transportation Program. Only families with trips that end in Berkeley would be permitted to use this drop-off location.

Approximately 38 percent of school vehicle trips originate from Tunnel Road to the north of the Project site. These trips comprise approximately 98 inbound trips in the AM peak hour, 66 trips during the after-school hour, and 29 trips during the PM peak hour. An alternate drop-off area on the east side of Tunnel Road (which borders Bentley School) would be more convenient for a majority or all of these trips. For this alternative to succeed, the school would be required to develop a

mechanism to ensure that households that travel to the Project site southbound along Tunnel Road actually drop-off and pick-up students on Tunnel Road instead of Hiller Drive.

For vehicles traveling southbound along Tunnel Road, the Tunnel Road drop-off point would be accessed by: 1) making a left turn off Tunnel Road and driving approximately 150 feet to the intersection of Caldecott Lane and Hiller Drive; then 2) making a sharp left-hand turn onto a connector road that links back to Tunnel Road in the northbound direction; and 3) proceeding approximately 575 feet north along Tunnel Road to the designated drop-off area.

There is currently no detailed design plan for a loading/unloading area along Tunnel Road. However, a shoulder exists adjacent to the northbound Tunnel Road lane that could conceivably be used for loading/unloading. The school would be required to ensure that adequate pedestrian linkages (e.g., an obstacle-free sidewalk) exist between the loading/unloading area and the rest of the school campus. Implementing this alternative would require the school to work with Caltrans to secure permission for developing a loading/unloading zone on Tunnel Road (which, as State Highway 13, is administered by Caltrans).

It is anticipated that the vehicles using the area would arrive randomly throughout the peak morning and afternoon periods. With limited space available for vehicle storage (approximately four vehicles), queues associated with the loading/unloading area could extend beyond the available drop-off area and adversely affect Tunnel Road operations. To avoid such queues, the school would be required to enforce staggered drop-off/pick-up times. Under such a policy, vehicles that arrive early would be required to circulate around the area (and potentially travel north on Hiller Drive), and return back to the drop-off area when appropriate. The feasibility of requiring private vehicle trips to be sufficiently staggered to reduce queuing is doubtful. Due to the small vehicle storage area, need for intense traffic management at the Tunnel Road pick-up and drop-off area, and potential sight line hazards (limited visibility between segments of Tunnel Road and the pick-up/drop-off area), this alternative would likely be infeasible. However, the alternative is qualitatively analyzed in this section for informational purposes.

Similar to the Project, under the Tunnel Road Drop-Off alternative, the school would be permitted to change the hours of operations for school activities, run a childcare program before and after school, extend the hours for sports and other extracurricular activities, and hold a limited number of weekend and evening events. In addition, the lower parking area would be legalized as part of the alternative. The Tunnel Road Drop-Off alternative would achieve all of the proposed Project's desired objectives.

2. Analysis of the Tunnel Road Drop-Off Alternative

The Tunnel Road Drop-Off alternative is evaluated for all the environmental topics analyzed in this EIR. The impacts associated with these topics would be similar to those that would result from implementation of the proposed Project (with the potential exception of Transportation and Circulation impacts, which could be marginally worse than the proposed Project).

a. Land Use. Similar to the proposed Project, the Tunnel Road Drop-Off alternative would not result in any significant land use impacts. Like the Project, this alternative would legalize existing conditions, and would not result in land use incompatibilities. Compared to the proposed Project, this alternative would reduce school-related traffic along Hiller Drive, but could result in longer queues on Tunnel Road. In addition, compared to the proposed Project, pick-up and drop-off activity would be

marginally reduced adjacent to the Firestorm Memorial Garden, and like the Project, this alternative would not result in incompatible land uses, or related impacts.

b. Planning Policy. Like the proposed Project, the Tunnel Road Drop-Off alternative would not conflict with any local policies or plans adopted for the purpose of environmental protection. This alternative would meet key Oakland General Plan policies, such as encouraging the operation of after-school extracurricular activities. Reduction of school-related traffic along Hiller Drive could also make school operations less problematic for the surrounding neighborhood (but potentially create long queues and sight line hazards on Tunnel Road).

c. Transportation and Circulation. Compared to the proposed Project, the Tunnel Road Drop-Off alternative would not significantly change traffic operations at the intersection of Tunnel Road and Warren Freeway, or the intersection of Tunnel Road and Vicente Road, because total trips moving through these intersections would be unchanged. This alternative would eliminate the need of a number of vehicle trips to enter Hiller Drive northbound to the school (and southbound on Hiller Drive out of the school), and could improve traffic operations at the intersection of Hiller Drive and Tunnel Road. The traffic operations and queues at the school entrance would also improve compared to the Project due to reduced vehicle trips entering to drop-off or pick up students. As with the proposed Project, the overall impact at the study intersections would be less than significant. However, with limited space available for vehicle queuing on Tunnel Road (approximately four vehicles), queues associated with the loading/unloading area could extend beyond the available drop-off area and create substantial congestion on Tunnel Road. Thus the traffic benefits associated with reduced traffic on Hiller Drive would need to be considered in the context of potentially increased queuing on Tunnel Road. In addition, vehicles slowing to drop-off and merging to re-enter the northbound Tunnel Road flow could increase the potential for traffic incidents.

Under this alternative, the school would be required to provide additional staff at the new drop-off area along Tunnel Road to facilitate student loading and unloading activities. Depending on the final configuration of this new loading area, approximately three staff persons (at a minimum) would be required to manage school-related loading/unloading activities: one staff person would be required at the front of the queue; one staff person would be required in the middle of the queue to facilitate students getting into and out of vehicles, and one staff person would be required at the end of the line to ensure that queues do not block through traffic on Tunnel Road. Even with additional staffing along Tunnel Road, traffic would have to be managed intensely to ensure that lengthy queues do not exceed the four-vehicle storage area. Due to the small vehicle storage area, need for intense traffic management at the Tunnel Road pick-up and drop-off area, and potential hazards, this alternative would likely be infeasible from a transportation perspective.

In terms of parking demand and transit demand, this alternative would result in impacts that are similar to those that would result from the Project.

d. Air Quality. Like the proposed Project, the Tunnel Road Drop-Off alternative would not substantially increase pollutant or odor concentrations, and would not conflict with BAAQMD standards. Compared to the proposed Project, CO concentrations would be expected to be reduced along Hiller Drive and increased along Tunnel Road. However, these changes would not be significant and overall CO concentrations at both locations would not exceed State or federal CO standards. Similar to the proposed Project, the alternative would not have significant air quality

impacts and would not require any mitigation measures. Under this alternative, the amount of vehicle trips would not change and, as such, the same greenhouse gas emissions as the proposed Project would occur. Similar to the proposed Project, the alternative would not have significant air quality impacts and would not require any mitigation measures.

e. Noise. Like the proposed Project, this alternative would not involve the use of construction equipment and would not expose individuals to excessive noise levels caused by heavy machinery. Compared to the proposed Project, noise levels would be reduced in the vicinity of the Firestorm Memorial Garden and elsewhere along Hiller Drive and would increase near the drop-off area along Tunnel Road. However, the changes in noise levels compared to the Project would not be substantial.

f. Hazards. Because the Tunnel Road Drop-Off alternative would permit an enrollment of up to 360 students, and legalize the days and hours of operation, this alternative would have the same less-than-significant hazards-related impacts as the proposed Project, while posing marginally greater hazards risks than the No Project and Reduced Enrollment alternatives (and additional roadway hazards risks on Tunnel Road compared to the Project and all other alternatives).

g. Public Services. The alternative – which would legalize the School’s current enrollment of 360 students – would result in the same increase in demand for police, fire, and library services (and the same less-than-significant impacts to these services) as the proposed Project.

E. OTHER ALTERNATIVES CONSIDERED

Because the proposed Project would result in no significant environmental impacts, the alternatives analysis in this EIR explores using different configurations of maximum student enrollment, operational characteristics, and transportation options to reduce the primary environmental concern of neighborhood residents: traffic. *CEQA Guidelines* section 15126.6 states that: “An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.” This alternatives analysis is consistent with this guidance in that it considers a range of feasible alternatives, including alternatives suggested by neighborhood residents, City staff, and the Oakland Planning Commission. The following alternatives were considered, but ultimately rejected. The reasons for rejection are summarized below.

- *Off-Site Alternative.* Since the site contains an operating school, and there are few sites available in the East Bay for construction or wholesale relocation of a school, an off-site alternative was not considered to be feasible and was not analyzed in detail. The City considered an alternative that would move the entire Hiller Campus student body to the Lafayette Campus. This alternative was rejected because it would be infeasible (permitting for such a move is not under the control of the lead agency, and the Lafayette Campus does not have adequate capacity to accommodate 360 additional students) and would likely result in new significant impacts (because students who live near the Hiller Campus would be subject to longer commutes, and these commutes would result in traffic congestion).
- *New Pick-Up/Drop-off Location Alternative.* An alternative that would convert the lower parking lot into a new drop-off zone (and remove the Hiller Drive drop-off zone) was rejected prior to detailed analysis primarily because the City of Berkeley Planning Department representatives

(who would be responsible for permitting such an alternative) have indicated strong opposition to the alternative, and the alternative would likely result in significant congestion and potential safety hazards on Tunnel Road.

- *Intermediate Reduced Enrollment Alternative.* This alternatives chapter provides a detailed analysis of two reduced enrollment alternatives: the No Project alternative (200 students) and the Reduced Enrollment alternative (280 students, or roughly half of the requested enrollment growth). These alternatives represent a reasonable range of reduced enrollment scenarios, and neither would be required to reduce the less-than-significant impacts of the Project. Therefore, the City did not analyze other reduced alternative scenarios (e.g., a 300 or 340-student alternative) in detail. These intermediate alternatives would not meaningfully reduce congestion, noise, or air pollution generated by the proposed Project.
- *100 Percent Public Transit Alternative.* An alternative that would require all students to use public transit was determined to be infeasible and would constrain school operations in a way that goes beyond the intent of CEQA. Students' schedules (which vary from day to day) and access to public transit would make mandatory public transit use infeasible. The Public Transit alternative analyzed in this chapter would require 160 students (the approximate difference between existing enrollment at the school and enrollment under the No Project alternative) to use transit.
- *No Middle School Move Alternative.* The City also considered an alternative that would prohibit the Middle School from moving to the Lafayette Campus (and the Hiller Campus from backfilling with younger students). The per-student trip generation rate for younger students is somewhat higher than the per-student trip generation for older students, hence the prima facie attractiveness of precluding the relocation of the older students. However, operation of Bentley School with only younger students (no Middle School students) would not result in new significant impacts beyond those identified for school operations with both Middle School and Lower School students. Therefore, an alternative that would prohibit the school from backfilling with younger students after a transfer of Middle School students would not be required to reduce significant impacts and was rejected from detailed consideration.

F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that the EIR identify the environmentally superior alternative. The No Project alternative would generate the lowest levels of traffic congestion on area roadways (and would also generate the least noise and air pollution) out of all the alternatives, and would thus be considered "environmentally superior." However, the No Project alternative would not allow the Project applicant to achieve the key objective of obtaining a new Major CUP that would legalize the current enrollment and operations at Bentley School.

CEQA Guidelines section 15126(e)(2) requires that an additional alternative be designated as the environmentally superior alternative if the No Project alternative is identified as such. The secondary environmentally superior alternative would be the Public Transit alternative, which would increase school-related trip generation only marginally above No Project levels while still allowing for a student enrollment of 360 students. The Public Transit alternative would require careful coordination by the school to ensure that bus/shuttle arrival and departure times are staggered, but has the greatest potential to achieve the school's objectives while minimizing less-than-significant environmental impacts on the neighborhood surrounding Bentley School. The environmentally superior alternatives

should be considered in the context of the environmental impacts that would result from the Project – all of which would be less than significant. Thus the environmentally superior alternatives (particularly the Public Transit alternative) would not represent significant environmental gains compared to the proposed Project.

