
5. ALTERNATIVES ANALYSIS

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INTRODUCTION

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to “[...] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives [...].”

The following objectives for the project were provided by the City:

1. *Niche*. Fine-tune Downtown’s role within the commercial framework of the City and region. Selectively guide growth and development in the Downtown district to secure Downtown’s role as Brentwood’s main community center within the changed economic landscape of the region brought about by the construction of the State Route 4 Bypass.
2. *Enhanced Draw and Appeal*. Promote the augmentation of existing shopping, eating, and entertainment offerings in the district to enable Downtown to effectively coexist with emerging competition at primary access points along the new State Route 4 Bypass. Identify and create the conditions to attract the unique retail tenancies critical to Downtown’s survival.
3. *Critical Mass*. Promote the development of the greater Downtown area as the most mixed-use and vibrant district in the City. Increase the opportunities to attract residents to Downtown, whether it is as their place of residence, place of work, place for shopping and entertainment, or simply as a central place to gather and to enjoy meeting and interacting with fellow members of the Brentwood community.
4. *Civic & Cultural Heart*. Enable the continued expansion of Downtown’s role as the civic and cultural heart of the City. Identify and protect opportunities for the widest possible range of civic and cultural facilities and public spaces offered in the Downtown. Enhance the performance of the district for festivals, markets, and other significant civic and cultural events.
5. *Access & Walkability*. Continue to enhance the visibility and accessibility of the Downtown from all approaches and via as many modes of travel as possible. And most of all, ensure that walking is a pleasure throughout the district.

6. *Character & Identity.* Ensure that the Downtown is a living example of the aesthetic qualities and characteristics that form the basis of what it means to build in “the Brentwood Way.” As the Downtown grows, ensure that the character of new buildings and site improvements draw from the social and cultural aesthetic qualities that furnish Brentwood with its well-renowned small-town identity.
7. *Private Actions: Buildings & Site Improvements.* Promote investment in the development of well-crafted built forms that are both attractive and appropriately scaled for Brentwood’s Downtown, which draw from and reinforce the best examples of Brentwood’s architectural traditions, and which preserve the City’s small town character.
8. *Public Actions: Public Spaces.* Guide public investment toward the preservation, enhancement, and increase in variety of public greens, plazas and street spaces to preserve the relaxed setting and pleasing public realm of the Downtown.

Section 15126.6 (f) states that “[...] 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 [...].”

The CEQA Guidelines (§15126.6 (e)(1)) state that a ‘no project’ alternative should be evaluated along with its impact. Specifically, the Guidelines state:

The specific alternative of the “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. The no project alternative analysis is not the baseline for determining whether the Proposed Project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.

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

SELECTION OF ALTERNATIVES

Alternatives that are included and evaluated in this EIR must be feasible alternatives. According to the CEQA Guidelines Section 15126.6(f), “[...] the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project [...].” In addition, Section 15126.6(f)(1) states that the feasibility of an alternative may be determined based on a variety of factors including, but not limited to,

site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control.

Alternatives Considered in this EIR

No Project Alternative

The No Project Alternative would allow the project area to be built out under the existing General Plan and zoning designations; the proposed uses under the Specific Plan would not occur. Under the No Project Alternative, areas in the northwest planned for residential development under the Specific Plan would be built out as Commercial Office/Business under current zoning. Areas in the southwest planned for a transit station under the Specific Plan would be built out as Commercial Office/Residential uses under current zoning. In the center of the Downtown area, parcels planned for ground floor retail under the Specific Plan would be built out as residential uses under current zoning. The No Project Alternative would not meet the second project objective of promoting “retail shopping in the center of the Downtown area in order to compete with emerging competition at primary access points along the new State Route 4 Bypass.” In addition, although the General Plan designates the areas proposed for civic development around the park as Public Facility, the General Plan does not specifically support the Specific Plan’s End-State Envisioned Town Pattern Scenario of building new civic and cultural infill development around the park. The General Plan also does not specify the project’s third goal of protecting opportunities for “the widest possible range of civic and cultural facilities and public spaces offered in the Downtown and enhancing the performance of the district for festivals, markets, and other significant civic and cultural events.”

Land Use

The No Project Alternative would result in buildout of the Downtown area under the existing General Plan and zoning designations. The project area is currently an urban area with developed commercial, retail, school, park, and residential uses as well as some vacant land. Under the No Project Alternative, the uses would presumably continue on the project site and the vacant land would be built out under the General Plan and Zoning Code. Implementation of the No Project Alternative would therefore result in no impacts to consistency with the General Plan and zoning designations; additionally, because the perimeters of the Downtown area are primarily zoned Planned Development and surrounding uses are predominantly residential, impacts to surrounding uses would be minimal. However, although the Specific Plan would substitute some of the land uses proposed under the General Plan, these uses are anticipated to be as or more compatible with existing adjacent uses than those proposed under the General Plan. For example, the Industrial/Commercial-zoned area at the western entrance to the Downtown area would be incompatible with the existing residential uses to the west. The residential uses proposed in the R-2 zone within central Downtown Brentwood, while compatible with the residential zones to the east and south, would be inconsistent with the Commercial Business zone in central Downtown. For these reasons, the No Project Alternative would result in less incompatibility with the surrounding land uses than the Proposed Project

and greater consistency with the General Plan, resulting in fewer impacts than the Specific Plan project.

Aesthetics

The project area currently consists of urbanized, developed land surrounded by residential, planned development, and commercial uses. The No Project Alternative would result in buildout of the project area with some differing uses from the proposed project. The No Project Alternative would therefore alter the existing views of the surrounding land uses and would add new sources of light and glare to the project site. Therefore, the No Project Alternative would result in equal impacts associated with aesthetics as the Downtown Specific Plan, although the development under the existing General Plan would not be guided by Design Guidelines included in the Specific Plan.

Transportation and Circulation

The No Project Alternative would cause a traffic increase in the surrounding areas because homes, public facilities, retail businesses, and office uses would be constructed under the No Project Alternative as under the Specific Plan. Additionally, although slightly different uses would be substituted in a few different areas under the Specific Plan, overall uses would generally remain the same. However, the No Project Alternative would not have the substantial construction-related traffic flow impacts related to buildout of the large-scale projects, including the multi-plex movie theater, the eBART station, and the multi-level parking garage, associated with the Downtown Specific Plan. Therefore, the No Project Alternative would have fewer impacts to traffic than the Downtown Specific Plan.

Air Quality

The No Project Alternative would have fewer operational air quality impacts than the proposed project because the multi-plex movie theater, parking garage, and eBART station would not be constructed under the No Project Alternative. In addition, because the proposed project would create substantial air quality impacts from the construction of these large-scale projects, construction-related air quality impacts associated with the project would not be created under the No Project Alternative. The No Project Alternative would therefore result in fewer impacts to air quality than the proposed project.

No Theater Alternative

The No Theater Alternative would result in development of the project area in accordance with the Downtown Specific Plan, with the exception of the multi-screen movie theater and its associated parking garage. Without the buildout of the movie theater, the parking garage would not be built because the parking garage is included only as a mitigation measure for the parking supply impacts created by the theater. The movie theater and parking garage sites proposed by the Downtown Specific Plan are on land designated as a Central Business zone under the current Zoning Code. The Central Business zone allows for the development of a movie theater, but does not necessarily encourage or promote this specific development. Under the No Theater Alternative, the

current uses on the proposed movie theater and parking garage sites would presumably continue to exist.

Land Use

The No Theater Alternative would be consistent with the Central Business zoning designation for the site. Additionally, the compatibility of the uses resulting from buildout under existing zoning would be similar under the proposed project because the zoning designations and the Specific Plan uses proposed are similar. The Central Business zone is intended to provide a pedestrian-oriented center for business, cultural, and recreational uses to serve the City and to promote, preserve, and protect the existing Downtown business core of the City. The multi-plex movie theater proposed under the Specific Plan would accomplish this purpose and is therefore compatible with the existing zoning designation. The theater would also result in similar compatibility issues with the surrounding land uses, which include a park, civic uses, and retail businesses. Therefore, the No Theater Alternative would result in roughly the same impacts as the proposed project.

Aesthetics

The project area currently consists of urban, developed land surrounded by residential, planned development, and commercial uses. Similar to the proposed project, the No Theater Alternative would result in buildout of the Downtown area, which is already urbanized; alteration of the existing views would therefore be minimal, and may improve after buildout due to the infill of unsightly vacant or underutilized parcels. Under both the proposed project and the No Theater Alternative, new sources of light and glare would be added to the Downtown area, but would not be expected to result in adverse impacts due to the urban nature of the project area. Therefore, the No Theater Alternative would result in comparable impacts to the proposed project associated with aesthetics.

Transportation and Circulation

In their parking study for the Downtown Specific Plan, Fehr and Peers found that with the addition of a multi-screen movie theater as proposed in the Specific Plan, the parking demand would significantly exceed the parking supply (including both public and private spaces), resulting in the need to add parking supply. However, parking demand is currently at 90 percent capacity during peak hours in some parts of the Downtown area, and without the construction of the parking garage proposed as mitigation for the multi-plex theater, parking demand would continue to nearly exceed current capacity. In addition, parking demand could exceed capacity upon buildout of the Specific Plan.

Traffic levels generated by the No Theater Alternative would be reduced due to the decreased intensity of use without a multi-plex theater. Fehr and Peers also identified potential circulation impacts associated with patron drop-off that could arise with the design of theater access. Additionally, without the construction of the parking structure and theater, two large-scale projects proposed by the Downtown Specific Plan, construction-related traffic impacts would be significantly reduced. Overall, then, the No Theater Alternative would result in fewer impacts to transportation and circulation than the proposed project.

Air Quality

The No Theater Alternative would result in buildout of the Downtown area with essentially the same uses as under the proposed project, with the exception of two of the large-scale projects, the multi-plex theater and the parking garage. Construction-related air quality impacts would therefore be reduced under the No Theater Alternative. Because the theater would increase the project trips, operational air quality impacts would also be reduced under the No Theater Alternative. Therefore, the No Theater Alternative would reduce air quality impacts.

No Residential Development Alternative

The No Residential Alternative would result in the development of the project site in accordance with the Downtown Specific Plan, with the exception of all the residential development proposed, which primarily occurs in the western half of the project area. The areas without residential uses under this Alternative would be built out as Industrial/Commercial, Commercial Office/Business, Planned Development, and Commercial Office/Residential as their current zoning designations specify, but would not have any residential uses even if permitted under their designations.

Land Use

The No Residential Development Alternative would not include residential development proposed in the western half of the Downtown area and would be built out instead according to the current zoning designations. The Planned Development designation in the westernmost portion of the project area would be consistent with the residential uses adjacent to the west, and the Commercial Office/Business designation in the western area would be consistent with the railroad road tracks adjacent to the west and the business uses to the east. The Commercial Office/Residential designations in the northwest and southwest would result in the development of office or business uses under the No Residential Development Alternative. These designations would be compatible with commercial uses to the west. Residential development in the southwest under the proposed project would be compatible with the residential uses proposed to the east, however. Although land use impacts were identified as less-than-significant for the proposed project, the No Residential Development Alternative would result in fewer impacts to land use compatibility and would be consistent with the General Plan and Zoning designations for the areas discussed above.

Aesthetics

The project area is currently an urbanized, developed area with some vacant or underutilized parcels. Buildout under the No Residential Development Alternative would preclude infill residences from being built and would result in the development of more commercial and office uses as planned under the General Plan. Buildout under this Alternative would result in the construction of structures in the project area, but would substantially alter existing views because the project area is already urbanized. New sources of light and glare would be approximately the same under either the Alternative or the proposed project. Therefore, the No Residential Development Alternative would result in comparable impacts to the proposed project associated with aesthetics.

Transportation and Circulation

Traffic levels generated from the No Residential Development Alternative would be slightly increased overall to and from the project site as compared to the proposed project. The No Residential Development Alternative would result in fewer residential uses and increased commercial, retail, and office uses. Because commercial and office uses typically generate a higher number of vehicle trips than residential uses, the No Residential Development Alternative would have slightly higher vehicle trips. Construction traffic associated with buildout under the No Residential Development Alternative would be roughly equivalent to the proposed project due to grading and construction of similar land areas under both. Overall, then, the No Residential Development Alternative would be expected to result in slightly higher impacts to traffic in and around the project site as compared to the proposed project due to the increased commercial and office uses under this Alternative.

Air Quality

The No Residential Development Alternative would slightly increase the impacts associated with air quality compared to the proposed project. The No Residential Development Alternative would increase the commercial and office development, which would subsequently increase the amount of vehicle trips in the vicinity of the site. The greater amount of vehicle trips would result in an increase in operational emissions, thereby further degrading the air quality of the region. Construction activities would result in approximately similar air quality impacts due to the same amount of land under grading and construction under either this Alternative or the proposed project. Therefore, the impacts related to air quality would be slightly greater than the air quality impacts generated by the proposed project.

Environmentally Superior Alternative

In order to assist the Lead Agency, an EIR typically identifies the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. In addition, §15126(d)(2) of the CEQA Guidelines states that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Designating a superior alternative depends in large part on what environmental effects one considers most important. This EIR does not presume to make this determination; rather the determinations of which impacts are more important, is left to the reader and to the decision-makers. Finally, it should be noted that the environmental considerations are one portion of the factors that must be considered by the public and the decision makers in deliberations on the proposed project and the alternatives. Other factors of importance include urban design, economics, social factors, and fiscal considerations.

For this project, the environmentally superior alternative would result in development of the site under the No Theater Alternative. Land Use and Aesthetic impacts would remain roughly equivalent under both the No Theater Alternative and the proposed project because the area proposed for the multi-plex theater and parking structure under the

proposed project would be built out with business uses under the current zoning designations for the theater and parking garage sites. Transportation and Circulation impacts would be reduced because parking supply would not be substantially exceeded as it would under the proposed project. In addition, fewer vehicle trips would be made due to the absence of the multi-plex theater, thereby reducing Traffic and Air Quality impacts. Circulation impacts anticipated around the movie theater would not be an issue of concern for the No Theater Alternative. In addition, because the parking garage is expected to be built only as mitigation for the theater's parking impacts, buildout under the No Theater Alternative would prevent two large-scale projects, both the theater and the parking garage, from being constructed. The No Theater Alternative would therefore decrease construction-related impacts to air quality and circulation. The No Theater Alternative is thus the Environmentally Superior Alternative.