

6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the 2040 General Plan that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

6.1 Development of Alternatives

Project alternatives considered were evaluated for their potential feasibility, their ability to achieve most of the project objectives, and their ability to reduce or substantially lessen significant environmental effects. The following section provides an overview of the project objectives and then describes the alternatives that were considered but ultimately rejected from further consideration in this section, as well as the alternatives that are analyzed in detail.

6.2 Project Objectives/Guiding Principles

As discussed in Section 2.0, *Project Description*, the 2040 General Plan vision, and thus the objectives for the future are as follows:

Union City is the heart of the Bay Area and a regional center for commerce, community, and culture. Our economy is strong and diverse and provides high paying jobs across a broad range of local businesses, high profile companies, and emerging industries. Our residents and neighborhoods are safe and healthy and our community is celebrated for its diversity and equitable treatment of everyone. Union City provides effective and efficient public services and is fiscally stable.

The 2040 General Plan sets the guiding principles for the City. The guiding principles are contained on pages 6 through 12 of the 2040 General Plan Introduction and abbreviated below:

- **Economic Development:** Promote Union City as a civic, cultural, and economic destination within the greater Bay Area to attract new businesses and facilitate new economic development opportunities and succeed in the global marketplace; expand the skills and knowledge of the workforce, protect and expand economic assets in Union City, and expand the job base.
- **Health and Quality of Life:** Promote a healthy and safe quality of life in Union City; prioritize education; promote access to healthy foods; attract and retain accessible, affordable, and quality health and recreation services and facilities; support and expand Youth and Family Services programs.
- **Land Use:** Maintain a balanced mix of residential, employment, and commercial uses; create a vibrant 24-hour Station District; ensure livable, healthy, and well-designed neighborhoods that are walkable and bicycle friendly; encourage higher-density developments and mixed-use projects in appropriate areas; promote and increase infill and reuse, while maintaining quality of life and important community character; and implement sustainable and resilient development practices.

- **Community Design:** Enhance gateways into the community; ensure new development respects the community’s natural setting; ensure new development is compatible with the scale and character of existing neighborhoods; preserve and protect important historic and cultural resources; create attractive commercial and mixed-use corridors and centers; create vibrant public places that serve as gathering places; and locate and design buildings, streetscapes, and public spaces that contribute to walkable neighborhoods, corridors, and districts.
- **Housing:** Promote a mix of housing types and affordability; and include a mix of housing types within neighborhoods to promote a diversity of household types and housing choices.
- **Mobility and Access:** Develop a balanced, integrated, multimodal transportation system that is efficient and safe; create a safe and convenient transportation network that incorporates complete streets concepts; continue providing a variety of transportation choices that promote alternatives to the automobile; and support the integration of emerging transportation technologies and modes.
- **Sustainability and Resiliency:** Reduce greenhouse gas (GHG) emissions to address climate change; protect natural resources; continue to promote sustainable levels of energy, water, and resource consumption; encourage residents and businesses to live, work, and operate in a more sustainable manner; and enhance the understanding of future risks ability to absorb, respond to, and recover from emergencies or other changes.
- **Parks and Recreation:** Maximize public access and use of city and regional open space and recreational areas; support the development of regional open spaces that connect Union City to the Bay Area; support the development of additional parkland for active recreational uses; expand and improve existing pedestrian and bike trails; and provide innovative recreational and sports facilities, services, and programs.
- **Public Safety:** Improve coordination among residents and businesses and City Departments to address security issues and maintain a safe community; support and expand the City’s Youth Violence Prevention Program and community policing unit; minimize vulnerability to natural disasters and manmade hazards; strengthen emergency response capabilities; modernize older public facilities to improve seismic safety; support and expand the Community Emergency Response Team (CERT) program; and ensure public facilities and infrastructure investment contribute to the safety and security of residents.
- **Services and Facilities:** Provide quality public services, facilities, and infrastructure throughout the city; expand and enhance telecommunication and broadband access; maintain transparency and improve accountability in all City decisions, practices, and service areas; promote opportunities for community education and involvement; ensure the fair treatment of residents of all races, cultures, and incomes with respect to City plans and policies; promote joint use of public facilities; ensure City revenues are sufficient to maintain and enhance City services, programs, and facilities; and ensure new development is fiscally neutral or positive to the City and provides a net social or economic benefit to the community.

6.3 Alternatives Evaluated in the Draft EIR

The analysis of alternatives focuses on the various land use scenarios that incorporate different assumptions regarding the combinations of future land uses and associated infrastructure improvements. Alternatives provided are intended to reduce, substantially lessen, or avoid significant and unavoidable impacts. As discussed in Section 4, *Environmental Impact Analysis*, the 2040 General Plan would have significant and unavoidable impacts related to greenhouse gas

emissions (Impact GHG-1), construction noise (Impact N-1), vibration (Impact N-3), and transportation (Impacts T-5 and T-6). An alternative location for the project as a whole is not possible. However the alternatives below consider different patterns of land use and infrastructure to accommodate forecasted future growth and regional housing needs in Union City, while attaining most of the project objectives/guiding principles.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3: Enhanced Employment Alternative

6.4 Alternative 1: No Project Alternative

6.4.1 Description

Section 15126.6(e) of the *CEQA Guidelines* requires a specific alternative of “no project” be evaluated in an EIR in order to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. *CEQA Guidelines* Section 15126.6(e)(3) describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). Alternative 1 represents the former alternative type of no project and assumes the continued implementation of the current 2002 General Plan.

Alternative 1 is comprised of a land use pattern that reflects the land use identified in the existing 2002 General Plan. Under this alternative, the proposed 2040 General Plan would not be adopted and the existing General Plan, including the land use map and all of the General Plan goals and policies, would remain in place through the horizon year of 2040. Thus, any new development in Union City would occur consistent with the existing land use designations and the allowed uses within each designation. Similarly, any new infrastructure in Union City would occur as envisioned in the 2002 General Plan.

Development under this alternative compared to the 2040 General Plan provides less infill residential development and less dense residential development on infill or undeveloped property within the City. This alternative would not include the Station East Mixed Use land use designation near the BART station. Instead, these properties would continue to be designated as Research and Development Campus, as shown on Figure 2-3 in Section 2, *Project Description*. Because this alternative would not include the higher density and infill residential development within developed areas of the City or the Station East Mixed Use designation, overall development and anticipated growth would be reduced compared to the 2040 General Plan. Overall growth would be similar to that anticipated under the current 2002 General Plan with approximately 22,000 dwelling units and a population of approximately 78,257 in the year 2040 (Hexagon 2018). This would be a reduction in overall development and growth compared to the 2040 General Plan which anticipates approximately 24,813 dwelling units and a population of approximately 84,477. This alternative would generate 27,477 total jobs in Union City in 2040, whereas the proposed 2040 General Plan would generate 37,233 (Hexagon 2018).

In addition to the existing 2002 General Plan, information provided in the following analysis of this alternative is derived from the *Final Environmental Impact Report for the City of Union City General Plan Update* (Union City 2002). The *Final Environmental Impact Report for the City of Union City General Plan Update* was prepared in conjunction with the existing 2002 General Plan and assessed the potential impacts of implementing the 2002 General Plan. Some physical, regulatory, and social conditions have changed since certification of the *Final Environmental Impact Report for the City of Union City General Plan Update*, such as the rate of population growth, groundwater supplies, and vehicle emission standards. Thus, the level of significance for impacts in the following analyses may differ from the impact findings in the *Final Environmental Impact Report for the City of Union City General Plan Update* based on current conditions.

6.4.2 Impact Analysis

a. Aesthetics

Development under this alternative would continue the land use pattern that currently exists in Union City. The City's visual character, and light and glare conditions would be slightly improved as compared to the 2040 General Plan because this alternative would involve less dense infill development, reduced overall development, and would not include the Station East Mixed Use Land use designation. Less dense development in the focus areas would result in better visibility and reduced light and glare. Impacts to scenic vistas under this alternative would be reduced as compared to the 2040 General Plan because less intensive development is anticipated under this alternative. Therefore, this alternative would avoid the significant and unavoidable impact to hillside and Baylands scenic vistas and maintain existing views. Continued implementation of the 2002 General Plan would have similar benefits with respect to creating public art, inviting gathering places, and implementation of higher quality architectural standards because the 2002 General Plan includes arts and culture policies. Both the 2002 General Plan and the 2040 General Plan includes goals, policies, and implementation measures that promote good design within new development, emphasize the visual quality of the public realm, and the design of streetscapes that protect views, but less dense development under this alternative could potentially result in reduced light and glare. Impacts would be less than significant and reduced as compared to the under the proposed 2040 General Plan due to the reduction in the overall level and intensity of development allowed under the current General Plan and the avoidance of the significant and unavoidable scenic vista impact in the 2040 General Plan.

b. Air Quality

Buildout of the 2002 General Plan would accommodate approximately 2,813 fewer housing units than the 2040 General Plan. Short-term emissions that would occur from construction of the 2,813 housing units would be avoided under this alternative. Similarly, non-residential development would be reduced under this alternative, resulting in reduced construction-related emissions as compared to the 2040 General Plan. Therefore, this alternative would have similar construction-related impacts on air quality despite less overall construction in Union City.

Because 2,813 fewer residential units would be constructed in Union City under this alternative, the long-term on-site emissions from use of natural gas for residential heating, cooking, and water heating would be reduced compared to the proposed 2040 General Plan. This alternative would result in approximately 197,044 fewer daily VMT compared to the 2040 General Plan. Reduced VMT would result in less operational emissions associated with mobile sources.

Infill development would be reduced under this alternative resulting in lower density development in specified arterial corridors, such as along Union City Boulevard and Decoto Road. Therefore, Alternative 1 would result in lower toxic air contaminants (TAC) for sensitive receptors near arterial corridors compared to the 2040 General Plan. However, as described in Section 4.2, *Air Quality*, the proposed 2040 General Plan would require implementation of Mitigation Measure AQ-1, which requires health risk assessments and implementation of measures to reduce exposure to TACs for projects near roadways with high average daily trips. There is no equivalent measure in the 2002 General Plan.

While the No Project Alternative would result in reduced VMT compared to the 2040 General Plan, VMT would increase by approximately 15.3 percent above existing conditions in 2040. Similarly, the service population would increase by approximately 7.2 percent. Because VMT associated with buildout of the 2002 General Plan would increase by approximately 15.3 percent, it would exceed the rate of increase from the forecast service population of approximately 8.1 percent. Therefore, criteria pollutant impacts would be significant and unavoidable. Overall, compared to the proposed 2040 General Plan, the No Project Alternative would have greater air quality impacts due to an increase in TACs and an increase in the rate of VMT versus the rate of population increase compared to the 2040 General Plan.

c. Biological Resources

As described in Section 4.3, *Biological Resources*, potential habitat suitable for special status species occurs in the hillside area east of State Route 238, along creeks and waterways, and the marshland areas at the western City limits. These areas are designated as open space and agriculture under both this alternative and the proposed 2040 General Plan. There would be no change in the land use designations for these potential habitat areas between the current 2002 General Plan and the proposed 2040 General Plan. Therefore, impacts to biological resources in these sensitive areas would be similar to the 2040 General Plan.

Under this alternative, similar parcels would be developed as under the proposed 2040 General Plan, but densities would be reduced compared to the 2040 General Plan. Nonetheless, this alternative could have the potential to impact nesting birds in the Plan Area. Therefore, potential impacts to special status species under the No Project Alternative would be potentially significant and similar to the 2040 General Plan. However, both the 2002 General Plans contains policies applicable to biological resources that would reduce biological impacts related to nesting birds. Therefore, the No Project Alternative would have less than significant impacts to wetland areas, trees, riparian habitats, and migratory wildlife corridors, similar to the proposed 2040 General Plan. Overall, compared to the proposed 2040 General Plan, the No Project Alternative would have reduced biological resources impacts as a result of reduced development.

d. Cultural Resources

The No Project Alternative would have the potential to impact cultural and historic resources in Union City through development of individual projects. The 2002 General Plan designates development within the same urbanized areas of Union City as the proposed 2040 General Plan, however overall development would be less dense than the 2040 General Plan. Therefore, the No Project Alternative would have reduced, but still potentially significant impacts to cultural and historic resources as the proposed 2040 General Plan. Further, the 2002 General Plan includes policies requiring review of development projects under CEQA and the National Historic Preservation Act that would lead to identification of resources and the application of mitigation

measures on a project by project basis, which are not included in the 2040 General Plan. Therefore, policies included in the 2002 General Plan would reduce impacts to cultural resources compared to the 2040 General Plan. The 2040 General Plan includes Mitigation Measure CR-1 requiring cultural resources surveys prior to project construction as discussed in Section 4.4, *Cultural Resources*. Alternative 1 would not require a mitigation measure. Therefore, impacts under the No Project Alternative would be reduced to less than significant, compared to the 2040 General Plan.

e. Energy

The proposed 2040 General Plan and No Project Alternative do not substantially differ in development footprints. However, the 2040 General Plan's land use scenario encourages a greater degree of high-density, transit-oriented, and mixed-use development. The colocation of residences and jobs minimizes vehicle trip lengths and, in some cases, reduces additional vehicle trips and associated transportation fuel consumption. Therefore, as compared to the No Project Alternative, the land use scenario of the proposed 2040 General Plan is designed to reduce vehicle trips and related energy consumption. Therefore, the No Project Alternative would have greater energy consumption than the 2040 General Plan. In addition, the 2002 General Plan does not contain energy efficiency and renewable policies that require the City to implement an array of energy efficiency and renewable energy measures through the year 2040 nor is consistent with energy efficiency goals contained in the Union City Climate Action Plan. The inefficient and unnecessary consumption of energy would be greater under the No Project Alternative. Overall, compared to the proposed 2040 General Plan, the No Project Alternative would have increased energy impacts.

f. Geology and Soils

Under this alternative development would occur within similar areas of Union City as the 2040 General Plan, but development would be reduced compared to the 2040 General Plan. Therefore, development under the No Project Alternative would occur on the same geologic units, soils, and slopes as developed under the 2040 General Plan, but development would not be as intensive as the 2040 General Plan. The potential for loss of topsoil, placement of development atop expansive soils, or accidental discovery of paleontological resources would thus be reduced under this alternative because although it would occur in similar areas there would be less overall development. Development under this alternative would be required to comply with applicable regulations, such as the California Building Code, the Uniform Building Code, the Union City Municipal Code, and the Clean Water Act, risks associated with topsoil loss, and expansive soils would be less under this alternative.

Growth and development under this alternative would be subject to seismic hazards, similar to development facilitated under the proposed 2040 General Plan. However, mandatory compliance with applicable building codes and regulations would reduce potential risks associated with seismic hazards. Both the proposed 2040 General Plan and the 2002 General Plan contain policies and implementation programs aimed at preventing and minimizing potential risks associated with earthquake hazards. However, the 2040 General Plan modifies policies in the current 2002 General Plan to encourage greater earthquake safety. While the current 2002 General Plan does not include these policies, full buildout of the 2002 General Plan would accommodate fewer residents and housing units than the proposed 2040 General Plan. Therefore, compared to the proposed 2040 General Plan, the No Project Alternative would expose fewer people and structures to risks from seismic hazards. Overall, impacts of the No Project Alternative would be less than significant and less than the proposed 2040 General Plan.

g. Greenhouse Gas Emissions/Climate Change

Implementation of the No Project Alternative would involve less overall development and associated growth than would occur under the proposed 2040 General Plan. Therefore, this alternative would have reduced construction related GHG emissions. Additionally, the No Project Alternative would result in less VMT and related GHG emissions. While this alternative would result in fewer sources of GHG emissions, the land use scenario and the associated GHG emissions envisioned under this alternative would not be consistent with applicable state regulations including Assembly Bill 32, Senate Bill 32, or the 2017 Scoping Plan. Similarly, development facilitated by the 2040 General Plan would result in 2040 GHG emissions that exceed reductions necessary to meet statewide GHG emission reduction goals. However, the proposed 2040 General Plan contains policies and implementation programs intended to facilitate greater GHG emission reductions than is mandated under the 2002 General Plan. Because this alternative would not include these emissions reduction policies and programs, GHG emissions would be higher than the 2040 General Plan and would have significant and unavoidable impacts, similar to the 2040 General Plan. Therefore, although both alternatives would result in significant and unavoidable impacts related to GHG emissions, the No Project Alternative would result in potentially greater impacts than the 2040 General Plan regarding consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions.

h. Hazards/Hazardous Materials

The No Project Alternative would accommodate fewer residents and jobs than the proposed 2040 General Plan. Therefore, the No Project Alternative would expose fewer people to potential hazards and hazardous materials as compared to the proposed 2040 General Plan. In addition, compliance with existing regulatory requirements would address potential impacts related to hazards and hazardous materials. Therefore, impacts related to the use, handling, transport, or emissions of hazardous materials under the No Project Alternative would be less than significant, similar to the proposed 2040 General Plan.

The No Project Alternative would result in a similar land use pattern in Union City as the proposed 2040 General Plan. Therefore, the potential for projects to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be similar under this alternative as under the 2040 General Plan. Impacts would be less than significant and similar to the 2040 General Plan.

The proposed 2040 General Plan contains several policies and implementation programs in addition to the policies and implementation programs contained in the 2002 General Plan intended to strengthen emergency and disaster preparedness. Therefore, impacts related to emergency disaster preparedness would be slightly greater under this alternative. However, the 2002 General Plan facilitates fewer residents, reducing the number of people affected by a potential emergency disaster. As a result, impacts related to hazards and hazardous materials resulting from implementation of the No Project Alternative would be less than significant and similar to the proposed 2040 General Plan.

i. Hydrology and Water Quality

The No Project Alternative would result in reduced development as compared to the 2040 General Plan and However, development under this alternative would consist of a similar land use pattern as the proposed 2040 General Plan. Therefore, development under this alternative would result in slightly reduced impervious surfaces and stormwater runoff volumes and velocity as the proposed

2040 General Plan. Both the 2002 General Plan and the proposed 2040 General Plan contain policies to reduce potential water quality impacts. Additionally, development under this alternative would be subject to the same regulatory requirements, such as NPDES permit requirements, governing runoff and protecting water quality and supply as the proposed 2040 General Plan. In addition, the No Project Alternative would result in a smaller population in 2040, and demand for groundwater would be reduced compared to the proposed 2040 General Plan. Impacts under this alternative would be less than significant and less than the proposed 2040 General Plan.

j. Land Use and Planning

Development under the No Project Alternative would occur in a similar land use pattern as the proposed 2040 General Plan. This alternative encourages orderly development in designated focus areas and would not divide established communities, similar to the 2040 General Plan. However, the 2002 General Plan was adopted prior to the development and adoption of ABAG and MTC's *Plan Bay Area 2040* (ABAG and MTC 2017). Therefore, the 2002 General Plan is inconsistent with several *Plan Bay Area 2040* goals and measures to reduce environmental impacts, such as reducing adverse health impacts by substantially reducing emissions. Therefore, impacts under this alternative would be potentially significant. Impacts would be greater compared to the 2040 General Plan, which is consistent with *Plan Bay Area 2040*.

k. Noise

Buildout of the 2002 General Plan would result in reduced development compared to the proposed 2040 General Plan. Therefore, less construction and associated construction noise and vibration would occur under the No Project Alternative as compared to the proposed 2040 General Plan, particularly in the already developed areas of the city and the proposed Station East Mixed Use land use area near the BART station. The 2002 General Plan contains policies to reduce construction noise during nighttime hours, similar to the proposed 2040 General Plan. Reduced development under this alternative would result in less construction noise. However, construction noise under this alternative may still exceed City standards, similar to the 2040 General Plan. Construction noise levels could be slightly reduced under this alternative, but would remain significant and unavoidable similar to the 2040 General Plan.

Daily VMT on area roadways would be less under this alternative as compared with the 2040 General Plan. Less VMT would result in reduced vehicle noise as compared to the 2040 General Plan. Overall, noise and vibration impacts under this alternative would be significant and unavoidable and slightly less than the proposed 2040 General Plan.

l. Population and Housing

Under the No Project Alternative, the existing land use designations in the 2002 General Plan would continue to define the type of development that occurs throughout Union City. Implementation of the No Project Alternative would accommodate 78,257 residents and 22,000 housing units in Union City through 2040. This would be approximately 6,220 fewer residents and 2,813 fewer housing units than would be accommodated by implementation of the proposed 2040 General Plan. Thus, compared to the proposed 2040 General Plan, the No Project Alternative would result in less population growth.

The current 2002 General Plan provides for orderly development and growth. The displacement of people or housing units as a result of the No Project Alternative would be minimal because development in Union City would continue pursuant to the existing 2002 General Plan. Impacts

would be less than significant. Compared to the proposed 2040 General Plan, the No Project Alternative would have reduced impacts on population and housing.

m. Public Services

Under the No Project Alternative, the existing land use designations in the 2002 General Plan would continue to define the type of development that occurs throughout Union City. The No Project Alternative would result in reduced development as compared to the proposed 2040 General Plan. Therefore, the No Project Alternative would generate less demand for fire, police, school, and library services. However, as discussed in Section 4.13, *Public Services*, the proposed 2040 General Plan includes policies that direct the City to strive to maintain adequate public service facilities.. Impacts would be less than significant, and overall, similar to the proposed 2040 General Plan.

n. Transportation

The No Project Alternative would result in reduced development as compared to the proposed 2040 General Plan. Therefore, daily VMT under this alternative would be 1,335,775, which is an approximately 13 percent reduction compared to the 2040 General Plan. The No Project Alternative would reduce VMT approximately 10 percent below the existing regional VMT per service population for the nine Bay Area counties. This alternative would not achieve a 15 percent reduction below the regional VMT per service population and impacts would remain significant and unavoidable.

As shown in Table 6-1, this alternative would generate an estimated 22,034 AM peak hour trips and 24,190 PM peak hour trips. The No Project Alternative would result in 3,892 fewer AM peak hour trips and 3,907 fewer PM peak hour trips as compared to the 2040 General Plan. Therefore, traffic on area roadways would be reduced under this alternative and overall roadway segment impacts would be lessened. However, this alternative would not avoid significant and unavoidable traffic impacts on area roadway segments, including Mission Boulevard north of Whipple Road and Union City Boulevard North of Dryer Street. The 2002 General Plan does not include trip reduction policies that would remove vehicles from area roadways.

Goals and policies in the 2002 General Plan would apply under this alternative and would support emergency access and safety design. However, policies of the 2002 General Plan may conflict with policies contained in ABAG/MTC’s Plan Bay Area 2040. Overall, this alternative would result in slightly reduced impacts to study segments compared to the 2040 General Plan, but would not reduce the significant and unavoidable traffic impacts.

Table 6-1 Alternative 1 – Trip Generation Comparison

	Proposed Project	Alternative 1: No Project	Difference
AM Peak Hour Trips	25,926	22,034	(3,892)
PM Peak Hour Trips	28,097	24,190	(3,907)

() = negative number

Source: Hexagon 2018 (see Appendix C)

o. Tribal Cultural Resources

As discussed in Section 4.15, *Tribal Cultural Resources*, tribal cultural resources impacts are highly dependent on both the individual project site conditions and the characteristics of the proposed

activity. Under the No Project Alternative, the existing land use designations in the 2002 General Plan would continue to define the type of development that occurs throughout Union City. Because the 2002 General Plan facilitates development within the same areas of Union City as would be facilitated by the proposed 2040 General Plan, the potential to encounter tribal cultural resources would be similar under this alternative as to the proposed 2040 General Plan. However, reduced development under this alternative could result in less impacts to tribal cultural resources because there is potential for less ground disturbance. In addition, development under this alternative would be subject to laws and regulations requiring Native American consultation, protection of human remains, and pre-historic artifacts. Impacts would be less than significant with adherence to applicable laws and regulations. Compared to the proposed 2040 General Plan, the No Project Alternative would have slightly reduced but similar impacts on tribal cultural resources. Impacts would remain less than significant.

p. Utilities and Service Systems

As discussed in Section 4.16, *Utilities and Service Systems*, the Alameda County Water District (ACWD) and Alvarado Treatment Plant would have adequate water supply and wastewater treatment capacity to service the City's anticipated 2040 population of 84,477 persons. The No Project Alternative would result in reduced development and a population of 78,257 persons. Therefore, there would be excess water supply and the Alvarado Treatment Plant would have excess capacity under this alternative. However, the 2002 General Plan does not contain goals and policies related to conserving water supply and wastewater reduction measures that would be implemented under the 2040 General Plan. Impacts to landfills would be slightly reduced as compared to the 2040 General Plan because there would be less overall development. Therefore, the No Project Alternative would have a less than significant impact to water supply, wastewater facilities, and landfill facilities, similar to the proposed project.

q. Wildfire

As discussed in Section 4.17, *Wildfire*, wildfire risk to Union City is primarily limited to the undeveloped hillside area east of State Route 238. The No Project Alternative would not expand the current development footprint into this area prone to wildfire hazard and areas at risk of wildfire in the City would remain under the Open Space and Agriculture land use designations. Overall, impacts would be less than significant, similar to the 2040 General Plan.

6.5 Alternative 2: Reduced Density Alternative

6.5.1 Description

Alternative 2 would reduce the residential and non-residential development density facilitated by the proposed 2040 General Plan such that approximately 50 percent fewer new housing units and new employment opportunities would be created. Development would occur within the same areas where development would occur under the 2040 General Plan, only at a reduced density. For example, the proposed General Plan would accommodate an approximately 21 percent increase in the number of housing units in Union City, whereas Alternative 2 would accommodate an approximately 10.5 percent increase, or about 50 percent of that accommodated by the 2040 General Plan. This alternative is similar to Alternative 1 in that overall density would be less compared to the proposed 2040 General Plan, thus accommodating a smaller population in 2040. However, Alternative 2 would allow for increased density compared to Alternative 1. Table 6-2

provides a comparison of the housing units and employment in Union City under this alternative compared with the proposed 2040 General Plan and Alternative 1. Table 6-2 also shows the population growth estimate, based on 50 percent fewer newer housing units than the proposed 2040 General Plan.

Table 6-2 Comparison of Density Facilitated by Alternative 2

Development/Growth	Proposed 2040 General Plan	Alternative 1	Alternative 2
Housing Units			
Existing - 2018	20,498	20,498	20,498
Net New Through 2040	4,315	1,502	2,158
2040 Total	24,813	22,000	22,656
Percent Growth	21.0	7.3	10.5
Population			
Existing - 2018	72,991	72,991	72,991
Net New Through 2040	11,486	5,266	5,743
2040 Total	84,477	78,257	78,734
Percent Growth	15.7	7.2	7.9
Employment			
Existing - 2018	18,475	18,475	18,475
Net New Through 2040	18,758	9,002	9,379
2040 Total	37,233	27,477	27,854
Percent Growth	101.5	48.7	50.8

6.5.2 Impact Analysis

a. Aesthetics

Alternative 2 would implement the same policies as the 2040 General Plan but would reduce residential and non-residential development by approximately 50 percent. Therefore, impacts to the City’s visual character, and light and glare conditions would be reduced as compared to the proposed 2040 General Plan. This alternative would not avoid the significant and unavoidable impacts to scenic resources because development of tall buildings could still occur. However, impacts would be reduced as a result of reduced development. Alternative 2 would have the same benefits with respect to creating public art, inviting gathering places, and implementation of higher quality architectural standards as the 2040 General Plan. Impacts would be reduced as compared to the proposed 2040 General Plan, and would remain significant and unavoidable similar to the 2040 General Plan.

b. Air Quality

Alternative 2 would result in 50 percent less development than the 2040 General Plan and thus less construction in Union City. Alternative 2 would implement the same development policies as the proposed 2040 General Plan, including Policy RC-5.2, which is intended to reduce construction-related emissions. Short-term emissions would thus be reduced under this alternative.

Similarly, the long-term on-site emissions from use of natural gas for residential heating, cooking, and water heating would be reduced compared to the proposed 2040 General Plan because there would be less residential development. In addition, Alternative 2 would result in fewer VMT as compared to the proposed 2040 General Plan. Reduced VMT would result in less operational emissions associated with mobile sources. Additionally, reduced residential development would place fewer sensitive receptors near major emissions sources and impacts to receptors from TACs would be reduced. Similar to the 2040 General Plan, Mitigation Measure AQ-1 would be implemented under this alternative and reduce impacts to people being exposed to TACs by requiring Health Risks Assessments for new sensitive receptors or emissions sources for projects near roadways with high average daily trips.

Under this alternative the service population in Union City would increase by 13.5 percent compared to existing conditions. Because development would be reduced by 50 percent under this alternative it was assumed that VMT would also be reduced by 50 percent and would thus increase 12.5 percent above existing conditions. Therefore, the increase in VMT associated with buildout of Alternative 2 would not exceed the rate of increase from the forecast service population. Therefore, impacts on criteria pollutants would be less than significant, similar to the proposed 2040 General Plan. Overall, compared to the proposed 2040 General Plan, Alternative 2 would have fewer air quality impacts.

c. Biological Resources

Alternative 2 would reduce residential and non-residential development by approximately 50 percent as compared to the 2040 General Plan, but would not alter the land uses identified in the 2040 General Plan. Less development potentially would result in reduced impacts to biological resources. Overall, impacts to biological resources under Alternative 2 would be less than the 2040 General Plan. However, impacts would remain less than significant with mitigation because Mitigation Measure BIO-1 to add a nesting bird protection policy would still apply under Alternative 2.

d. Cultural Resources

Buildout of Alternative 2 would have the potential to impact cultural and historic resources in Union City, similar to the 2040 General Plan. Reduced development would reduce impacts to cultural resources because fewer historic and archaeological impacts would be potentially disturbed. In addition, goals and policies in the 2040 General Plan would continue to protect valuable cultural resources. Overall, impacts to cultural resources under this alternative would be less than the 2040 General Plan. However, impacts would remain less than significant with mitigation because Mitigation Measure CR-1 to require a cultural resources study implementation program would still apply to Alternative 2.

e. Energy

Alternative 2 would reduce development in Union City by 50 percent, although the proposed 2040 General Plan and Alternative 2 do not substantially differ in their 2040 development land use pattern. This alternative includes less dense development compared to the 2040 General Plan's land use scenario that encourages a greater degree of high-density and mixed-use development. Less dense development would result in less construction and thus reduced energy consumption for construction vehicles. Similarly, a reduced level of development would result in reduced consumption of energy from operational uses including heating and transportation fuel. However,

Alternative 2 would still promote a mixed-use and transit oriented development, which leads to lower energy consumption. Similar to the 2040 General Plan, Alternative 2 would implement new energy efficiency and renewable energy policies and implementation programs that would reduce energy consumption and would be consistent with energy goals and policies contained in the current Union City Climate Action Plan. Therefore, Alternative 2 would have reduced energy consumption. Overall, compared to the proposed 2040 General Plan, Alternative 2 would have reduced energy impacts and impacts would be less than significant, similar to the 2040 General Plan.

f. Geology and Soils

Alternative 2 would facilitate development within the same areas of Union City as the proposed 2040 General Plan, although new residences and other development would be reduced by approximately 50 percent. Therefore, development under Alternative 2 would occur on the same geologic units, soils, and slopes as developed under the 2040 General Plan. Reduced development under this alternative would reduce geology and soils impacts as compared to the 2040 General Plan because there would be less impacts from subsidence liquefaction, collapse, and other geologic hazards in the Plan Area. However, similar to the 2040 General Plan development would be required to comply with applicable regulations, such as the California Building Code, the Uniform Building Code, the Union City Municipal Code, and the Clean Water Act that include erosion control, best management practices, and engineering design to reduce geologic hazards.

Less overall development would reduce impacts to paleontological resources because less ground disturbance would occur under this alternative. However, impacts would remain less than significant with mitigation because Mitigation Measure GEO-1 requires implementation of a paleontological resources protection program, which would still apply to Alternative 2.

Alternative 2 would implement the same policies and programs as the proposed 2040 General Plan aimed at preventing and minimizing potential risks associated with earthquake hazards. Overall, impacts of Alternative 2 would be less than significant with mitigation and similar to the proposed 2040 General Plan.

g. Greenhouse Gas Emissions/Climate Change

Implementation of Alternative 2 would involve less overall development and associated growth than would occur under the proposed 2040 General Plan. Therefore, this alternative would have reduced construction related GHG emissions and natural gas consumption for heating and power.

Additionally, Alternative 2 would result in less VMT compared to the 2040 General Plan and GHG emissions from vehicle sources would be reduced.

Reduced population and employment projections under this alternative would result in a new per capita threshold of 1.3 MT CO₂e capita per year. Assuming that 50 percent less development would result in a 50 percent reduction in GHG emissions, implementation of Alternative 2 would result in 2.44 MT CO₂e capita per year. Therefore, similar to the 2040 General Plan the service population per year threshold would be exceeded under this alternative. Reduced development would lessen GHG emissions; however, impacts would remain significant and unavoidable with implementation of Mitigation Measure GHG-1 to update the City's climate action plan. Similar to the 2040 General Plan under this alternative if and when the City's CAP is updated GHG would be reduced to less than significant.

Alternative 2 would be consistent with GHG reduction measures in the City's Climate Action Plan and ABAG/MTC's Plan Bay Area 2040 because Alternative 2 contains the same policies and

implementation programs intended to facilitate greater GHG emission reductions as the 2040 General Plan. Therefore, Alternative 2 would result in similar impacts to the 2040 General Plan regarding consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Overall, although GHG emissions under this alternative would be reduced, impacts would remain significant and unavoidable similar to the 2040 General Plan.

h. Hazards/Hazardous Materials

Buildout of Alternative 2 would accommodate 50 percent less residents and jobs than the proposed 2040 General Plan. Therefore, Alternative 2 would expose fewer people to potential hazards and hazardous materials as compared to the 2040 General Plan. Similar to the 2040 General Plan, compliance with existing regulatory requirements would reduce potential impacts related to hazards and hazardous materials. Therefore, impacts related to the use, handling, transport, or emissions of hazardous materials under Alternative 2 would be less than significant and slightly reduced as compared to the proposed 2040 General Plan.

Alternative 2 facilitates development within the same areas of Union City as would be facilitated by the proposed 2040 General Plan. Therefore, the potential for projects to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be similar under this alternative and the 2040 General Plan. Impacts would be less than significant, similar to the 2040 General Plan.

Alternative 2 would implement the same policies and programs as included in the proposed 2040 General Plan intended to strengthen emergency and disaster preparedness. Therefore, Alternative 2 would result in similar impacts regarding emergency preparedness than the proposed 2040 General Plan. Additionally, as described above, Alternative 2 would result in fewer residences, reducing the number of people affected by a potential emergency disaster. As a result, impacts related to hazards and hazardous materials under Alternative 2 would be less than significant and reduced as compared to that of the proposed 2040 General Plan.

i. Hydrology and Water Quality

Buildout of Alternative 2 would reduce development by 50 percent as compared to the 2040 General Plan. Alternative 2 would develop the same areas of Union City as would be developed during buildout of the proposed 2040 General Plan. Although the same areas would be developed, development facilitated under Alternative 2 would result in fewer impervious surfaces as the proposed 2040 General Plan. Stormwater runoff volumes and velocity would therefore be reduced under this alternative compared to the proposed 2040 General Plan. Similar to the 2040 General Plan, Alternative 2 contains policies that would reduce potential water quality impacts. Additionally, development under this alternative would be subject to the same regulatory requirements, such as NPDES permit requirements, governing runoff and protecting water quality and supply as the proposed 2040 General Plan. Because Alternative 2 would result in reduced development, the demand for groundwater would be reduced compared to the proposed 2040 General Plan. Impacts under this alternative would be less than significant and slightly less than the proposed 2040 General Plan.

j. Land Use and Planning

Buildout of Alternative 2 would reduce development by 50 percent as compared to the 2040 General Plan. Similar to the 2040 General Plan, Alternative 2 encourages orderly development in designated focus areas and would not divide established communities. Because the same goals and

policies would be implemented under Alternative 2 as the 2040 General Plan, this alternative would be consistent with and compatible to other applicable land use plans, policies, and regulations. As with the 2040 General Plan, Alternative 2 would be consistent with the *Plan Bay Area 2040* goals and measures, such as Goal 2 Adequate Housing, to reduce environmental impacts. Similar to the 2040 General Plan, this alternative would include provisions for providing adequate housing. For example, Policy LU-5.1 would apply under this alternative which states that the City shall continue to provide opportunities for a variety of housing types at varying densities and affordability levels. In addition, Policy HE-A.3 would also apply, which encourages home builders to use multifamily designated land for the highest allowable density housing to make use of land and facilities more efficient and provide more affordable housing opportunities. Impacts would be similar to the 2040 General Plan and less than significant.

k. Noise

Buildout of Alternative 2 would reduce development by 50 percent as compared to the 2040 General Plan. Therefore, less construction and associated construction noise and vibration would occur under Alternative 2 as compared to the proposed 2040 General Plan. Similar to the proposed 2040 General Plan, Alternative 2 would contain policies to reduce construction noise during nighttime hours, as well as policies that control measures be included as a standard condition of approval of new projects. As a result, construction noise and vibration levels would be substantially reduced under Alternative 2 as compared to the proposed 2040 General Plan, but would remain significant and unavoidable because construction noise may still exceed City standards.

Daily VMT on area roadways would be less under buildout of Alternative 2 as compared with the 2040 General Plan because there would be less overall development. Less VMT would result in reduced noise from motor vehicles at sensitive receptors located along area roadways. Overall, noise and vibration impacts under this alternative would be similar to the proposed 2040 General Plan and would remain significant and unavoidable because construction noise and vibration may still exceed City standards.

l. Population and Housing

Alternative 2 would have reduced density than the 2040 General Plan. However, land use designations would remain similar to the 2040 General Plan defining the type of development that occurs throughout Union City. Buildout of Alternative 2 would accommodate 78,734 residents and 22,656 housing units in Union City. This would be approximately 5,743 fewer residents and 2,157 fewer housing units than would be developed under the proposed 2040 General Plan. Thus, compared to the proposed 2040 General Plan, Alternative 2 would result in less population growth. Similar to the proposed 2040 General Plan, Alternative 2 would provide for orderly development and growth. Goals and policies from the proposed 2040 General Plan would also apply to Alternative 2, which would ensure that development of new housing occurs in accordance with state and local requirements, while preserving existing residential neighborhoods. Impacts would be less than significant. Compared to the proposed 2040 General Plan, Alternative 2 would have slightly reduced impacts on population and housing.

m. Public Services

Buildout of Alternative 2 would accommodate 50 percent fewer residents and housing units than the proposed 2040 General Plan. Therefore, Alternative 2 would generate less demand for fire, police, school, and library services compared to the proposed 2040 General Plan. Additionally, as

discussed in Section 4.13, *Public Services*, the proposed 2040 General Plan includes policies that direct the City to strive to maintain adequate public service facilities, which would be implemented under Alternative 2. Therefore, impacts would be less than significant, and overall, reduced as compared to the proposed 2040 General Plan.

n. Transportation

Alternative 2 would reduce density by 50 percent compared to the 2040 General Plan. Therefore, it was assumed that this alternative would generate approximately 50 percent fewer AM and PM peak hour trips and VMT than the 2040 General Plan. Therefore, project related traffic on area roadway segments would be reduced by approximately 50 percent. Although Alternative 2 would substantially reduce the traffic volume and volume to capacity ratio at impacted roadway segments, such as I-880 north of Whipple Road, traffic impacts would remain significant and unavoidable, because this alternative would not remove enough trips from area roadways. In addition because this alternative would proportionally reduce density the VMT per service population would remain the same as under the 2040 General Plan. As compared to the regional VMT per service population VMT under this alternative would not reduce VMT per service population by 15 percent and impacts to VMT would remain significant and unavoidable.

Goals and policies in the 2040 General Plan would still apply under this alternative. Therefore, Alternative 2 would support emergency access and safety design, and would not conflict with policies contained in ABAG/MTC's Plan Bay Area 2040 or the City's Pedestrian and Bicycle Master Plan. Overall, this alternative would result in fewer impacts to study roadway segments than those associated with the 2040 General Plan and would reduce impacts to a less than significant level.

o. Tribal Cultural Resources

As discussed in Section 4.15, *Tribal Cultural Resources*, tribal cultural resources impacts are highly dependent on both the individual project site conditions and the characteristics of the proposed activity. Under Alternative 2, similar land use pattern would occur as the proposed 2040 General Plan and would define development that occurs throughout Union City, however development would be reduced by 50 percent. Overall, tribal cultural resources impacts under Alternative 2 would be less than the 2040 General Plan because reduced development would have less potential to unearth tribal cultural resources. Similar to the 2040 General Plan, development under Alternative 2 would be subject to laws and regulations requiring Native American consultation, protection of human remains, and pre-historic artifacts. Impacts would be less than significant with adherence to applicable laws and regulations. Overall, tribal cultural resources impacts under Alternative 2 would be less than the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

p. Utilities and Service Systems

As discussed in Section 4.16, *Utilities and Service Systems*, the Alameda County Water District (ACWD) and Alvarado Treatment Plant would have adequate water supply and wastewater treatment capacity to service the City's anticipated 2040 population of 84,477 persons. Alternative 2 would result in a 50 percent reduction in development and a population of 78,734 persons. Therefore, there would be excess water supply and the Alvarado Treatment Plant would have excess capacity under this alternative. Additionally, the goals and policies in the 2040 General Plan related to water supply and wastewater reduction would be implemented under this alternative to further reduce impacts to utilities and service systems. Impacts to landfills would be slightly reduced

as compared to the 2040 General Plan because there would be 50 percent less overall development. Therefore, Alternative 2 would have a less than significant impact to water supply and landfill facilities, similar to the proposed project.

q. Wildfire

As discussed in Section 4.17, *Wildfire*, wildfire risk to Union City is primarily limited to the undeveloped hillside area east of State Route 238. Alternative 2 would not expand the current development footprint into the areas prone to wildfire hazard. As a result, Alternative 2 would have the same impact regarding wildfires and associated hazards as the 2040 General Plan. In addition, goals and policies in the 2040 General Plan related to wildfire suppression and preparedness would be implemented under this alternative to further reduce wildfire impacts. Overall, impacts would be less than significant, similar to the 2040 General Plan.

6.6 Alternative 3: Enhanced Employment Alternative

6.6.1 Description

Alternative 3, the Enhanced Employment Alternative, would consist of the same policies and land use designations as the proposed 2040 General Plan, with the exception of the designations within the Greater Station District, Union City Boulevard, and Horner/Veasy focus areas of the City. Alternative 3 would reprogram these three focus areas to emphasize a mix of commercial, office, and industrial land uses which are employment generating development. It would designate some areas east of the Union Pacific railroad tracks in the Greater Station District for office and commercial development and retain others for research and development. Station East would be designated for office and employment generating uses and would not include residential designations under this alternative. Alternative 3 also includes intensification of the existing commercial centers at Alvarado-Niles Road and Decoto Road with employment and commercial uses. Union City Boulevard would retain its special industrial land use on the west side as well as retail commercial, similar to the 2040 General Plan. However unlike the 2040 General Plan, this alternative would accommodate only retail commercial, office and employment generating uses, without the potential for residential components, on the east side of Union City Boulevard. Horner-Veasy would retain its planned industrial use for areas west of Whipple Road, but the site west of Whipple Road would not be designated for low-density residential. Instead, this alternative would designate the site west of Whipple Road as industrial, commercial, or other employment generating uses.

Because this alternative places more emphasis on employment growth and less on residential development compared with the proposed General Plan, it would accommodate a smaller population in Union City in 2040. There would be a smaller population and fewer housing units within Union City in 2040, but there would be more jobs and employment opportunities within the City compared to the proposed 2040 General Plan. Additional employment opportunities under this alternative would increase the number of local jobs for Union City residents and would thus lower commute distances and VMT compared to the 2040 General Plan.

6.6.2 Impact Analysis

a. Aesthetics

Alternative 3 would develop more employment-generating land uses than residential uses compared to the proposed 2040 General Plan. As a result, visibility from and of scenic vistas, the City's visual character, and light and glare conditions would be similarly impacted as under the proposed 2040 General Plan. Overall, aesthetic impacts under this alternative would not be substantially different than identified as part of the proposed 2040 General Plan because residential development in the Greater Station District, Union City Boulevard, and Horner/Veazy focus areas would become employment generating development under this alternative. The significant and unavoidable impact to scenic vistas would not be avoided under this alternative. Alternative 3 would have the same benefits with respect to creating public art, inviting gathering places, and implementation of higher quality architectural standards as the 2040 General Plan because this alternative would include the same goals and policies in the 2040 General Plan. Impacts would be significant and unavoidable and similar to those under the proposed 2040 General Plan.

b. Air Quality

Alternative 3 would replace housing units with employment-generating facilities compared with the proposed 2040 General Plan. Short-term emissions that would occur from construction of this alternative would be similar to impacts identified for the proposed project because a similar amount of development would occur. Additionally, Alternative 3 would implement the same development policies as the proposed 2040 General Plan, including Policy RC-5.2, which is intended to reduce construction-related emissions. Therefore, Alternative 3 would have similar construction-related impacts on air quality.

Because fewer residential units would be constructed in Union City under this alternative, long-term on-site emissions from use of natural gas for residential heating, cooking, and water heating would be reduced compared to the proposed 2040 General Plan. While employment-generating facilities require heating, residential units typically have higher natural gas demands (U.S. Energy Information Administration 2019). Therefore, operational emissions resulting from employment generating development instead of residential development would be reduced under this alternative. Alternative 3 would also result in reduced VMT compared to the proposed 2040 General Plan as a result of less residential development and increased employment-generating development within the City, which would allow for existing and planned residences to shorten commute lengths by increasing employment opportunities within the City. Reduced VMT would result in less operational emissions associated with mobile sources. In addition, because this alternative would accommodate only retail commercial, office, and industrial, without residential components in the east side of Union City Boulevard and west of Whipple Road Alternative 3 would expose fewer sensitive receptors to major emissions sources. Impacts from TACs would be reduced. However, similar to the 2040 General Plan, Mitigation Measure AQ-1 would still apply under this alternative and reduce impacts to people being exposed to TACs by requiring Health Risks Assessments for new sensitive receptors or emissions sources. Impacts would remain less than significant with mitigation incorporated under this alternative.

Under Alternative 3 both VMT and service population would increase above existing conditions. It is anticipated that the increase in VMT associated with buildout of Alternative 3 would not exceed the rate of increase from the forecast service population because providing additional employment opportunities in Union City would result in an increase in service population and smaller increase in

VMT because Alternative 3 would provide additional employment opportunities within the City. These additional employment opportunities within the City would lower commute distances for Union City residents, thus lowering VMT compared to the proposed 2040 General Plan. Therefore, impacts on criteria pollutants would be less than significant, similar to the proposed 2040 General Plan. Overall, compared to the proposed 2040 General Plan, Alternative 3 would have reduced air quality impacts.

c. Biological Resources

Alternative 3 would develop more employment-generating land uses than residential uses compared to the proposed 2040 General Plan. Therefore, a similar amount of development in the Greater Station District, Union City Boulevard, and Horner/Veasy focus areas of the City would occur under this alternative. Therefore, ground disturbing impacts for Alternative 3 would be similar to the 2040 General Plan. Similar to the 2040 General Plan, the large open space area in the northwestern portion of the city that contains sensitive biological resources would maintain their open space and agriculture uses under this alternative. However, impacts would remain less than significant with mitigation because Mitigation Measure BIO-1 to add a nesting bird protection policy would still apply under Alternative 3. Therefore, biological resource impacts would be similar to those identified under the 2040 General Plan.

d. Cultural Resources

Alternative 3 would develop more employment-generating land uses than residential uses compared to the proposed 2040 General Plan. Therefore, a similar amount of development and thus ground disturbance would occur in the Greater Station District, Union City Boulevard, and Horner/Veasy focus areas of the City under this alternative. Buildout of Alternative 3 would have similar potential to impact cultural and historic resources in Union City as the 2040 General Plan. Alternative 3 would not substantially increase potential impacts to cultural resources, and all policies and mitigation measure provided in Section 4.4, *Cultural Resources*, would apply under Alternative 3. Impacts would remain less than significant with mitigation because Mitigation Measure CR-1 to require a cultural resources study implementation program would still apply to Alternative 3. Compared to the proposed 2040 General Plan, Alternative 3 would have similar impacts.

e. Energy

Alternative 3 would develop more employment-generating land uses than residential uses compared to the proposed 2040 General Plan. However, the amount of construction would be similar to the 2040 General Plan. Therefore, construction energy consumption would be similar to the 2040 General Plan.

The proposed 2040 General Plan and Alternative 3 do not substantially differ in their 2040 development footprints; however, the land use scenario for Alternative 3 would implement reduced residential development in the Greater Station District, Union City Boulevard, and Horner/Veasy focus areas of the City. While employment-generating facilities require heating, residential units typically have higher natural gas demands (U.S. Energy Information Administration 2019). Therefore, energy consumption from employment-generating facilities would be reduced under this alternative as compared to the 2040 General Plan. In addition, the increase in employment-generating areas minimizes vehicle trip lengths by providing more jobs in the City, which would result in fewer vehicle trips and associated transportation fuel consumption under Alternative 3.

Finally, similar to the 2040 General Plan, Alternative 3 would implement new energy efficiency and renewable policies, as well as implementation programs to reduce energy consumption. Therefore, the inefficient and unnecessary consumption of energy would be reduced under Alternative 3. Overall, although energy consumption under this alternative would be less, impacts would remain less than significant similar to the 2040 General Plan.

f. Geology and Soils

Alternative 3 would facilitate development within the same areas of Union City as the proposed 2040 General Plan, although proposed residential uses within the Greater Station District, Union City Boulevard, and Horner/Veasy focus areas of the City would be replaced with employment-generating uses. Therefore, development under Alternative 3 would occur on the same geologic units, soils, and slopes as developed under the 2040 General Plan. A similar amount of development would occur under this alternative as the 2040 General Plan. Therefore, impact from subsidence, liquefaction, collapse, and other geologic hazards in the Plan Area would be similar to the 2040 General Plan. Development would be required to comply with applicable regulations, such as the California Building Code, the Uniform Building Code, the Union City Municipal Code, and the Clean Water Act. Therefore, risks associated with topsoil loss and expansive soils would not substantially differ between Alternative 3 and the proposed 2040 General Plan.

Because similar development would occur under this alternative, ground disturbance impacts would be similar to the 2040 General Plan. Therefore, the potential to unearth unknown resources would not substantially differ between Alternative 3 and the 2040 General Plan. Impacts would remain less than significant with mitigation because Mitigation Measure GEO-1 to require implementation of a paleontological resources protection program would still apply to Alternative 3.

Alternative 3 would implement the same policies and programs as the proposed 2040 General Plan aimed at preventing and minimizing potential risks associated with earthquake hazards. Overall, impacts of Alternative 3 would be less than significant with mitigation and similar to the proposed 2040 General Plan.

g. Greenhouse Gas Emissions/Climate Change

Implementation of Alternative 3 would involve less residential and more employment-generating development than would occur under the proposed 2040 General Plan. Therefore, short-term construction GHG emissions and natural gas consumption would be similar to the 2040 General Plan. Alternative 3 would result in less VMT compared to the 2040 General Plan because increased employment-generating development within the City would allow for existing and future residents to shorten commute lengths by increasing employment opportunities within Union City. Therefore, GHG emissions from mobile sources would be reduced under this alternative.

Although this alternative would result in additional employment-generating development and a reduction in residential development, overall GHG emissions under Alternative 3 would be similar to the 2040 General Plan because the amount of development would be similar. However, this alternative would accommodate a smaller population in Union City in 2040 because there would be fewer housing units. Therefore, GHG emissions under Alternative 3 would not be substantially reduced and would still exceed the service population emissions threshold established as part of the 2040 General Plan. Impacts would remain significant and unavoidable with implementation of Mitigation Measure GHG-1 to update the City's climate action plan consistent with state regulations. Similar to the 2040 General Plan, under this alternative if and when the City's CAP is updated in accordance with GHG reduction targets, GHG would be reduced to less than significant.

Alternative 3 would be consistent with GHG reduction measures in the City's Climate Action Plan and ABAG/MTC's Plan Bay Area 2040 because Alternative 3 contains the same policies and implementation programs intended to facilitate similar GHG emission reductions as the 2040 General Plan. Therefore, Alternative 3 would result in similar impacts to the 2040 General Plan regarding consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Overall, GHG emissions under this alternative would be similar to the 2040 General Plan and would remain significant and unavoidable.

h. Hazards/Hazardous Materials

Buildout of Alternative 3 would accommodate fewer residents and more jobs than the proposed 2040 General Plan resulting in a smaller 2040 population in Union City. However, Alternative 3 would expose a similar number of people to potential hazards and hazardous materials as compared to the proposed 2040 General Plan because this alternative would result in additional employees in Union City resulting in a similar number of people being exposed to potential hazards. Similar to the 2040 General Plan, compliance with existing regulatory requirements would address potential impacts related to hazards and hazardous materials. Therefore, impacts related to the use, handling, transport, or emissions of hazardous materials under Alternative 3 would be similar to the proposed 2040 General Plan.

Alternative 3 facilitates development within the same areas of Union City as would be facilitated by the proposed 2040 General Plan. Therefore, the potential for projects to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be similar under this alternative and the 2040 General Plan. Impacts would be less than significant, similar to the 2040 General Plan.

Alternative 3 would implement the same policies and programs as included in the proposed 2040 General Plan intended to strengthen emergency and disaster preparedness. Therefore, Alternative 3 would result in similar impacts regarding emergency preparedness as the proposed 2040 General Plan. As a result, impacts related to hazards and hazardous materials resulting from implementation of Alternative 3 would be less than significant and similar to the proposed 2040 General Plan.

i. Hydrology and Water Quality

Buildout of Alternative 3 would result in fewer residential units and greater jobs than the 2040 General Plan. Development under Alternative 3 would occur in the same areas of Union City as the proposed 2040 General Plan. Therefore, development facilitated under Alternative 3 would create a similar amount of impervious surfaces. Stormwater runoff volumes and velocity would therefore be similar under this alternative to the 2040 General Plan. Alternative 3 would include 2040 General Plan policies to reduce potential water quality impacts. Additionally, development under this alternative would be subject to the same regulatory requirements, such as NPDES permit requirements, governing runoff and protecting water quality and supply as the 2040 General Plan. Because Alternative 3 would result in a smaller population in 2040, the demand for groundwater would be reduced compared to the proposed 2040 General Plan because residential uses require more water use than employment generating land uses (City of Los Angeles 2006). Overall, impacts under this alternative would be less than significant and similar to the 2040 General Plan.

j. Land Use and Planning

Alternative 3 would result in development within the same areas of Union City as the 2040 General Plan. Similar to the 2040 General Plan, Alternative 3 encourages orderly development in the designated focus areas and would not divide established communities. In addition, this alternative would be consistent and compatible with other applicable land use plans, policies, and regulations including Plan Bay Area 2040 goals and measures, such as Goal 2 Adequate Housing, to reduce environmental impacts. Similar to the 2040 General Plan, this alternative continues to provide for residential development on infill sites within the Greater Station District and other areas of the City and includes provisions for providing adequate housing. For example, Policy LU-5.1 would apply under this alternative which states that the City shall continue to provide opportunities for a variety of housing types at varying densities and affordability levels. In addition, Policy HE-A.3 would also apply, which encourages home builders to use multifamily designated land for the highest allowable density housing to make use of land and facilities more efficient and provide more affordable housing opportunities. Impacts would therefore be similar to the 2040 General Plan and less than significant.

k. Noise

Buildout of Alternative 3 would result in fewer residential units and greater jobs than the 2040 General Plan. Therefore, similar construction and associated construction noise and vibration impacts would occur under Alternative 3 as compared to the proposed 2040 General Plan. Consistent with the proposed 2040 General Plan, Alternative 3 contains policies to reduce construction noise during nighttime hours. Specifically, Policy S-8.9, which requires construction noise control measures that are to be included as a standard condition of approval of new projects. As a result, construction noise and vibration levels would be similar under Alternative 3 compared with the proposed 2040 General Plan because there would be a similar amount of development under Alternative 3.

Daily VMT on area roadways would be less under buildout of Alternative 3 as compared with the 2040 General Plan because Alternative 3 would provide more employment opportunities in the City and reduce overall VMT. Therefore, roadway noise would be reduced at sensitive receptors located along area roadways. Overall, noise and vibration impacts under this alternative would be similar to the proposed 2040 General Plan and would remain significant and unavoidable because construction noise and vibration impacts may still exceed applicable City thresholds.

l. Population and Housing

Under Alternative 3, commercial, office, and other employment generating land uses would replace residential land use designations proposed in the Greater Station District, Union City Boulevard, and Horner/Veasby focus areas of the City. Thus, while residential development on infill sites in other parts of the City would continue under this alternative, compared to the 2040 General Plan, Alternative 3 would result in a smaller 2040 population. Similar to the 2040 General Plan, Alternative 3 provides for orderly development and growth. Goals and policies from the proposed 2040 General Plan would also apply to Alternative 3, which would ensure that development of new housing occurs in accordance with state and local housing requirements. Compared to the 2040 General Plan, Alternative 3 would have reduced impacts on population and housing and would remain less than significant.

m. Public Services

Buildout of Alternative 3 would accommodate fewer residents and housing units than the 2040 General Plan. Therefore, although there would be fewer residences under this alternative the number of employees would be increased compared to the 2040 General Plan. Alternative 3 would generate slightly reduced demand for fire, police, school, and library services compared to the proposed 2040 General Plan because even though a similar amount of development would occur residents create a higher demand on public services because they more frequently utilize services. As discussed in Section 4.13, *Public Services*, the 2040 General Plan includes policies that direct the City to strive to maintain adequate police staffing levels. These policies would also be implemented under Alternative 3. Therefore, impacts would be less than significant, and overall, slightly reduced as compared to the 2040 General Plan.

n. Transportation

Implementation of Alternative 3 would involve less residential and more employment-generating development than would occur under the proposed 2040 General Plan. This alternative would result in additional employment opportunities for residents of Union City and would thus substantially reduce overall VMT because it would reduce work length trips. However, the reduction in VMT under this alternative would not achieve a 15 percent reduction below the regional VMT per service population and significant and unavoidable impacts related to VMT would not be avoided.

Similarly, this alternative would generate fewer AM and PM peak hour trips, as fewer high-density residential development and more employment-generating development would be included as compared to the proposed 2040 General Plan. Due to the decreased commute trip length for city residents, workers would be encouraged to utilize alternative forms of transportation, including public transit and bicycles, which would remove additional vehicle trips from local roadways. However, even though this alternative would lessen traffic impacts, impacts would remain significant and unavoidable because it cannot be determined if the reduction in trips would avoid roadway segment impacts.

Goals and policies in the 2040 General Plan would still apply under this alternative. Therefore, Alternative 2 would support emergency access, safety design, and would not conflict with policies contained in ABAG/MTC's Plan Bay Area 2040 or the City's Pedestrian and Bicycle Master Plan. Overall, this alternative would result in reduced impacts to study intersections than those associated with the 2040 General Plan; however impacts would remain significant and unavoidable.

o. Tribal Cultural Resources

As discussed in Section 4.15, *Tribal Cultural Resources*, tribal cultural resources impacts are highly dependent on both the individual project site conditions and the characteristics of the proposed activity. A similar amount of development and thus ground disturbance would occur in the Greater Station District, Union City Boulevard, and Horner/Veasby focus areas of the City under this alternative and all other areas of the Plan Area would be developed similar to the 2040 General Plan. Buildout of Alternative 3 would thus have similar potential to impact tribal cultural resources in Union City as the 2040 General Plan because there would be a comparable amount of ground disturbance. Similar to the 2040 General Plan, development under Alternative 3 would be subject to laws and regulations requiring Native American consultation, protection of human remains, and pre-historic artifacts. Impacts would be less than significant with adherence to applicable laws and regulations. Overall, tribal cultural resources impacts under Alternative 3 would be similar to the 2040 General Plan and impacts would remain less than significant.

p. Utilities and Service Systems

As discussed in Section 4.16, *Utilities and Service Systems*, the Alameda County Water District (ACWD) and Alvarado Treatment Plant would have adequate water supply and wastewater treatment capacity to service the City's anticipated 2040 population of 84,477 persons. Alternative 3 would accommodate a smaller population in Union City in 2040. Therefore, there would be excess water supply and the Alvarado Treatment Plan would have excess capacity under this alternative. Impacts to landfills would be similar to the 2040 General Plan because although there would be increased employment generating land uses, overall development density would be similar to the 2040 General Plan. Additionally, the goals and policies in the 2040 General Plan related to water supply and wastewater reduction would be implemented under this alternative to further reduce impacts to utilities and service systems. Therefore, Alternative 3 would have a less than significant utilities impact, similar to the proposed project.

q. Wildfire

As discussed in Section 4.17, *Wildfire*, wildfire risk to Union City is primarily limited to the undeveloped hillside area east State Route 238. Alternative 3 would not expand the current development footprint into the areas prone to wildfire hazard. As a result, Alternative 3 would have the same impact regarding wildfires and associated hazards as the 2040 General Plan. In addition, goals and policies in the 2040 General Plan related to wildfire suppression and preparedness would be implemented under this alternative to further reduce wildfire impacts. Overall, impacts would be less than significant, similar to the 2040 General Plan.

6.7 Alternatives Considered but Rejected

Two alternatives, described in the following sections, were considered but ultimately rejected from being reviewed and analyzed as potential alternatives to the proposed project. The first of these alternatives is the "No Construction of the Quarry Lakes Parkway Alternative." The Quarry Lakes Parkway project has already been approved by the Alameda County Transportation Authority and is not a project directly resulting from the implementation of the proposed 2040 General Plan. The project will occur with or without adoption of the 2040 General Plan. As such, this alternative was ultimately rejected.

The second alternative which was considered but rejected, the Designate Vacant Parcels Currently Identified for Residential and Employment Generating Uses as Open Space alternative, would meet most of the project objectives related to health, quality of life, sustainability, resiliency, and parks and recreation. However, it was rejected because it would not meet the objectives/guiding principles related to economic development and housing.

Each of the alternatives considered but rejected is described below, along with the reasons for rejecting them from further consideration.

6.7.1 No Construction of the Quarry Lakes Parkway Alternative

This alternative consists of not constructing the Quarry Lakes Parkway. The Quarry Lakes Parkway is a proposed parkway that extends from Mission Boulevard to Paseo Padre Parkway in Fremont that will include Class 1 and 2 bicycle lanes and pedestrian amenities. .

The No Construction of the Quarry Lakes Parkway alternative was rejected from further consideration because the project has already been approved by the Alameda County

Transportation Authority and is not a project directly resulting from the implementation of the proposed 2040 General Plan. The Final Environmental Impact Report for the project was completed and approved in April 2009. This alternative would not alter any of the impacts associated with the 2040 General Plan because the Quarry Lakes Project is not a project directly resulting from the implementation of the proposed 2040 General Plan.

6.7.2 Designate Vacant Parcels Currently Identified for Residential and Employment Generating Uses as Open Space

Similar to the proposed 2040 General Plan, this alternative would facilitate infill development and redevelopment of underutilized parcels within the urbanized areas of Union City. However, parcels that are currently vacant but designated for development under the 2040 General Plan would instead be designated as open space under this alternative. Similar to the proposed 2040 General Plan, this alternative would include development of the vacant parcels comprising the Station East and other Station District sub-areas of the Greater Station District focus area. As an example of parcels that would be designated as open space under this alternative, there are vacant parcels on the east side of Union City Boulevard near its intersection with the Union Pacific Railroad that the 2040 General Plan designates as mixed-use employment. Under this alternative, these parcels would be designated as open space and would not be developed with mixed use employment.

Because this alternative would result in more open space areas within Union City, there would be less residential and non-residential development compared with the proposed 2040 General Plan. With reduced development the population growth and employment growth facilitated under this alternative would be less compared with the 2040 General Plan. Therefore, this alternative may result in fewer impacts related to ground disturbance, including biological resources, archaeological resources, and geology and soils and would substantially lessen greenhouse gas, noise, and traffic impacts.

This alternative was rejected from further consideration because it would fail to meet most of the General Plan objectives/guiding principles. This alternative would conserve vacant parcels in the City, some of which are currently identified in the City's adopted and certified Housing Element, and would result in reduced housing opportunities especially for populations that are identified as low and very low income. Therefore, this alternative would not meet the objective/guiding principle to promote a mix of housing types and affordability because it would reduce opportunities for mixed-use development and related housing. This would also result in legal concerns due to the City not meeting its Regional Housing Needs Assessment and inconsistency between the Housing Element and other General Plan elements. In addition, maintaining vacant parcels as open space would not meet the objective to promote Union City as an economic destination to attract new businesses and facilitate new economic development opportunities because it would reduce non-residential development. Because this alternative would not meet most of the objectives/guiding principles of the 2040 General Plan it was ultimately rejected.

6.8 Environmentally Superior Alternative

This section compares the impacts of the three alternatives to those of the 2040 General Plan. Table 6-3 shows whether each alternative would have impacts that are less than, similar to or greater than the 2040 General Plan for each of the issue areas studied.

The No Project Alternative (Alternative 1) would not be considered environmentally superior overall because while it would involve less development and growth it would not include goals and policies of the 2040 General Plan that would reduce environmental impacts, specifically policies related to noise, energy efficient development, and transit oriented land use development. Alternative 1 would result in increased impacts for energy, land use and planning, and greenhouse gases. Further, Alternative 1 would not eliminate the significant and unavoidable greenhouse gas emissions and transportation impacts and the City's Climate Action Plan would still need to be updated under this alternative. Additionally, although traffic impacts would be slightly reduced under this alternative as a result of less development, traffic impacts would remain significant and unavoidable. Finally, the significant and unavoidable noise impact would not be reduced under this alternative because although overall development would be reduced construction noise and vibration may still exceed City standards.

Alternative 2, the Reduced Density Alternative, performs similar or better to the 2040 General Plan for all of the environmental resource impact areas. This alternative would result in less intensive development in both residential and non-residential areas within the city, reducing both population growth and employment opportunities compared to the 2040 General Plan. Therefore, Alternative 2 would result in fewer impacts to the majority of issue areas including aesthetics, air quality, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, population and housing, public services, and utilities and service systems. Alternative 2 would not eliminate the significant and unavoidable traffic impact even though this alternative would reduce project traffic on area roadway segments by 50 percent, thus substantially reducing traffic impacts. Similarly, Alternative 2 would lessen but not eliminate the significant and unavoidable greenhouse gas emission impact because the service population per year threshold would be exceeded under this alternative and the City's Climate Action Plan would still need to be updated. In addition, the significant and unavoidable noise impact would occur under this alternative because construction noise and vibration impacts may still exceed City standards.

Alternative 3, the Enhanced Employment Alternative, would perform similar or better than the 2040 General Plan for all issue areas. This alternative would reduce population growth while increasing employment opportunities within the city. Therefore, Alternative 3 would result in fewer impacts to some issue areas including air quality, energy, population and housing, traffic, and utilities and service systems. Impacts would be similar to the 2040 General Plan for all other issue areas. In addition, Alternative 3 would substantially reduce, but not eliminate, the significant and unavoidable traffic impact because it would reduce commuter work trip lengths and encourage alternative methods of transportation. In addition, Alternative 3 would reduce but not eliminate the significant and unavoidable greenhouse gas emission impact because the City's Climate Action Plan would still need to be updated. Finally, Alternative 3 would not reduce the significant and unavoidable noise impact because the amount of development would be similar under this alternative as the 2040 General Plan and construction noise and vibration impacts may still exceed City standards.

Although both Alternative 2 and Alternative 3 would be superior to the 2040 General Plan, based on the information presented herein, Alternative 2 is determined to be the environmentally superior alternative when considering overall environmental impacts relative to the performance metrics. Alternative 2 would substantially reduce impacts in the majority of environmental issue areas and would have similar impacts as the 2040 General Plan in two issue areas, land use and planning and wildfire. However, Alternative 2 would less fully meet the objectives/guiding principles of the 2040 General Plan because it reduces new housing development and limits employment opportunities.

Therefore, Alternative 2 would not meet the project objectives of housing and economic development.

After Alternative 2, Alternative 3 is the next most environmentally superior alternative when considering overall environmental impacts relative to the performance metrics. Alternative 3 would substantially lessen the significant and unavoidable traffic impact, but would perform similar to the 2040 General Plan in the majority of environmental issue areas. However, this alternative would reduce fewer overall impacts compared to Alternative 2, and it would not avoid the GHG and noise significant and unavoidable impacts. Table 6-3 shows a comparison of all three alternatives. Similar to Alternative 2, Alternative 3 would not meet all of the objectives of the 2040 General Plan. Alternative 3 would focus on employment opportunities and would reduce housing development such that this alternative would not meet the project objective for housing.

Table 6-3 Alternative Comparison

Issue	Alternative 1	Alternative 2	Alternative 3
Aesthetics	+	= / +	=
Air Quality	-	= / +	= / +
Biological Resources	= / +	= / +	=
Cultural Resources	+	= / +	=
Energy	-	= / +	= / +
Geology and Soils	= / +	= / +	=
Greenhouse Gas Emissions/Climate Change	= / -	= / +	=
Hazards/Hazardous Materials	=	= / +	=
Hydrology and Water Quality	= / +	= / +	=
Land Use and Planning	-	=	=
Noise	= / +	= / +	= / +
Population and Housing	= / +	= / +	= / +
Public Services	=	= / +	= / +
Transportation	= / +	= / +	= / +
Tribal Cultural Resources	= / +	= / +	=
Utilities and Service Systems	=	= / +	= / +
Wildfire	=	=	=
+ Superior to the proposed project (reduced level of impact) = Similar level of impact to the proposed project - Inferior to the proposed project (increased level of impact) = / + Slightly superior to the proposed project in one or more aspects, but not significantly superior = / - Slightly inferior to the proposed project in one or more aspects, but not significantly inferior + / - Some areas inferior to the proposed project, and some areas superior, but not significantly inferior or superior			

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