

CHAPTER 6 ALTERNATIVES

6.1 INTRODUCTION

Note: After the Draft EIR was released, the applicant chose to remove the car wash facilities from the Project site, and use of the car wash area is no longer part of the proposal. All references to future use of the car wash area have been removed from the project description and the impact analysis.

CEQA Guidelines § 15126.6 provides a framework for the formulation and analysis of alternatives in an EIR. This chapter states,

“[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

Project objectives are listed in Chapter 2, Project Description.

Key concepts pertaining to the discussion of alternatives are further specified in the CEQA Guidelines. The range of alternatives required within an EIR is governed by the “rule of reason,” which requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. Although there is no rule for the number of alternatives that must be discussed, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation, but need not consider every conceivable alternative to a project. Furthermore, an EIR need not consider an alternative with an unlikely or speculative potential for implementation or an alternative that would result in effects that cannot be reasonably ascertained.

An EIR is not required to include alternatives that are infeasible. The term “feasible” is defined in the CEQA Guidelines § 15364 as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (see Public Resources Code § 21061.1). CEQA Guidelines § 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the proponent can reasonably acquire, control, or otherwise have access to potential alternative sites.

Alternative locations should be discussed where any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. CEQA Guidelines § 15126.6(f)(2)(A) specifies that only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. CEQA Guidelines § 15126.6(f)(2)(B) states, “If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.”

Finally, the analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, CEQA Guidelines § 15126 specifies that the

EIR must include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project.”

6.2 ALTERNATIVES TO THE PROJECT

The alternatives assessed in this chapter include various approaches to reducing or avoiding one or more of the Project’s impacts. Table 6-1 provides a comparison of environmental impacts associated with the Project and the various alternatives, using the highest impact classification (i.e., if a resource would have Class I, II, and III impacts, only the Class I [significant and unavoidable] impact is shown). Both the impact classifications and the relative degree of impact of the alternatives compared to the Project are shown.

6.2.1 Alternative 1: No Project Alternative

The No Project Alternative is defined in CEQA Guidelines § 15126.6(e) as:

“...the existing conditions at the time of the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Existing conditions at the Project site are described in each of the impact analyses in Chapter 4, Environmental Impact Analysis.

Under the No Project Alternative, none of the proposed fire protection improvements would be implemented, and the hammerhead turnaround would remain paved, ~~and the car wash facilities would be removed and the area could no longer be used for this purpose.~~

6.2.1.1 Aesthetics

~~The only change to the Project area’s visual resources under this alternative would result from removal of the car wash facilities, which would have a minor, but **beneficial (Class IV)** impact because they would be removed from public views along the trail running along the north side of Devereux Creek. **No impacts** on aesthetic resources would occur because no construction would occur; therefore, impacts on aesthetics would be less than under the Project, which would require the removal of trees along Devereux Creek.~~

6.2.1.2 Biological Resources

~~The only change to the biological resources of the Project area would result from removal of the car wash facilities, which would prevent runoff from this area from entering an Environmentally Sensitive Habitat Area (ESHA) and Streamside Protection Area (SPA) buffer. This would represent an improvement over existing conditions and would be a **beneficial (Class IV)** impact. **No impacts** on biological resources would occur because no construction would occur; therefore, Overall, impacts on biological resources would be less than under the Project.~~

6.2.1.3 Cultural Resources

No impacts on cultural resources would occur because no ground disturbance would occur. Impacts on cultural resources would be less than under the Project.

Table 6-1 Comparison of Environmental Impacts for Project Alternatives

Environmental Impacts	Proposed Project	Impacts of Alternatives Compared to the Proposed Project							
		Alternative 1 No Project		Alternative 2a Alternative Access Road and Fire Line Location		Alternative 2b <u>No Emergency Access Road and Alternative Fire Line Location</u>		Alternative 3 Alternative Car Wash Location	
Aesthetics	Class II	<u>No Impact</u> Class IV	-	Class III	-	<u>No Impact</u>	:	Class II	=
Biological Resources	Class I ¹	<u>No Impact</u> Class IV	-	Class II	-	Class II	:	Class I ⁴	=
Cultural Resources	Class II	No Impact	-	Class II	=	Class II	:	Class II	=
Geology and Soils	Class III	No Impact	-	Class III	=	Class III	:	Class III	=
Hydrology and Water Quality	Class III	<u>No Impact</u> Class IV	-	Class III	=	Class III	≡	Class II	=
Land Use and Planning	Class I	No Impact	-	No Impact	-	<u>No Impact</u>	:	Class I	=
Noise	Class II	No Impact	-	Class II	=	Class III	:	Class II	=
Public Services	Class IV	Class I	+	Class IV	=	Class IV	:	Class IV	=
Utilities and Service Systems	Class III	No Impact	-	Class III	=	Class III	:	Class III	=

Notes:

Class I = significant impact

Class II = significant but mitigable to less than significant

Class III = less than significant

1. Potential policy inconsistencies exist due to construction within the Streamside Protection Area (SPA) buffer. As proposed, a 100-foot SPA buffer is not feasible at the emergency access road site because the parcel is too narrow, and a 100-foot buffer would encroach on the adjacent residential neighborhood located along Daytona Drive. These homes were constructed prior to the City's incorporation and adoption of the SPA buffer policy. If the City Council approves the Project as proposed and there is a feasible alternative Project siting that would maintain the 100-foot SPA buffer, this determination would result in a significant (Class I) impact because the access road and fire line would conflict with a local policy protecting biological resources. If the City Council determines that alternative Project siting within the property that would maintain the 100-foot SPA buffer is not feasible, the emergency access road and fire line as proposed would result in a less than significant (Class III) impact because they would not conflict with a local policy protecting biological resources. However, other Class I impacts on biological resources from policy inconsistencies also have been identified; thus, the overall impact would remain Class I even if the impact associated with the SPA buffer was determined to be Class III.

"+" Impacts from this alternative would be greater than the proposed Project.

"-" Impacts from this alternative would be less than the proposed Project.

"=" Impacts from this alternative would be similar to the proposed Project.

6.2.1.4 Geology and Soils

No impacts on geology and soils would occur because no ground disturbance would occur. Impacts on geology and soils would be less than under the Project.

6.2.1.5 Hydrology and Water Quality

~~The only change to hydrology and water quality would result from removal of the car wash facilities, which would prevent runoff from this area from entering ESHA and the SPA buffer. This would be a **beneficial (Class IV)** impact. **No impacts** on hydrology and water quality would occur because no construction would occur; therefore, impacts on hydrology and water quality would be less than under the Project.~~

6.2.1.6 Land Use and Planning

No impacts would occur because no changes to land uses would occur. However, the objective of promoting City planning goals by improving fire safety through the provision of additional emergency access and improved fire infrastructure would not be met. Land use impacts would be less than under the Project because no conflicts with the City's goals of protecting Goleta's natural heritage would occur.

6.2.1.7 Noise

No impacts would occur because no construction would occur. Impacts on noise would be less than under the Project.

6.2.1.8 Public Services

Fire Department access would remain as it is at present because none of the Project improvements would occur. This would represent a **significant and unavoidable (Class I)** impact because secondary fire access would not be provided, substandard fire hydrants would not be upgraded, and no new fire hydrants would be added; thus, fire protection services to ~~Rancho Goleta Estates~~ would not meet current standards. This impact would be greater than under the Project.

6.2.1.9 Utilities and Service Systems

No impacts on utilities and service systems would occur because no construction would occur. Impacts on utilities and service systems would be less than under the Project.

6.2.2 Alternative 2a: Alternative Access Road and Fire Line Location

Under this alternative, gated emergency access would be taken from Sea Gull Drive instead of north of Devereux Creek and the fire hydrant at the hammerhead would be connected to the fire line off of Sea Gull Drive in place of a new fire line adjacent to Devereux Creek. To create space for this road, two mobile homes that are immediately adjacent to Sea Gull Drive would need to be removed. Approximately 60 feet of new paved roadway would be constructed, and the trees that border the mobile home park in this area would be removed. About 460 feet of additional trenching through the paved area of the site would also be required. The hammerhead turnaround would remain in its current location, and other proposed fire protection improvements would remain as they are under the Project, with the exception of the retaining wall north of Devereux Creek, which would not be required, nor would hydroseeding of adjacent slopes.

6.2.2.1 Aesthetics

Under this alternative, several trees would be removed at the terminus of Sea Gull Drive. The trees are in a developed urban area and would not affect scenic resources or scenic vistas, and any changes in the area's visual quality and character would be minor and **less than significant (Class III)**. The removal of two mobile homes would not affect aesthetic resources. Impacts would be less than under the Project.

6.2.2.2 Biological Resources

This alternative would require the removal of several nonnative trees at the terminus of Sea Gull Drive, located in a developed neighborhood. No sensitive biological resources are present in this area, which is not included in an ESHA or in the riparian area associated with Devereux Creek. Native vegetation would not need to be removed to meet Fire Department access requirements. No policy inconsistencies would occur, and any impacts would be **less than significant (Class III)**. The removal of two mobile homes would not affect biological resources. ~~Impacts from use of the car wash area would be **significant but mitigable to less than significant (Class II)** through implementation of MM HYD-1, as described for the Project.~~ Overall, impacts would be less than under the Project.

6.2.2.3 Cultural Resources

The road would be located in an already-disturbed, paved area. The potential for encountering cultural resources is low, and no impacts are anticipated. Nonetheless, there is a potential for unanticipated discoveries during construction. Therefore, this impact is **significant but mitigable to less than significant (Class II)** through implementation of MM CUL-1 and MM CUL-2. Impacts would be similar to the Project.

6.2.2.4 Geology and Soils

The area where the access road would be constructed is in a relatively level, already-developed area that is approximately ¼ mile from Devereux Creek, and contains no known geologic hazards. The same construction standards/Best Management Practices would be implemented as for the Project, and any impacts would be **less than significant (Class III)**. Overall, impacts would be similar to the Project.

6.2.2.5 Hydrology and Water Quality

Impacts on hydrology and water quality during construction would be **less than significant (Class III)** because construction would occur in a relatively level, already-developed area that is approximately ¼ mile from Devereux Creek, and the same construction standards/Best Management Practices would be implemented as for the Project. ~~Impacts from use of the car wash would be **significant but mitigable to less than significant (Class II)** through implementation of MM HYD-1, as described for the Project.~~ Overall, impacts would be similar to the Project.

6.2.2.6 Land Use and Planning

No impacts on land use and planning would occur. This alternative would require removal of two mobile homes, requiring relocation of the residents. This is not a significant impact under CEQA because no land use changes would be required to accommodate these residents elsewhere, and no policy inconsistencies would occur. Land use impacts would be less than under the Project because no conflicts with the City's goals of protecting Goleta's natural heritage would occur.

6.2.2.7 Noise

Noise impacts would be **significant but mitigable to less than significant (Class II)** through implementation of MM NOI-1, MM NOI-2, and MM NOI-3. Impacts would be similar to those of the Project because the same types of equipment would be used in proximity to a residential area.

6.2.2.8 Public Services

Impacts would be **beneficial (Class IV)** and similar to those of the Project because the same fire protection improvements would occur.

6.2.2.9 Utilities and Service Systems

Impacts on public services would be similar to those of the Project because similar amounts of water would be used and similar amounts of waste would be generated. Impacts would be **less than significant (Class III)**.

6.2.3 Alternative 2b: No Emergency Access Road and Alternative Fire Line Location

Under this alternative, no emergency access would be constructed, and the fire hydrant at the hammerhead would be connected to the fire line off Sea Gull Drive in place of a new fire line adjacent to Devereux Creek. About 460 feet of additional trenching through the paved area of the site would be required. Because the emergency access road would be removed from the Project, no new grading or road surfacing would be needed, no trees would be removed, vegetation near Devereux Creek would not need to remain trimmed to meet Fire Department requirements, and no mobile homes would be removed. The hammerhead turnaround would remain in its current location, and other proposed fire protection improvements would remain as they are under the Project, except for the retaining wall north of Devereux Creek, which would not be required, nor would hydroseeding of adjacent slopes.

6.2.3.1 Aesthetics

No trees would be removed under this alternative, and **no impacts** on aesthetic resources would occur because the only construction would occur within the already developed mobile home park and would be consistent with urban uses. Impacts would be less than under the Project.

6.2.3.2 Biological Resources

No trees would be removed, nor would any construction occur in an ESHA or in the riparian area associated with Devereux Creek. Native vegetation would not need to be removed to meet Fire Department access requirements, nor would any policy inconsistencies occur. The new fire hydrant at the hammerhead turnaround would be adjacent to ESHA, but this would require minimal construction. Any impacts on biological resources from construction would be **less than significant (Class III)**. Overall, impacts would be less than under the Project.

6.2.3.3 Cultural Resources

All construction would be located in an already-disturbed, paved area. The potential for encountering cultural resources is low, and no impacts are anticipated. Nonetheless, there is a potential for unanticipated discoveries during construction. Therefore, this impact is **significant but mitigable to less than significant (Class II)** through implementation of MM CUL-1 and MM CUL-2. Impacts would be similar to the Project.

6.2.3.4 Geology and Soils

Only very minor amounts of construction would be required; trenching for the water pipeline and the installation of new and upgraded fire hydrants would occur in paved, relatively level parts of the mobile home park. The same construction standards/Best Management Practices would be implemented as for the Project, which would prevent the potential for substantial erosion and sedimentation from the small area of disturbance. Impacts would be **less than significant (Class III)**. Impacts would be less than the Project because a much smaller area would be disturbed, and it is farther removed from Devereux Creek.

6.2.3.5 Hydrology and Water Quality

Only very minor amounts of construction would be required; trenching for the water pipeline and the installation of new and upgraded fire hydrants would occur in paved, relatively level parts of the mobile home park. The same construction standards/Best Management Practices would be implemented as for the Project, which would prevent the potential for substantial erosion and sedimentation from the small area of disturbance. Impacts would be **less than significant (Class III)**. Impacts would be less than the Project because a much smaller area would be disturbed, and it is farther removed from Devereux Creek, but overall, they generally would be similar.

6.2.3.6 Land Use and Planning

No impacts on land use and planning would occur. No land use changes would be required, nor would any policy inconsistencies occur. Land use impacts would be less than under the Project because no conflicts with the City's goals of protecting Goleta's natural heritage would occur.

6.2.3.7 Noise

Noise impacts would be **less than significant (Class III)** because the heavy equipment required to construct the emergency access road and associated infrastructure would not be required, the construction period would be shorter, and all City of Goleta requirements regarding the hours of construction would be adhered to. Impacts would be less than those of the Project.

6.2.3.8 Public Services

The impact would be **beneficial (Class IV)** because new and upgraded fire hydrants would be provided, thus improving public safety. Secondary emergency access would not be provided, however, so the benefits of this alternative would be less than those of the Project.

6.2.3.9 Utilities and Service Systems

Water would be required during construction, and some solid waste would be generated, as described for the Project. Impacts would be **less than significant (Class III)**. Overall, impacts on public services would be less than those of the Project because less water would be used and less waste would be generated due to the more limited construction.

6.2.36.2.4 Alternative 3: Alternative Car Wash Location

Under this alternative, the car wash area would be relocated from the hammerhead turnaround to a site near the pool. All other proposed fire protection improvements would remain the same.

6.2.3.16.2.4.1 Aesthetics

Impacts from relocating the car wash would be minor, but **beneficial (Class IV)** because they would be removed from public views along the trail running along the north side of Devereux Creek. All other impacts would be the same as under the Project **significant but mitigable to less than significant (Class II)** through implementation of MM BIO-4 because construction would occur in the same areas and the same construction practices would be implemented. Overall, impacts would be similar to those of the Project.

6.2.3.26.2.4.2 Biological Resources

Impacts resulting from relocating the car wash facilities would be similar to the Project and **significant but mitigable to less than significant (Class II)** through implementation of MM HYD-1 because runoff from the alternative location could still drain into the ESHA and SPA buffer. Other impacts on biological resources would be similar to the Project **(Class III, II, and I)** because construction would occur in the same areas, and the same construction practices would be implemented. Class II impacts would be mitigable to less than significant through implementation of MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, and MM BIO-7. Overall, impacts would be similar to those of the Project.

6.2.3.36.2.4.3 Cultural Resources

Impacts would be **significant but mitigable to less than significant (Class II)** through implementation of MM CUL-1 and MM CUL-2. They would be similar to those of the Project because construction would occur in the same areas, and the same construction practices would be implemented.

6.2.3.46.2.4.4 Geology and Soils

Impacts would be **less than significant (Class III)** and similar to those of the Project because construction would occur in the same areas, and the same construction practices would be implemented.

6.2.3.56.2.4.5 Hydrology and Water Quality

Impacts resulting from relocation of the car wash facilities would be similar to the Project and **significant but mitigable to less than significant (Class II)** through implementation of MM HYD-1 because runoff from the alternative location could still drain into the ESHA and SPA buffer. Other impacts would be **less than significant (Class III)** and similar to those of the Project because construction would occur in the same areas, and the same construction practices would be implemented.

6.2.3.66.2.4.6 Land Use and Planning

Impacts would be **significant (Class I)** due to the significant and unavoidable impacts associated with biological resources, which conflict with the City's goal of protecting Goleta's natural heritage. Impacts would be similar to the Project because construction would occur in the same areas.

6.2.3.76.2.4.7 Noise

Impacts would be **significant but mitigable to less than significant (Class II)** through implementation of MM NOI-1, MM NOI-2, and MM NOI-3. They would be similar to those of the Project because construction would occur in the same areas, and the same construction practices would be implemented.

~~6.2.3.86.2.4.8 Public Services~~

~~Impacts would be **beneficial (Class IV)** and similar to those of the Project because the same fire protection improvements would occur.~~

~~6.2.3.96.2.4.9 Utilities and Service Systems~~

~~Impacts on public services would be similar to those of the Project because similar amounts of water would be used and similar amounts of waste would be generated. Impacts would be **less than significant (Class III)**.~~

6.2.4 Alternatives Considered but Rejected as Infeasible

Routing the access road through the public park on Mathilda Drive, located just north of the Coastal Zone boundary, was considered but rejected as infeasible because it would have required removing the tot lot, which provides a valuable service to local residents.

6.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines § 15126.6(e)(2) require that an environmentally superior alternative be identified among the alternatives. The environmentally superior alternative is defined as the alternative that would result in the least adverse environmental impacts, when compared to the impacts of the Project. If the No Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

Table 6-1 above provides a comparison of environmental impacts associated with the Project and the various alternatives. The No Project Alternative (Alternative 1) would avoid the environmental impacts of the Project, but it would not meet the Project objectives. ~~Alternative 3 would meet the Project objectives, but it would result in the same impacts as the Project and therefore is not environmentally superior.~~

~~Alternative 2a is environmentally superior because it would meet the Project objectives while reducing its significant impacts on aesthetic and biological resources. **Significant (Class II)** impacts on aesthetic resources from the removal of nine trees would not occur, and although this impact would be mitigable through revegetation, many years would pass before the trees could grow to sufficient height to fully compensate for this impact. The Project also would result in **significant and unavoidable (Class I)** impacts from conflicts with City policies intended to protect biological resources, including those located within an ESHA and SPA buffer (although the City may determine that alternative siting is not feasible, which would reduce the conflict with policies related to the SPA buffer to less than significant (**Class III**); other impacts would remain **Class I**. These impacts would be avoided by Alternative 2a. Other **significant but mitigable (Class II)** impacts on a variety of biological resources also would be avoided by this alternative, which would be located in a developed urban area. Permitting incompatible uses within the SPA and SPA buffer is also a cumulatively significant Project impact in the region, and the impact severity of the Project, not only reducing and removing the buffer but removing the SPA itself, would be cumulatively considerable and therefore **significant (Class I)**. This cumulative impact also would be avoided by Alternative 2a. Alternative 2a would not increase the severity of impacts on other resources, and other impacts would be comparable to those of the Project.~~

Like Alternative 2a, Alternative 2b would reduce the Project's impacts on aesthetics, biological resources, geology and soils, hydrology and water quality, land use and planning, noise, and utilities. It also would further reduce construction-related Class III impacts on geology and soils, hydrology and water quality, and utilities and service systems, as well as a Class II construction noise impact compared to Alternative 2a because no emergency access road would be constructed. These are all temporary impacts, however, and would either be less than significant or readily mitigable to less than significant. Importantly, Alternative 2b would not meet Project objectives 1, 3, and 5, which are related to the provision of improved emergency access. By failing to include secondary emergency access, this alternative would not correct the life safety deficiency identified by the Fire Department as part of the Development Agreement for the subdivision project. The 2013 California Fire Code § 503.1.2 allows the fire code official to require "additional access" when impairment of a single road is a concern. Currently, the Fire Department only has access through one access point at the mobile home park (off of Hollister Avenue). Should a fire occur near Hollister Avenue, the Fire Department would not have access to the rest of the mobile home park. Accordingly, the Fire Department requested secondary access outside the boundaries of the mobile home park. Therefore, although this alternative would lessen a number of the Project's impacts and would further lessen certain temporary, construction-related impacts compared to Alternative 2a, it is not considered environmentally superior because it would fail to meet key Project objectives related to public safety.

Thus, Alternative 2a is considered environmentally superior because it is the only alternative that would reduce significant impacts of the Project while meeting Project objectives.