Alternatives

SECTION 6.0

6.0 ALTERNATIVES

INTRODUCTION

CEQA Guidelines Section 15126.6 provides a framework for the formulation and analysis of alternatives in an EIR. This Section states, "An 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." The selection and discussion of alternatives is intended to foster meaningful public participation and informed decision-making. The CEQA Guidelines also require the analysis of a "No Project" alternative, and the identification of the "environmental superior alternative." "If the environmentally superior alternative is the 'no project alternative' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."[1]

Project objectives for the project are listed in Chapter 2.0.

Reasonable Range of Alternatives

The range of alternatives required within an EIR is governed by the "rule of reason," under CEQA Guidelines Section 15126.6(f) which requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. While there is no rule for the number of alternatives that must be discussed, as mentioned above, 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.

Feasibility

An EIR is not required to include alternatives that are not feasible. The term "feasible" is defined in the CEQA Guidelines Section 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." CEQA Guidelines Section 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.

Level of Analysis

The analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, the CEQA Guidelines Section 15126.6(d) states that the EIR shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project."

[1] *State CEQA Guidelines Section 15126.6 (e)(2).*

Alternatives to the Project

Three alternatives were selected for analysis:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Scale Alternative
- Alternative 3: Redesign Alternative

Each of these is described further below in Sections 6.1 through 6.3.

Alternatives Considered but Rejected As Infeasible

The CEQA Guidelines require EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency's determination. Section 15126.6 (c) of the State CEQA Guidelines states the following:

> *"The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. ... Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts".*

Several alternatives were considered, but ultimately rejected as infeasible based on the criteria established under CEQA. These alternatives are described below.

Camino Vista Road Closed to Through-Traffic Alternative

An alternative project that was considered, but ultimately rejected, was one that would not allow for a through-connection between Camino Vista Road and Aero Camino to the east of the project site. This alternative was considered to reduce traffic impacts and industrial-related truck traffic through the residential area of the project, as well as noise and air quality impacts related to potential through-traffic. Closing the through connection would likely have the effect of deterring traffic on this roadway if it were not directly associated with the project's residential traffic. However, this alternative was determined to be infeasible and rejected for further analysis as it would have been inconsistent with the City's General Plan, which plans for this future through-connection, as it would provide an alternate east-west movement road for the local area that avoids Hollister Avenue. In addition, the through-connection is considered important for emergency vehicle access for the surrounding area.

Senior Living Facility Alternative

A senior living facility was considered as a possible alternative to the project. This would have required the development of a facility that included smaller units; and therefore, could have reduced the development footprint. A smaller development footprint would have reduced aesthetic resource impacts and potentially cultural resources if the archaeological area could be avoided further. The units would have accommodated up to two people per unit, so would also likely have involved less population with recreation demands, and less traffic. However, this alternative was rejected, as it would not have achieved the project objectives to provide a mix of housing types to meet the range of affordability needs of the City. In addition, a senior living facility would fall within the land use of "Assisted-Living Residential Units," and would likely

require a different operational model and construction-type than the property owner applicant would undertake.

Notice of Preparation Project Description Alternative

At the time of the NOP, the project included an alternative configuration that located the entrance road to the project, Willow Springs Court, to the west of Building 30, and moved Building 30 closer to Building 31. This configuration would have greater impacts to archaeological resources than the project, and did not provide traffic calming features, such as a median in the center of Camino Vista Road and tree planting curb bulb-out areas along the roadway. In addition, this project alternative did not include the recreational components of the project, described as the tot-lot and parcourse ("Life Trail"). As such, recreational impacts would have been greater under this alternative. In short, this alternative would have involved greater impacts for two issue areas and would not have reduced significant impacts in other issue areas. Therefore, this alternative was rejected from further analysis.

Alternative Location

The project site has been designated for residential development in the City's General Plan to meet the City's regional housing needs. In addition, it is not considered feasible or reasonable for the applicant to acquire an alternative location. Therefore, an alternative location is not assessed in this EIR.

6.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

The No Project Alternative is defined in Section 15126.6(e) of the CEQA Guidelines 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." In this case, if the project is not approved, the site is expected to remain in its existing condition (vacant, cleared, and partially graded).

6.1.1 Aesthetics

The No Project Alternative would not involve any development of the site, and the existing open, graded, and soil stockpile conditions would remain. The project's potential visual character impacts related to creating "unsightly" conditions from improper placement of specific development features and the introduction of new light and glare to the area would be avoided. Although less than significant under the project, changes to scenic views from the Los Carneros Road/US-101 overpass and UPRR looking southeast would not occur. Views from the Los Carneros Overpass and UPRR would continue to include middle distance views of Willow Springs I and the Aero Camino industrial area, with Willow Springs North vacant site in the foreground view and the horizon with the Santa Barbara Airport, Goleta Slough, development and coastline in the distance view. Similarly, although less than significant, impacts to scenic northeasterly views of the Santa Ynez Mountains from Los Carneros Road and from Camino Vista Road near Calle Koral would not occur. Therefore, this alternative would avoid the project's significant but mitigable visual character impacts and reduce its less than significant scenic view impacts.

6.1.2 Air Quality

The No Project Alternative would not result in any increase in emissions associated with construction activities or long-term development within the project site. As such, under the No Project Alternative, the short-term significant but mitigable regional and local emissions impacts associated with construction of the project would be avoided. Additionally, the less than significant impacts associated with increased emissions from operation of the project would not occur.

6.1.3 Biological Resources

Under the No Project Alternative, the site would remain undeveloped and in its existing condition. As such, the removal of existing vegetation required for construction of the project would be avoided. Existing wildlife and wildlife movement corridors would remain undisturbed. Structures, other impermeable surfaces, and landscaping would not be introduced at the site. Thus, the project's significant but mitigable impacts (indirect effects on the off-site Los Carneros Wetland ESHA, impacts on nesting birds, and contribution to cumulative loss of foraging habitat) would be avoided.

6.1.4 Cultural Resources

The No Project Alternative would not require grading or excavation for the construction of new buildings since development would not occur. As such, the No Project Alternative would not result in potential impacts associated with the disturbance of archaeological resources. Under the No Project Alternative, the significant but mitigable impacts that would occur with the project would be avoided. However, it should also be noted that under the No Project Alternative, the benefit of protecting the remains with a cap would not be realized.

6.1.5 Geology and Soils

Under the No Project Alternative, site preparation activities such as grading and introduction of new development would not occur. As a result, this Alternative would avoid the project's significant but mitigable impacts related to geologic hazards (seismic shaking, liquefaction, expansive soils, settlement, and erosion).

6.1.6 Greenhouse Gas Emissions

The No Project Alternative would not result in any increase in GHG emissions generated at or in connection with development of the site. As such, this Alternative would avoid the project less than significant contribution to cumulative GHG impacts.

6.1.7 Hazards and Hazardous Materials

The No Project Alternative would not involve physical disturbance of the site, nor would it introduce new development or population. As such, this Alternative would avoid the project's significant but mitigable impacts associated with exposure to hazardous materials from previous use of the site or from neighboring properties.

6.1.8 Hydrology and Water Quality

As the No Project Alternative would not involve any new construction, no grading activities that could result in erosion would occur. As such, the hydrology and surface water quality impacts

that would result from project construction would not occur with the No Project Alternative. Furthermore, the No Project Alternative would not increase the amount of impervious areas on the site. Thus, there would be no increase in surface runoff, and no changes to existing drainage patterns would occur. Impacts related to hydrology would not occur, and the significant but mitigable impacts identified for the project would be avoided.

6.1.9 Land Use and Planning

The No Project Alternative would be consistent with the City's General Plan, City of Santa Barbara's Goleta Slough Ecosystem Management Plan, and the Airport and Goleta Slough Coastal Plan and no changes to the site or land use designation would occur. The site would remain vacant and no changes in lot configuration, General Plan Designation or zoning would occur, leaving the site as open space and potentially available for other uses. This Alternative would not provide housing opportunities to meet various income levels of the City, as described in the Housing Element of the General Plan. Compatibility issues generated as a result of impact issues described in Section 4.9 *Land Use and Planning* would not occur. No impacts to Land Use and Planning would occur.

6.1.10 Noise

As no construction activities would occur under the No Project Alternative, this Alternative would avoid the project's significant but mitigable construction noise impact. Additionally, the No Project Alternative would not result in an increase in traffic or introduce other new noise sources. Therefore, the project's operational noise impact (less than significant with mitigation) would not occur.

6.1.11 Utilities and Service Systems

Water Supply, Wastewater Treatment, and Solid Waste

Under the No Project Alternative, no development would occur within the project site. It would not generate demand for water, wastewater treatment, or solid waste. Therefore, it would avoid the project's significant but mitigable impacts related to water supply and wastewater treatment and reduce its less than significant solid waste impact.

6.1.12 Recreation

Under the No Project Alternative, no development of residential uses would occur and no additional population would be introduced to the site. No demand for open space, parks, or recreational facilities would be created and the existing sand volleyball court would not be removed. Therefore, this Alternative would avoid the project's significant but mitigable recreation impacts. However, mitigation identified in the recreation section requiring installation of parcourse equipment would not occur. Therefore, existing residents of Willow Springs I would not have access to this recreational opportunity.

6.1.13 Transportation and Traffic

The No Project Alternative would result in no new development at the project site. This Alternative would avoid the project's significant but mitigable circulation impacts as well as the project's significant contribution to cumulative impacts at the intersections of Los Carneros Road/Calle Koral and the CMP intersections at Los Carneros Road/Hollister Avenue and Los Carneros Road/US 101 SB Ramps. The cumulative impacts at these intersections would still

occur but would be slightly reduced. Area-wide circulation, particularly the east-west movement along Hollister Avenue, would not benefit from the connection of Camino Vista Road between Aero Camino and the current eastern terminus in front of Willow Springs I.

6.1.14 Public Services

Under the No Project Alternative, no development of residential uses would occur and no No demand for public services would occur. Therefore, this Alternative would avoid the project's significant but mitigable fire protection impacts.

6.2 ALTERNATIVE 2: REDUCED DENSITY ALTERNATIVE

As stated in Section 2.0 *Project Description*, the project would include a total of 100 units, for a total density of approximately 18 units per acre, based on the project site's gross area of 5.49 acres. The configuration of Camino Vista Road with the traffic calming measures would remain unchanged from the project. Alternative 2 would eliminate two of the buildings: Building 27 and 28 and a portion of Building 29 (as labeled on Figure 2-3, Site Plan). These buildings are adjacent to each other at the western portion of the site. Building 27 is one of two 'E' Floor Plan buildings containing 8 two-bedroom units. Building 28 is one of three 'A' Floor Plan buildings containing 16 one-bedroom units. Building 29 is also an 'A' Floor Plan building and would be reduced in size by 4 units, so it would contain 12 rather than 16 units. This would reduce the total number of units from 100 to 72. Under Alternative 2 the westerly portion of the internal driveway and parking areas could be eliminated, as this portion of the driveway provides access and parking for the structures that would be eliminated. The western extent of the internal driveway would terminate just west of the Fire Lane. It is also possible that the internal driveway link with Willow Springs I on the west side could be eliminated, with access being directed mainly through the Willow Springs Court from Camino Vista and through the internal driveway circulation connection with Willow Springs I along the eastern boundary. The elimination of the westerly internal driveway connection would eliminate the need to remove the portion of existing private recreation area containing the volleyball court, as would occur under the project. Alternative 2 would offer an opportunity to expand open space areas from Lot 20 northward into the project site, on an approximately 1.06-acre area. A conceptual layout of Alternative 2 is provided as **Figure 6.2-1**. The lot coverage of development and open space areas would be changed as shown in **Table 6.2-1** and the mix in building type and number of housing units is summarized in Table 6.2-2.

Table 6.2-1[a,b]
Lot Coverage

	Lot Area (square feet)	Percent of Lot Area
Common Open Space and Interior Walkways and Sidewalks	118,272	55
Buildings	35,540	16
Private Outdoor Space	7,848	4
Roads, Driveways, Parking	52,462	25
Total	**214,122**	**100**

[a] Excludes Camino Vista Road area (1.08 acres)
[b] These figures are not from precise engineering specifications. They are for conceptual purposes only.

Table 6.2-2
Summary Building and Unit Count

Building Type	Number of Buildings	Units Per Building	Total Units	Number of Bedrooms Per Unit
A	1	16	16	1
A	1	12	12	1
E	1	8	8	2
F	3	8	24	3
GL	1	8	8	2
H	1	4	4	2
Total:	**8**	**-**	**72**	**-**

6.2.1 Aesthetics

The removal of two buildings under Alternative 2 would reduce the extent to which the site is converted to a structurally "built environment." Significant but mitigable visual character and quality impacts related to roof-mounted utility and mechanical equipment, above-ground utility connections, exterior lighting, and trash storage areas would still occur under Alternative 2, but to a slightly lesser degree with the reduced number of buildings. The two buildings to be removed would be in direct view from the Los Carneros Road overpass and UPRR right-of-way under the project. Eliminating these buildings would extend the foreground open space view slightly as this open space area would be contiguous to the existing open space of Lot 20 in Willow Springs I and Willow Springs North; however, the view would ultimately extend to similar residential structures of Willow Springs I. Northerly views from Los Carneros Road would be improved slightly as the roof-top would be eliminated. Also, the less than significant northerly view impacts from existing Camino Vista Road caused by Building 27 would be eliminated; however, this view is not a General Plan scenic view. The project's less than significant scenic view impacts would be reduced under this Alternative.

6.2.2 Air Quality

Elimination of 28 units under Alternative 2 would reduce the total amount of construction activity at the project site relative to the project. The area upon which Buildings 27, 28 and a portion of 29 would be eliminated would still be filled with soil to meet the finished grades, and as such, air emissions from grading equipment and potential for fugitive dust impacts would remain the same as with the project. Given the air non-attainment status of the air basin for ozone and PM-10, these impacts would remain potentially significant prior to mitigation. However, construction of structures would be reduced, and therefore, there would be a reduction in air emissions from construction equipment, painting and paving activities during the structural improvement phase of the construction period. Overall construction-related air impacts would be less than the project, but remain potentially significant prior to mitigation.

This Alternative would result in the development of 72 housing units, which would be expected to generate approximately 484 new trip ends and 3,509 VMT per day as compared to the project's 672 new trip ends and 4,872 VMT. The project's less than significant impacts from air emissions of ROG, NOx, CO, PM-10, PM-2.5, and CO2 would be incrementally reduced under this alternative.

With the nearest source of significant toxic air contaminants being more than 3.5 miles away, this Alternative would result in less than significant impacts similar to the project, as exposure of people to toxics from additional residential units is not expected.

Both the density and magnitude of the project are consistent with the General Plan. This Alternative would reduce the project's density and magnitude; therefore, it would be consistent with the Clean Air Plan by virtue of its consistency with General Plan growth projections. Similar to the project, impacts related to planning consistency would be less than significant.

6.2.3 Biological Resources

Under Alternative 2, approximately 4.94 acres would be developed with residential uses and Camino Vista Road, as opposed to 6.0 acres under the project. However, it is assumed that the entire site would be capped and therefore all existing vegetation would be removed, similar to the project. Under this Alternative, construction-period and operational indirect impacts to the Los Carneros Wetland ESHA associated with runoff water quality and landscaping with invasive species would remain potentially significant before mitigation. However, as overall development would be reduced, impacts under Alternative 2 would be less than those identified for the project. The project's significant but mitigable impacts on nesting birds would be same under this Alternative, as all of the site's vegetation would be removed. If the undeveloped area were to remain open space, this Alternative could marginally reduce the project's less than significant impacts on wildlife movement and its less than significant contribution to cumulative impacts associated with loss of foraging habitat for raptors.

6.2.4 Cultural Resources

Alternative 2 is designed to reduce potential impacts to archaeological resources associated with CA-SBA-56 by avoiding the development of structures on top of the intermediate artifact scatter area as defined in the Phase II archaeological investigations. Under this Alternative, development would be limited to the low-density (low-lying) area of CA-SBA-56, with the exception of the portion of Camino Vista Road construction. While this Alternative would eliminate structures from occurring atop sensitive archaeological resources, it is assumed that the capping of the area with geo-grid fabric and fill soil would continue to occur. The capping is included in this alternative to allow for finished grades to blend without the need for steep slopes or additional retaining walls, and to limit the potential for looting or inadvertent impacts from increased residents in the area.

Construction-related impacts in this area from activities such as site preparation through vegetation removal, and filling as part of capping would remain, and the same mitigation would be required to reduce impacts to a less than significant level. The potential for impacts associated with stockpile removal on the Willow Springs North property would also remain. Limited excavations within the underlying native soils for portions of water pipeline and a sewer manhole at the southeast portion of the site would remain. Utility pipelines (that would be reduced) within the area of Buildings 27 and 28 were to occur within the layer of fill soil so there would be no change in impacts associated with the removal of portions of the utilities.

Since the area would remain undeveloped in the long-term (with the exception of capping), the archeological artifacts within the intermediate scatter area would remain accessible for future research, and as such impacts involving accessibility would be reduced under this Alternative. Impacts associated with the covering of human remains would be the same as the project, since the identified remains do not occur within the area of these buildings. As overall development

would be reduced, impacts under Alternative 2 would be less than those identified for the project, however they would remain significant but mitigable.

6.2.5 Geology and Soils

Potentially significant geologic impacts associated with the project and Alternative 2 would be essentially the same. However, there would be a reduction in the number of persons and structures subject to potential geologic hazards including seismic-shaking, liquefaction, expansive soils, and settlement. Potential erosion and sedimentation impacts would still occur requiring drainage and stabilization related mitigation. Similar to the project, implementation of the mitigation measures would reduce geologic impacts to a less than significant level.

6.2.6 Greenhouse Gas Emissions

Alternative 2 would reduce the project's greenhouse gas emissions from transportation and non-transportation sources, such as electricity and natural gas electricity use, and its associated less than significant contribution to cumulative impacts.

6.2.7 Hazards and Hazardous Materials

Potential for exposure of construction workers to contaminated soils during construction would be similar to that of the project since the soil stockpile would still be utilized as fill. The potential for exposure to agricultural-related chemical releases and soil contamination from adjacent properties would also remain. However, given the industrial nature of the adjacent Aero Camino area, and potentially unknown future industrial uses that could occupy the buildings, the less than significant impact from exposure to toxic air contaminants would remain and mitigation would still be recommended. Impacts would remain potentially significant requiring mitigation to reduce impacts to less than significant levels.

6.2.8 Hydrology and Water Quality

Alternative 2 would reduce the areas of impermeable surfaces associated with the project in the form of building coverage, driveways, parking, and walkways. If the undeveloped area were used as open space, this would reduce stormwater flow quantities and water quality impacts associated with urban pollutants. In addition, the added open space area could act as a surface water detention area that could offer a bio-filtration quality for runoff that is not currently directed to the bio-swale along the eastern property line. Assuming a straight decrease in impervious surfaces of 24 percent (relative to the project), the overall surface water runoff during a 25-year storm event would result in a runoff volume of 4.1 cfs (as compared to the project's 5.4 cfs); thereby slightly preserving more of the capacity of the Los Carneros Wetlands/retention area. Potential for impacts to surface water and groundwater quality would be reduced but would remain potentially significant during construction and long-term operations requiring mitigation to reduce impacts to less than significant. The 1.06-acre undeveloped area would be utilized to provide BMPs such as on-site detention, bio-filtration areas, as set forth in Mitigation Measures WQ 1-2, WQ 2-1, WQ 2-2, and WQ 2-3.

6.2.9 Land Use and Planning

Alternative 2 would reduce the housing opportunities anticipated within the City's Housing Element of the General Plan. There would be an overall reduction in numbers of multi-family housing and a reduction in the numbers of mixed housing opportunities for moderate, above

moderate, low and very low-income households. While this alternative project could continue to offer some mix of income levels of housing, the reduction in total number of mixes of housing would be reduced. Compatibility issues related to impacts described in each of the Sections of the EIR would be reduced. Therefore, impacts related to land use and planning would be reduced relative to the project.

6.2.10 Noise

Alternative 2 would result in a reduction in noise-related impacts as they pertain to on-site noise exposure and noise generation impacts of the project on the surrounding community. Elimination of residential units would reduce the potential for future residents to be exposed to noise from US-101 and the UPRR. Similarly, there would be fewer residences exposed to noise that would be generated from traffic on Camino Vista Road. As such, the potential for private outdoor space (e.g. balconies) along the north boundary to exceed the standard of 60 dBA would be reduced; however this impact can be reduced to a less than significant level with mitigation.

As provided below in Section 6.2.13 *Transportation and Traffic*, this Alternative would result in a reduction in expected trip generation from 672 ADT to 484 ADT. This reduction would result in a marginal decrease in traffic-related noise generation at the nearby roadways and intersections. The less than significant impacts of the project would be reduced.

With the development of fewer structures under this Alternative, construction-related noise and the potential for the construction noise to impact adjacent residences of Willow Springs I would be reduced. In addition, the overall timeframe for construction activity and exposure would be reduced. While impacts would be reduced, as with the project, mitigation would be required to ensure they are reduced to a less than significant level.

6.2.11 Utilities and Service Systems

The following addresses the change in impacts associated with Alternative 2 for Water Supply, Wastewater Treatment, and Solid Waste.

Water Supply

With the reduction in development under Alternative 2, the demand for water would be reduced for residential units, and potentially increased if the vacant area is to be converted into active recreation other landscape requiring irrigation. Seventy-two units would demand approximately 8.28 acre-feet per year (AFY) (.115 AFY/unit) of water and landscaping would require approximately 2.14 (1.06 acres x 2.02 AFY/acre) for a total water use of approximately 10.42 AFY as compared to 14.35 AFY for the project. The reduced number of buildings would still involve the same amount of mass grading to cap and fill for archeological purposes; therefore the use of water for dust suppression would remain the same. Overall demand of water supply and associated water supply impacts would be less than with the project, but would remain significant but less than significant with implementation of mitigation.

Wastewater Treatment

Alternative 2 would result in a decrease in the amount of wastewater generation. Seventy-two multi-family residential units would generate approximately 13,248 gallons per day (0.013 mgd),

as compared to the project's generation of 18,400 gallons per day (0.018 mgd).[2] The sewer connection at the southeast portion of the site would remain and the capacity of the infrastructure as well as the capacity of the sewer treatment plant operated by GWSD would be adequate to serve the project. However, potentially significant cumulative impacts to the treatment plant facilities would still occur requiring mitigation in the form of a connection permit with fees to ensure long-term capacity through plant upgrades. Thus, impacts on wastewater would be less than significant with mitigation though such impacts would be less than those of the project.

Solid Waste

As with the project, construction of Alternative 2 would generate solid waste from construction activities and long-term residential occupancy. With a reduction in the number of buildings to be constructed under this alternative, the amount of construction waste would be expected to decrease relative to the project. Construction waste impacts would be less than those of the project, but would still be significant prior to mitigation. The occupancy of 72 units would result in waste generation of approximately 181 tons per year (72 units x 2.65 residents per unit x .95 tons per year per resident), as compared to the project's 100 units generating approximately 252 tons per year. With recycled volume estimated at 50 percent, operational waste that would be disposed at landfills would be approximately 91 tons per year under this alternative. Less than significant impacts of the project relative to long-term waste generation would be reduced under this Alternative however, mitigation would still be recommended.

6.2.12 Recreation

Alternative 2 would generate approximately 191 new residents (72 units x 2.65 persons per unit). This Alternative would decrease the demand for public parks and recreational facilities, as well as use of the existing private recreation areas in Willow Springs I, relative to the project. In addition, the elimination of the driveway along the west that would connect to Willow Springs I would eliminate the need to remove the existing volleyball court, which offers approximately 1,850 square feet of active recreation for Willow Springs I and the project. With the volleyball court in place and the reduction in number of residents, the resulting on-site service ratio would be more favorable for existing residents of Willow Springs I and new residents of Willow Springs II. It is assumed that this Alternative would continue to provide for shared recreation amenities between the developments and the construction of the paracourse ("Life Trail") equipment around the perimeter of Lot 20.

Alternative 2 would provide opportunity for 1.06 acres that could be used passive open space recreation or developed with active recreational components to meet the needs of the residents, or possibly be designated a public neighborhood park under agreement with the City.

The project's potentially significant but mitgable impacts to recreation would be reduced under this Alternative; however, they would remain potentially significant until provisions are in place to secure legal access to shared recreation amenities with Willow Springs I, as required by Mitigation Measure REC 1-1, and to incorporate the paracourse into improvement plans, as required by Mitigation Measure REC 1-2.

[2] 184 gallons per day per household, City of Goleta General Plan FEIR, page 3.12-5

6.2.13 Transportation and Traffic

Alternative 2 would result in changes to internal access and circulation and traffic generation. There would be no changes to impacts relative to through traffic on Camino Vista Road or the parking and bicycle path conflict on the exiting portion of Camino Vista Road; these impacts would remain potentially significant prior to mitigation similar to the project.

Elimination of the driveway connection to Willow Springs I on the west side of the project site would result in two access points: Willow Springs Court off of Camino Vista Road and the easterly driveway connection with Willow Springs I. These changes to internal circulation would undergo review by the City Community Services and County Fire Department to ensure compliance with City codes and fire access.

Alternative 2 would not affect the potential for through-traffic, including truck traffic, to use Camino Vista creating a potential safety concern and consistency with the residential nature the local road designation. Therefore, potentially significant impacts related to the compatibility of through traffic with this residential area would not be reduced under this Alternative and traffic calming mitigation would still be required.

Alternative 2 would result in a decrease in trip generation relative to the project. Using the ITE Trip Generation report, as used for the project, Alternative 2 would generate approximately 484 ADT (72 units x 6.72 trips per unit), as compared to the project's 672 ADT (a 28 percent reduction).[3] There would be similar reductions in AM and PM peak hour volumes. The less than significant project-specific impacts to roadways and intersection operations would be reduced.

The reduction in trip generation would reduce the project's contribution to cumulative traffic congestion impacts at the Calle Koral/Los Carneros Road intersection; however they would remain potentially significant prior to mitigation. Under Alternative 2, the pro-rata fair share contribution to improvements to this intersection would still be required. The project's contribution to cumulative impacts to the CMP US-101 SB Ramps/Los Carneros Road intersection would be reduced (approximately 25 trips under this alternative, as compared to the project's 35 trips); however, the PM peak hour trip threshold of 10 trips would still be exceeded and impacts would remain significant prior to mitigation (GTIP fees). The project's contribution to cumulative traffic impacts to the CMP Hollister Avenue/Los Carneros Road would be reduced (17 trips under this alternative as compared to 24 under the project) to below the CMP threshold of 20 trips. Therefore, the project's significant contribution to the cumulative impact at this location would be reduced to less than significant.

With respect to parking, the development of 72 units would require 143 parking spaces according to the Inland Zoning Ordinance.[4] The site design under Alternative 2 would accommodate the reduced amount of parking required. Therefore, as with the project, no impacts to parking would occur.

[3] The ITE average rate for apartments assumes a mix of bedrooms per unit. Trip Generation, Institute of Transportation Engineers, 7th Edition, 2003.

[4] The ITE average rate for apartments assumes a mix of bedrooms per unit. Trip Generation, Institute of Transportation Engineers, 7th Edition, 2003.

6.2.14 Public Services

Alternative 2 would decrease, but not eliminate, the demand for public services. Sgnificant impacts on fire protection would be reduced under this Alternative however, mitigation would still be required.

6.2 ALTERNATIVE 3: REDESIGN ALTERNATIVE

Alternative 3 would redesign the project site plan and elevations to include three-story structures, which would maintain the number of overall residential units and density, but would decrease the footprint of structures. Under the zoning code the maximum height allowed would be 35 feet, which would support three-story structures. This Alternative would remove Buildings 28 and 29 (as labeled on Figure 2-3, Site Plan), which combined provide a total of 32 one-bedroom units. The one-bedroom units would be placed at the floor level of Buildings 31, 34, 35, and 36 along the eastern boundary, providing eight additional units per building, and would cause the footprint of those structures to increase marginally. Buildings 28 and 29 were selected for removal as they are the only two structures that completely within the archaeologically sensitive area, and the compatibility with adding residential units at higher elevations adjacent Aero Camino industrial area was considered a less significant impact to avoid as compared to the preservation of archaeological resources in this case. This would leave an opportunity to provide additional open space through further clustering of the units in taller buildings. Alternative 3 would avoid sensitive cultural resource areas and create additional open space. It is assumed that traffic calming features, such as a median in the center of Camino Vista Road and the tree planting areas would remain. Access to Building 27 would be through the westerly connection to the internal driveway of Willow Springs I.

6.3.1 Aesthetics

At 35 feet in height, the change in uilding heights above mean sea level (amsl) would be as follows:

Building No.	Alternative 3 Height amsl	Project Height amsl
31	63’	56’3’’
34	62’	55’
35	60’	53’
36	59’	52’3’’

The heights of the buildings would be increased approximately seven feet amsl. However, these heights would not significantly differ from the heights of Buildings 28 and 29, were they to be constructed according to the project’s location. These two structure’s heights would reach 63 ft. amsl and 62 feet amsl, respectively.

As shown in Figure 4.1-7, View 7B, the two most prominent buildings of the project would be Buildings 28 and 29. With these structures removed from this location the middle-distance view from the Los Carneros Road Overpass would be marginally improved as the view over the open space would extend slightly further into the project site before reaching Willow Springs I structures. However, because the increased height would not intrude into the skyline, and would extend middle distance open space views, this Alternative would result in a slight improvement to view shed impacts.

The increased height of Buildings 31, 34, 35, and 36 may intrude slightly into view form northbound Los Carneros Road. The roof-tops would be of similar height to that shown in Figure 4.1-8, which simulates the project location and heights of Buildings 28 and 29, which are at similar heights to those at would be created as a result of this Alternative. Impacts to viewsheds from this location would be slightly increased, but remain less than significant as the buildings would not intrude into the skyline blocking the distant Santa Ynez Mountains.

The on-site visual character and quality impacts of Alternative 3, as compared to the project, would be increased. The scale and massing of Buildings 31, 34, 35, and 36 would be more prominent and likely out of scale with the adjacent Willow Springs I. Also, in order to meet the 35-foot height limitation and provide the number of units necessary, the architectural floor plans and style would be changed significantly and would no longer follow the same architectural style as Willow Springs I. The project's visual character impacts associated with the potential for roof-mounted utility and mechanical equipment, aboveground utility connections, exterior lighting, and trash storage areas would remain potentially significant prior to mitigation.

Given that the removal of Buildings 28 and 29 from the project location would open the middle-distnat views slightly from the Los Carneros Overpass, and that the buildings would increase the heights of several other buildings and add an architectural style that may be out of character with the adjacent Willow Springs I, Alternative 3 would result in an overall increase in aesthetic impacts.

6.3.2 Air Quality

Under Alternative 3, there would be no appreciable change to construction levels and associated emissions and no change to the number of residents and associated vehicular and non-vehicular air emissions. Therefore, impacts would be same as with the project.

6.3.3 Biological Resources

Alternative 3 would occur within the same footprint as the project. All impacts to biological resources would be the same as with the project.

6.3.4 Cultural Resources

Alternative 3 is designed to avoid potential impacts to sensitive archaeological resources as it would reduce the number of permanent structures to be placed over the site. It is assumed that the cap and fill grading methodology would over the area would remain as it would still be necessary for construction Camino Vista Road, and portions of site construction for portions of other buildings and site development areas, including parking. Potentially significant impacts associated with possible inadvertent disturbance during construction activity would remain the same as with the project.

Since the area where the Building 28 and 29 would not be constructed, the archeological artifacts within the intermediate scatter area (with the exception of portions of Building 27, which would be constructed) would remain accessible for future research, and as such, impacts involving accessibility would be reduced under Alternative 3.

6.3.5 Geology and Soils

Potentially significant geologic impacts associated with the project and Alternative 3 would be essentially the same. It is assumed that the soils engineering requirements would be similar to that necessary for two-story structures and would be for three-story structures. Similar to the project, implementation of the identified mitigation measures would reduce impacts to a less than significant level.

6.3.6 Greenhouse Gas Emissions

Alternative 3 would not reduce the project's greenhouse gas emissions from transportation or non-transportation sources, such as electricity and natural gas electricity use. Therefore, this Alternative's contribution to cumulative impacts would be the same as the project's contribution.

6.3.7 Hazards and Hazardous Materials

Alternative 3 would located more residents closer to the Aero Camino industrial area; however, the potential impact associated with unknown hazards chemical use was less than significant and recommended mitigation would remain the same. The increased heights are not expected to be incompatible with the safety standards of the Santa Barbara Airport. There would be essentially no, or very minimal, change in potential hazardous materials impacts under this alternative.

6.3.8 Hydrology and Water Quality

Alternative 3 would reduce the hardcape portion of the developed area, which would decrease runoff volume and could potentially add open space area that would be used for bio-filtration to further reduce surface water quality impacts. The potential hydrology and water quality impacts under this Alternative would be reduced.

6.3.9 Land Use and Planning

This project would provide a mix of housing consistent with the land use designation and zoning. As with the project, Alternative 3 would be consistent with the City's General Plan, City of Santa Barbara's Goleta Slough Ecosystem Management Plan and Airport and Goleta Slough Coastal Plan. Impacts would be less than significant, similar to the project.

6.3.10 Noise

The raising of heights and locating more residents along the east portion of the property would not result in a substantial change to on-site noise exposure. Mitigation for the potential for industrial noise impacts would remain the same. Similarly, the project's traffic noise generation would not change, as there would be no change in the number of residents or associated vehicle trips. Therefore, impacts related to noise would be potentially marginally greater due to the locating of more residents near the adjacent Aero Camino industrial area to the east, but would be reduced to less than significant as with the project.

6.3.11 Utilities and Service Systems

The following addresses the change in impacts associated with Alternative 3 for Water Supply, Wastewater Treatment, and Solid Waste.

Water Supply

With the addition of landscaping within the center median(s) of Camino Vista Road, there would be a potentially slight increase in the amount of water demand of the project to irrigate the landscaping. However, with Alternative 3 impacts would be less than significant with implementation of mitigation.

Wastewater Treatment

Alternative 3 would not change the amount of wastewater generated by the project or associated impacts, which would be less than significant with mitigation.

Solid Waste

Alternative 3 would not change the amount of building materials and construction-related waste generation of the project. The long-term waste generation would also not change. Impacts related to solid waste would the same as those identified for the project (less than significant).

6.3.12 Recreation

Alternative 3 would not change the number of units or number of residents that would require recreation facilities. As with the project, it would require the elimination of the existing volleyball court that serves Willow Springs I to allow for the internal access road to reach Building 27. However, it would create new areas that could provide recreation opportunities to serve the project's residents or the public. Therefore, recreation impacts under this alternative would be reduced from those of the project.

6.3.13 Transportation and Traffic

Under Alternative 3, the access and circulation could change somewhat. Access to Building 27 could be achieved through the westerly internal driveway connection with Willow Springs I, while access to the remainder of the site would continue to be through the Willow Springs Court connection to Camino Vista Road toward the east portion of the site and the internal driveway connection with Willow Springs I along the eastern boundary. Parking requirements would remain unchanged, because a portion of the area that would not be constructed with Buildings 28 or 29 would still be used to supply adequate parking space. There would be no changes in project impacts relative to site access and circulation, effects on the Camino Vista Road/Aero Camino intersection, traffic congestion impacts on surrounding intersections and roadways, or parking.

6.2.14 Public Services

Alternative 3 would result in similar impacts to public services as would be generated by the project.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of a project and the alternatives, CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the Alternative 1 (No Project-No Action Alternative) would result in the fewest amount of

impacts. However, Section 15126.6(2) of the CEQA Guidelines requires that an environmentally superior alternative be selected above and beyond the No Project Alternative.

Based on the alternative analysis provided above, it has been determined that Alternative 2 (Reduced Density Alternative) would result in the fewest number and lesser significance of adverse impacts; and thus, has been chosen as the environmentally superior alternative. This alternative would result in fewer (or reduction in significance of) impacts in the issue areas of Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas, Hydrology and Water Quality, Noise, Utilities, Recreation and Transportation and Traffic.

Alternative 2 may not meet the project objectives of providing 100 housing units consistent with City zoning and General Plan land use designations and housing demands. However, as provided previously, Alternative 2 could provide required active recreation space, which could be counted toward the recreation area that would be required within the Willow Springs North property. As such, it is possible that the balance of housing units could be achieved upon future build-out of Willow Springs North.

Alternative 3*,* the *Redesign Alternative* would have fewer impacts to the area of Cultural Resources and Recreation. However, aesthetic impacts would be increased as a result of the character consistency with Willow Springs I. Other impacts would remain relatively unchanged.