CHAPTER 6 ALTERNATIVES

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CEQA Guidelines Section 15126.6 provides a framework for the formulation and analysis of alternatives in an EIR. This section 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 Guidelines as follows. 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 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" (Public Resources Code, Section 21061.1). 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.

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 Section 15126.6(f)(2)(A) states 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. The guidelines go on to state "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."

With regard to offsite alternatives, the two alternative site analyses discussed later in this chapter do not include an analysis of relocating the existing Hollister Center building, because that building is already in place, and the proposed project would not include changes to the existing building or its use.

Finally, 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 state that the EIR shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project."

6.1 SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED IN THIS EIR

As described above, the primary purpose of the alternatives analysis is to identify changes to the project that would reduce or avoid significant impacts of the project as proposed. As described in Chapter 4, "Environmental Setting and Impact Analysis," the project results in the following significant unavoidable impact and potentially significant impacts which can be mitigated to less than significant levels.

6.1.1 Aesthetics and Visual Resources

The project would result in potentially significant but mitigable (Class II) impacts on the visual character of the area and the loss of scenic mountain views due to construction of a 118-room hotel and associated improvements as well as increased night lighting and glare from project lighting (Class II).

6.1.2 Biological Resources

The project would result in the potential for significant but mitigable (Class II) impacts on the environmentally sensitive Goleta Slough from water quality—related impacts if the final design of the site landscape plan includes invasive species and if the final design of the site grading and drainage plan, stormwater detention, and filtering/treatment of stormwater runoff do not adequately provide for filtering of degraded runoff water from the site prior to discharge off site.

6.1.3 Cultural Resources

Site development would contribute to significant and unavoidable cumulative impacts to cultural resources, primarily from past development and other activities within SB-58 and in the project area. Site-specific cultural resource impacts have the potential to result in significant but mitigable impacts (Class II) involving possible disturbance of artifacts and/or human remains during project construction.

6.1.4 Geology and Soils

The project would result in potentially significant but mitigable (Class II) geology and soils impacts if construction does not follow soil and geotechnical report recommendations for grading; foundation design and construction to address site soil constraints; the foundation design using pilings, geotextile fabric, fill, and avoidance/minimization of over-excavation (to reduce cultural resource impacts), as well as potentially significant impacts from construction-related erosion and sedimentation.

6.1.5 Hazards and Hazardous Materials

The project would result in a potentially significant but mitigable impact (Class II) during construction and operational phases related to previously identified onsite contamination and proximity to the Santa Barbara Municipal Airport.

6.1.6 Hydrology and Water Quality

The project would result in the potential for significant but mitigable (Class II) drainage and surface water quality impacts if the final designs for stormwater detention and the

filtering/treatment of stormwater runoff are not adequate to reduce peak stormwater flow and provide adequate filtering of degraded runoff water from the site prior to discharge off site.

6.1.7 Land Use and Planning

The project would result in the potential for significant but mitigable (Class II) impacts on a variety of environmental issues and their related policies as discussed in the various sections of the EIR.

6.1.8 Public Services and Facilities

The project would result in the potential for significant but mitigable impacts (Class II) on the provision of adequate fire protection services.

6.1.9 Transportation and Traffic

The project would result in the potential for significant but mitigable traffic impacts during the construction phase due to turning movements into and out of the project site by heavy equipment, including large trucks bringing imported fill to the project site as part of site preparation activities.

6.1.10 Utilities and Service Systems

The project results in potentially significant but mitigable (Class II) impacts on the demand for water and sewer service.

6.2 ALTERNATIVES CONSIDERED IN THIS EIR

The alternatives assessed in this chapter include various approaches to reducing or avoiding one or more of the proposed project's impacts. Table 6-1 provides a comparison of environmental impacts associated with the proposed project and the various alternatives.

TABLE 6-1
COMPARISON OF ENVIRONMENTAL IMPACTS FOR PROJECT ALTERNATIVES

	Impact of Alternatives Compared to the Proposed Project ¹			
Environmental Effect	Proposed Project	Alt 1: No Project	Alt 2: Page Property/ Key Site 6	Alt 3: Project Redesign/ Environmentally Superior Alternative
Aesthetics and Visual Resources	II	NA / Less	II / Less	II / Less
Air Quality	III	NA / Less	III / Greater	III / Similar
Biological Resources	II	NA / Less	II / <u>Similar or</u> Greater	II / Similar
Cultural Resources (project impacts)	II	NA / Less	III / Less	II / Less
Cultural Resources (cumulative impacts)	1	NA / Less	III / Less	I / Less
Geology and Soils	II	NA / Less	II / Similar	II / Similar

	Impact of Alternatives Compared to the Proposed Project ¹			
Environmental Effect	Proposed Project	Alt 1: No Project	Alt 2: Page Property/ Key Site 6	Alt 3: Project Redesign/ Environmentally Superior Alternative
Greenhouse Gas Emissions	III	NA / Less	III / Greater <u>Similar</u>	III / Similar
Hazards and Hazardous Materials	II	NA / Less	II / Less	II / Similar
Hydrology and Water Quality	II	NA / Less	II / Less	II / Similar
Land Use and Planning	II	NA / Less	II / Less	II / Less
Noise	III	NA / Less	III / Greater	III / Similar
Public Services	II	NA / Less	II / Similar	II / Similar
Transportation and Traffic	II	NA / Less	II / Greater	II / Similar
Utilities and Service Systems	II	NA / Less	II / Similar	II / Similar
Agricultural Resources	NA	NA	I / Greater	NA

Impact Comparison:

The first symbol identifies the impact classification (e.g., NA = Not Applicable, Class I = significant and unavoidable, Class II = potentially significant, but mitigable to less than significant, Class III = adverse, but less than significant).

Next, there is a comparison to the project even if the classification is the same (e.g., both the proposed project and the alternative result in a Class II impact, but the alternative has "Less,", "Similar," or "More" of an impact compared to the proposed project).

6.2.1 Alternative 1: No Project Alternative

The No Project Alternative as defined in Section 15126.6(e) of the CEQA Guidelines is "the existing conditions at the time of the notice of preparation is publishedas 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 Setting and Impact Analysis."

In this case, if the project is not approved, the site is expected to remain in its existing condition (existing building, parking, landscaping on Parcel 1 and partially paved, partially undeveloped, limited landscaping on Parcel 2). The existing 10.71-acre parcel is developed with an existing 106,500—square-foot research and development/office building and related parking and landscaping improvements. The western third of the property is primarily vacant. Under the No Project Alternative, the undeveloped western portion of the property is expected to remain essentially as is. The existing setting includes an economic use on this legal parcel, which is consistent with the site's land use designation and zoning.

6.2.1.1 Aesthetics and Visual Resources

Under the No Project Alternative it is assumed that existing development on site would remain and that the western portion of the site for the Marriott Residence Inn would remain undeveloped with the exception of existing paved parking areas and utility infrastructure (Figure 6-1). The existing minimal vegetation would remain with varying degrees of maintenance (primarily mowing the undeveloped portion). Frontage improvements, including the meandering sidewalk and new landscaping would not be installed along the property's frontage between La Patera Lane and Robin Hill Road.

As stated in the Section 4.1, "Aesthetics," of this document, the aesthetic values associated with the site are tied to the scenic views through the site of the Santa Ynez Mountains from Hollister Avenue, which is designated as a Local Scenic Corridor in the City's General Plan. Scenic views worthy of protection are identified in all directions from Hollister Avenue near the project site. With regard to visual compatibility of the two- and three-story 80,945-square-foot hotel development with the surrounding neighborhood, increased night-lighting, and obstruction of mountain views from Hollister Avenue, the No Project Alternative would essentially maintain the existing setting. There would be no change to the aesthetic values associated with the existing site (or the lack of visually significant resources on the site itself). Further, the No Project Alternative would avoid significant but mitigable impacts on visual compatibility of the hotel development with the surrounding area, with increased night-lighting/glare and with scenic public views of the Santa Ynez Mountains from Hollister Avenue.

6.2.1.2 Air Quality

Short-term and operational air quality impacts at the project site are discussed in Section 4.2, "Air Quality," and are considered less than significant. The No Project Alternative, which would not result in new development, would not result in air quality impacts.

6.2.1.3 Biological Resources

The proposed project would result in potentially significant impacts on the offsite Goleta Slough Ecosystem, which can be mitigated to adverse but less-than-significant levels through implementation of mitigation measures identified in the Section 4.3, "Biological Resources," of this document. The No Project Alternative would not involve site grading and related potential for erosion/sedimentation impacts on the Goleta Slough. In addition, the No Project Alternative would not result in an increase in impervious surfaces on site and related reduction in natural bio-filtration of stormwater runoff on site, before runoff is conveyed south of Hollister Avenue and on to the Goleta Slough. The No Project Alternative would also avoid an increase in oil and grease in site runoff from project-related vehicles driving and parking on site.

6.2.1.4 <u>Cultural Resources</u>

Section 4.4 of the EIR identifies potentially significant but mitigable impacts on cultural resources from development of the project. These project specific impacts are associated with impacts to the last remaining undeveloped portion of archaeological site CA-SBA-58. This project specific impact, while mitigated to a level of insignificance, also contributes to the identified significant and unavoidable cumulative impact to cultural resources when the project is considered with past activities that have impacted the larger archaeological site, as well as when considering impacts to the numerous archaeological sites in the project vicinity which have been impacted by past grading and development related activities.

Earthwork associated with project development—including grading, utility trenching, landscape installation, foundation installation, installation of the swimming pool, demolition of existing paving, installation of new hardscape areas (walkways, parking lot, sidewalk, courtyard, etc.), and other construction activities—has the potential to disturb, unearth, and/or damage buried cultural resources, which are considered potentially significant impacts. There is also the potential for short-term trespass and vandalism of cultural resources during the construction period. The No Project Alternative would not result in earthwork or construction or the related potential for encountering, disturbing, or damaging buried resources or increasing trespass or vandalism during construction activities.

6.2.1.5 Geology and Soils

Development of the proposed project would result in potentially significant impacts related to erosion/sedimentation (from site preparation activities) and geologic/soils impacts related to construction on a site with constrained soils and high groundwater, as well as historic groundwater contamination. As discussed in Sections 4.5, "Geology and Soils," and 4.7, "Hazards," of this document, mitigation is identified to reduce such impacts to less-than-significant levels.

Because the No Project Alternative does not necessitate grading, excavation, or construction activities, geology and soils impacts of the No Project Alternative would be avoided.

6.2.1.6 **Greenhouse Gas Emissions**

Greenhouse gas emissions at the project site are discussed in Section 4.6, "Greenhouse Gas Emissions," and are considered less than significant. The No Project Alternative, which would not result in new development, would not result in greenhouse gas impacts.

6.2.1.7 Hazards and Hazardous Materials

As discussed in Section 4.7, "Hazards and Hazardous Materials," the proposed project would result in potentially significant impacts associated with the nearby airport, historic groundwater contamination, and the potential for encountering contaminated soil on site, which can be mitigated to less-than-significant levels with implementation of identified mitigation measures. The No Project Alternative would not locate a hotel on the western portion of the property, and therefore there would be no guests or employees to be exposed to airport-related impacts. In addition, if the site is not developed and related site preparation activities are not necessary, there would be no impacts associated with potential exposure to subsurface contaminated soils or the need to dewater the site resulting in the need to dispose of potentially contaminated groundwater. Therefore, hazards and hazardous materials impacts associated with the No Project Alternative would be avoided.

6.2.1.8 **Hydrology and Water Quality**

As discussed in Section 4.8, "Hydrology and Water Quality," the proposed project would result in potentially significant impacts associated with increased erosion/sedimentation, water quality in surface waters including the Goleta Slough, and flooding/drainage, which could be mitigated to adverse but less-than-significant levels with implementation of identified mitigation measures. Under the No Project Alternative the existing baseline condition would be maintained. Currently, stormwater runoff sheet flows across the existing paved parking areas, with much of the runoff draining across the undeveloped and vegetated western portion of the site before being directed

under Hollister Avenue to the drainage channel immediately south of Hollister Avenue and ultimately the Goleta Slough. This existing drainage pattern allows for some filtering and stormwater runoff and retardation of stormwater peak flows in the undeveloped and vegetated portion of the site. There would be no hydrology and water quality impacts associated with the No Project Alternative.

6.2.1.9 Land Use and Planning

Section 4.9, "Land Use and Planning," discusses land use and planning issues, including the project's consistency with the City of Goleta General Plan. In addition, the proposed project would result in potentially significant environmental impacts associated with a variety of environmental issue areas as described in Sections 4.1–4.13 of this EIR. The No Project Alternative would not include new development or otherwise alter the existing setting. Therefore, the No Project Alternative would avoid and reduce land use and planning impacts identified for the proposed project.

6.2.1.10 Noise

Short-term and operational noise impacts at the project site are discussed in Section 4.10, "Noise," and are considered less than significant. The No Project Alternative, which would not result in new development, would not result in noise impacts.

6.2.1.11 Public Services

Section 4.11 describes the proposed project's impacts on public services. Impacts related to fire protection services are considered potentially significant, but implementation of identified mitigation would reduce this impact to less-than-significant levels. The No Project Alternative, which does not result in new development, would not increase demand for, or otherwise alter demand for, public services.

6.2.1.12 Transportation and Traffic

As discussed in Section 4.12, "Transportation and Traffic," new vehicle trips associated with the proposed project would result in potentially significant short-term construction period traffic safety impacts. Feasible mitigation to reduce such traffic safety impacts to less-than-significant levels is also identified in Section 4.12. The No Project Alternative would avoid these potentially significant impacts.

6.2.1.13 Utilities and Service Systems

Under the No Project Alternative there would be no change in the level of demand for water or sewer service. As noted in Section 4.13, "Utilities and Service Systems," the proposed project would result in potentially significant impacts related to increased demand for water and sewer service. However, mitigation is identified that would reduce impacts to less-than-significant levels. Under the No Project Alternative, impacts on utilities and service systems would be avoided.

6.2.2 Alternative 2: Page Property/Key Site 6 (Alternative Location)

The 11.38-acre Page Property/Key Site 6 alternative location (APN 071-130-23) is located west of Ward Memorial Boulevard (Highway 217) and the San Jose Creek channel and immediately

west of the intersection of Kellogg Way and Kellogg Avenue (Figure 6-2). The property is also known as the "Page" property and as "Key Site 6" in the Goleta Old Town Revitalization Plan (GOTRP). The site has a land use designation and zoning of Visitor Serving Commercial. Alternative 2 includes development of a 118-room hotel on all or part of this property, with associated parking, landscaping, and walking paths/trails connecting the hotel with the Goleta Valley Community Center and Hollister Avenue commercial corridor to the north. The Ekwill/Fowler extension project, currently under separate City review, involves (in part) extension of Ekwill Street along the northern boundary of this property parallel to Old San Jose Creek along with related improvements, including a bike path and pedestrian access. Previous plans to extend Ekwill Street placed this roadway extension across the southern, rather than the northern, portion of the property.

6.2.2.1 Aesthetics and Visual Resources

Alternative 2 would convert an existing, undeveloped, agricultural field to a 118-room hotel with associated parking lot and related paths and landscaping. Given the larger size of the property, the overall height of the structure could be reduced by eliminating the need for a three-story component. Therefore, the hotel would be limited to a one- and two-story building. The Page property is less prominent from public views than is the 6300 Hollister Avenue project site, although development under Alternative 2 would still be visible from Kellogg Avenue, Highway 217 (briefly), the Goleta Valley Community Center to the north, and from public viewing areas along the Old San Jose Creek corridor. Potentially significant impacts on visual resources would be associated with the change in existing views from undeveloped/agricultural land to a fairly large, one- and two-story hotel with associated parking. The project would be visible from public viewing areas. However, there are no General Plan-designated scenic views or view corridors in the project vicinity that are identified for protection, and development on this site would not obstruct scenic public views of the Santa Ynez Mountains or the coast. In addition, there is sufficient area available to provide ample landscaping along the property perimeter as well as within the parking areas and surrounding the building itself. Aesthetic impacts of Alternative 2 would still be associated with increased night-lighting and compatibility of new development with the surrounding Goleta Old Town area and this segment of Old San Jose Creek. These impacts are expected to be potentially significant, but to a lesser degree than for the proposed project. because the Page property is more visually isolated from surrounding development. With implementation of mitigation measures similar to those required for the proposed project (identified in Section 4.1, "Aesthetics and Visual Resources"), potential impacts could be mitigated to less-than-significant levels. Given the site's less prominent location, the lack of resulting obstruction of mountain or coastal views, and the larger site acreage that would allow for lower overall building heights, Alternative 2 impacts on visual resources would be less than for the proposed project.

6.2.2.2 Air Quality

Project short-term and operational air quality impacts at the project site are discussed in Section 4.2, "Air Quality," and are considered less than significant. Unlike the proposed project site, sensitive receptors on parcels in proximity to the Alternative 2 site would be exposed to construction emissions during the construction period. Long-term air quality impacts associated with Alternative 2 would be similar to the proposed project. Therefore, Alternative 2 would result in greater short-term air quality impacts compared to the proposed project.

6.2.2.3 **Biology**

The Alternative 2 project site is bounded on the north by Old San Jose Creek. This riparian area has been subject to degradation due to historic realignment as well as a high level of adjacent urban development. Alternative 2 is expected to result in similar biological impacts as those identified in Section 4.3, "Biology," for the proposed project. Impacts would, however, be focused on Old San Jose Creek instead of the Goleta Slough. Potentially significant impacts are associated with erosion and sedimentation during site preparation activities and long-term impacts on wildlife movement along this wildlife corridor, and from an increase in impervious surfaces, which would reduce natural bio-filtration of stormwater runoff from the site and that which may be laden with oil, grease, and other pollutants. Potentially significant indirect impacts related to runoff into Goleta Slough via San Jose Creek and introduction of invasive species would occur. Similar to the proposed project, impacts are expected to be mitigable to less-thansignificant levels with implementation of the mitigation measures identified in Section 4.3 as well as additional mitigation requiring protective fencing along the creek corridor during grading and construction activities (unless the Ekwill extension is already under construction or completed). Therefore, biological impacts of Alternative 2 would be similar to or greater than those identified under the proposed project.

6.2.2.4 Cultural Resources

There are no known historic or archaeological sites associated with the Alternative 2 project site based on previous archaeological survey and a records search (GOTRP Program EIR, 96-EIR-5 as amended by Addendum dated June 16, 1998). Therefore, potentially significant but mitigable project-specific impacts on cultural resources associated with the proposed project would be substantially lessened with Alternative 2. Also, this alternative would not contribute to a significant and unavoidable cumulative impact to cultural resources, so cumulative impacts would be substantially lessened with Alternative 2.

6.2.2.5 **Geology and Soils**

Alternative 2 would have similar geologic/soils impacts as those identified for the proposed project with regard to erosion/sedimentation during the construction period, seismic shaking similar to seismic impacts countywide (because no faults are located in proximity to the site) and soil hazards associated with construction on constrained soils (compressible soils, soils subject to liquefaction due to high groundwater) that may cause settlement, cracked foundations, and loss of structural strength. Development on the Alternative 2 site would likely require more earthwork, including importation of substantial fill material, to raise development elevations above the flood plain level. But, given the lack of cultural resources onsite, a wider variety of construction methods could be used to address geotechnical/soils constraints. Implementation of mitigation identified in Sections 4.5, "Geology and Soils," and 4.7, "Hazards," would reduce geologic impacts for Alternative 2 to less-than-significant levels. Construction options would make it easier to address some geologic/soils-related impacts of developing the Alternative 2 site, but the lack of cultural resources associated with the site would allow for more foundation/construction design options to address overall geologic/soils impacts of Alternative 2. Therefore, geologic/soils impacts of Alternative 2 are expected to be similar to the proposed project.

¹ Depending on specific agricultural practices, continued cultivation may also result in erosion and sedimentation.

6.2.2.6 **Greenhouse Gas Emissions**

Greenhouse gas emissions at the project site are discussed in Section 4.6, "Greenhouse Gas Emissions," and are considered less than significant. Greenhouse gas emissions associated with Alternative 2 would be similar to the proposed project.

6.2.2.7 Hazards and Hazardous Materials

As discussed in Section 4.7, "Hazards and Hazardous Materials," the project would result in potentially significant impacts associated with the nearby airport and historic groundwater and soil contamination on site, which can be mitigated to less-than-significant levels with implementation of identified mitigation measures. The Alternative 2 site is similarly located in proximity to the Santa Barbara Airport Approach Zone, and implementation of mitigation identified in Section 4.7 with regard to FAA review of project plans would reduce potential impacts to less-than-significant levels. The Alternative 2 site is not associated with any known soil or groundwater contamination. Therefore, hazards/hazardous materials impacts associated with Alternative 2 would be similar to or less than impacts associated with the proposed project.

6.2.2.8 Hydrology and Water Quality

As discussed in Section 4.8, "Hydrology and Water Quality," the proposed project would result in potentially significant impacts associated with increased erosion/sedimentation, diminished water quality in surface waters including the Goleta Slough, and flooding/drainage. These impacts could be mitigated to adverse but less-than-significant levels with implementation of identified mitigation measures. Alternative 2 would result in similar potentially significant but mitigable erosion/sedimentation, flooding (both site elevations must be raised to address potential flooding issues), and water quality impacts. These impacts can be mitigated to less-than-significant levels with implementation of identified mitigation measures. Mitigation identified in Section 4.8 would reduce flooding/drainage impacts to less-than-significant levels. Therefore, impacts on hydrology and water quality would be similar to the proposed project.

6.2.2.9 Land Use and Planning

The proposed project would result in potentially significant environmental impacts associated with a variety of environmental issue areas as described in Sections 4.1 through 4.13 of this EIR. These environmental impacts are also tied to policies and development standards in the City's General Plan as discussed in Section 4.9, "Land Use and Planning." Alternative 2 land use impacts relate directly to environmental impacts identified in the various environmental issue areas discussed in Chapter 4. A comparison of the environmental impacts of Alternative 2 with the impacts of the proposed project is summarized throughout this chapter, and Table 6-1 compares the various environmental impacts of Alternative 2 with the proposed project.

6.2.2.10 Noise

Project short-term and operational noise impacts at the project site are discussed in Section 4.10, "Noise," and are considered less than significant. Unlike the proposed project location, sensitive receptors on parcels in proximity to the Alternative 2 site would be exposed to significant noise levels during the construction period. Similar to the proposed project, the Alternative 2 property would not be exposed to significant noise levels from ambient noise levels generated by vehicles on nearby roadways or train noise to the north. With regard to long-term noise impacts, future guests/employees would be exposed to less-than-significant nuisance

noise from aircraft overflights. Therefore, Alternative 2 would result in greater short-term noise impacts compared to the proposed project.

6.2.2.11 Public Services

Section 4.11 of the EIR describes the proposed project's impacts on public services. Impacts related to fire protection services are considered potentially significant, but implementation of identified mitigation would reduce this impact to less-than-significant levels. Development of Alternative 2 would also be subject to the development impact fees and mitigation identified in Section 4.11 of the EIR. Development on the Alternative 2 site would result in similar impacts on public services as the proposed project.

6.2.2.12 <u>Transportation and Traffic</u>

As discussed in Section 4.12, "Transportation and Traffic," new vehicle trips associated with the proposed project would result in potentially significant short-term construction period traffic. Feasible mitigation to reduce such traffic safety impacts to less-than-significant levels is also identified in Section 4.12. Alternative 2 is expected to result in similar construction period traffic safety impacts. Although vehicle trips may be slightly lower for Alternative 2 due to the site's location within easy walking distance of some restaurants and the commercial corridor, project traffic is expected to result in potentially significant impacts on the Hollister Avenue/Kellogg Way, Hollister Avenue/Fairview Avenue, and Hollister Avenue/Highway 217 ramp intersections, based on existing LOS at these intersections (as identified in the Ekwill-Fowler Draft EIR, Tables 2-4 and 2-5 included in Appendix P1). The future extension of Ekwill Street near the southern boundary of the property is designed to improve overall circulation in the Alternative 2 project area and would reduce the project's impacts on area intersections. Therefore, traffic impacts associated with Alternative 2 would be similar to, or greater than, the traffic impacts associated with the proposed project.

6.2.2.13 Utilities and Service Systems

As noted in Section 4.13, "Utilities and Service Systems," the proposed project would result in potentially significant impacts related to increased demand for water and sewer service. However, mitigation identified in Section 4.13 would reduce impacts to less-than-significant levels. Alternative 2 impacts on utilities and service systems would be similar to impacts of the proposed project.

6.2.2.14 Other Environmental Impacts

Agricultural Resources

Alternative 2 would convert the existing agricultural field to urban development. Conversion of this agricultural land to development was identified as an unavoidable adverse impact in the GOTRP EIR. The Goleta General Plan/Coastal Land Use Plan (GP/CLUP) Final EIR acknowledged a Class I impact (significant and unavoidable) on agriculture from conversion of agricultural land to other uses under buildout conditions, including conversion of the Page property's approximately 12 acres of prime farmland (GP/CLUP Final EIR Agricultural impact discussion included in Appendix V). The proposed project would not convert agricultural land to urban development. Therefore, Alternative 2 would result in greater impacts on agricultural resources than the proposed project.

6.2.3 Alternative 3: Project Redesign

The current proposed project has undergone several revisions since the original proposal was submitted to the City of Goleta. In order to minimize the potential impact on cultural resources from the construction of the Marriott Residence Inn the following changes to the original plan were made:

- 1. Placing the building on pilings so that the excavation of over a meter of soil and the recompaction of the soil beneath the entire footprint of the building was not necessary.
- 2. Using geo-textile fabric beneath the parking lot and landscaping features within the known archaeological site boundaries, thus reducing the depth of excavation within the currently established archaeological site boundaries from 18 inches to 4 to 8 inches.
- 3. Directionally drilling the easternmost sewer line within the currently established archaeological site boundaries at a depth that is below the established depth of intact cultural resources.
- 4. Placing tie-in excavations for the eastern sewer line either outside the currently established archaeological site boundaries or as close to existing utilities as possible and where there has been prior disturbance of cultural materials.
- 5. Placing of utilities and plantings within imported fill soils.
- 6. Making all frontage improvements occur within the top 4 inches of existing soil or restricting improvements to redeposited fill soils only.

In addition, the structural setback from Hollister Avenue has been increased, the number of hotel rooms has been reduced, and the structural square footage and the building footprint have all been reduced. The project does, however, still result in potentially significant impacts. Based on comments associated with the prior Marriott Residence Inn proposed project, the major issues of concern were the project's impact on cultural resources and aesthetic impacts relating to obstruction of mountain views and the development's compatibility with the surrounding area. Section 4.1, "Aesthetics and Visual Resources, concludes that impacts on visual resources can be reduced to adverse but less-than-significant levels with implementation of identified mitigation measures. However, aesthetic impacts could be further reduced consistent with visual resource policies with additional changes to the project.

Alternative 3 is a project redesign that attempts to reduce impacts on cultural resources (and possibly on aesthetics). Alternative 3 involves the following changes to the project.

- The configuration of the hotel would be "flipped," so that the north/south wing was located
 on the side of the parcel closest to Robin Hill Road. This would place the pilings furthest
 from the most culturally sensitive portion of the site. One concern with this configuration is
 that the Robin Hill Road elevation would be a solid wall that may further impact mountain
 views. This configuration would also place the swimming pool in shadow much of the day.
- The swimming pool would be redesigned to minimize or avoid the need for excavation below new fill soils.
- The swimming pool could be located elsewhere on site as long as the swimming pool installation can be accommodated without disturbing intact soils.
- As an option for this alternative, the hotel structure could be limited to two stories, to minimize impacts to mountain views.

This alternative would reduce the impacts on scenic mountain views from Hollister Avenue; reduce the size, bulk, and scale of the structure along the Hollister Avenue corridor; and reduce subsurface disturbance for a hotel accessory (swimming pool) that would otherwise involve excavation that may result in disturbance of significant intact or redistributed archaeological resources.

6.2.3.1 <u>Aesthetics and Visual Resources</u>

Alternative 3, especially with the 2-story option, would reduce the bulk of the building and maintain more of the existing scenic views of the Santa Ynez Mountains as viewed from Hollister Avenue. It would blend in better with the immediately adjacent development. Increasing the building's proximity to Robin Hill Road would not substantively affect existing mountain views if the building were two-story but may further impact mountain views if the building were three-story. Although Alternative 3 would still result in potentially significant impacts that can be reduced to less-than-significant levels, the two-story alternative would slightly reduce aesthetic impacts, especially with regard to obstruction of scenic mountain views compared to the proposed project.

6.2.3.2 Air Quality

Short-term and operational air quality impacts at the project site are discussed in Section 4.2, "Air Quality," and are considered less than significant. Alternative 3 would result in slightly less impacts during due to the reduced size of the footprint of construction. Otherwise, impacts would be similar.

6.2.3.3 <u>Biological Resources</u>

Alternative 3 impacts on biological resources (including on water quality) would be similar to biological impacts of the proposed project. It is expected that the grading and drainage plan and the landscape plan would require revision to address possible relocation/redesign of the detention basin and bioswales.

6.2.3.4 Cultural Resources

Alternative 3 would result in the same types of potentially significant impacts that are identified in Section 4.4, "Cultural Resources." However, flipping the building configuration and redesigning the swimming pool to further reduce sub-surface disturbance (to primarily new fill soil imported to the site) could slightly reduce the potential for encountering buried resources during site development. Flipping of the building would be expected to result in less direct impacts to intact archaeological soils compared to the proposed project. The archaeological significance is focused on those areas of the site with intact soils that retain spatial integrity, as location (both vertically and laterally) is used in investigations to help answer research questions important to history or prehistory. Disarticulated remains or isolated materials in disturbed soils may be relocated from within or beyond the project site. Therefore, disturbed soil areas do not have the same ability to answer important research questions. Further, given the nature of disturbed soils, it is not known which portions of the disturbed soils on site might contain sensitive materials. Therefore, impacts on cultural resources would be slightly less with Alternative 3, but this alternative would still contribute to a significant cumulative impact on cultural resources.

6.2.3.5 **Geology and Soils**

Alternative 3 site disturbance and grading/excavating activities would not change measurably from those needed to construct the proposed project. Therefore, Alternative 3 would result in similar geology and soil impacts as the proposed project.

6.2.3.6 Greenhouse Gas Emissions

Greenhouse gas emissions at the project site are discussed in Section 4.6, "Greenhouse Gas Emissions," and are considered less than significant. Greenhouse gas emissions associated with Alternative 3 would be similar to the proposed project.

6.2.3.7 Hazards and Hazardous Materials

Given that the project location and type of use would not change under Alternative 3, project impacts associated with hazards and hazardous materials would be the same for either Alternative 3 or the proposed project.

6.2.3.8 **Hydrology and Water Quality**

Because the extent of impervious surfaces under Alternative 3 would not change measurably from that of the proposed project, potential hydrology and water quality impacts resulting from implementation of this alternative would be similar to the proposed project.

6.2.3.9 Land Use and Planning

The proposed project would result in potentially significant environmental impacts associated with a variety of environmental issue areas as described in Sections 4.1 to 4.13 of this EIR. These environmental impacts are also tied to policies and development standards in the City's General Plan as discussed in Section 4.9, "Land Use and Planning." Alternative 3 land use impacts relate directly to environmental impacts identified in the various environmental issue areas discussed in Chapter 4 of this EIR. A comparison of the environmental impacts of Alternative 3 with the impacts of the proposed project is summarized throughout this chapter, and Table 6-1 compares the various environmental impacts of Alternative 3 with the proposed project.

6.2.3.10 Noise

Short-term and operational noise impacts at the project site are discussed in Section 4.10, "Noise," and are considered less than significant. Alternative 3 would result in less-than-significant impacts similar to the proposed project.

6.2.3.11 Public Services

Because the type of use and project location would not change under Alternative 3, this alternative would result in the same potentially significant but mitigable project impacts on fire protection services as the proposed project.

6.2.3.12 <u>Transportation and Traffic</u>

Alternative 3 would have similar short-term construction period traffic safety impacts as the proposed project. Long-term operational impacts would also be similar, although if the number of hotel rooms is reduced, increased vehicle trips associated with the project would be reduced commensurately. However, the level of impact is not expected to change compared to the proposed project.

6.2.3.13 Utilities and Service Systems

Alternative 3 would have similar potentially significant but mitigable impacts associated with water and sewer services as the proposed project. If the size of the hotel is reduced, demand for these services would be slightly reduced, but the level of impact would not change compared to the proposed project.

6.3 ADDITIONAL ALTERNATIVES DETERMINED TO BE INFEASIBLE

6.3.1 Smaller, One-Story Hotel

A smaller (approximately 50-room), one-story hotel could slightly reduce the loss of scenic mountain views, and, if the overall size of the hotel footprint is reduced and the structure is located near the southwest corner of the property, impacts on cultural resources could be substantially reduced. However, site preparation activities for even a small hotel have the potential to disturb cultural resources and result in significant impacts. This is, in part, due to the fact that the precise location and extent of buried cultural resources on site is not known to a high degree of certainty. Based on financial information provided to and independently reviewed by the City of Goleta for the Camino Real Hotel and the Rincon Palms Hotel, a much smaller hotel is not expected to be economically feasible.

6.3.2 Rincon Palms Site (Alternative Location)

The 3.05-acre Rincon Palms site (APN 073-140-0040) is located at the northeast corner of Storke Road and Hollister Avenue, at 6868 and 6878 Hollister Avenue. The site was considered for an additional alternative because the property has a land use designation of Professional Institutional with a Hotel Overlay and the site is zoned Industrial Research Park (M-RP) with a Hotel Overlay. The site is similarly located on a corner lot, with two front yard setbacks. A hotel project was approved for this site in 2008, but for a period of time it appeared that the project had been abandoned by the applicant. However, plans have recently been submitted to modify the development approval (Rincon Palms project). Therefore, the site is no longer considered available for development for the Marriott Residence Inn and this alternative location is no longer being considered for the project.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (Section 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 proposed project. If the No-Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmental superior alternative among the other alternatives.

As discussed in Section 4.4, "Cultural Resources," the project is expected to result in potentially significant but mitigable impacts on cultural resources. The project site is the last remaining undeveloped portion of a larger significant archaeological site. Further, there has been widespread loss of archaeological sites in the project area, particularly in those areas around the Goleta Slough, due to past agricultural and development activities. Covering the site with development would limit the ability to perform additional archaeological field work, which can further the understanding of historic and prehistoric time periods. Impacts are also associated with the potential for disturbing buried resources during the construction phase of the project and with developing a hotel over a site with cultural significance to local Native Americans. Residual project specific impacts on Cultural Resources, upon implementation of mitigation measures identified in Section 4.4, are determined to be adverse but less than significant. However, the project would contribute to a significant cumulative impact to cultural resources, primarily due to the impacts of past actions.

All other environmental impacts posed by the project can also be feasibly reduced to less-thansignificant levels through implementation of the mitigation measures identified and evaluated in Chapter 4. Although aesthetic impacts have been identified as potentially significant but mitigated to less-than-significant levels by mitigation identified in Section 4.1, "Aesthetics and Visual Resources," there have been considerable comments relating to the project's aesthetic impacts, including obstruction of scenic mountain views from Hollister Avenue and the project's size, bulk, and scale in relation to other nearby developments.

Impacts on cultural resources and aesthetics would be substantially lessened with Alternative 2 or 3. However, only the No Project Alternative has the ability to reduce the designated "level" of impacts beyond the levels anticipated for the proposed project. Therefore, the No Project Alternative is environmentally superior to the proposed project. Implementation of the No Project Alternative, however, is not consistent with the project objectives. Specifically, by not developing an extended stay hotel on Parcel 2, it would not provide an economically viable use for the remaining undeveloped property along Hollister Avenue that complements existing nearby development and amenities such as the Santa Barbara Airport. It would also not create additional transient occupancy tax revenues associated with an extended stay hotel development. It would also not facilitate or accelerate the undergrounding of utility infrastructure in an important view corridor.

With regard to Alternative 2, the Page property is not known or expected to be associated with cultural/archaeological resources, given its location, soil characteristics, and both onsite and nearby archaeological investigations to date. In contrast, the project site at 6300 Hollister Avenue is known to be part of a large Native American site, and the property has been included as a mapped archaeological site since at least the 1920s with references to artifacts on the site in the 1800s. Because Alternative 2 would avoid the significant cumulative impact to cultural resources that would occur with the proposed project, it is environmentally superior to the proposed project. Alternative 2 could feasibly accomplish most, but not all, of the project objectives. However, Alternative 2 would not create an economically viable use of the undeveloped portion of the property along Hollister Avenue (Objective 4). It would not facilitate or accelerate undergrounding of utility infrastructure in an important view corridor (along Hollister Avenue) (Objective 6). Also, because the Page property location is not as visible as the proposed project site, does not have direct access from either State Route 217 or Hollister Avenue two streets (that is, it is not on a corner lot), and is not located adjacent to the Santa Barbara Airport, the Page property location is a more challenging location for a new hotel and therefore it may not ultimately provide additional transient occupancy tax revenues (Objective 5). Further, the alternative site is not under the control of either the City or the applicant.

Alternative 3, the onsite project redesign alternative would partially avoid sensitive areas of the project site with regard to cultural/archaeological resources. With the option that reduces the height of the building, the project's aesthetic impacts would be reduced, especially with regard to reduction of mountain views from Hollister Avenue. Alternative 3 could feasibly accomplish most, but not all, of the applicant's objectives for the project, but may not allow for construction of as large a hotel (especially if the third floor is not included), which would limit the amount of additional transient occupancy tax revenues (Objective 5). Alternative 3 would not reduce the classification of impact levels, particularly with regard to aesthetics and cultural resource impacts. However, Alternative 3 would result in reduced severity of impacts compared to the proposed project. Therefore, Alternative 3 is considered to be environmentally superior to the proposed project.

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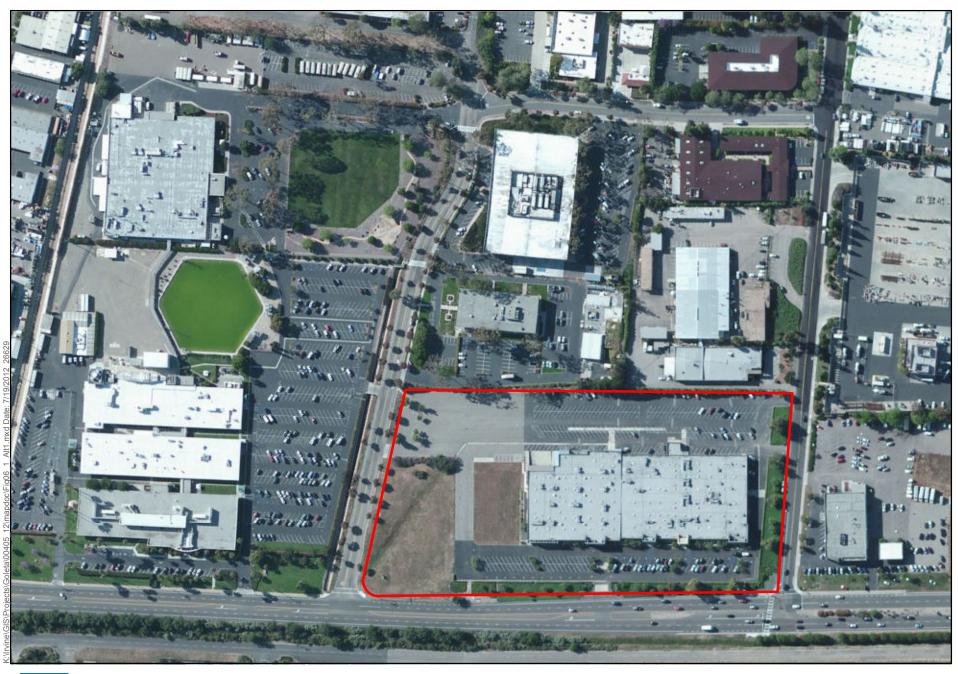




Figure 6-1 Alternative 1 – No Project Alternative City of Goleta Marriott EIR

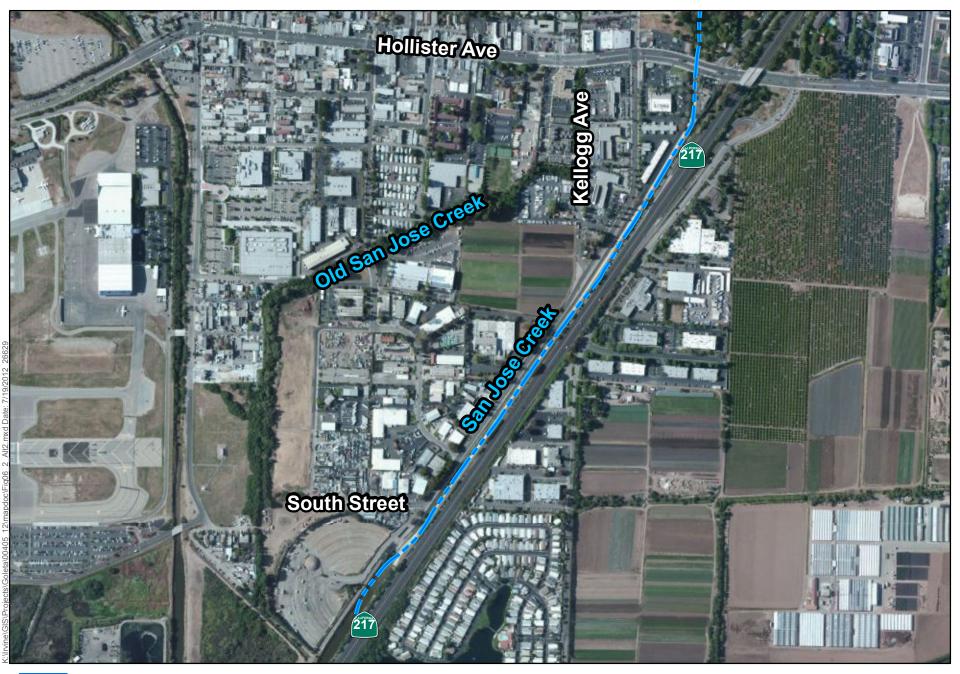




Figure 6-2 Alternative 2 – Page Property/ Key Site 6 City of Goleta Marriott EIR