

CHAPTER 6 ALTERNATIVES

CEQA Guidelines § 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 CEQA 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 § 15364 as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (see Public Resources Code § 21061.1). CEQA Guidelines § 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the proponent can reasonably acquire, control, or otherwise have access to potential alternative sites.

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

Finally, the analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, CEQA Guidelines § 15126 specifies that the EIR 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 Impact Analysis,” the project would result in the following significant unavoidable impacts and potentially significant impacts that can be mitigated to less-than-significant levels.

6.1.1 Aesthetics and Visual Resources

The project would result in significant and unavoidable (Class I) impacts on scenic vistas and scenic resources due to loss of foothill and mountain views from a designated scenic corridor (Cathedral Oaks Road). (This impact would also represent a considerable contribution to cumulative impacts along Cathedral Oaks Road.) The project would also result in potentially significant, but mitigable (Class II), impacts related to potential excessive light and glare.

6.1.2 Biological Resources

The project would result in potentially significant, but mitigable (Class II), impacts on special-status plants (Santa Barbara honeysuckle) and animals (California red-legged frog, least Bell's vireo, western pond turtle, bats, nesting and foraging raptors, riparian wildlife species, and nesting birds). In addition, it would result in potentially significant, but mitigable (Class II), indirect impacts to riparian communities, wetlands, and wildlife movement (El Encanto Creek).

6.1.3 Cultural Resources

The project would result in potentially significant, but mitigable (Class II), impacts on archaeological resources due to the potential for discovery of unknown archaeological resources, paleontological resources, or human remains.

6.1.4 Hydrology and Water Quality

The project would result in the potential for significant, but mitigable (Class II), surface water quality and groundwater quality impacts if final plans did not include adequate best management practices (BMPs). Similarly, the project would result in Class II impacts on stormwater flows and drainage if final design details, related installation, and/or long-term maintenance of the onsite drainage control systems were not adequate; or if stormwater detention, retention and treatment prior to discharge was not sufficient to prevent substantial flooding or erosion on or off site, prevent channelization of El Encanto Creek, or prevent other impacts related to stormwater flows and drainage.

6.1.5 Transportation and Traffic

The project would result in the potential for significant, but mitigable (Class II), traffic impacts related to consistency with the SBCAG Congestion Management Program (CMP).

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**

	Proposed Project	Alt. 1: No Project	Alt. 2: Reduced Scale A	Alt. 3: Reduced Scale B	Alt. 4: Multi-family Residential Development	Alt. 5: Girsh/Westen Alternative Site
Aesthetics and Visual Resources	I	I / Less	I / Similar	I / Similar	I / Greater	I / Similar
Biological Resources	II	II / Similar	II / Less	II / Similar	II / Less	II / Similar
Cultural Resources	II	II / Similar	II / Similar	II / Similar	II / Similar	II / Similar
Hydrology and Water Quality	II	II / Similar	II / Less	II / Less	II / Similar	II / Similar
Transportation and Traffic	II	II / Less	II / Less	II / Less	II / Similar	II / Greater
Other impacts	--	--	--	--	Land Use	Hazards (I and II)

6.2.1 Alternative 1: No Project Alternative

The No Project Alternative as defined in CEQA Guidelines § 15126.6(e) is “the existing conditions at the time of the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Existing conditions at the project site are described in each of the impact analyses in Chapter 4, “Environmental Impact Analysis.”

In this case, if the project is not approved, the site is expected to remain in its existing condition. The existing setting includes a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn. The project site had an avocado orchard until the late 1990s, a remnant of which is evident on the northern third of the lot. The property is currently used in part for the storage of woodchips and firewood. The avocado orchard could be re-established. Other land uses allowed by right under the property’s existing zoning of Agriculture-II are listed in Goleta Municipal Code § 35-217.3; the major uses are summarized below.

- All types of agriculture, except commercial livestock feed or sales yard.
- Sale of agricultural products produced on the premises.
- Greenhouses not exceeding a total of 20,000 square feet.
- One single-family dwelling unit per legal lot.
- One guest house or artist studio per legal lot.
- Home occupations.
- One Residential Agricultural Unit.
- Animal hospitals.
- Commercial boarding of animals and riding stables.

For the purposes of this analysis, the No Project Alternative would include the largest amount of structural development allowable on the project site by right, which would be a complex of greenhouses totaling 20,000 square feet in floor area (e.g., 10 greenhouses at 2,000 square feet each). Row crops, orchards, or animal grazing would also be allowed over most of the project site.

6.2.1.1 Aesthetics and Visual Resources

The structural development allowed under the No Project Alternative would be approximately one-sixth of the building floor area to be developed under the proposed project (a 20,000-square-foot complex of greenhouses vs. 60 single-family dwellings averaging 2,000 square feet each). If the greenhouse complex were to be located with the minimum required setback from Cathedral Oaks Road (20 feet from the right-of-way line), it would be highly visible from Cathedral Oaks Road, Royal Linda Drive, and King Daniel Lane.

Therefore, the impacts on aesthetics and visual resources of the No Project Alternative would be similar to those for the proposed project. Views from Cathedral Oaks Road, other local roadways, and nearby land uses would be similar to views of the proposed project. A reduction of views of the foothills and mountains would result in significant adverse impacts on scenic resources. The potential impacts related to night-lighting and glare would be less than those for the proposed project, due to the smaller scale of development under the No Project Alternative.

6.2.1.2 Biological Resources

Due to the smaller scale of development under the No Project Alternative, it would be feasible to locate the greenhouse complex to avoid the Santa Barbara honeysuckle plants observed on the project site, as well as the Streamside Protection Area (SPA) for El Encanto Creek and its associated riparian habitat. Ground disturbances and construction activities would not occur in areas potentially used by sensitive wildlife species (California red-legged frog, least Bell's vireo, western pond turtle, bats, and nesting birds).

Agricultural uses on the project site could cause impacts to biological resources. Fertilizers and pesticides used on crops could run off the project site into El Encanto Creek. Such agricultural discharges must be managed in compliance with regulations of the State Water Resources Control Board; however, some amount of fertilizers and/or pesticides in discharges could still continue to El Encanto Creek and affect the quality of the watershed. If not fenced off properly, grazing activities could encroach on the SPA. Such agricultural uses could degrade the quality of habitat of sensitive wildlife species within El Encanto Creek and the SPA; these impacts are considered potentially significant, but mitigable.

Therefore, impacts to biological resources under the No Project Alternative would be similar in scale to those of the proposed project.

6.2.1.3 Cultural Resources

Under the No Project Alternative, ground disturbances and construction would occur but at a lesser scale than the proposed project. However, because the location (or existence) of cultural resources, paleontological resources, and human remains on the project site is not known, the No Project Alternative's potential risk for impacts on these resources would be similar to that for the proposed project.

6.2.1.4 Hydrology and Water Quality

Under the No Project Alternative, grading activities would occur for the construction of the greenhouse complex and, to a lesser extent, for any crop plantings. The greenhouse buildings would result in new impervious areas on the project site, but at a smaller scale than the proposed project.

Fertilizers and pesticides resulting from agricultural uses could run off the project site into El Encanto Creek. Such agricultural discharges must be managed in compliance with regulations of the State Water Resources Control Board; however, some amount of fertilizers and/or pesticides in discharges could still continue to El Encanto Creek and affect the quality of the watershed. These discharges would be considered a potentially significant, but mitigable, impact.

Therefore, the No Project Alternative would result in lower impacts due to grading and construction than the proposed project, but would result in a new water quality impact due to fertilizer and pesticide use associated with agriculture.

6.2.1.5 Transportation and Traffic

The agricultural uses of the No Project Alternative would likely result in less vehicular trips on area roadways and intersections than the proposed project (several agricultural employees vs. 60 households). The No Project Alternative would likely not result in a cumulative contribution to the Storke Road/Hollister Avenue intersection, as the proposed project would. Therefore, the No Project Alternative's impacts on transportation and traffic would be less than for the proposed project.

6.2.1.6 Other Impacts of Alternative 1

No other environmental impacts would result from Alternative 1, the No Project Alternative.

6.2.2 Alternative 2: Reduced Scale Alternative A—Avoidance of Streamside Protection Area

This alternative would be similar to the proposed project, but with all development pulled out of a 100-foot SPA buffer measured from the eastern edge of the riparian corridor of El Encanto Creek. Under the proposed project, a detention/retention basin, vegetated bioswale, children's tot lot, walking path, small portions of two residential lots, and a portion of the internal road system would occur within the 100-foot SPA buffer. Under Alternative 2, the detention/retention basin, walking path, and segment of the internal road system would be relocated out of the SPA buffer. The children's tot lot and up to 6 residential lots would be eliminated, leaving a total of 54 residential lots.

6.2.2.1 Aesthetics and Visual Resources

Under Alternative 2, most of the proposed project would be constructed. Views from Cathedral Oaks Road, other local roadways, and nearby land uses would be similar to views of the project. Therefore, Alternative 2 would have a similar reduction of views of the foothills and mountains due to the additional development, resulting in significant adverse impacts on scenic resources. Potential impacts related to night-lighting and glare would be similar to those for the project.

6.2.2.2 Biological Resources

Alternative 2 would avoid development within the SPA. This alternative would not affect the existing Santa Barbara honeysuckle plants, avoiding this potentially significant, but mitigable impact. Direct impacts on foraging and dispersal habitat for California red-legged frog would still potentially occur because this species may use areas outside the SPA. Indirect impacts on California red-legged frog, least Bell's vireo, western pond turtle, bats, raptor nesting and foraging, and nesting birds would be somewhat reduced, but would still occur, potentially at significant levels due to construction dust, noise, pets, and human activity in the area. Indirect impacts on riparian vegetation in El Encanto Creek during construction and over the lifetime of the project would be reduced, but would still be potentially significant (reduced water quality and habitat quality). Indirect impacts on wetlands and wildlife movement would also be reduced, but would still be potentially significant (water quality degradation, night-lighting, and noise).

6.2.2.3 Cultural Resources

Because the location (or existence) of cultural resources, paleontological resources, and human remains is not known, the potential for impacts on these resources from Alternative 2 would be similar to that for the proposed project.

6.2.2.4 Hydrology and Water Quality

Grading activities associated with Alternative 2 would be similar to those for the proposed project, though located slightly further from El Encanto Creek and outside the SPA. However, soil erosion and potential sedimentation of El Encanto Creek would potentially occur. Potential for polluted runoff and infiltration of the groundwater would be similar to that for the proposed project—potentially significant, but mitigable. Long-term pollutant discharges from the operation of Alternative 2 would be similar to those for the proposed project.

It is assumed that a similar detention/retention basin would be constructed for Alternative 2, although not within the SPA. Runoff for the project would be slightly less because slightly fewer houses would be constructed. However, the impacts of runoff from new impervious surfaces would still result in a potentially significant, but mitigable impact.

6.2.2.5 Transportation and Traffic

Alternative 2 would result in slightly fewer residences being built and slightly fewer vehicular trips being generated. Because of this slight reduction in the number of trips, Alternative 2's contribution to cumulative traffic would be slightly less, but this alternative would still likely add 20 or more trips to the U.S. Highway 101 southbound ramps at the Glen Annie Road/Storke Road intersection. Alternative 2 may be able to avoid a significant cumulative contribution to the Storke Road/Hollister Avenue intersection if the reduction in the trips resulted in less than 20 new trips.

6.2.2.6 Other Impacts of Alternative 2

No other environmental impacts would result from Alternative 2, the Reduced Scale Alternative A—Avoidance of Streambed Protection Area.

6.2.3 Alternative 3: Reduced Scale Alternative B—Minimum 65-Foot Lot Frontage

This alternative would be a project similar to the current project, but with all lots meeting the 65-foot minimum lot frontage requirement of the 7-R-1 zone district, and no lots exceeding the subdivision standard maximum lot depth-to-width ratio of 3:1. The proposed project includes 46 lots that do not meet the 65-foot lot frontage requirement. For the purposes of this analysis, it is assumed that the site would be reconfigured to include 48 units, rather than 60, a 20% reduction compared to the proposed project. For the purposes of this analysis, it is assumed that the land cover amount would be similar to that of the proposed project, with the same scope of development activities within the 100-foot SPA of El Encanto Creek. These include placement of the detention/retention basin, vegetated bioswale, children's tot lot, walking path, small portions of two residential lots, and a portion of the internal road system.

6.2.3.1 Aesthetics and Visual Resources

Under Alternative 3, structural development would be reduced in scale compared to the proposed project, but the land cover amount would be similar. Views from Cathedral Oaks Road, other local roadways, and nearby land uses would be similar to those for the proposed project. Therefore, Alternative 3 would have a similar reduction of views of the foothills and mountains due to the additional development, resulting in significant adverse impacts on scenic resources. Potential impacts related to night-lighting and glare would be similar to those for the proposed project.

6.2.3.2 Biological Resources

Alternative 3 would include development within the same area proposed by the project. This alternative would not reduce impacts on the existing Santa Barbara honeysuckle plants or direct impacts on foraging and dispersal habitat for California red-legged frog. Indirect impacts on California red-legged frog, least Bell's vireo, western pond turtle, bats, raptor nesting and foraging, and nesting birds would be similar to those for the proposed project (potentially significant levels, but mitigable due to construction dust, noise, pets, and human activity in the area). Indirect impacts on riparian vegetation in El Encanto Creek during construction and over the lifetime of the project would be similar to those for the proposed project (reduced water quality and habitat quality). Indirect impacts on wetlands and wildlife movement would also be similar (potentially significant, but mitigable for water quality degradation, night-lighting, and noise).

6.2.3.3 Cultural Resources

Because the location (or existence) of cultural resources, paleontological resources, and human remains is not known, the potential for impacts on these resources from Alternative 3 would be similar to the proposed project.

6.2.3.4 Hydrology and Water Quality

Grading activities associated with Alternative 3 would be similar to those for the proposed project. Soil erosion and potential sedimentation of El Encanto Creek would potentially occur. Potential for polluted runoff and infiltration of the groundwater would be similar to those for the proposed project and would be potentially significant but mitigable. Long-term pollutant

discharges from the operation of Alternative 3 would be similar to those for the proposed project.

It is assumed that a similar detention/retention basin would be constructed for Alternative 3, although potentially a small basin would be required due to the slightly reduced amount of impervious surfaces and runoff. Runoff for the project would be slightly less because 20% fewer houses would be constructed. However, the impacts of runoff from the impervious surfaces would still result in a potentially significant, but mitigable impact.

6.2.3.5 Transportation and Traffic

Alternative 3 would result in 20% fewer residences being built and fewer vehicular trips being generated. Because of this slight reduction in the number of trips, Alternative 3's contribution to cumulative traffic would be less, but this alternative would still likely add 20 or more trips to the U.S. Highway 101 southbound ramps at the Glen Annie Road/Storke Road intersection. Alternative 3 would be able to avoid a cumulative contribution to the Storke Road/Hollister Avenue intersection if the reduction in the trips resulted in less than 20 new trips.

6.2.3.6 Other Impacts of Alternative 3

No other environmental impacts would result from Alternative 3, the Reduced Scale Alternative B—Minimum 65-Foot Lot Frontage.

6.2.4 Alternative 4: Multi-family Residential Development

This alternative would be a project of 60 multi-family units (such as duplexes, triplexes, or other medium-density residential buildings) on the same project site.

6.2.4.1 Aesthetics and Visual Resources

Under Alternative 4, the residential units would be clustered into larger, taller buildings. The land cover amount would be reduced as fewer buildings would be constructed. Impacts on views from Cathedral Oaks Road, other local roadways, and nearby land uses would potentially be more adverse than for the proposed project due to the increased height and bulk of the buildings. Potential impacts related to night-lighting and glare would be similar to those for the proposed project.

6.2.4.2 Biological Resources

Alternative 4 would result in more compact development on the project site and may locate all development activities outside of the SPA of El Encanto Creek (a 100-foot wide buffer from the riparian environmentally sensitive habitat area [ESHA] boundary). This alternative would potentially reduce impacts on the existing Santa Barbara honeysuckle plants or direct impacts on foraging and dispersal habitat for California red-legged frog by locating development activities further from the riparian habitat area of El Encanto Creek. Indirect impacts on California red-legged frog, least Bell's vireo, western pond turtle, bats, raptor nesting and foraging, and nesting birds would be similar to those for the proposed project (potentially significant levels, but mitigable due to construction dust, noise, pets, and human activity in the area). Indirect impacts on riparian vegetation in El Encanto Creek during construction and over the lifetime of the project would be similar to those for the proposed project (reduced water quality and habitat quality). Indirect impacts on wetlands and wildlife movement would also be

similar (potentially significant, but mitigable for water quality degradation, night-lighting, and noise).

6.2.4.3 Cultural Resources

Because the location (or existence) of cultural resources, paleontological resources, and human remains is not known, the potential for impacts on these resources from Alternative 4 would be similar to the proposed project.

6.2.4.4 Hydrology and Water Quality

Grading activities associated with Alternative 4 would be similar to those for the proposed project. Soil erosion and potential sedimentation of El Encanto Creek would potentially occur. Potential for polluted runoff and infiltration of the groundwater would be similar to those for the proposed project and would be potentially significant, but mitigable. Long-term pollutant discharges from the operation of Alternative 4 would be similar to those for the proposed project.

It is assumed that a similar detention/retention basin would be constructed for Alternative 4, although potentially a small basin would be required due to the slightly reduced amount of impervious surfaces and runoff. However, the impacts of runoff from the impervious surfaces would still result in a potentially significant, but mitigable impact.

6.2.4.5 Transportation and Traffic

Alternative 4 would result in a similar number of vehicular trips being generated to the proposed project. Therefore, Alternative 4's contribution to cumulative traffic would be similar, and would still likely add 20 or more trips to the U.S. Highway 101 southbound ramps at the Glen Annie Road/Storke Road intersection and Storke Road/Hollister Avenue intersection.

6.2.4.6 Other Impacts of Alternative 4

Alternative 4 could potentially result in a land use impact as the project site would result in a different subdivision pattern and feel than that of the surrounding neighborhoods (single-family residential and agricultural), given the clustered nature of the buildings on the site. This alternative would have the same density as the proposed project, using a different configuration of units. This alternative would require a change to the site's General Plan land use designation and a zone change that allows multi-family residential development.

6.2.5 Alternative 5: Girsh/Westen Alternative Site

The Girsh/Westen site is located in the 7100 block of Hollister Avenue, west of Santa Felicia Drive. It is comprised of three parcels totaling approximately 10 acres in area (APN 073-003-005, -006, and 009). A church is located on the westernmost parcel; the remainder of the Girsh/Westen site is vacant. The site has a land use designation of Medium Density Residential (R-MD) for its northern half and General Commercial (G-C) for its southern half. For the purposes of this analysis, the entire site would be developed for a 60-unit residential project. The site is smaller than the 14.38-acre Shelby property; therefore some clustering of units into duplexes or triplexes would likely be necessary to accommodate 60 units on this site.

6.2.5.1 Aesthetics and Visual Resources

Under Alternative 5, the density of residential units would be similar or higher than the proposed project. The height of the buildings would be similar to the proposed project (one and two story buildings not exceeding 30 feet in height). The Girsh/Westen site is mostly flat, and views to the Santa Ynez Mountains are available from the site. Hollister Avenue is denoted as a scenic corridor in the GP/CLUP. Alternative 5 could result in significant and unavoidable impacts to visual resources that are similar to those for the proposed project. Potential impacts related to night-lighting and glare would be similar to those for the proposed project.

6.2.5.2 Biological Resources

The Girsh/Westen site is not located adjacent to a creek; however, there are riparian and sage scrub habitats denoted on the site in the Conservation Element of the GP/CLUP (GP/CLUP Figure 4-1, *Special Status Species and Environmentally Sensitive Habitat Areas*). These appear to be associated with a depression in the site's terrain. For this analysis, the mapped riparian and sage scrub habitats are considered ESHAs. The quality of the ESHAs is likely to be similar to that of the Shelby property; therefore this alternative would result in similar impacts to biological resources to that of the proposed project (Class II).

6.2.5.3 Cultural Resources

Because the location (or existence) of cultural resources, paleontological resources, and human remains is not known, the potential for impacts on these resources from Alternative 5 would be similar to the proposed project.

6.2.5.4 Hydrology and Water Quality

Grading activities associated with Alternative 5 would be similar to those for the proposed project. Potential for polluted runoff and infiltration of the groundwater would be similar to those for the proposed project and would be potentially significant, but mitigable. Long-term pollutant discharges from the operation of Alternative 5 would be similar to those for the proposed project. It is assumed that a similar detention/retention basin would be constructed for Alternative 5. The impacts of runoff from the impervious surfaces would still result in a potentially significant but mitigable impact.

6.2.5.5 Transportation and Traffic

Alternative 5 would result in a similar number of vehicular trips being generated to the proposed project. However, a greater proportion of these trips would likely be routed through the Storke Road/Hollister Avenue intersection and the U.S. Highway 101 southbound ramps at the Glen Annie Road/Storke Road intersection. These two intersections are projected to operate at LOS E under cumulative conditions. Therefore, Alternative 5 could result in greater cumulative impacts and greater Congestion Management Program (CMP) impacts at these intersections as compared to the proposed project. These impacts would still be mitigable.

6.2.5.6 Other Impacts of Alternative 5

The Union Pacific Railroad right-of-way adjoins the northern boundary of the Girsh/Westen site. Alternative 5 would result in a significant and unavoidable risk of upset associated with derailment of hazardous materials transported on the railroad line. Also, there is a high-pressure

natural gas pipeline that runs along the southern boundary of the Girsh/Westen site. Alternative 5 would result in a significant, but mitigable impact associated with the rupture of this line.

6.3 ADDITIONAL ALTERNATIVES DETERMINED TO BE INFEASIBLE

Other alternative sites for developing a project similar to the proposed project were considered, but determined to be infeasible. Of the remaining vacant sites within the City that could accommodate development of similar scale to the proposed project, some are currently designated as Agriculture in the GP/CLUP and others have a non-agricultural land use designation. Development on vacant sites with an Agriculture designation would result in losses of agricultural lands that are larger or more severe than the proposed project. The remaining vacant sites with non-agricultural designations all have pending applications for development with the City, and therefore were not further considered for analysis as alternatives to the proposed project.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

Table 6-1 above provides a comparison of environmental impacts associated with the proposed project and the various alternatives. Of these alternatives, Alternative 2, the Reduced Scale Alternative A—Avoidance of Streamside Protection Area, results in the greatest overall reduction of impacts as compared to the proposed project. By relocating all development outside the 100-foot SPA buffer of El Encanto Creek, Alternative 2 would reduce impacts under three areas: biological resources, hydrology/water quality, and transportation/traffic. The reduction in impacts to biological resources is Alternative 2's most significant reduction. Direct impacts on existing Santa Barbara honeysuckle plants would be avoided, and indirect impacts on sensitive species and the quality of riparian habitat within the SPA buffer would be reduced (though not to a less-than-significant level). For these reasons, Alternative 2 is the Environmentally Superior Alternative. Alternative 2 achieves the proposed project's objectives.

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