

Alternatives

SECTION 6.0

6.0 ALTERNATIVES

6.1 INTRODUCTION

CEQA Guidelines §15126.6 provides a framework for the formulation and analysis of alternatives in an EIR. The Guidelines state, "[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 2.0, Project Description.

Reasonable Range of Alternatives

CEQA Guidelines § 15126.6(f) requires an EIR to review only those alternatives necessary to permit a reasoned choice. The alternatives selected for review must meet the *rule of reason*; that is, they must be feasible, capable of fulfilling the purpose and intent of the project, and need not include alternatives with an unlikely or speculative potential for implementation or include alternatives that would not result in effects that cannot be reasonably ascertained.

While there is no rule dictating 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. The CEQA Guidelines also require the analysis of a "No Project" alternative. A "No Project" alternative may include one or both of (1) a "reasonably foreseeable project" that could be implemented based on existing zoning and general plan land use designations or (2) an assessment of what might occur if there is no change to the existing condition ~~were to occur~~.

The Guidelines also require that an alternatives analysis identify the *environmentally superior alternative* based on an objective review of the impact associated with each alternative. If the *environmentally superior alternative* is the 'no project alternative' alternative, the EIR is also required to identify an environmentally superior alternative among the other alternatives presented."¹

Feasibility

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." CEQA Guidelines § 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can reasonably acquire, control or otherwise have access to potential alternative sites.

Level of Analysis

The analysis of the environmental effects of project alternatives need not be as thorough or detailed as the analysis of the Project itself. Rather, the CEQA Guidelines § 15126.6(d) states

¹ CEQA Guidelines § 15126.6 (e)(2).

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

Alternatives to the Project

Three alternatives were selected for analysis:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Footprint/Density Alternative
- Alternative 3: Reduced Density/Scale Alternative

Each of these is described further below in sub-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 for the lead agency’s determination. Section 15126.6 (c) of the CEQA Guidelines states:

“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”.

For this Project, the lead agency considered and rejected assessment of an alternative location for the Project. Of the alternative locations considered only the 240-acre Bishop Ranch site, located at 96 Glen Annie Road (APN: 077-202-045), is large enough in size to accommodate 465 residences with the mix of housing types and level of amenities proposed for the Village at Los Carneros Project. The Bishop Ranch site was rejected as infeasible because it is currently designated as Agricultural land in the General Plan and, according to the Goleta Heritage Farmlands Initiative, passed by the voters in 2012, a change in the Agricultural land use designation would require approval by a vote of the people. The Goleta Heritage Farmlands Initiative was designed to protect agricultural lands that are ten or more acres in size. Therefore, the Bishop Ranch site is considered infeasible for the development of a residential project since a change in the land use designation approved by the voters would be required. Further, the alternative site is not under the control of either the City or the Applicant.

The Project site is located within the Central Hollister Residential Development Area of the Inland Area of the City as identified in the GP/CLUP and, therefore, was pre-selected by the City for residential development to meet City and regional housing needs. The site is considered an infill site as it is surrounded by existing or planned urban development. In addition, the existing Project site is located near commercial and office/light industrial centers developed with retail, office, and light industrial facilities. It is also located in close proximity to major local and regional transportation corridors. These features, in addition to the site’s residential designation in the General Plan, would facilitate development that could avoid many potential impacts that could result from development in other areas of the City such as the Bishop Ranch site, such as including inadequate existing infrastructure or the intrusion of urban development into land that is in agricultural use or protected as open space. Based on these factors, the lead agency

determined that it would not be feasible or appropriate for the Applicant to pursue an alternative location and for these reasons an alternative location is not assessed in this EIR.

6.2 ALTERNATIVE 1: NO PROJECT ALTERNATIVE – REASONABLY FORESEEABLE

Alternative 1 is the *No Project Alternative* and is characterized based on an assessment of defined as the Project that would be reasonably expected to occur in the foreseeable future if ~~the proposed Project were not approved~~, based on current land use designations, zoning, available infrastructure, and community services. Based on the foregoing, the “No Project” alternative would result in development of the central portion of the site consistent with the site’s existing entitlements (Village at Los Carneros Phase I approved by the City in February of 2008), with the remainder of the site ~~to be~~ developed with multi-family residences consistent with specified Central Hollister Affordable Housing Opportunity Sites minimum density of 20 units per acre, which is consistent with the DR-20 zoning district density requirements. The existing business park use would not be changed. No lot line adjustments other than those approved for the Tentative Map (TM) approved in 2008 would occur. The Raytheon Specific Plan would not be repealed and development of the Specific Plan area would proceed based on the Plan’s most current amendment (2008).

Based on these assumptions, the “No Project” alternative will consist of 275 multi-family dwelling units pursuant to existing entitlements of the Village at Los Carneros Phase I project, developed on 16.11 acres comprised of the reconfigured Lots 2 and 5 of the then-approved TM. The remaining area of 27.02 acres of residentially zoned land would be developed with multi-family housing at a density of approximately 25 dwelling units per acre, consistent with the existing maximum build out of the Central Hollister Housing Opportunity Sites. Each of these sites would be required to reserve 20% percent of its total *for sale* units for units ~~that would be~~ priced at a level affordable to very low, low, moderate and above moderate income households in accordance with the percentages for each group outlined in the GP/CLUP. Approximately 4.82 acres of the site would be dedicated as a public park and approximately 2.47 acres would be preserved as part of the Environmentally Sensitive Habitat Area (ESHA) and (Stream Protection Area) SPA (ESHA) ~~for of the~~ Tecolotito Creek and SPA associated with its unnamed tributary. The private recreational facilities approved for the 2008 Project would be provided. All other constraints on site development imposed by the City’s Municipal Code, General Plan policies, and other applicable laws, ordinances and regulations, and potential archaeological resources would apply to the “No Project-Reasonably Foreseeable Development” alternative. These constraints would include a building height not to exceed 35 feet (three stories), the provision of a 100-foot Stream buffer measures from the edge of the ESHA area (top of the Tecolotito Creek bank), the required setbacks from Los Carneros Road and the UPRR/U.S. 101 transportation corridor, and the maximum land coverage requirements pursuant to the Inland Zoning Code and GP/CLUP for each zone, with allowances permitted by the General Plan for affordable housing.

The DR (Design Residential) Zone permits development of single family (subject to the requirements of the R-1 zoning district), duplex, triplex, and multifamily dwelling units including developments such as row houses, townhouses, condominiums, cluster, and community apartment projects. Parking lots, carports, and garages must be located either adjacent to each unit or centrally located so as to serve a cluster of units. The gross land area for each dwelling unit in the DR-20 zone is 2,178 square feet. A front setback of 20 feet from any street right-of-way must be observed and a 10-foot setback from rear and side property lines is required but

may be increased for various reasons. The distance between buildings is a minimum of five feet. Not less than 40 percent of the net area of the property must be devoted to common open space.²

In the PRD zone, buildings containing residences are limited to thirty percent coverage of the net area of the property and total building coverage is limited to fifty percent of the net area of the property. The same uses are permitted as are allowed under the DR zone, the same height restrictions apply, and a minimum of forty percent of the gross acreage must be used for public and/or common area open space.

In both zones, ESHAs are considered to contribute to the open space requirement. The total number of dwelling units permitted based on net developable land is as follows:

PRD Property Pursuant to Existing Entitlements:	15.01 gross acres	12.17 net acres
DR-20 Property:	28.13 gross acres	18.05 net acres
TOTAL RESIDENTIAL ACREAGE:	43.13 gross acres	30.22 net acres

UNITS

PRD Zoned Property Pursuant to Existing Entitlements:	275 dwelling units
DR-20 Zone Property	450 dwelling units
TOTAL RESIDENTIAL UNITS	725 dwelling units
Proposed Project	(465)
Additional Units	260 additional units

AFFORDABLE UNITS:

PRD Site with Existing Entitlements:	6 ownership condos @ 150-200 percent AMI
	63 rental apartments @ 50 percent AMI
DR-20 Site Per GP Policy HE 11.6	23 rental/ownership @ 100 – 120 percent AMI
	46 rental apartments @ 50 percent AMI
	23 rental/ownership @ 120 to 200 percent AMI
TOTAL AFFORDABLE:	46 ownership/rental @ Moderate
	109 rental @ Very low/low

6.2.1 Aesthetics

The No Project Alternative would permit the development of a greater number of residential units on the site, which would result in a higher density, although remaining consistent with permitted density pursuant to the zoning. The PRD zoned area would have the same intensity of use and the size and number of buildings originally approved for the Project in 2008. The remaining 27 acres would consist of larger buildings, all of which would be three stories in height in order to achieve the allowable density. To achieve sufficient parking while meeting open space requirements and respecting environmental constraints, semi or fully subterranean parking would be required for all buildings, although surface parking proposed for the PRD project would be provided as part of the mix. The potential visual character of the site would be similar to that of the proposed Project but would include less surface parking and greater building coverage. Light and glare impacts would be similar. Scenic views from the Los Carneros Road/U.S. 101 overpass would be similar because the foreground view would continue to be dominated by a three-story, multifamily building. Impacts to the Los Carneros/Calle Koral vantage point views would be similar. Open space would be similar

² Inland Zoning Code DR zone.

greater due to zoning code requirements and the application of provisions to protect ESHA-designated areas and the proposed neighborhood park, as well as the proposed central recreation area in the PRD project. Therefore, this alternative would have visual character and impacts to Aesthetic resources similar to the proposed Project in spite of its higher density.

6.2.2 Air Quality

The No Project Alternative would not result in a substantial increase in short-term emissions associated with construction activities, as the grading footprint would remain the same as with construction of the proposed Project. However, the grading period would be extended to accommodate increased excavation for increased subsurface parking. In addition, the amount of export from the site would substantially increase, as the soils excavated to accommodate increased subsurface parking could not be disposed of onsite without substantially increasing the overall site grade, which would result in higher pads, a Project that would be out of character with the balance of the community, and which would increase impacts on views. In addition, the construction phase would be extended in order to accommodate the construction of an additional 100 units. However, because construction would be spread over an additional period of time, air quality impacts during the construction phase would remain under the SBCAPCD threshold guidelines for ROG and NO_x and the implementation of mitigation measures and the SBCAPCD standard conditions for the control of fugitive dust during the construction phase would reduce these potential Air Quality impacts to a less than significant level. Nevertheless, while mitigation measures would continue to maintain AQ impacts at a less than significant level, those impacts would be greater and would continue over a longer period of time than would be the case with the proposed Project, due to its larger size and greater dirt generation and export.

6.2.3 Biological Resources

Under the No Project Alternative, the ~~secondary access involving requiring construction of the bridge over Tecolotito Creek would remain as it would be needed to serve the Project. Therefore and impacts to the Tecolotito Creek ESHA and Tecolotito Creek within that area would remain similar to those created by the proposed Project. The Project's impacts resulting from development of residences within 100 feet of Tecolotito Creek are unlikely to be avoided as the number of units would increase could be avoided under this Alternative through revised building placement and greater use of subterranean parking.~~ Impacts to the wildlife movement corridor would remain the same or would be greater as the bridge would still be built to a height that would allow the passage of large mammal and the bridge foundations would be set back from the creek and creek bank pursuant to existing SBCFCWCD City policy. However the greater number of units constructed on the Project site could result in taller and more dense construction adjacent to the 50-foot wide SPA buffer, which is unlikely to be enlarged, allowing a greater amount of light and noise to penetrate into the ESHA/SPA at night, potentially inhibiting wildlife movement. The alternative's impacts on nesting birds and contribution to cumulative loss of foraging habitat would be the same as those of the proposed Project. Therefore, the Alternative's impacts to biological resources would be similar or greater than ~~to~~ those of the proposed Project.

6.2.4 Cultural Resources

The No Project Alternative would require more and potentially deeper excavation for construction of new buildings. As development would need to occur roughly within the same development footprint area, there would be a greater need to employ subsurface parking to

accommodate the proposed additional development while continuing to provide the required open space, observe the limitations on building lot coverage, and the setback requirements for the ESHA, SPA upland buffer, 100-year flood plain in Lot 7 and special need open space in Lot 6. Accordingly, With increased and/or deeper excavation there would be greater potential for unearthing buried cultural resources. However, that potential impact would be highly speculative and in terms of CEQA assessment, the Alternative's impacts on cultural resources would remain ~~the same~~ similar compared to those of the proposed Project.

6.2.5 Geology and Soils

Under the No Project Alternative, site preparation activities such as grading and site clearance could expand to account for the need to accommodate parking for a larger number of units and the potential need to include more subterranean parking than is proposed for the proposed Project. Nevertheless, the alternative would also avoid the ~~Project's~~ mitigable impacts to geologic and seismic hazards.

6.2.6 Greenhouse Gas Emissions

The No Project Alternative would result in an increase in GHG emissions when compared to the Project's GHG emissions, due to the increased number of residences and associated vehicle use trips by a larger resident population that would require additional energy consumption and result in increased emissions by stationary and mobile sources, although the impact would most likely remain cumulatively less than significant.

6.2.7 Hazards and Hazardous Materials

The No Project Alternative would involve similar impacts regarding hazards as would be present with the proposed Project. Depending upon how buildings, circulation and parking are arranged, however, there is potential for a greater number of residents to be located in close proximity to the UPRR and U.S. Highway 101 corridor, which would potentially increase the number of residents who would be exposed to ~~potentially~~ significant hazards resulting from potential derailment or other accidents within the corridor. Therefore, the alternative would ~~marginally~~ increase the Project's impacts associated with the risk of exposure to hazards and hazardous materials.

6.2.8 Hydrology and Water Quality

As the No Project Alternative would also involve new construction over the entirety of the site, similar impacts to site surface hydrology and surface water quality would result from its construction. If additional subterranean parking is required to accommodate the additional units that could be constructed on the site, potential conflicts with ground water and the need for dewatering could occur due to the comparative depth to groundwater in various portions of the site. Building coverage would be limited by zoning requirements but could exceed the amount of coverage assumed for the proposed Project, depending upon building arrangement and the way parking is provided. Therefore, the Alternative could result in an increase in the amount of surface runoff. However, like the proposed Project, the Alternative would be required by existing regulations to retain incremental flows on site and to treat surface flows before discharge. Accordingly, the actual impacts on the environment of this alternative would be similar to those of the proposed Project.

6.2.9 Land Use and Planning

The No Project Alternative would be consistent with the City's GP/CLUP. The Alternative would provide more housing opportunities to meet the needs of various income levels as described in the Housing Element of the General Plan and, since the AHO designation would not be removed from Lots 4, 6, and 7, affordable units required of the approved PDR project would not change and could increase, ~~the number of units potentially affordable to very low, low, and moderate income families would increase with addition of development on the three remaining lots that are identified in the General Plan as Affordable Housing Opportunity sites.~~ Because the Alternative would comply with the General Plan and the Inland Zoning Ordinance, its Land Use and Planning impacts would be similar to those of the proposed Project.

6.2.10 Noise

The No Project Alternative would result in short-term construction noise impacts that would be similar to the Project's less than significant construction noise impacts, as similar equipment would be used, and the nearest sensitive receptor would be the same; however the period of impact would be longer, because the time involved in grading and construction would likely increase and, therefore, its construction would result in an incremental increase in construction noise impacts as compared to the proposed Project. Similarly, the Alternative's operational noise impacts would result in an incremental increase in intensity due to an increase in traffic generation relative to the proposed Project and the presence of a larger population on the site. However, as discussed in Section 4.10, Noise, the existing traffic on a given roadway would have to double to result in a noticeable (+3 dB) increase in traffic noise, the additional traffic generated by the alternative would not ~~be expected to~~ result in a substantially greater noise impact on nearby sensitive receptors. The Alternative could result in a greater number of residences ~~than~~ that would be exposed to noise and vibrations along the U.S. Highway 101/UPRR transportation corridor and Los Carneros Road, that require mitigation to comply with indoor and outdoor noise standards. Therefore, this Alternative's noise and vibration impacts would be ~~marginally~~ greater than those of the Project due to the incremental increase in Project size.

6.2.11 Public Services

The No Project Alternative would be served by the same agencies that would serve the proposed Project. The incremental increase in the number of residents would result in an incremental increase in demand for services; however that incremental increase would result in similar ~~less than significant~~ impacts on Public Services.

6.2.12 Recreation

The No Project Alternative would be required to provide for the development of a neighborhood park in the same manner as the proposed Project. The incrementally greater density of development would result in an incrementally greater demand for public recreational facilities than would the proposed Project. Therefore, this Alternative would not avoid, and could increase, the Project's significant but mitigable impacts on recreation.

6.2.13 Transportation and Traffic

The additional 260 dwelling units that would be developed under the No Project Alternative would result in a 37 percent increase in the number of residential units developed on the Project

site. Such an increase in units would require elimination of lower density single family detached units and their replacement with higher density apartments and stacked flat (Podium) ownership units. Assuming that the Alternative development would result in an incremental increase in the number of same type of units as the proposed Project and that a similar percentage increase in traffic generation would occur, this Alternative would generate approximately 1,714 additional trips per day compared to the proposed Project. Therefore, this Alternative would result in an increase in the Project's significant but mitigable circulation impacts, including the Project's contribution to cumulative impacts on Los Carneros Road, and at the intersections of Cortona Drive/Hollister Avenue, Los Carneros Road/U.S. 101 Southbound Ramps, and Los Carneros Road/Calle Koral.

6.2.14 Utilities and Service Systems

Water Supply, Wastewater Treatment, and Solid Waste

Future development under the No Project Alternative would result in an incrementally greater demand for water, wastewater generation and treatment, and solid waste disposal. Therefore, it would not avoid, but would increase the Project's significant but mitigable impacts related to water supply and wastewater treatment. The No Project Alternative also would incrementally increase ~~not avoid~~ the Project's significant and unavoidable solid waste impact, ~~and would result in an incremental increase in solid waste disposal impacts.~~

6.3 ALTERNATIVE 2: REDUCED FOOTPRINT/ DENSITY

As stated in Section 2.0, *Project Description*, the proposed Project would include a total of 465 units, for a total density of approximately 15.5 dwelling ~~10.78 units per net acre based on the gross area of 43.13 acres, and 15.38 units per acre based on the net developable acreage, after the dedication of the Neighborhood Park area and bicycle path, open space, pocket parks, and preserved stream watercourse areas.~~³ Alternative 2 would develop fewer residential units, which would reduce population-related impacts on air quality emissions, traffic generation, and solid waste disposal. Alternative 2's smaller development footprint ~~would~~ allow for a full 100-foot upland buffer area for the ESHAs, and the increasing the width of the Tecolotito Creek SPA along Tecolotito Creek and the buffer along its unnamed tributary pursuant to GP/CLUP Conservation Element Policy CE 2.2. To achieve these reductions in the overall number of dwelling units and a reduction in development footprint sufficient to permit a minimum 100-foot wide upland buffer along the entire length of Tecolotito Creek and its tributary. Alternative 2 would be required to eliminate at least 14 of the Project's single family detached unit 2-Pac buildings, two single-family detached unit alley-loaded buildings, and at least the western halves of the two 44-unit stacked podium flats proposed for Lot 6. The area of Lot 6 that is beyond the 100-foot SPA could be developed with either 2 smaller podium flat buildings (22 units each) designed as half of the proposed buildings; 4 townhome buildings consisting of 6 units each; or 7 single-family detached units 2-Pac buildings, depending on feasibility of design and space accommodations for such units. These options under Alternative 2 would reduce the total number of units from 465 to either 405, 385, or 368 respectively. A summary of housing units is provided in **Table 6-1**. By increasing the upland buffer from Tecolotito Creek SPA to 100 feet for the SPA, the Alternative would reduce the size of the access drive to Los Carneros Road. ~~the Alternative would also permit provision of a Fire Lane to provide easier access for emergency vehicles to the Project's westernmost residences.~~

³ Net developable acreage based on the Constraints Analysis prepared by Comstock Homes, and dated December 9, 2010 on file with Planning and Environmental Services.

Table 6-1
Reduced Footprint/Density Alternative Building and Unit Count

Building Type	Housing Type	Number of Buildings	Units Per Building	Number of Housing Units	Number of Bedrooms Per Unit
2-Pac	Single-family Dwelling	14	1	14	4 - 5
Alley-loaded	Single-family Dwelling	26	1	26	3 - 4
Triplex	Multi-family Dwelling	9	3	27	2 - 4
Fourplex	Multi-family Dwelling	18	4	72	2 - 4
Townhomes	Multi-family Dwelling	14	3 – 6 ¹	78	2 - 3
Podium Flats	Multi-family Dwelling	2	22	44	2 - 3
Market Rate Apartments	Multi-family Dwelling	3	-	74	1 - 3
Affordable Housing Apartments	Low-Mod Income Multi-family Dwelling	4	-	70	1 - 3
Total:		88	-	361	-
Total with provision of optional new structures on Lot 6		89-96		368-405	

Since all other aspects of the proposed Project would remain the same, no other changes to the proposed Project would occur.

6.3.1 Aesthetics

The removal of buildings within 100 feet of Tecolotito Creek along the west boundary, or the removal of buildings located in closest proximity to the UPRR/U.S. 101 corridor under Alternative 2 would reduce the extent to which the site is converted to a structurally “built environment.” Significant but mitigable visual character and visual quality impacts related to potentially roof-mounted utility and mechanical equipment, above-ground utility connections, exterior lighting, and trash storage areas would still occur under the Alternative 2 but would be incrementally reduced by the smaller number of buildings. ~~In addition,~~ If the removal of units along the western side of the Project were implemented the amount of “natural” open space would increase by widening the SPA view corridor along Tecolotito Creek and the proposed Neighborhood Park at the northwest corner of the property. Northerly views of the Santa Ynez Mountains from Los Carneros Road would be improved slightly along this wider ~~view~~ view corridor. Therefore, the Project’s less than significant scenic view impacts would be incrementally reduced by this Alternative.

6.3.2 Air Quality

Elimination of 60-97 dwelling units under Alternative 2 would reduce the total amount of construction activity. The amount of grading would be reduced. If the reduction in footprint and units were made on the west side of the Project site, grading would not need to extend into the creek’s ESHA upland buffer along the most westerly portions of the site. For this reason air emissions from grading equipment and potential for fugitive dust impacts would be incrementally reduced as compared to the proposed Project. The construction period would also be reduced; therefore, there would be an incremental reduction in air emissions from construction

equipment, painting and paving activities during the construction period. Overall construction-related air impacts would be incrementally less than those of the proposed Project and would remain mitigable to a less than significant level.

This Alternative would result in the development of 368-405 housing units, which would be approximately 13 percent to 20 percent fewer residences than would be constructed by the proposed Project. Applying the same percentage reductions to the Project's trip generation of 3,046 trips, implementation of this Alternative would result in estimated trip generation rates of between 2,400 to 2,650 trips. This reduction in traffic generation would incrementally reduce the Project's less than significant impacts from air emissions of NOx and CO.

Both the density and magnitude of the proposed Project would not be are consistent with the General Plan minimum density for this site because the Alternative would incrementally reduce the density and magnitude of development onsite. ~~but the total development would remain within the projected development for the site.~~ However, both the Alternative and the proposed Project would be consistent with the Clean Air Plan by virtue of their consistency with General Plan growth projections. In common with the proposed Project, impacts related to air quality planning consistency would be less than significant.

6.3.3 Biological Resources

Under Alternative 2, if the development footprint would were be reduced on the west side of the Project site, in a manner that would allow a full 100-foot SPA upland buffer area adjacent the Tecolotito Creek ESHA and its tributary and ~~Stream Protection Area (SPA)~~ the amount of grading required would be reduced and would not need to extend to western bank of the creek, which would allow the existing two foot wide riparian corridor to remain in place without disturbance, slightly reducing the amount of vegetation lost to construction. Construction phase and operational phase indirect impacts to downstream habitat associated with runoff water quality would be incrementally reduced through the minor revisions to grading in proximity to the creek. ~~maintenance of the riparian corridor and the reduction in grading proximate to the creek.~~ However, any remaining construction phase impacts would be mitigated in the same manner as the proposed Project through the implementation of the Project's SWPPP-required BMPs during construction and structural BMPs subsequent to development. The Project's significant but mitigable impacts on nesting birds would be reduced slightly under this Alternative during the construction phase as the existing riparian vegetation adjacent to the maintenance road (approximately two feet) would remain, potentially providing locations for nesting, and the construction setback from the ~~riparian corridor and~~ creek would increase, allowing for a reduced level of potential disturbance. The increased SPA would similarly reduce overall impacts (both direct and indirect) on wildlife movement through the creek and SPA riparian corridor and the impact to loss of foraging habitat for raptors would also be reduced by adding approximately 50 feet of native grassland (Zone 3) to the planned SPA Zone1/Zone2 vegetation plan. The impacts to the ESHA associated with the construction of the Tecolotito Creek bridge would still occur.

6.3.4 Cultural Resources

Alternative 2 would develop fewer structures within a smaller footprint and would require less grading in order to achieve needed finished grades for pads to support proposed buildings on the west side of the Project. However, the location of potential cultural resources would not change and would continue to be avoided and therefore impacts associated with cultural resources would remain the same. ~~not be reduced.~~ ~~Potential cultural resource impacts resulting~~

from construction activities, including vegetation removal and site preparation, would likewise be incrementally reduced.

6.3.5 Geology and Soils

Potential geologic impacts associated with the proposed Project and Alternative 2, regardless of site configuration, would be similar. However, there would be a small reduction in the number of persons and structures subject to potential geologic hazards including seismic-shaking, liquefaction, expansive soils, and settlement. The greater setback of construction from the creek, where soil is most susceptible to liquefaction due to high groundwater and alluvial deposits would not reduce potential impacts associated with liquefaction and lateral spreading since the proposed Project avoids construction within areas that are located within the 50-foot wide SPA. Potential impacts due to construction and post-construction erosion and sedimentation impacts would continue to require drainage and water quality treatment. However, the potential conflict between the proposed location of the most westerly subsurface detention basin and the foundations of the condominium buildings immediate to its south would be reduced or eliminated if the site were reconfigured on the west side. Any conflict between the placement of the proposed westerly detention basin would be resolved through re-engineering. as the building footprint would be pulled back into the site by fifty feet or more. Accordingly, while both the proposed Project and the Alternative, would mitigate impacts associated with geology, soils, and seismicity to a less than significant level. ~~the amount of mitigation required would be reduced with Alternative 2.~~

6.3.6 Greenhouse Gas Emissions

Alternative 2 would incrementally reduce the GHG emissions compared to the proposed Project by reducing the number of residences, and by incrementally reducing vehicle trips and emissions associated with the use of fossil fuels. In addition, the reduction in the number of units would reduce the amount of electricity used, also reducing GHG emissions. Therefore, the Project's less than significant GHG impacts would be further reduced under this Alternative.

6.3.7 Hazards and Hazardous Materials

Given the site's proximity to the UPRR/U.S. Highway 101 corridor, the significant but mitigable impacts from exposure to toxic air contaminants would be marginally reduced due to setbacks of residential units. Reducing the project footprint and removing units from the west side of the Project site ~~would~~ reduces the number of residents located in proximity to hazardous conditions. However, Cumulative impacts associated with development in proximity to a rail route that carries freight trains would remain the same if the site were reconfigured on the west side of the site.

6.3.8 Hydrology and Water Quality

Alternative 2 would increase the amount of pervious surface on the Project site by reducing building coverage, driveways, parking and walkways. ~~Since~~ If the site were reconfigured on the west side, the undeveloped wider upland buffer SPA would be retained as pervious open space, the quantity of urban storm water runoff and associated water quality impacts would be incrementally reduced due to the effects of increased grassland within the wider SPA through the addition of Zone 3 vegetation. ~~In addition,~~ The added open space area could serve as a surface water detention area or bio-swale that could offer a bio-filtration for runoff prior to

entering the onsite storm water management system or directly sheet flowing into the creek. Under this Alternative, potential impacts to surface water and groundwater quality would be reduced compared to the proposed Project, and would require incrementally less mitigation when compared to proposed Project to reduce impacts to a less than significant level.

6.3.9 Land Use and Planning

Regardless of whether the development footprint and unit reduction occurred on the west or the north side of the Project site, Alternative 2 would reduce the housing opportunities anticipated within the City's Housing Element of the General Plan including an overall reduction in numbers of multi-family and single family housing. While this Alternative would continue to offer housing for a mix of income levels, the total number of market rate units would be reduced by approximately 13-20 percent. Both the proposed Project and the Alternative 2 project would be compatible with the surrounding community and adjacent uses and would be developed at a density consistent with proposed zoning. ~~However, If reconfigured on the west side, thereby increasing the size of the Tecolotito Creek SPA to the preferred width specified in the GP/CLUP, the Alternative would. Alternative 2 would have an incrementally reduced impact on land use and planning as compared to the impact of the proposed project in terms of Conservation Element Policies. However, by reducing the number and mix of housing units available on the site, both alternative site configurations would be inconsistent with the Central Hollister Residential Development Area policies of the Land Use Element and the increased housing goals of the City's Housing Element and would be inconsistent with the site's zoning. although it would be consistent in all respects with the General Plan, ALUP, and IZO.~~

6.3.10 Noise

~~If the Project site were reconfigured and the number of units reduced on the west side of the Project, then~~ Alternative 2 would result in a reduction in impacts related to ~~on-site noise exposure, noise generation impacts on the surrounding community, and noise impacts on the ESHA habitat/wildlife movement corridor.~~ Elimination of residential units near the northwestern boundary of the site would reduce the number of future residents who would be exposed to significant noise or vibration levels from U.S. Highway 101 and the UPRR. As such, the number of units with a potential for private outdoor spaces (e.g., balconies or patios) that would exceed the standard of 60 dBA and require mitigation would be reduced. Reducing the development footprint and number of units on the west side of the site would result in reduced noise impacts on wildlife.

This Alternative would result in a reduction in trip generation, which would incrementally reduce the Project's less than significant impact from traffic-related noise generation at nearby roadways and intersections.

Under this Alternative, if reconfiguration and unit reduction occurred on the west side of the site, grading would be reduced and ~~would have less~~ construction noise impacts on ~~and redesigned to avoid the riparian corridor of Tecolotito Creek and therefore would~~ reducing the impact of construction generated noise on that habitat. ~~and therefore would~~ reducing the impact of construction generated noise on that habitat. In addition, the 100-foot SPA would reduce the ~~post construction impact of noise related edge effects on the riparian corridor.~~

6.3.11 Public Services

Alternative 2 would result in an incrementally reduced demand for public services as compared to the proposed Project. In either case, however, these impacts would remain less than significant.

6.3.12 Recreation

Alternative 2 would provide homes for approximately 1,053 residents based on the maximum potential number of units considered for construction under this alternative⁴ (405 units x 2.65 persons per unit). For this reason, Alternative 2 would incrementally decrease the demand for public parks and recreational facilities generated by the Project, while still providing the same private and public recreational areas onsite as the proposed Project. Both the proposed Project and Alternative 2 would have less than significant impacts on existing recreational facilities and both would provide for the development of the Neighborhood Park and the proposed public bikeway. The reduced number of residents may reduce demand for the private recreational facilities proposed for the Project site, though these could be reduced in size and/or number due to the reduction in the HOA revenue required to maintain them.

6.3.13 Transportation and Traffic

Alternative 2 would result in changes to internal access and circulation and traffic generation. However, in both scenarios, traffic impacts would be reduced to a less than significant level by the same mitigation measures.

Alternative 2 would result in an incremental decrease in trip generation as compared to the proposed Project, which would incrementally reduce impacts to intersections and roadway segments in the Project vicinity. Cumulative mitigation fair share contributions would be reduced incrementally as compared to the revenue generated by the proposed Project. Required street improvement would remain the same.

6.3.14 Utilities and Service Systems

Alternative 2 would incrementally reduce the demand for potable water, the amount of wastewater generated and requiring treatment, and the amount of solid waste generated by the Project. The incremental decrease in solid waste would still exceed the City's significance threshold, so that both project alternatives would have a significant and unmitigated solid waste impact. If the site were reconfigured on the west side of the Project site, the An increase in the SPA would not necessarily result in a reduction in the amount of ornamental landscape onsite and could result in more landscape given the reduction in building coverage, therefore result in an incremental increase in green waste entering the waste stream as compared to the proposed Project. While temporary irrigation may be required to establish the SPA buffer, it reasonable to assume that the irrigation needs of the SPA will be reduced over time; however, a reduction in building coverage resulting in more ornamental landscape would incrementally increase the need for potable water for irrigation and ~~such that there would be a very small difference, if any, in water demand the need for water.~~

⁴ By replacing the podium flats in Lot 6 with similar buildings of half as many units.

6.4 ALTERNATIVE 3: REDUCED DENSITY/SCALE

Alternative 3 would retain the same development footprint as the proposed Project but would reduce the total number of units by replacing the two 3-story, 44-unit podium buildings (88 units total) on Lot 6, with 39 multi-family townhome dwellings for a total unit count of 416 units instead of the current 465-unit Project. This design would decrease the overall density of development and the scale and massing of structures on the property, specifically as scale and massing relate to the Tecolotito Creek riparian corridor, and the intensity of operational and resource consumption aspects of the Project. Alternative 3 would provide an opportunity to reduce impacts to some views of the Santa Ynez Mountains by reducing the heights of residential buildings near Los Carneros Road. The unit count is summarized in **Table 6-2**.

Table 6-2
Reduced Density/Scale Alternative Building and Unit Count

Building Type	Housing Type	Number of Buildings	Units Per Building	Number of Housing Units	Number of Bedrooms Per Unit
2-Pac	Single-family Dwelling	28	1	28	4 - 5
Alley-loaded	Single-family Dwelling	28	1	28	3 - 4
Triplex	Multi-family Dwelling	9	3	27	2 - 4
Fourplex	Multi-family Dwelling	18	4	72	2 - 4
Townhomes	Multi-family Dwelling	23	3 - 6 ¹	117	2 - 3
Podium Flats	Multi-family Dwelling	0	-	0	-
Market Rate Apartments	Multi-family Dwelling	3	-	74	1 - 3
Affordable Housing Apartments	Low-Mod Income Multi-family Dwelling	4	-	70	1 - 3
Total:		113	-	416	-

6.4.1 Aesthetics

The reduction in building heights along Los Carneros Road from 3-story to 2-story would reduce the Project's less than significant impacts to northerly views of the Santa Ynez Mountains from Los Carneros Road. This Alternative would also reduce the less than significant impacts related to the views from adjacent developments to the west and from the Tecolotito Creek riparian corridor and maintenance road. This Alternative would also incrementally reduce the 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. These impacts would still occur under Alternative 3, but to a slightly lesser degree with the reduced building heights.

6.4.2 Air Quality

Under Alternative 3, there would be a small reduction in construction activity; however, temporary air quality impacts from grading activities and associated emissions would remain the same as with the proposed Project construction, as the grading footprint would not change

under this Alternative. The number of residences would be reduced by approximately 10 percent with this Alternative, which would result in a similar incremental reduction in associated post-construction vehicular and non-vehicular emissions as compared to emissions generated by the proposed Project. Based on APCD thresholds, both the proposed Project and Alternative 3 would have similar impacts that would be mitigated to a less than significant level.

6.4.3 Biological Resources

Alternative 3 would occur within the same footprint as the proposed Project. Therefore, the Alternative would not result in any reduction in the impacts to biological resources associated with the proposed Project. However, since less parking would be required, there is potential for increasing the amount of SPA available by revising building footprints in Lot 6. If this were to occur, impacts to biological resources associated with SPA areas might be somewhat reduced.

6.4.4 Cultural Resources

Development of Alternative 3 would require the same full-site grading footprint and would, therefore, have the same less than significant impacts on potential cultural resources as the proposed Project.

6.4.5 Geology and Soils

Potentially significant geologic impacts associated with the proposed Project and Alternative 3 would be the same. The soils engineering requirements for this Alternative would be similar for the two-story structures that would replace the Project's three-story Podium Flat structures, and implementation of the Project's identified mitigation measures would also reduce Alternative 3 impacts to a less than significant level.

6.4.6 Greenhouse Gas Emissions

By developing 10 percent fewer residences, Alternative 3 would incrementally reduce GHG emissions when compared to those for the proposed Project. However, GHG emissions would remain less than cumulatively considerable in both Project scenarios.

6.4.7 Hazards and Hazardous Materials

Fewer residences would be developed on the site with Alternative 3. However, since the proposed location of buildings would remain the same, the Alternative would have the same potential impact associated with the risk of upset due to proximity to rail or highway transportation as would the proposed Project.

6.4.8 Hydrology and Water Quality

The development proposed for Alternative 3 would occupy the same footprint as development pursuant to the proposed Project. The amount of area graded would be the same and accordingly, the potential construction phase impacts to water quality, erosion, and sedimentation would require the same level of mitigation to reduce them to a less than significant level. Less parking would be required. However, the proposed reduction in building height would affect only the podium flats in Lot 6 and a reduction in parking would not result in an increase in the amount of impervious surface and would not reduce hydrology and water

quality impacts associated with the proposed Project, although in both cases the impacts can be mitigated to a less than significant level.

6.4.9 Land Use and Planning

This Alternative 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 GP/CLUP, City of Santa Barbara's Goleta Slough Ecosystem Management Plan, the Airport Land Use Plan, and Goleta Slough Coastal Plan. Land Use and Planning impacts would be similar to those of the proposed Project. Although the number of units would be reduced, the site would still be developed in a manner consistent with its proposed zoning and General Plan land use designation. No reduction in the number of units affordable to very low and low-income households is proposed and, therefore, the Alternative would, in common with the proposed Project, remain consistent with the City's affordable housing objectives.

6.4.10 Noise

Short-term construction noise impacts would remain the same as under the proposed Project. A small reduction in the number of Project residents would result in an incremental reduction in vehicle trips and project-generated noise. However, the reductions would be marginal and in both Project scenarios, impacts would be less than significant.

6.4.11 Public Services

Alternative 3 would marginally reduce the Project's less than significant impacts to public services through a 10 percent reduction in the number of residential units constructed and a similar decrease in the number of residents.

6.4.12 Recreation

Alternative 3 would reduce the number of units and number of residents that would require public recreation facilities. As with the Project, this Alternative would provide new active and passive recreation amenities for residents and would marginally reduce demand for public parks and recreational facilities. Alternative 3 would still provide development of the Neighborhood Park. In both Project scenarios, recreation impacts would remain less than significant.

6.4.13 Transportation and Traffic

Under Alternative 3, internal circulation could change somewhat within Lot 6. However, access and external circulation would not be significantly altered. Therefore, the reduced number of residents generated by this Alternative would result in marginally reduced potential traffic impacts, which, in common with the proposed Project, would be mitigable to a less than significant level.

6.4.14 Utilities and Service Systems

Alternative 3 would incrementally reduce the demand for potable water, the amount of wastewater generated and requiring treatment, and the amount of solid waste generated by the Project. The incremental decrease in residentially generated solid waste would still exceed the City's significance threshold, resulting in a significant and unmitigated solid waste impact, in common with the proposed Project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As illustrated in Table 6-3, Alternative 2 would be the environmentally superior alternative. Alternative 2 would result in the greatest reduction in the number of residential units and would, therefore, result in the greatest incremental reduction of all population-dependent impacts relative to environmental impacts to biological resources.

This change results in the following:

1. A reduction in the grading footprint since the edge of grading can be pulled back at least 50 feet on ~~the west side of the Project site~~ while still providing sufficient room to grade for pads and streets. The movement of the grading edge, if made on the west side of the site, would allow the Tecolotito Creek SPA ~~riparian corridor~~ to achieve a minimum 100-foot width over its entire length remain intact and would keep grading away from the creek bed and bank with the exception of grading required for the detention basin outlet and the construction of the Tecolotito Creek bridge.
2. Pullback of the western edge of grading would slightly reduce potential erosion and sedimentation impacts on the creek during construction and provide a wider buffer between the construction area and the creek riparian area, reducing potential impacts to nesting birds and wildlife movement during the construction phase.
3. A wider SPA would reduce all edge effects associated with the development's proximity to the Tecolotito Creek ESHA. Noise, lighting, trash & debris, emissions and other effects will be reduced due to the full width buffer along the entire length of the creek, which would benefit both the vegetative habitat and the wildlife movement corridor during the operation phase.
5. The pull back of the western edge of the podium flat buildings eliminates the potential conflict between the buildings and the proposed westerly subsurface detention basin noted in the 2013 geotechnical report and the Penfield and Smith hydrology study.
6. Observing the ~~full~~ 100-foot width upland SPA along the full length of the creek is fully consistent with the GP/CLUP Policy CE 2.2.
7. Observing the ~~full width~~ 100-foot wide upland SPA south of the Tecolotito Creek bridge would remove a building further from an area that may be prone to liquefaction and lateral spreading due to shallow groundwater and young alluvial deposits in the vicinity of the creek.

As noted below, the significance of all of the impacts associated with the proposed Project will remain the same regardless of the fact that Alternative 2 is the environmentally superior alternative, as the significant and unavoidable impact remains unchanged and the balance of the Project's impacts remain less than significant or less than significant with mitigation.

~~Each of the alternatives achieves the Project's goals and objectives. Each of the Alternatives achieves some but not all of the Project's goals and objectives. However, only the No Project – Reasonably Foreseeable Alternative achieves consistency with the General Plan's Land Use Element's Central Hollister Residential Development Area Policies and Objectives and the Housing Element's objectives of maximizing to the extent feasible the availability of housing~~

opportunities in the Goleta Area. In addition, only the No Project-Reasonably Foreseeable Alternative is consistent with the site's zoning.

Table 6-3
Comparison of Environmental Impacts

	Alternative 1 No Project – Reasonably Foreseeable Project	Alternative 2 Reduced Project Footprint (<u>West- Increased setback from Tecolotito Creek - 100' SPA</u>)	Alternative 3 Reduced Density (Reduced Height)
Aesthetics	Incremental Change due to additional units <u>and less variation in building height and massing</u> but remains less than significant.	Incremental change due to reduced built environment and preservation of 100 foot SPA/Riparian Corridor, reduction in visual impacts to Los Carneros Road on the west side of the Project (<u>not a General Plan designated viewpoint</u>) and larger potential view corridor associated with Tecolotito Creek.	Incremental change due to reduction in building height less impact to viewshed on west side of the Project in vicinity of Los Carneros Road and Tecolotito Creek but impacts would be less than significant in all Project scenarios.
Air Quality	Incremental change due to 56 percent increased number of units but remains less than significant.	Incremental change due to 13-20 percent reduction in units, reduction in construction phase impacts due to reduced grading footprint but impact is less than significant in all project scenarios.	Incremental change due to 10 percent reduction in units but impact is less than significant in all project scenarios.
Biological Resources	Incremental change due to 56 percent increase in the number of units, may require further reduction in the size of the SPA, will require full clearance of existing riparian corridor and grading in the ESHA.	Significant reduction in impacts to biological resources, increased SPA buffer to 100 feet <u>in those areas where the upland buffer is 50-feet wide.</u> Provides enhanced protection for ESHA, reduces all other edge effects, increases open space.	No change in the impact to biological resources as 10 percent reduction in units would not change the footprint of the buildings located on the west side of the Project in Lot 6.
Cultural	No change – less than significant.	No change – less than significant.	No change – less than significant.
Geology/Seismic	Incremental change due to increase in the number of units may require underground parking for more units to accommodate additional units with	Reduced incremental change, as grading edge would be further from Tecolotito Creek in order to achieve engineered pads for west edge buildings. Riparian corridor	No change – less than significant.

	Alternative 1 No Project – Reasonably Foreseeable Project	Alternative 2 Reduced Project Footprint (<u>West- Increased setback from Tecolotito Creek - 100' SPA</u>)	Alternative 3 Reduced Density (Reduced Height)
	potential issues with groundwater and dewatering, more grading due to excavation and longer construction period.	can be retained through the construction phase with the exception of impacts associated with the Tecolotito Creek bridge. Alternative would slightly reduce seismic-related impacts by eliminating the need to grade entire ESHA and by removing buildings farther from liquefaction and lateral spreading area.	
Greenhouse Gas	Incremental increase in GHG emissions due to a 56 percent increase in number of units but remains less than significant in all project scenarios.	Incremental reduction in GHG emissions due 13-20 percent reduction in the number of units but impacts remain less than significant in all project scenarios.	Incremental reduction in GHG emissions due to 10 percent reduction in the number of units but remains less than significant in all project scenarios.
Hazards	Incremental increase due to increase in the number of residents potentially exposed to hazards associated with proximity to UPRR/U.S. 101 transportation corridor.	Incremental decrease in the number of residents potentially exposed to hazards associated with proximity to UPRR/U.S. 401 corridor on west side of site. <u>Minor decrease in number of residents exposed to hazards associated with transportation corridor due to removal of homes in proximity to the corridor in the northwest or northeast corners of the site.</u>	Incremental decrease in the number of residents potentially exposed to hazards associated with proximity to UPRR/U.S. 101 corridor both east and west sides of site.
Hydrology & Water Quality	Incremental increase in hydrology impacts due to potential increase in the amount of impervious surface, potential incremental increase in related impacts to water quality due to increased grading (excavation) and construction period.	Incremental decrease in the impacts to Tecolotito Creek during construction due to reduced grading footprint and retention of riparian corridor , reduced water quality and hydrology impacts due to increase in pervious surfaces and ability of larger SPA to serve as bio swale and for detention <u>south of the Tecolotito Creek bridge.</u>	No change – same footprint of development but remains less than significant with mitigation.

	Alternative 1 No Project – Reasonably Foreseeable Project	Alternative 2 Reduced Project Footprint (<u>West- Increased setback from Tecolotito Creek - 100' SPA</u>)	Alternative 3 Reduced Density (Reduced Height)
Land Use & Planning	Consistent with GP/CLUP by, providing increased amount of housing affordable to low and very low-income households. <u>Consistent with Land Use Policies and Housing Element Policies related to increasing housing opportunities in the Central Hollister Residential Development Area. Inconsistent with General Plan policies in Aesthetics (Views) and Conservation (Tecolotito Creek SPA)</u>	Consistent with GP/CLUP <u>Conservation Element Policies. Inconsistent with Land Use Policies related to the Central Hollister Residential Development Area and Housing Element Policies related to increasing housing opportunities.</u> No change in proposed affordable housing but could decrease due to decrease in net area and number of market rate units.	Consistent with GP/CLUP. No change in the number of units proposed for affordable housing.
Noise	Incremental increase in noise due to increase in traffic and potential reduction of buffer between development and ESHA but remains less than significant.	Incremental decrease due to reduction in traffic. Significant decrease in noise related edge effects due to increased SPA buffer and reduced number of units adjacent to SPA provides benefits wildlife movement.	Incremental decrease due to reduction in traffic but remains less than significant.
Public Services	Incremental increase in demand for public services but remains less than significant.	Incremental decrease due to 13-20 percent decrease in population but remains less than significant.	Incremental decrease due to 10 percent decrease in population but remains less than significant.
Recreation	Incremental increase in demand due to 28 percent increase in population but remains less than significant.	Incremental decrease in demand due to 13-20 percent decrease in population. Remains less than significant.	Incremental decrease in demand due to 10 percent decrease in population. Remains less than significant.
Traffic	Incremental increase in trips due to 56 percent increase in unit count. Impacts mitigated to less than significant level.	Incremental decrease in trips due to 13-20 percent decrease in trips. Impacts mitigated to less than significant level.	Incremental decrease in trips due to 10 percent decrease in trips. Impacts mitigated to less than significant level.

	Alternative 1 No Project – Reasonably Foreseeable Project	Alternative 2 Reduced Project Footprint (<u>West</u>- Increased setback from Tecolotito Creek - 100' SPA)	Alternative 3 Reduced Density (Reduced Height)
Utilities - Water	Incremental increase in demand due to 56 percent increase in number of units but remains less than significant.	Incremental decrease in demand due to 13-20 percent decrease in number of units and reduced demand for potable water for landscape irrigation once SPA is established (less ornamental landscape).	Incremental decrease due to 10 percent decrease in the number of units. Remains less than significant.
Utilities - Wastewater	Incremental increase in generation and treatment required but remains within the capacity of the system and less than significant impact.	Incremental decrease in generation and treatment due to reduction in number of units. Remains within the capacity of the system with less than significant impact.	Incremental decrease in the generation and treatment demand. Remains within system capacity. Less than significant impact.
Utilities – Solid Waste	Incremental increase in total solid waste, potential decrease in green waste. Significant and unavoidable due to impacts exceeding the City threshold.	Incremental decrease in solid waste, potential decrease in green waste due to reduction in ornamental landscape but may be made up by increase in fuel modification activity. Significant and unavoidable due to impacts exceeding the City threshold.	Incremental decrease in solid waste due to reduced number of units, no change in green waste. Significant and unavoidable due to impacts exceeding the City threshold.
ENVIRONMENTALLY SUPERIOR ALT		X	