5.0 ALTERNATIVES

5.1 INTRODUCTION

CEQA Guidelines § 15126.6 provides a framework for the identification 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 SEIR Section 2.0, Project Description.

Key concepts pertaining to the evaluation of alternatives are further specified in the CEQA Guidelines as follows. The range of alternatives required to be evaluated in an EIR is governed by the rule of reason, which requires an EIR to set forth only those alternatives necessary to foster informed decision-making. 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 (CEQA Guidelines § 15126.6.).

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

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

5.2 SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED IN THIS SEIR

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. The GP/CLUP Final EIR identified significant and unavoidable impacts (Class I impacts) and significant impacts that can be mitigated to less-than-significant levels (Class II impacts).

The significance of the environmental impacts that would result from the implementation of the proposed GPA would not exceed the significance of most of the impacts identified in the GP/CLUP Final EIR. Impacts that would result from the GPA that would exceed the significance of impacts identified in the GP/CLUP Final EIR pertain to:

- Potential impacts to special status habitats (riparian habitat adjacent to the project site) that could result from a reduction of the El Encanto Creek Streamside Protection Area buffer.

- Potential policy consistency impacts that could result from a reduction of the El Encanto Creek Streamside Protection Area buffer

- A cumulative city-wide increase in the number of residential that could be exposed to hazardous materials in the unlikely event of a major transportation accident along U.S. 101 or the Union Pacific Railroad tracks.

As supported by the analysis in Section 4.0, Environmental Impact Analysis, the proposed GPA would result in no new significant environmental effects beyond those identified in the GP/CLUP Final EIR. Table 1.5-1 in the SEIR Summary lists all the Class I and Class II impacts that were identified in the GP/CLUP Final EIR and in this Supplemental EIR.

5.3 ALTERNATIVES CONSIDERED IN THIS SEIR

5.3.1 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."

Under the No Project Alternative, the GPA would not be approved, the Land Use Map change for the Kenwood Village property would not occur, and the project site would continue to be designated Agriculture and Single-family Residential in the GP/CLUP Land Use Element. Also, the Open Space Plan Map would not be changed and the site would continue to be identified as Open Space in the GP/CLUP Open Space Element.

The existing land use designations of the main (9.39-acre) portion of the project site are Single Family Residential (maximum of five units per acre) on the northern portion of the site, and Agriculture on the southern portion. The northern residentially-zoned portion of the site has a "net" developable area of approximately 5.6 acres that excludes riparian ESHA associated with El Encanto Creek. The eastern "arm" parcel that is part of the project site is 0.17 acres and has a land use designation of Single Family Residential (maximum of 5 units per acre); and the western arm parcel is 0.53 acres and has a land use designation of Planned Residential (8 units per acre). Overall the "net" area of the project site that currently has a residential land use designation is approximately 6.3 acres. Using a development density of five units per acre, the northern portion of the project site could support the development of approximately 31 residential units (6.3 acres x 5 units per acre); and one residential unit could be developed on the southern portion of the site, for a total of 32 units.

Under the No Project Alternative, agricultural uses could be established on the southern portion of the project site, and the number of residential units that could be developed on the project site would be consistent with the site's existing land use designations. Therefore, this

alternative would avoid the increases in environmental impacts identified in the GP/CLUP Final EIR that would occur if the proposed project were to be implemented.

5.3.2 Alternative 2: Reduced Site Conversion Alternative

Alternative 2 would modify the proposed GPA by minimizing the area of the Kenwood Village project site that would have its land use designation changed. Under this alternative, only the land use designation on the northern 6.3 acres of the project site (the main project parcel and the two "arm parcels") would be change to Planned Residential; and the remaining 3.8-acre southern portion of the site would continue to be designated as Agriculture.

To be comparable to the proposed Kenwood Village Project, which would provide 60 residential units, this alternative would require a more extensive use of multi-family type units (such as duplexes, triplexes, or other medium-density residential buildings) and would be unlikely to include any single-family units. This alternative would reduce the proposed GPA area (the entire project site) from 10.1 acres to approximately 6.3 acres. With a land use designation and zoning that supports multi-family development, this alternative is potentially feasible as it would be possible to design a project of 60 multi-family units that meets current zoning standards for height, setback, and lot coverage.

The incremental increases to many of GP/CLUP impacts that would occur if the proposed GPA were implemented would also occur under Alternative 2 because the existing GP/CLUP land use designation on the northern portion of the project site would facilitate the development of 31 residential units and this alternative would result in the development of approximately 60 units. This alternative would still have the potential to result in impacts to special status habitat and policy consistency impacts if it resulted in a reduction of the El Encanto Creek Streamside Protection area; and would still result in an increase in the number of residents in the city that could be exposed to hazardous materials in the unlikely event of a major transportation accident. This alternative would also have increased consistency with GP/CLUP policies that pertain to issue areas such as agriculture and open space preservation because the southern portion of the project site would not be converted to residential uses.

5.4 ADDITIONAL ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Alternative sites that could accommodate development of a similar scale to the project were considered but determined to be infeasible. The following alternative sites were considered:

- The approximately 10-acre Girsh/Westen site, located on the 7100 block of Hollister Avenue, west of Santa Felicia Drive.
- Several sites that are vacant with pending applications, including:
    - 17 acres located east of Los Carneros Road and north of Camino Vista (Heritage Ridge Apartments).
    - The 290-acre Bishop Ranch property, which is currently designated as Agriculture in the GP/CLUP.

These sites were determined to be infeasible for a variety of reasons. None of these sites are owned by and could not be developed by the Kenwood Village project applicant. Development of all or part of the Bishop Ranch site is subject to Measure G, which generally prohibits conversion of most agricultural land without voter approval. Additionally, it would result in a loss of agricultural land that is at least equal to that of the project. The remaining vacant sites have non-agricultural designations, but most have applications for development pending with the City or have greater environmental issues and therefore were not considered to be a viable alternative site for the project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines § 15126.6(e)(2) requires 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.

The No Project Alternative would not result in changes to the General Plan land use designations of the project site, nor would it result in the conversion of lands designated as Agriculture in the GP/CLUP to non-agricultural uses. The GPA's incremental increases to the impacts identified in the GP/CLUP Final EIR would not occur. Therefore, the No Project Alternative would be the environmentally superior alternative, but would not implement the proposed project's objective of amending the land use designation of the project site.

The Reduced Site Conversion Alternative would reduce incremental increases to GP/CLUP Final EIR impacts related to issue areas related to agriculture and open space preservation. Therefore, the Reduced Site Conversion Alternative would result in reduced impacts when compared to the impacts of the proposed project and would be the environmentally superior alternative that would at least partially implement the objectives of the proposed project.