

5.0 ALTERNATIVES

This section addresses alternatives to the proposed Project required to be discussed in an EIR as defined in CEQA Guidelines Section 15126.6, Consideration and Discussion of Alternatives to the Proposed Project.

5.1 Introduction

EIRs are required to examine alternatives to a proposed project in order to explore a reasonable range of alternatives that meet most of the basic objectives of the proposed project, while reducing the severity of significant project environmental impacts. CEQA Guidelines Section 15126.6(b) notes that “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” If there is an “environmentally superior” alternative to the proposed project, it must be identified. Analysis of the “No Project” alternative, assuming the reasonable future use of the project parcel if the application were not approved, is also required. If the environmentally superior alternative is the No Project Alternative, the EIR must identify an additional “environmentally superior” choice among the other project alternatives.

The analysis of project alternatives in this EIR focuses on a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6(a). Accordingly, Section 15126.6(a) states:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

CEQA Guidelines Section 15126(f) provides additional definition of the “rule of reason.”

(f) Rule of reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

- (1) *Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.*
- (2) *Alternative locations.*
 - (A) *Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.*
 - (B) *None feasible. 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. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.*
 - (C) *Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 573).*
- (3) *An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.*

5.2 Range of Alternatives Considered

5.2.1 Basic Project Objectives

The first step in determining a reasonable range of alternatives to be analyzed is to consider the basic project objectives as previously defined in Section 2.3. These are summarized below:

1. Add a new three-person fire station crew on duty around the clock;
2. Meet the NFPA five-minute fire service response time throughout western Goleta;

3. Reduce the western Goleta area fire fighter-to-population ratio to an acceptable level of less than 1:4,000;
4. Substantially improve emergency response times for fires, accidents, and emergency medical response calls in the western portions of the City and surrounding unincorporated areas; and
5. Substantially enhance and improve water rescue capabilities for the Fire Department for the western Goleta area with the ability to launch certain types of water rescue watercraft at nearby Haskell's Beach, rather than relying on the existing sole launch point at the Goleta Pier.

Objective No. 1 dictates the minimum size required of the proposed Fire Station and its location.

- The proposed facility must be sufficiently large enough to provide for the three-person fire station crew.

Objective Nos. 2 through 5 dictates the locational requirements of proposed Fire Station and its location.

- The proposed facility must be located strategically to provide needed improvements to the NFPA five-minute fire service response time throughout western Goleta. This location is illustrated on Figure 2-2, City of Goleta Fire Station 5-Minute Response Zones.

5.2.2 Minimize Potentially Significant Environmental Impacts

The second step in identifying a feasible range of project alternatives is to define all potentially significant impacts associated with the proposed Project. Only potentially significant impacts can be used to identify feasible project alternatives. These are listed below:

- **Aesthetics/Visual Resources:** Removal of eucalyptus tree vegetation and short-term change in project site character until proposed screening landscaping is established (Impact AES-1), and impacts associated with structural compatibility (AES-4) and new lighting (AES-5).
- **Biological Resources:** Removal of eucalyptus tree clusters could potentially result in the loss of raptor nests (Impact BIO-3).
- **Cultural Resources:** Though no intact, significant archaeological resources are identified on the basis of an intensive ground surface survey and two subsurface excavation investigations, there is the potential for unknown cultural remains to be encountered during construction (Impact CR-1).
- **Geological Resources:** The north-facing Project slope exceeds 20% grade and is susceptible to failure and severe erosion (Impact GEO-1).
- **Land Use:** The project would require a General Plan/Coastal Land Use Plan Amendment to allow for the fire station institutional use (Impact LU-1).

- **Noise:** Construction of the Project would result in the generation of short-term noise levels potentially adversely impacting adjacent sensitive receptors (Impact LU-1).
- **Transportation:** Short-term construction traffic and associated parking on nearby private streets (Impact TRANS-5) would result in potentially *significant but feasibly mitigated impacts* (Class II), similar to the proposed Project.

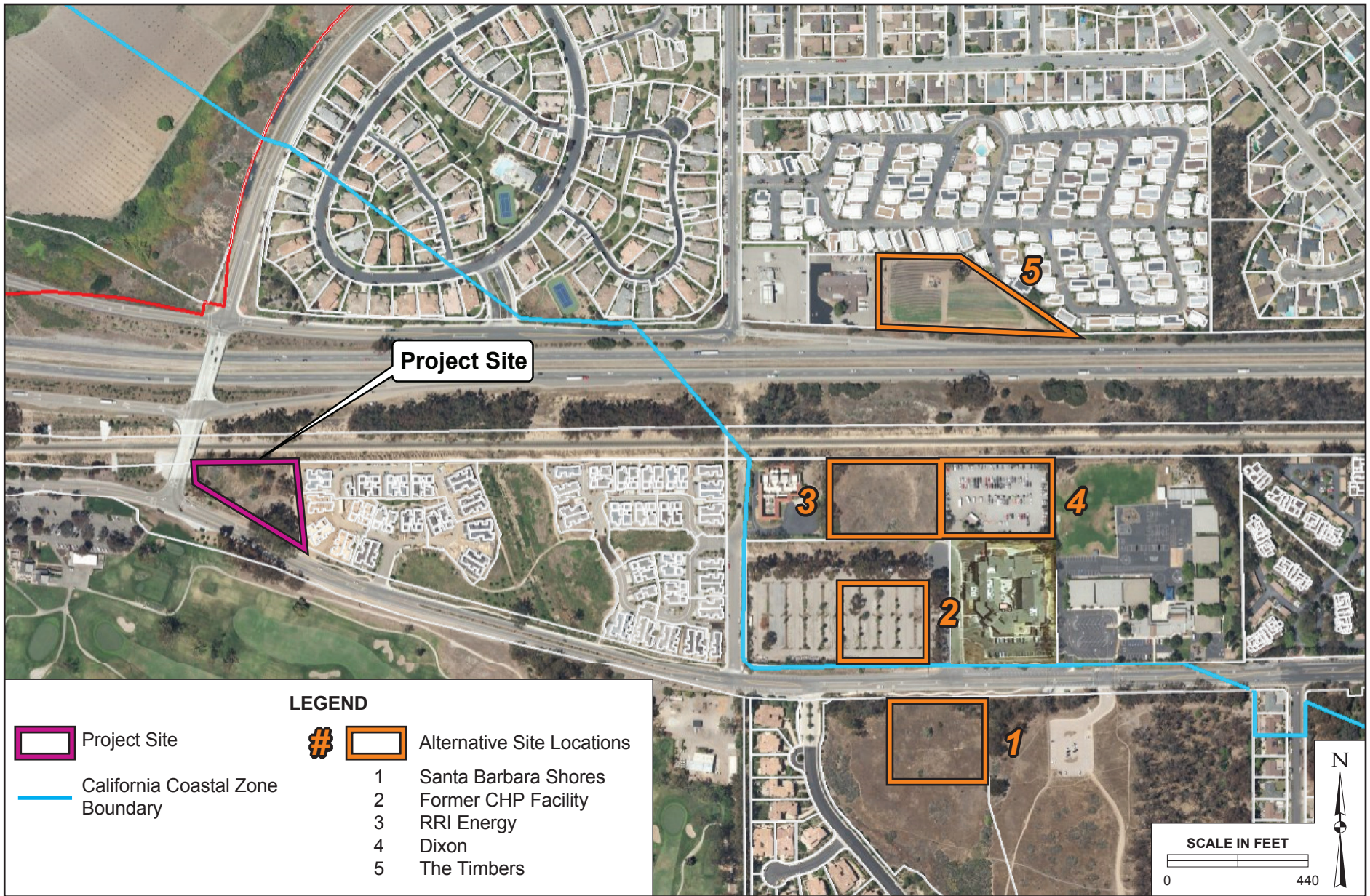
The potentially significant environmental impacts associated with the proposed Fire Station 10 project are exclusively associated with the project location, rather than size, bulk, or appearance. For example, there is no potential impact resulting from the size or intensity of the station's use that would result in impacts on air quality, greenhouse gas emissions, operational noise, or transportation/circulation. Project alternatives that otherwise would focus on a smaller fire station facility or reconfiguring the structure on-site would not address a potentially significant impact. A reduced and/or reconfigured project alternative therefore is not considered in this analysis.

Instead, the emphasis on identifying feasible project alternatives to minimize potentially significant impacts is addressed by identifying other locations. A feasible location for project alternative consideration would potentially achieve the following:

- Be within the NFPA five-minute fire serve response time throughout western Goleta;
- Avoid substantially changing the aesthetic/visual character of the site;
- Avoid removal of potential raptor roosting habitat;
- In location without any potential for encountering unknown archaeological resources;
- Outside of slopes exceeding 20 percent requiring stabilization;
- Outside of the Coastal Zone;
- Over 1,600 feet from noise sensitive receptors to reduce short-term construction impacts; and
- Avoid short-term construction traffic and associated parking on nearby private streets.

An analysis of available project sites of sufficient size (in this case, at least 1.2 acres, similar to the proposed Fire Station 10 site) and within the NFPA five-minute fire service response time throughout western Goleta result in the following alternative locations, illustrated on Figure 5-1.

1. **Santa Barbara Shores Site.** This site was originally identified as a fire station site when the Ellwood Shores Specific Plan was proposed. The site on the south side of Hollister Avenue is within the Coastal Zone and is presently undeveloped.



**Alternative Site Locations
City of Goleta Fire Station 10**

**FIGURE
5-1**

2. **Former California Highway Patrol Relocation Site.** This site is on the north side of Hollister Avenue and outside of the Coastal Zone, and within a larger vacant, paved parking lot area.
3. **RRI Energy Site.** This site is accessed on a cul-de-sac at the terminus of Via Jero on the north side of Hollister Avenue and is outside of the Coastal Zone. It is presently undeveloped.
4. **Dixon Site.** This site is also accessed on a cul-de-sac at the terminus of Via Jero on the north side of Hollister Avenue and outside of the Coastal Zone. It is presently used as a paved parking lot area.
5. **Timbers Restaurant Site.** This site was the former Timbers Restaurant, now vacant. It is located north of US 101 and is accessed by Winchester Canyon Road, through a shared ingress/egress with the Union 76 gas station. It is outside of the Coastal Zone.

Subsequent to identification of these potential alternate site locations, further definition of geographical Project objectives was provided. Fire stations must be readily visible and accessible to the public (Captain Michael Klusyk, SBCFD, personal communication 2018). Therefore, a feasible fire station site must front a street, rather than being accessed through a shared driveway. As a result, Alternatives Nos. 3, 4, and 5 would not be feasible options for Fire Station 10, and are not analyzed further.

Preliminary analysis of Alternative No. 2, the former California Highway Patrol Relocation Site (7781 Hollister Avenue, APN 079-210-056), determined that the parcel does not have the ability to obtain a Goleta Water District (GWD) meter. The state-owned site does not have an historic account, and therefore is subject to the GWD current voter-mandated current prohibition on new connections (Ryan Drake, 2015). As a result, Alternative No. 2 would not be feasible in the foreseeable future for operation of Fire Station No. 10. It is therefore not considered further in this analysis.

5.3 No Project Alternative

As defined in CEQA Guidelines Section 15126.6(e), the No Action Alternative:

“shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, 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.”

The Project existing setting is vacant, having previously occupied by a gas station and has been abandoned and the site remediated. There presently are no physical impacts associated with the absence of land uses on site.

It is reasonable to expect that the Project site would be redeveloped with similar land uses allowed under City GP/CLUP Resort Visitor-Serving Commercial (C-V) under the designation and City Zoning Ordinance Limited Commercial (C-1)

designations. Besides the previous gas station, allowable land uses on the Project site could include:

“Light commercial uses (i.e., barber and beauty shops, gift shops, restaurants, etc.) normally associated with the needs of visitors, provided such commercial activities are so designed and limited as to be incidental and directly oriented to the needs of visitors.” (City of Goleta 1997)

The Project site has previous historical GWD and Goleta Sanitary District meter connections that would be available for a future land use. Such a use would be limited in mass and size, including setbacks. It is reasonable to expect that a future use would be conditioned to be architecturally compatible, including landscaping, with surrounding land uses.

The projected environmental impacts of such a No Action Alternative land use are assessed below:

Aesthetics/Visual Resources. Under the No Action Alternative, the proposed structure would require review of the City Design Review Board to ensure compatibility with surrounding land uses, including appropriate design, mass, color, and landscaping. It is reasonable to assume that a visitor-serving facility would be of such size, similar to the previous gas station on-site, to avoid removing the existing eucalyptus trees on-site. Preservation of the eucalyptus tree visual resource would minimize Impact AES-1 to *adverse, but less than significant* (Class III), and **would be less than the proposed Project**. Other impacts associated with structural compatibility (AES-4) and new lighting (AES-5) would be *significant, but feasibly mitigated* (Class II), **similar to the proposed Project**.

Biological Resources. Preservation of the eucalyptus trees on-site would avoid potentially significant removal of raptor nesting habitat during construction (Impact BIO-3). Alternative project construction would result in potentially short-term disturbances to any raptors nesting in the trees, requiring feasible mitigation to avoid these impacts. Residual impacts on biological resources would be *significant, but feasibly mitigated* (Class II), **similar to the proposed Project**.

Cultural Resources: Project alternative construction would result in the same low potential to impact unknown prehistoric cultural resources (Impact CR-1). The project would be subject to the same mitigation measures as the proposed Project. Residual impacts on biological resources would be *significant, but feasibly mitigated* (Class II), **similar to the proposed Project**.

Geological Resources: A visitor-serving commercial facility similar in size to the former gas station would not likely require stabilization of the north-facing project slope (Impact GEO-1), assuming that all parking would be located on the south side of the parcel adjacent to Hollister Avenue. Therefore, the Alternative would not encroach within topographic grades susceptible to failure and severe erosion. Residual impacts on geological resources would be

adverse, but less than significant (Class III), and **would be less than the proposed Project.**

Land Use: The No Action Alternative supporting a visitor-serving commercial land use would be consistent with existing land use and zoning ordinance designations (Impact LU-1), and would not require a General Plan/Coastal Land Use Plan Amendment. Residual impacts on land use would be *adverse, but less than significant* (Class III), and **would be less than the proposed Project.**

Noise: Construction of the No Action Alternative would result in the generation of short-term noise levels potentially adversely impacting adjacent residential sensitive receptors at The Hideaway residential development to the east and Sandpiper Golf Course to the south (Impact NOI-1). Although no stabilization of the north-facing slope would likely be required, short-term noise levels affecting sensitive receptors to the east would be *significant, and unavoidable* (Class I), but **less than the proposed Project.** Intermittent noise from long-term operations of a visitor-serving commercial land use (Impact NOI-2) would be *adverse, but less than significant* (Class III), **similar to the proposed Project.**

Public Services: The No Action Alternative would not provide for Fire Station 10, thereby not increasing the fire protection services from the Santa Barbara County Fire Protection District serving the western Goleta area and not improving service ratios and response times (Impact PS-1). The **beneficial Project impact would not occur.**

Transportation: Implementation of the No Action Alternative would likely also require modifying the existing pedestrian, bicycle, and public transit configuration within the Project area and/or on the Hollister Avenue Project boundary (Impact TRANS-3), resulting in a beneficial impact (Class IV) **similar to the proposed Project.** Short-term construction traffic and associated parking on nearby private streets (Impact TRANS-5) would result in potentially *significant but feasibly mitigated impacts* (Class II), **similar to the proposed Project.**

Less Than Significant Impacts: The visitor-serving Alternative project would generate more vehicular traffic impacts than the proposed Project. Depending on the Alternative land use and size, impacts on transportation from additional peak hour trips (PHT) (Impact TRANS-1) could be potentially *significant but feasibly mitigated* (Class II). For example, a convenience store or small restaurant would likely generate hundreds of Average Daily Trips (ADT) and potentially tens of PHT, substantially more than the 29 ADT and 9 Peak Hour Trips (PHT) associated with the proposed Project. Associated long-term air quality (Impact AQ-2) and greenhouse gas (GHG) (Impact GHG-1) emissions would also be potentially substantially greater than the proposed Project, and potentially *significant but feasibly mitigated* (Class II). **Therefore, the No Action Alternative would have greater long-term transportation, air quality, and GHG impacts than the proposed Project.**

5.4 Alternative Location

Santa Barbara Shores. As previously discussed, this site was originally identified as a fire station site when the Ellwood Shores Specific Plan was proposed. It has remained in open space and is within the 137-acre Sperling Preserve. The Alternative site is approximately 300-feet east of a 62-residential unit gated development, and 300-feet west of a public parking lot adjacent to hiking and biking trails connecting to the Sperling Preserve trail network. The site is adjacent to stands of eucalyptus trees that extend southward from Hollister Avenue.

The projected environmental impacts of such as land use are assessed below:

Aesthetics/Visual Resources. Public views from Hollister Avenue extend across the Alternative Project site southward for over 600 feet, at which point the residential structures are experienced in the background. The eucalyptus trees frame this view. The open space views and adjacent eucalyptus trees are considered important visual resources.

Construction of the 32-foot high fire station in this location would impact public views of the Sperling Preserve open space as experienced from Hollister Avenue and would likely require removal of some adjacent eucalyptus trees. Recreational trail users would also experience the institutional use instead of open space. These changes in the visual character of the northwestern portion of the Sperling Preserve would be a *significant impact* (Impact AES-1) on aesthetics/visual resources. The permanent impact as perceived by trail users could be mitigated by screening vegetation, but the change from open space to institutional uses as experienced from Hollister Avenue would be *significant and unavoidable* (Class I), and ***greater than the proposed Project***. Other impacts associated with structural compatibility (AES-4) and new lighting (AES-5) would be *significant but feasibly mitigated* (Class II), ***similar to the proposed Project***.

Biological Resources. Preservation of eucalyptus trees on both sides of the Alternative site adjacent to Hollister Avenue would be possible with redesign of the project, but some thinning would be reasonable to expect. This disturbance and potential removal of raptor nesting habitat and disturbances during construction (Impact BIO-3) would be potentially significant. Alternative project construction would result in potentially short-term disturbances to any raptors nesting in the trees, requiring feasible mitigation to avoid these impacts. Residual impacts on biological resources would be *significant, but feasibly mitigated* (Class II), ***similar to the proposed Project***.

Cultural Resources: The Alternative site area has been intensively surveyed during planning of the Ellwood Mesa Preserve. No prehistoric or historic archaeological sites are recorded within this area. Therefore, the potential for encountering unknown archaeological resources during construction (Impact CR-1) is *adverse and less than significant* (Class III), and ***would be less than the proposed Project***.

Geological Resources: Construction of the Fire Station on this relatively level coastal terrace would not encroach within topographic grades susceptible to failure

and severe erosion (Impact GEO-1). Residual impacts on geological resources would be *adverse, but less than significant* (Class III), and **would be less than the proposed Project**.

Land Use: The Alternative Location site is within the Coastal zone, such that it would require a General Plan/Coastal Land Use Plan Amendment (Impact LU-1). Additional land use considerations would result from conversion of existing coastal recreational uses of the open space, and the proximity of the Alternative site to the existing Sperling Preserve trail system. Residual impacts on land use would be potentially *significant, but feasibly mitigated* (Class II), and **would be greater than the proposed Project**.

Noise: Construction of the Alternative Location site would result in the generation of short-term noise levels potentially adversely impacting adjacent residential sensitive residential receptors to the north and west, and recreationists on trails to the east and south (Impact NOI-1). Although no retaining wall with pilings would be required, short-term noise levels affecting sensitive receptors would be *significant and unavoidable* (Class I), but **less than the proposed Project**. Intermittent noise from long-term operations (Impact NOI-2) would be *adverse, but less than significant* (Class III), **similar to the proposed Project**.

Public Services: This Alternative would also provide for Fire Station 10, and increase the fire protection services from the Santa Barbara County Fire Protection District serving the western Goleta area and would improve service ratios and response times (Impact PS-1). This would be **similar to the proposed Project**.

Transportation: Construction of the fire station on the Alternative Location site would not likely require modifying the existing pedestrian, bicycle, and public transit configuration within the Project area and/or on the northern Hollister Avenue Project boundary (Impact TRANS-3), such that **the beneficial Project impact would not occur**. Short-term construction traffic and associated parking on nearby private streets (Impact TRANS-5) would result in potentially *significant but feasibly mitigated impacts* (Class II), **similar to the proposed Project**.

Less Than Significant Impacts: The Alternative Location project would generate the same number of vehicular traffic impacts than the proposed Project (Impact TRANS-1) and associated long-term air quality (Impact AQ-2) and greenhouse gas (GHG) (Impact GHG-1) emissions. Impacts would be **similar to the proposed Project**.

5.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(d) requires that an EIR:

“include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison.”

CEQA Guidelines Section 15126.6(e)(2) requires that:

“If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

A summary of the proposed Project’s potentially significant impacts and comparison with the two Alternatives discussed above is provided in Table 5-1.

Table 5-1. Proposed Project and Alternatives Impact Comparison

Impact	Proposed Project	No Action Alternative	Alternative Location
<i>Aesthetics/Visual Resources</i>			
AES-1. Change to Visual Resources	Class I (Short-Term)	Class III (-)	Class I (Long-Term) (+)
AES-4. Structural Compatibility	Class II	Class II (=)	Class II (=)
AES-5. Introduction of new light and glare	Class II	Class II (=)	Class II (=)
<i>Biological Resources</i>			
BIO-3. Disturbance to raptor nesting habitat during construction	Class II	Class II (-)	Class II (=)
<i>Cultural Resources</i>			
CR-1. Disturbance to unknown prehistoric cultural resources	Class II	Class II (=)	Class III (-)
<i>Geological Resources</i>			
GEO-1. Encroachment within topographic grades susceptible to failure and severe erosion	Class II	Class III (-)	Class III (-)
<i>Land Use</i>			
LU-1. Inconsistent with existing General Plan/Coastal Land Use Plan designation	Class II	Class II (=)	Class II (+)
<i>Noise</i>			
NOI-1. Short-term construction noise impacting adjacent residential sensitive receptors	Class I	Class I (-)	Class I (-)
<i>Public Services</i>			
PS-1. Increase the fire	Class IV	Class IV (-)	Class IV (=)

(-) Less impact (less adverse) than the proposed Project (except for Class IV impacts that would be less beneficial)

(+) Greater (more adverse) impact than the proposed Project

(=) Equal to the proposed Project

Table 5-1. Proposed Project and Alternatives Impact Comparison (Continued)

Impact	Proposed Project	No Action Alternative	Alternative Location
protection services from the Santa Barbara County Fire Protection District serving the western Goleta area and improve service ratios and response times			
Transportation			
TRANS-1. Generation of new traffic that would impact existing operations	Class III	Class II (+)	Class III (=)
TRANS-3. Modification of existing pedestrian, bicycle, and public transit configuration within the Project area and/or on the Hollister Avenue Project boundary	Class IV	Class IV (=)	Class IV (-)
TRANS-4. Generation of negligible net new traffic and no conflict with applicable congestion management plans or programs	Class III	Class II (+)	Class III (=)
TRANS-5: Short-term construction traffic and associated parking generated along roads within the Project area	Class II	Class II (=)	Class II (=)
Air Quality			
AQ-2. Long-term operational air pollutant emissions from area sources, energy use, and	Class III	Class II (+)	Class III (=)

- (-) Less impact (less adverse) than the proposed Project (except for Class IV impacts that would be less beneficial)
- (+) Greater (more adverse) impact than the proposed Project
- (=) Equal to the proposed Project

Table 5-1. Proposed Project and Alternatives Impact Comparison (Continued)

Impact	Proposed Project	No Action Alternative	Alternative Location
vehicular trips to and from the site			
Greenhouse Gas Emissions			
GHG-1: Generation of long-term operational GHG emissions	Class III	Class II (+)	Class III (=)

- (-) Less impact (less adverse) than the proposed Project (except for Class IV impacts that would be less beneficial)
- (+) Greater (more adverse) impact than the proposed Project
- (=) Equal to the proposed Project

Review of Table 5-1 indicates that the following:

No Action Alternative:

- The No Action Alternative would reduce several potentially significant impacts: short-term, significant and unavoidable impacts on aesthetics/visual resources (AES-1); BIO-3; GEO-1; and NOI-1.
- The No Action Alternative would likely increase impacts on transportation (TR-1) and air quality/GHG emissions (AQ-2; GHG-1).
- The No Action would appear to have the least number of potentially significant impacts compared to the proposed Project and the Alternative Site.
- The No Action Alternative would not provide any of the basic proposed Project objectives and beneficial Project impacts including providing a fire station in western Goleta (PS-1).

Alternative Site Location:

- The Alternative site location would reduce three potentially significant impacts associated with the proposed Project: CR-1; GEO-1; and NOI-1.
- The Alternative site location would increase the intensity of two potentially significant impacts associated with the proposed Project: AES-1 and LU-1. Importantly, the alternative would exacerbate the long-term *significant and unavoidable impact* (AES-1), relative to the proposed Project.
- The Alternative site location would not provide one beneficial impact associated with the proposed Project: TRANS-3.

Conclusion:

The above analysis indicates that the **proposed Project would be the environmentally superior alternative** to the only other feasible alternative location that is capable of achieving most of the basic project objectives.

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