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6.1 Introduction

Section 15126.6 of the *CEQA Guidelines* provides guidance for the identification and evaluation of project alternatives in an Environmental Impact Report (EIR). The *CEQA Guidelines* state that 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."

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the following project objectives:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan (General Plan) designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).
- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.
- Provide a permanent critical access easement to the flood channel for the City of Goleta and the Santa Barbara County Flood Control District.

In addition to meeting the project objectives, alternatives were considered that would avoid or substantially lessen the following significant unavoidable adverse impacts identified for the project:

- General Plan inconsistency due to the reduction in 100-foot setback from the San Jose Creek Streamside Protection Area (SPA) (project-level)
- Alteration of scenic views of the Santa Ynez Mountains and foothills from State Route (SR) 217, a locally designated scenic corridor (project-level)
- Inconsistency with Goleta General Plan policies pertaining to the preservation of visual resources along a locally designated scenic corridor (project-level)
- Solid waste generation during demolition and construction (project level and cumulative)

6.2 Project Alternatives

This discussion focuses on alternatives to the project, including alternatives which were considered but ultimately rejected from further evaluation. These alternatives have been selected for their ability to substantially reduce or eliminate one or more of the significant and unavoidable adverse impacts associated with the project, while still meeting basic project objectives. This EIR also evaluates a No Project Alternative, consistent with the *CEQA Guidelines* (Section 15126.6[e]).

6.2.1 Alternatives Considered but Rejected from Further Evaluation

Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the *CEQA Guidelines*, the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives 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 the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]).

CEQA Guidelines Section 15126.6(a) also states that "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 decision making and public participation." The alternatives shall be limited to those 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. Other alternatives may be considered but are not required to satisfy the requirements of CEQA.

For the project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with City policies;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors.

Alternative Location

The first step in considering an off-site alternative is identifying whether any of the significant impacts of the project would be avoided or substantially lessened by the relocation. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][A]). If it is determined that no

feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines, Section 15126.6[f][2][B]).

No alternative properties to undertake the proposed project are analyzed in this EIR. The project involves redevelopment of a vacant drive-in theater with an industrial warehouse building on approximately 6.75 acres. Based on a review of properties for sale in the City, there are no other properties in the City that could support a development similar to the proposed project, and the project applicant does not own or control any other property within the City that would be suitable for development of the project. Moreover, the applicant cannot reasonably acquire or control an alternative property in a timely fashion that would allow for the implementation of a project with similar uses and square footage. As of March 2024, there are currently no vacant properties that could be redeveloped of similar size for sale in the City (Loopnet 2024). As a result of these considerations, alternative project site locations were considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

Alternative Use – Research and Development

The potential uses of the site are currently limited by the project site zoning and land use designation and location within the vicinity of the Santa Barbara Airport.

The project site has a Goleta General Plan land use designation of Service/Industrial. This designation is applied to areas within the airport flight path where airport operations limit the range and density of activities that may be allowed. Allowable land uses include warehouses, storage, outdoor storage (including storage of vehicles and recreational vehicles), automotive sales and rentals, manufacturing, and heavy commercial uses.

The zoning applicable to the project site is Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL) (Article II, Coastal Zoning Code).[1] The southern two-thirds of the site is zoned M-1, which allows for development of light industrial uses. The northern third of the site is zoned M-S-GOL, which allows for development of service and/or light industrial uses.

The project is subject to the requirements of the 1993 Santa Barbara County ALUP (Airport Land Use Plan). The entire project site is located in Airport Safety Zone II, which includes safety restrictions and height limitations for development within the safety area. Airport Safety Zone II is divided into three safety areas based on the degree of airport hazard. The northern half of the project site is located within Safety Area 1 (Clear Zone) which is the area beneath the airplane takeoff or landing path and is the most restrictive area because it is subject to the greatest airport hazard. The southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone), which is the area in which airport traffic patterns occur and has the least restrictive requirements. The ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, applies to the project site. Allowable building development within Safety Area 1 is limited to warehouse and storage of non-flammable materials, wholesale trade, retail of building materials, auto parking lots, or open space, provided that the density of people on the site are less than 25 people per acre, as a site-wide average. Uses in Safety Area 3 are not specifically restricted, as long as the density does not exceed 25 people per acre.

Rezoning of the site to other uses, such as residential, is not feasible because the project must be compatible with the uses allowed by the ALUP, and these uses are restricted in the Safety Area 1 (Clear Zone) portion of the project site. In addition, residential uses would not meet most of the

[1] While the current zoning on the site is Service Industrial, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code).

project objectives, including providing tenant spaces consistent with the site zoning, attracting local employment opportunities in the industrial sector, and maximizing economically beneficial use.

The City considered alternative uses on the site that would be compatible with the existing zoning, including a Research and Development (R&D) use, which is allowed in the M-S-GOL and M-1 zoning. While an R&D facility would be allowable in the M-S-GOL and M-1 zoning, it would conflict with the Goleta General Plan land use designation of Service/Industrial (I-S). While a land use designation change could be approved by the City, an R&D facility would conflict with the use allowed by the ALUP because the number of employees would likely exceed 25 people per acre. As a result of these considerations, an alternative use of R&D was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

Alternative Use – Public Park

The *Parks and Recreation Plan Map* in the Goleta General Plan identifies the project site as a potential planned future park site. The City considered an alternative that would develop the project site as a park with active recreation, including playgrounds and sport fields. Public uses, such as public parks, are allowed in the I-S land use designation, but are not an allowable use in the M-S-GOL and M-1 zoning. In addition, recreational uses are not allowed in the airport Safety Area 1 (Clear Zone). While the ALUP lists recreational uses as an allowable use in Safety Area 3 (General Traffic Pattern Area), density is restricted to 25 people per acre. During peak use of a park, the number of people on the site could exceed 25 people per acre, which would exceed the density allowed by the ALUP. Additionally, a public park would not meet the majority of the project objectives, including providing tenant spaces consistent with the site zoning, attracting local employment opportunities in the industrial sector, and maximizing economically beneficial use. As a result of these considerations, an alternative use of a public park was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

6.2.2 Description of Alternatives Evaluated

This analysis considers the following three alternatives to the proposed project:

- Alternative 1: No Project Alternative
- Alternative 2: 100-foot Streamside Protection Area Setback
- Alternative 3: Outdoor Storage

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and each of the alternatives considered. Each of these alternatives is described below. The potential environmental effects of each of these alternatives in comparison to the proposed project is described in Section 6.3.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Feature	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Site Use	Industrial Warehouse	Vacant Drive-In Theater	Industrial Warehouse	Outdoor Storage
Structures Demolished	Movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box	None	Movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box	Movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box
Building Square Footage	70,594 sf industrial warehouse	3,663 sf existing concession stand; 200 sf existing projector building	70,594 sf industrial warehouse	70,594 sq feet outdoor construction material and RV storage 500 sf office
Number of Employees	75	0	75	5
Development Area	6.75 ac	11.77 ac	6.87 ac	6.75 ac
Area of Disturbance	293,861 sf	0	299,487 sf	293,861 sf
Impervious Surface Area	184,543 sf	188,963 sf	183,675 sf	184,543 sf
Parking Spaces	101 (9 EV)	600	92 (9 EV)	minimum of 9[2] (1 EV; 8 multi-use [EV or non-EV])
Loading Zones	6	None	8	None
Landscaping	60,939 sf	10,074 sf	106,520 sf	60,939 sf
On-site Trees within Development Area	45	10	54	45
Cut	600 cy	None	300 cy	600 cy
Fill	38,000 cy	None	38,900 cy	38,000 cy
Soil Import	37,400 cy	None	38,600 cy	37,400 cy
Construction Duration	15 months	None	15 months	9 months
Construction Haul Trucks Required for Soil Import	1,100	None	1,148	1,100
Total Daily Operational Passenger Vehicle Trips (One-Way Trips)	224	0	224	89[1]

Feature	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Total Daily Operational Truck Trips (One-Way Trips)	28	0	28	16[1]
Detention Basin	8,321 sf	None	17,625 sf	8,321 sf
SPA Setback	25-feet	50-feet	100-feet	25-feet

[1] Vehicle trips from the outdoor storage use was based on the ITE rates for High-Cube Transload and Short-Term Storage Warehouse for the outdoor storage use (1.4 trips per 1,000 square feet, 15.7% trucks) and General Office for the office building (10.84 trips per day per 1,000 square feet).

[2] Number of required parking spaces would be determined by the Review Authority based on scope/intensity of the use per Chapter 17.38 of Goleta Municipal Code.

ac = acres

cy = cubic yards

EV = Electric Vehicle

sf = square feet

SPA = Streamside Protection Area

6.2.2.1 Alternative 1: No Project Alternative

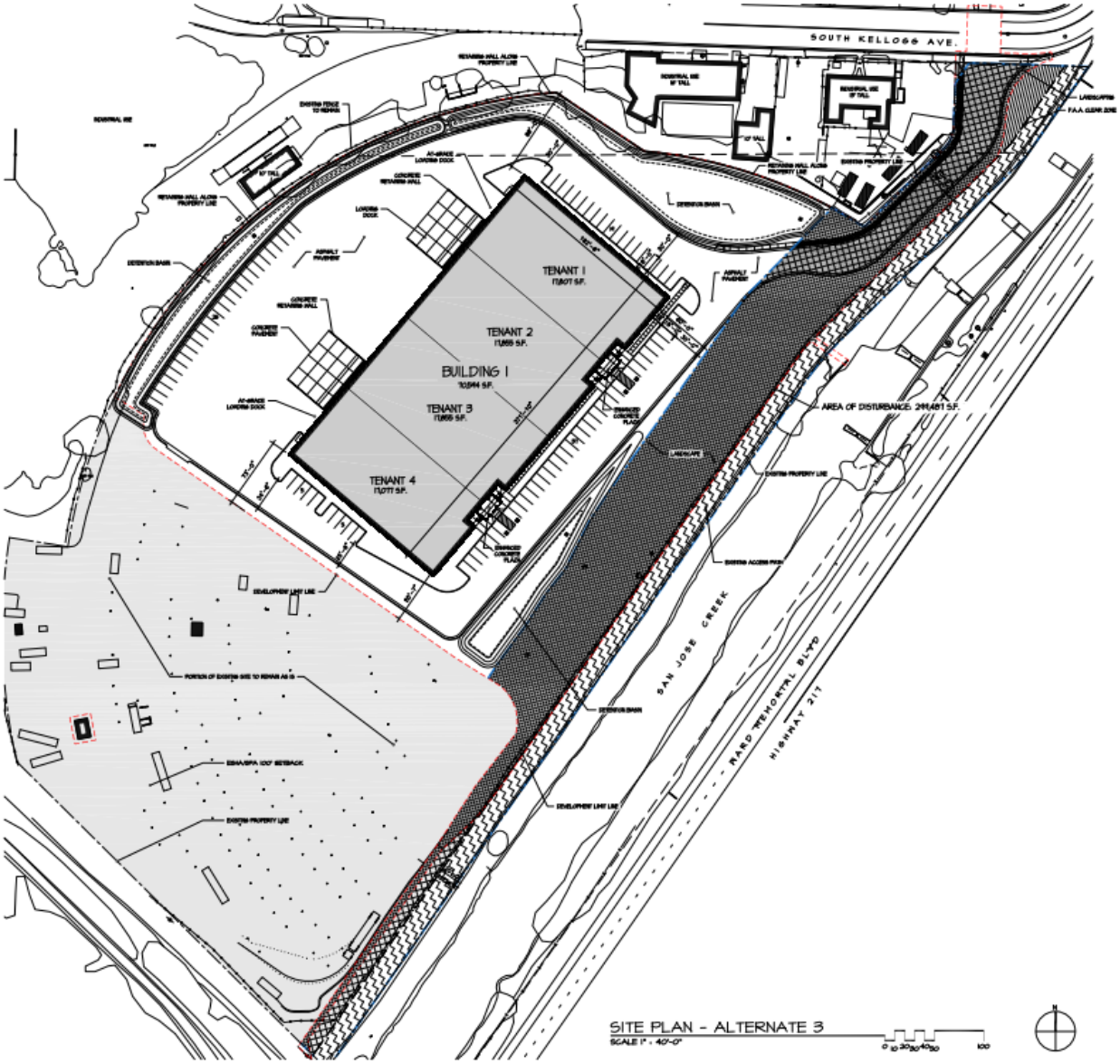
The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. The No Project Alternative assumes that the proposed project is not approved and the industrial warehouse building is not constructed. The project site would remain a vacant drive-in theater and the existing on-site structures, including concessions building, movie screen, ticket booths, and projector buildings would not be demolished.

6.2.2.2 Alternative 2: 100-foot Streamside Protection Area Setback

Alternative 2 would include similar components as the proposed project and would be constructed on the same project site. However, as shown in Figure 6.3-1, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest in order to avoid development within the San Jose Creek 100-foot SPA buffer to the extent feasible, and would also be 63 feet further from State Route 217 compared to the proposed project. Development within the 100-foot SPA would be limited to access road improvements, installation of the underground utility trench, and the addition of landscaping, which would consist of native California riparian and upper wetland habitat. Like the proposed project, the square footage of the industrial warehouse would be 70,594 sf. Electricity would be supplied by Central Coast Community Energy (3CE) using 100 percent renewable energy sources. Due to the reconfigured footprint of the proposed building, an additional 1,600 cy of fill would be required to elevate the building above the floodplain compared to the proposed project. Like the proposed project, Alternative 2 would require demolition of the existing movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box.

Table 6-1 provides the characteristics and construction details of Alternative 2.

Figure 6.3-1 Alternative 2 Site Plan



6.2.2.3 Alternative 3: Outdoor Storage

Alternative 3 would include a 70,594 sf outdoor storage facility on the same project site as the proposed project. Alternative 3 would be developed on approximately 6.75 acres of the northeastern portion of the project site, in the same location as the proposed project. Half of the outdoor storage area would support storage of construction materials in storage bays and half would support recreational vehicle (RV) storage. Alternative 3 would include a 500-square foot office building with a restroom, which would be constructed in the northeastern corner of the project site. Electricity would be supplied by 3CE using 100 percent renewable energy sources. Nine parking spaces would be provided, all of which would include EV charging stations. Like the proposed project, Alternative 3 would require demolition of the existing movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box. Like the proposed project, between 4 to 6 feet of fill would be used to elevate the outdoor storage area and office building above the 100-year floodplain elevation, which would require 37,400 CY feet of soil to be imported to the site. Like the proposed project, development of Alternative 3 would include a request to reduce the 100-foot SPA buffer at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek.

Table 6-1 provides the characteristics and construction details of Alternative 3.

6.3 Alternatives Impact Analysis

6.3.1 Alternative 1: No Project Alternative

Impacts Summary

Alternative 1 assumes the proposed project is not approved and the industrial warehouse building is not constructed. No demolition, construction, or operation of proposed industrial uses would occur. Therefore, Alternative 1 would result in no impact to each environmental issue area analyzed. In comparison to the proposed project, Alternative 1 would result in reduced impacts to each issue area, aside from specific environmental issues dependent on site-specific conditions which the proposed project would result in no impact (i.e., proximity to scenic highways, conflicts with habitat conservation plans, effects on historical resources, Alquist-Priolo earthquake fault zones, landslides, expansive soils, hazardous materials within 0.25-mile of a school, and physically dividing an established community). However, the No Project Alternative would not fulfill any of the project objectives.

a. Aesthetics

Threshold: Would the project have a substantial adverse effect on a scenic vista?

The project site would remain a vacant drive-in theater and the existing on-site structures, including concessions building, movie screen, ticket booths, and projector buildings would not be demolished. Therefore, Alternative 1 would maintain existing conditions at the project site and would not result in a substantial adverse impact on a scenic vista. Alternative 1 would have no impact on scenic vistas, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Alternative 1 would not involve new development and would maintain existing conditions at the project site. Therefore, Alternative 1 would have no impact to scenic resources within a state scenic highway, which would be the same level of impact than the proposed project.

Threshold: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative 1 would not result in new development that would conflict with applicable zoning or other regulations that govern scenic quality. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project. However, Alternative 1 would result in the project site remaining unused and subject to further degradation.

Threshold: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Alternative 1 would not result in new sources of light and glare, as no new development would occur and the site would remain vacant. Therefore, Alternative 1 would result in no impact involving the creation of a new source of light and glare that could adversely affect daytime or nighttime views, which would be a lesser level of impact than the proposed project.

b. Air Quality

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Alternative 1 would not result in new development, and the project site would remain a vacant drive-in theater. No demolition or construction activities would occur. Therefore, no direct or indirect emissions would need to be accommodated under the 2022 Ozone Plan. Alternative 1 would not conflict with or obstruct the implementation of the 2022 Ozone Plan. No impact would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. In addition, no operational activities from existing structures would occur; therefore, Alternative 1 would not generate air pollutant emissions and would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. No impacts would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition, construction, or operational activities would occur. The vacant site would not generate air pollution emissions; therefore, Alternative 1 would not expose sensitive

receptors to substantial pollutant concentrations. No impact would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. Therefore, Alternative 1 would not generate odors. No impact would occur, which would be a lesser level of impact than the proposed project.

c. Biological Resources

Threshold: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Alternative 1 would maintain existing conditions at the project site and would not result in new development that would have a substantial adverse effect, either directly or indirectly, on special-status species. Alternative 1 would result in no impact to special-status species, which would be a lesser level of impact than the proposed project.

Threshold: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No sensitive natural communities are located on the project site. Alternative 1 would maintain existing conditions at the project site and would not result in new development that would adversely impact riparian habitat, either directly or indirectly. Alternative 1 would result in no impact to riparian habitat, which would be a lesser level of impact than the proposed project.

Threshold: Would the project have a substantial adverse effect on state or federally-protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

In contrast to the proposed project, Alternative 1 would not involve construction activities that could result in temporary impacts to jurisdictional wetland features, as no new development would occur for Alternative 1. Alternative 1 would have no impact to wetlands, which would be a lesser level of impact than the proposed project.

Threshold: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Alternative 1 would maintain existing conditions at the project site and would not involve new development that could substantially interfere with the movement of fish or wildlife species. Alternative 1 would have no impact on wildlife movement, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Alternative 1 would not involve new development that would conflict with a local policy or ordinance that protects biological resources. In contrast to the proposed project, Alternative 1 would not conflict with the City's Conservation Element Policy CE 2.2, as the 100-foot setback from San Jose Creek would be maintained. Therefore, Alternative 1 would have no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Alternative 1 would be located on the same project site as the proposed project. The project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, Alternative 1 would have no impact related to conflicts with these plans, which is the same level of impact as the proposed project.

d. Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Alternative 1 would not involve the removal of existing structures on the project site and would maintain existing conditions. Furthermore, the existing buildings on the project site are not eligible as historic resources. Alternative 1 would result in no impact on historical resources, which would be a similar level of impact as the proposed project.

Threshold: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb subsurface archaeological resources. Therefore, Alternative 1 would have no impact on archaeological resources, which would be a lesser level of impact than the proposed project.

Threshold: Would the project disturb any human remains, including those interred outside of formal cemeteries?

No new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb human remains. Therefore, Alternative 1 would have no impact on human remains, which would be a lesser level of impact than the proposed project.

e. Energy

Threshold: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No new development on the project site would occur. Consequently, Alternative 1 would not involve any demolition or construction activities that could use energy resources. Under Alternative 1, the

drive-in theater would continue to not be operational and would not use energy resources. Therefore, Alternative 1 would have no impact related to wasteful, inefficient, or unnecessary consumption of energy resources, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Alternative 1 would not include any demolition, construction, or operational activities. Therefore, Alternative 1 would not result in energy use and would have no impact related to conflicts with state or local renewable energy or energy efficiency plans, which would be a lesser level of impact than the proposed project.

f. Geology and Soils

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Alternative 1 would be located on the same project site as the proposed project. There is no Alquist-Priolo fault located on the project site, and the risk of fault rupture is low. In contrast to the proposed project, which would introduce employees to the project site, Alternative 1 would maintain existing conditions and the project site would remain vacant. Alternative 1 would have no impact involving fault rupture, which would be the same level of impact as the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. The project site would remain vacant and would not include the construction of new structures. Therefore, Alternative 1 would not involve new development on the project site that could increase the risk of loss, injury, or death due to seismic ground shaking compared to existing conditions. Therefore, Alternative 1 would have no impact involving seismic ground shaking, which would be a lesser level of impact than the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

and

Threshold: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site is not at risk of landslides, lateral spreading, or collapse. Both liquefaction and settlement are potential concerns for project site soils. However, Alternative 1 would not change the existing, vacant condition of the project site. Therefore, the project would not increase the potential for unstable soils compared to existing condition. Alternative 1 would have no impact involving unstable soils, which would be a lesser level of impact than the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site is not located in a landslide hazard area and is not subject to landslide risk. Alternative 1 would have no impact involving landslides, which would be the same level of impact as the proposed project.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Project site soils are highly erodible. However, Alternative 1 would not involve construction activities, such as grading, that would increase the potential for erosion and sedimentation. Alternative 1 would maintain existing drainage patterns on the project site and would not result in new sources of runoff that could contribute to project site erosion and the loss of topsoil. Alternative 1 would have no impact involving substantial soil erosion or the loss of topsoil, which would be a lesser level of impact than the proposed project.

Threshold: Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Similar to the proposed project, Alternative 1 would not create substantial direct or indirect risks to life or property due to expansive soils because on-site soils are not expansive. For Alternative 1, no impact involving expansive soils would occur, which would be the same level of impact as the proposed project.

Threshold: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Alternative 1 would not involve the use of septic tanks or alternative wastewater disposal systems. Alternative 1 would result in no impact, which would be the same level of impact as the proposed project.

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no documented paleontological resources at the project site. For Alternative 1, no new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb unanticipated paleontological resources. Therefore, Alternative 1 would have no impact on paleontological resources, which would be a lesser level of impact than the proposed project.

g. Greenhouse Gas Emissions

Threshold: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. In addition, no operational activities would occur; therefore, Alternative 1 would not generate greenhouse gas (GHG) emissions and would not have a significant impact on the environment. No impacts would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. In addition, no operational activities would occur; therefore, Alternative 1 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impacts would occur, which would be a lesser level of impact than the proposed project.

h. Hazards and Hazardous Materials

Threshold: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Alternative 1 would not involve new development on the project site and the project site would remain vacant. Consequently, Alternative 1 would not involve the routine transport, use, or disposal of hazardous materials. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Alternative 1 would not result in the demolition of existing structures on the project site, and would not risk the release of asbestos-containing materials (ACM) and lead-based paints (LBP), which may be present in on-site structures. As Alternative 1 would not result in new development, Alternative 1 would not disturb existing hazardous materials in surficial soil to the west of the existing concession stand. Furthermore, Alternative 1 would not require groundwater dewatering, and would not necessitate the proper treatment and disposal of potentially contaminated groundwater. Alternative 1 would result in no impact involving the accidental release of hazardous materials, which would be a lesser level of impact than the proposed project.

Threshold: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The project site is not located within 0.25 mile of an existing or proposed school. Therefore, Alternative 1 would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school, which would be the same level of impact as the proposed project.

Threshold: Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

There are no hazardous materials sites mapped within the project site. As such, Alternative 1 would not create a significant hazard to the public or the environment due to hazardous materials sites. For Alternative 1, no impact would occur, which would be the same level of impact as the proposed project.

Threshold: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport and the entire project site is within the Airport Influence area of the Santa Barbara Municipal Airport. In addition, the project site falls within the 20,000-foot Federal Air Regulations (FAR) Part 77 Notification Area for the Santa Barbara Municipal Airport. In contrast to the proposed project, Alternative 1 would not result in new construction or the addition of new on-site employees to the project site, and the project site would remain vacant. Alternative 1 would result in no impact involving airport hazards, which would be a lesser level of impact than the proposed project.

Threshold: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Alternative 1 would maintain existing, vacant conditions at the project site, and would not involve construction vehicles or operational traffic that could potentially interfere with an adopted emergency response or emergency evacuation plan. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is not within a State Responsibility Area (SRA), or lands classified as very high fire hazard severity zones (VHFHSZ). The nearest VHFHSZ is located approximately 1.95 miles north of the project site. Existing residential development, commercial development, and United States Route 101 (U.S. 101) separate the project site from the VHFHSZ. The existing drive-in theater would remain vacant, and would not introduce new on-site employees or uses to the project site. Alternative 1 would result in no impact involving wildland fires, which would be a lesser level of impact than the proposed project.

i. Hydrology and Water Quality

Threshold: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Alternative 1 would not result in demolition or new construction that could violate water quality standards or waste discharge requirements. No new sources of pollutants would be introduced to the project site, and existing drainage patterns would be maintained. Therefore, Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Alternative 1 would not involve construction and consequently would not require groundwater dewatering. Alternative 1 would not change the operational water demands for the project site, and would not introduce new impervious surfaces that could affect groundwater recharge. Therefore, Alternative 1 would have no impact involving the substantial decrease of groundwater supplies or

interference with groundwater recharge, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

and

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

and

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Alternative 1 would not involve new development and would maintain existing conditions at the project site. Therefore, Alternative 1 would not substantially alter the drainage pattern of the project site, including through the alteration of a course of a stream or river or through the addition of impervious surfaces. Alternative 1 would not result in substantial erosion or siltation, increased runoff, or additional sources of polluted runoff. Alternative 1 would have no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

and

Threshold: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is located outside of a tsunami hazard zone and is not proximate to a large body of water and therefore is not subject to seiche. Therefore, as with the proposed project, Alternative 1 would not risk release of pollutants in a tsunami hazard zone or seiche hazard zone.

Alternative 1 would be located on the same project site as the proposed project and therefore is subject to similar flood hazards. Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site.

The project site is within the inundation zone of the Rancho Del Ciervo dam. Alternative 1 would not include any features which would preclude routine dam inspection or otherwise increase the risk for dam failure and inundation.

No new sources of pollutants would be introduced to the project site. Therefore, Alternative 1 would not redirect flood flows and would not risk the release of pollutants due to project inundation. No impacts would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. Alternative 1 would not result in water quality impacts related to erosion, groundwater dewatering, construction of new development, or addition of new uses to the site. Therefore, Alternative 1 would not conflict with the Basin Plan, and would result in no impact, which would be a lesser level of impact than the proposed project.

GWD's Groundwater Management Plan Goleta Groundwater Basin (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement. Alternative 1 would not adversely impact groundwater supplies or the management of the Goleta Groundwater Basin in accordance with the Wright Judgement as Alternative 1 would not involve water consumption or groundwater extraction. Therefore, Alternative 1 would not conflict with the Groundwater Management Plan Goleta Groundwater Basin, and would result in no impact, which would be a lesser level of impact than the proposed project.

j. Land Use and Planning

Threshold: Would the project physically divide an established community?

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood. Alternative 1 would not include new construction that could physically divide an established community and would result in no impact, which would be the same level of impact as the proposed project.

Threshold: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Alternative 1 would maintain existing conditions at the project site and would not result in new development. In contrast to the proposed project, Alternative 1 would not conflict with Goleta General Plan Policy CE 1.6, CE 2.2, and CE-2.6 intended to protect ESHAs, SPAs, and creeks, respectively. Furthermore, Alternative 1 would not conflict with Goleta General Plan Policy LU 1.8, VH 1.1, VH 2.2, and VH 2.3, intended to protect scenic views and neighborhood compatibility. Alternative 1 would not conflict with the Goleta General Plan and would have no impact involving conflict with existing plans adopted for the purpose of avoiding or mitigating an environmental effect, which would be a lesser level of impact than the proposed project.

k. Noise

Threshold: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Alternative 1 would not involve demolition or removal or construction, including grading and excavation. Therefore, this alternative would not result in the generation of construction noise levels that exceed City of Goleta standards. As the existing drive-thru use of Alternative 1 would still be inoperable and vacant, the alternative would have no impact from operational noise. Alternative 1 would have no impacts related to noise, and impacts would be reduced compared to the proposed project.

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Alternative 1 would not involve construction activities that would generate ground-borne vibration. No impact would occur, which would be a lesser level of impact than the proposed project.

Threshold: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in exposure of people residing or working in the project area to excessive noise levels?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. Therefore, Alternative 1 would not expose people to noise from the Santa Barbara Airport. No impact would occur, which would be a lesser level of impact than the proposed project.

l. Public Services

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

and

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

and

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

and

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Alternative 1 would not result in new residents or employees at the project site. Therefore, Alternative 1 would not result in population growth that could affect demand for public facilities, including fire protection, police protection, schools, or other public facilities. Alternative 1 would result in no impact to public facilities, which would be a lesser level of impact than the proposed project.

m. Transportation and Circulation

Threshold: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Alternative 1 would not result in new development or uses at the project site and would not introduce features that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Alternative 1 would be consistent with the City's Transportation Element policies. Alternative 1 would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Alternative 1 would maintain the existing vacant conditions at the project site and would not introduce new uses that would increase vehicle miles traveled (VMT) within Goleta. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Alternative 1 would not result in new development that could increase roadway hazards due to geometric design features or incompatible uses. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project result in inadequate emergency access?

Alternative 1 would not result in new development, and consequently, would not require construction vehicles or construction staging areas that could affect emergency access. Alternative 1 would result in no impact involving inadequate emergency access, which would be a lesser level of impact than the proposed project.

n. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 1 would be located on the same site as the proposed project. Based on Native American consultation conducted for the proposed project, no tribal cultural resources have been identified on the project site. No new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb unanticipated tribal cultural resources. Therefore, Alternative 1 would have no impact on unknown tribal cultural resources, which would be a lesser level of impact than the proposed project.

o. Utilities and Service Systems

Threshold: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

and

Threshold: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

and

Threshold: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Alternative 1 would maintain the existing vacant conditions at the project site and would not result in new demand for water, wastewater, stormwater, electric, natural gas, or telecommunications facilities. Alternative 1 would not involve an increase in water demand or wastewater generation. Alternative 1 would have no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

and

Threshold: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

In contrast to the proposed project, Alternative 1 would not involve demolition and consequently would not generate demolition debris. No new development or new uses on the site would occur, and no new sources of solid waste generation would be introduced. Therefore, Alternative 1 would have no impact involving solid waste, which would be a lesser level of impact than the proposed project.

6.3.2 Alternative 2: 100-foot Streamside Protection Area Setback

Impacts Summary

Alternative 2 would include demolition of the same existing drive-in theater structures as the proposed project and construction of the same sized storage warehouse. However, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest in order to avoid development within the San Jose Creek 100-foot SPA buffer to the extent feasible. This would require import of 1,200 cubic yards of more fill than the proposed project.

The development characteristics (i.e., number of employees) of Alternative 2 are the same as the proposed project; therefore, impacts related to per capita generation, such as impacts related to public services, and utilities and service systems would be the same as the proposed project. Alternative 2 would include two additional loading zones in comparison to the proposed project; however, these additional loading zones would not result in increased truck trips in comparison to the proposed project. The relocation of Alternative 2's proposed development on the project site outside of the 100-foot SPA buffer would result in reduced impacts related to biological resources in comparison to the proposed project. However, the relocation of Alternative 2's proposed development on the project site would require additional construction haul trips and soil export, which would marginally increase greenhouse gas and energy use. In addition, the relocation of Alternative 2's proposed development would potentially move construction equipment closer to residential development, resulting in increased construction noise at sensitive receptors in comparison to the proposed project. Alternative 2 would not worsen any significance conclusions in comparison to the proposed project. In addition, Alternative 2 would fulfill all the project objectives.

a. Aesthetics

Threshold: Would the project have a substantial adverse effect on a scenic vista?

Similar to the proposed project, Alternative 2 would construct an approximately 70,594-square-foot "high cube" industrial building, with a height of 35 feet from finished grade. Compared to the proposed project, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest. Because Alternative 2 would include placement of fill to elevate the structure above the floodplain, the total height of the structure would be approximately 40 feet above existing grade, which would be consistent with height limits of the M-S-GOL and M-1 zones, pursuant to the City's previous Coastal Zoning Ordinance. The proposed industrial building would include aesthetic features such as architectural detailing and landscaping, which would reduce building massing and integrate the proposed building with natural areas of vegetation growing along SR 217. The proposed building

would be constructed from concrete of muted, natural colors (e.g., gray and tan), with dark blue accents.

Given the site's distance (0.9 mile and 0.7 mile respectively) from U.S. 101 and Hollister Avenue, the proposed industrial building would not substantially degrade views from these locally designated scenic corridors. However, construction of the proposed industrial building under Alternative 2 may affect a locally designated scenic corridor along SR 217. Compared to the proposed project, the Alternative 2 building would be placed 63 feet farther away from SR 217. The Alternative 2 building would be visible from lanes traveling in both directions along SR 217, although vegetation would obscure most of the project site from the roadway. Figure 6.3-2 and Figure 6.3-4 demonstrate, through visual renderings (Photographs 2), that the industrial building proposed under Alternative 2 would rise above existing and proposed vegetation and the surrounding one- to two-story industrial development and would obstruct northward scenic views of the foothills and Santa Ynez mountains. Figure 6.3-3 and Figure 6.3-5 show the visual renderings of the proposed project from SR 217, included in Section 4.1, *Aesthetics*, for comparison. The proposed building would have substantially more mass than the existing movie screen. The existing movie screen and laurel sumac shrubs behind the movie screen would be removed under Alternative 2; consequently, the proposed building would be more visible from SR 217 when compared to existing conditions until the proposed cypress trees have matured, which would take approximately 10 to 12 years to reach a height of 30 feet. While Alternative 2 would be consistent with the height limitation of 35 feet from finished grade, the proposed industrial building would be constructed on fill material, giving the proposed building the appearance of being taller than surrounding development and emphasizing the proposed building against the scenic vista. Similar to the proposed project, the addition of the Alternative 2 building would constitute a potentially significant impact to the northward scenic vista experienced from SR 217.

Alternative 2 would also alter public views of the site from Kellogg Avenue and South Fairview Avenue. As shown in Figure 6.3-6, the view from Kellogg Avenue would be largely obstructed by construction of the proposed industrial building (Photograph 2). Also shown in Figure 6.3-8, the proposed industrial building would be elevated above vegetation levels, so the building would be visible from South Fairview Avenue (Photograph 2). Figure 6.3-7 and Figure 6.3-9 show the visual renderings of the proposed project from Kellogg Avenue and South Fairview Avenue, respectively, which are included in Section 4.1, *Aesthetics*, for comparison. However, the Visual and Historic Resources Element of the Goleta General Plan does not recognize these roadways as scenic view corridors that provide scenic views, given the generic nature of surrounding development and lack of scenic resources on these two roadways. Similar to the proposed project, changes to views from these local roadways would be less than significant, as Alternative 2 would add to existing development and these roadways are not considered scenic views.

Considering Alternative 2 would substantially alter scenic views of the Santa Ynez Mountains and foothills from SR 217, a locally designated scenic corridor, Alternative 2 would overall have a potentially significant impact to scenic vistas, similar to the proposed project. Similar to the proposed project, there is no feasible mitigation to reduce this significant impact because the proposed building height is the minimum height required to support the high-cube warehouse use and the proposed 4 to 6 feet of fill is necessary to elevate the proposed building above the 100-year floodplain. Therefore, impacts to scenic corridors would be significant and unavoidable.

Figure 6.3-2 Alternative 2: Existing and Simulated Views from SR 217 Facing West

Photograph 1. Existing westward view of the project site from SR 217. Vegetation obscures most of the project site.

Photograph 2. Simulated westward view of Alternative 2 from SR 217 with visual simulation of the proposed industrial building and landscaping.

Figure 6.3-3 Proposed Project: Existing and Simulated Views from SR 217 Facing West

Photograph 1. Existing westward view of the project site from SR 217. Vegetation obscures most of the project site.

Photograph 2. Simulated westward view of the proposed project from SR 217 with visual simulation of the proposed industrial building and landscaping.

Figure 6.3-4 Alternative 2: Proposed and Simulated Views from Northbound SR 217

Photograph 1. Existing northbound view of the project site from SR 217. Existing drive-in theater structures on the project site are visible above the vegetation.

Photograph 2. Northbound view of Alternative 2 from SR 217 with visual simulation of the proposed industrial building.

Figure 6.3-5 Proposed Project: Proposed and Simulated Views from Northbound SR 217

Photograph 1. Existing northbound view of the project site from SR 217. Existing drive-in theater structures on the project site are visible above the vegetation.

Photograph 2. Northbound view of the proposed project from SR 217 with visual simulation of the proposed industrial building..

Figure 6.3-6 Alternative 2: Existing and Similated Views from Kellogg Avenue

Photograph 1. Existing southward view of the existing project site from Kellogg Avenue. The project site is directly visible from this roadway.

Photograph 2. Simulated southward view of Alternative 2 from Kellogg Avenue, including the visual simulation of the proposed building.

Figure 6.3-7 Proposed Project: Existing and Simulated Views from Kellogg Avenue

Photograph 1. Existing southward view of the existing project site from Kellogg Avenue. The project site is directly visible from this roadway.

Photograph 2. Simulated southward view of the proposed project from Kellogg Avenue, including the visual simulation of the proposed building.

Figure 6.3-8 Alternative 2: Existing and Simulated Views from South Fairview Avenue

Photograph 1. Existing eastward view of the existing project site from South Fairview Avenue. Vegetation completely obstructs views of the project site.

Photograph 2. Simulated eastward view of Alternative 2 from South Fairview Avenue, including the visual simulation of the proposed building.

Figure 6.3-9 Proposed Project: Existing and Simulated Views from South Fairview Avenue

Photograph 1. Existing eastward view of the existing project site from South Fairview Avenue. Vegetation completely obstructs views of the project site.

Photograph 2. Simulated eastward view of the proposed project from South Fairview Avenue, including the visual simulation of the proposed building.

Threshold: Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Alternative 2 would be constructed on the same project site as the proposed project. The project site is approximately 0.9 mile south of U.S. 101, which is eligible for designation as a State Scenic Highway. Similar to the proposed project, given the distance of U.S. 101 from the project site, as well as the presence of intervening vegetation and structures, construction of the proposed industrial building under Alternative 2 would not substantially degrade views from U.S. 101. Alternative 2 would result in no impacts to scenic highways, which is the same as the proposed project.

Threshold: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative 2 would develop an approximately 70,594-square-foot industrial warehouse building on the project site. The building itself would have a height of 35 feet from finished grade, and the use of fill to elevate the structure would bring the total height of the structure to approximately 40 feet from existing grade. Alternative 2 landscaping would include approximately 106,520 square feet of the project site and would be comprised of native and climate-appropriate plantings within the proposed stormwater drainage basin and along the proposed parking lot, the driveway connecting to South Kellogg Avenue, and the exterior of the proposed industrial building. Landscaping would consist of native California riparian and upper wetland habitat within the SPA.

Similar to the proposed project, Alternative 2 would not obstruct or substantially degrade views of the Pacific Ocean, beach, or other coastal areas, as those scenic resources are currently not visible from the site and southward views are blocked by intervening buildings, SR 217, and vegetation. Therefore, Alternative 2 would not conflict with Section 30251 of the California Coastal Act, which requires that development projects in the Coastal Zone protect scenic and visual qualities, including views of the ocean and scenic coastal areas.

The proposed industrial building, which would include operational activities such as warehouse storage, wholesaling, and distribution, is considered a permitted use for the M-S-GOL zone under Section 35-84A of the City's previous Coastal Zoning Ordinance. The height of proposed industrial building would be approximately 40 feet when taking into account the amount of fill proposed to elevated the building out of the 100 year floodplain; however, the building would be 35 feet from finished grade. Therefore, the industrial building would not exceed 35 feet from finished grade, and would comply with the maximum height limitation for the M-S-GOL zone established in Section 35-84A of the previous Coastal Zoning Ordinance.

Although Alternative 2 would alter the site's existing visual character by introducing a new industrial building with associated site improvements, the proposed intensity and height of development would be generally consistent with the Goleta General Plan. For example, Alternative 2 would be consistent with Policy VH 4.6, Industrial Areas, which requires industrial development to include architectural detailing to break building massing; adequate lighting; protected bicycle parking; screened outdoor storage, maintenance, or trash areas; and buffers or screens to protect residential development from industrial land uses. Alternative 2 would comply with Policy VH 4.6 as it would use landscaping to screen the site from SR 217 and residential development, would provide sufficient parking (including bicycle spaces), would screen outdoor maintenance or trash areas, would provide adequate lighting in accordance with City requirements, and would include architectural detailing to break massing of the proposed industrial building.

However, Alternative 2 may obstruct scenic views of the Santa Ynez Mountains and foothills experienced by northward travelers along SR 217, a designated local scenic corridor. Alternative2 would be inconsistent with Goleta General Plan Policy VH 1.1, Scenic Resources, which identifies scenic resources in the City; Policy VH 2.2, Preservation of Scenic Corridors, which requires preservation of aesthetic qualities of scenic corridors; and Policy VH 2.3, Development Projects Along Scenic Corridors, which requires development adjacent to scenic corridors to not degrade or obstruct views of scenic areas. Therefore, Alternative 2 would have a potentially significant impact regarding conflict with applicable regulations that govern scenic quality, similar to the proposed project. Because there is no feasible mitigation to reduce the impact, impacts would be significant and unavoidable, similar to the proposed project.

Threshold: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Similar to the proposed project, construction of Alternative 2 is not anticipated to occur during evening or nighttime hours and would thus not introduce new light sources to the site during the construction time period. Consequently, the following discussion focuses on Alternative 2's operational impact involving light and glare.

Alternative 2 would introduce new sources of light from the parking lot and the proposed industrial building exterior once operational. Lighting would consist of a combination of exterior building-mounted wall packs as well as pole-mounted fixtures in the parking lot. All lighting would use light emitting diode (LED) fixtures and would include semi- and fully cut-off light fixtures. Alternative 2's lighting would be designed in accordance with City standards, including Goleta General Plan Policy 4.12, Lighting, which requires outdoor lighting fixtures to be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow (City of Goleta 2006).

Alternative 2's design, including lighting, would be subject to Federal Air Regulations (FAR) Part 77, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration. If a proposed development is identified as a presumed hazard, the Federal Aviation Administration (FAA) may require further aeronautical study or allow the project to be revised. The project applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 2's design, the FAA would then determine whether Alternative 2 poses a hazard to air navigation and could request changes to Alternative 2's design to minimize those hazards. The FAA would evaluate Alternative 2 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 2 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Therefore, similar to the proposed project, Alternative 2 lighting would not be substantial to the extent that it would interfere with aviation activity and interfere with views.

Moving sources of light would come from the headlights of vehicles driving on roadways near the project site and entering or exiting the site early in the morning and evening. While Alternative 2's operation would involve vehicle travel, and thus potential light from vehicles, these lighting sources would be similar to existing conditions surrounding the site, as commercial and industrial vehicles are frequent in the area.

Alternative 2 would introduce new sources of glare in the form of focused, intense light from sunlight reflecting on the industrial building, parked car windows, or truck windshields when vehicles are backed up to loading docks. As the proposed industrial building would include light-colored exteriors

with elements of metal and glass, Alternative 2 has the potential to reflect sunlight and produce glare from this building. However, vegetative screening along the perimeter of the project site would reduce off-site impacts of glare from both the proposed building and from vehicles associated with building operation. Considering adjacent land uses include few glare-sensitive receptors, the potential for glare-related impacts would be limited. Overall, Alternative 2 would have a less than significant impact associated with light and glare, which would be similar to the proposed project.

b. Air Quality

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Similar to the proposed project, Alternative 2 would involve the construction and operation of an industrial warehouse building. Alternative 2 does not propose residential uses and would not directly increase population growth. The Alternative 2 is estimated to add approximately 75 new employees. While these jobs would likely come from the local workforce, it is conservatively assumed that all 75 new employees would become new residents. In a conservative scenario, there would be a population growth of 198 based on the city's average persons per household of 2.64. Goleta has a current population of approximately 32,591 persons (California Department of Finance [DOF] 2022). The Santa Barbara County Association of Governments (SBCAG) growth forecast estimates that the population in Goleta would increase from an existing population of 32,591 residents to 34,700 residents by 2050. In addition, the growth forecast estimates that jobs would increase from 25,580 jobs in 2020 to 31,070 jobs by 2050. The population in Goleta would increase by 2,109 residents by 2050, and the jobs in Goleta would increase by 5,490 jobs by 2050. Therefore, the addition of 75 employees and 198 new residents to Goleta would be accommodated in the City's growth forecasts, and Alternative 2 would not exceed SBCAG's growth forecasts of population and jobs for Goleta (SBCAG 2019).

In addition, in accordance with standard practices in the City, Alternative 2 would follow SBCAPCD fugitive dust control measures from the SBCAG's *Scope and Content of Air Quality Sections in Environmental Documents*. For these reasons, Alternative 2 impacts would be less than significant, which would be similar to the proposed project.

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Construction

Alternative 2 would involve temporary and short-term construction emissions similar to the proposed project. Construction activities such as demolition, grading, construction worker travel to and from the project site, delivery and hauling of construction supplies and debris to and from the project site, hauling of import soil to the site, and fuel combustion by on-site construction equipment would generate air quality emissions.

Table 6-2 summarizes construction emissions that would be generated from Alternative 2. Air quality modeling results for Alternative 2 are included in Appendix R-1. As shown in Table 6-2, construction emissions would not exceed the SBCAPCD construction thresholds used by the City of Goleta for this analysis. Therefore, Alternative 2 construction would not contribute substantially to an existing or

projected air quality violation and impacts would be less than significant, and similar to the proposed project.

Table 6-2 Estimated Alternative 2 Annual Construction Emissions

	Annual Emissions (tons per year)					
Construction Year	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2027	<1	1	1	<1	<1	<1
2028	<1	1	1	<1	<1	<1
Overlap						
Utility Pipelines	<1	1	1	<1	<1	<1
Maximum Annual Emissions	**1**	**2**	**2**	**<1**	**<1**	**<1**
Threshold	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rules 345, 323.1, and 329).

Operation

Operation of Alternative 2 would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 6-3 summarizes Alternative 2's operational emissions by emission source (area, energy, and mobile). As shown therein, the emissions generated by the operation of Alternative 2 would not exceed County operational thresholds used by the City of Goleta for this analysis. In addition, Alternative 2 operation would not contribute substantially to an existing or projected air quality violation and impacts would be less than significant, and the same as the proposed project.

Table 6-3 Estimated Alternative 2 Operation Emissions

Emissions Source	Maximum Daily Emissions (pounds per day)					
	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	2	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	3	<1	1	<1
Total	**3**	**1**	**6**	**<1**	**1**	**<1**
Threshold (area + energy + mobile)	55	55	N/A	N/A	80	N/A
Threshold Exceeded?	No	No	N/A	N/A	No	N/A
Threshold (mobile only)	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not sum precisely due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rule 323.1) and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations

Construction

Alternative 2 construction activities would result in temporary project generated diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Alternative 2 construction is anticipated to begin in July 2027 and end in September 2028. Construction would be phased, and each construction phase would be periodic and short-term. Construction-related toxic air contaminant (TAC) emissions would cease with the completion of construction activities. The detailed results of the construction health risk assessment (HRA) are provided in Appendix R-2 and summarized below.

The maximum unmitigated risk from construction of Alternative 2 sensitive receptors within 1,000 feet of the project site boundary as detailed in Appendix R-2. The maximum off-site residential cancer risk would be 0.86 in one million at one of the mobile homes east of the project site across SR-217. In addition, the chronic risk at the maximum off-site receptor would be exposed to a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or hazard index of 1 for chronic risk. Given that neither the cancer risk nor the chronic risk would exceed regulatory thresholds, health risk from construction of Alternative 2 would be less than significant, and similar to the proposed project.

Operation

Alternative 2 would generate approximately 14 truck round trips per day (28 one-way trips) from the project site, which is the same as the proposed project. The truck trips are assumed to all be diesel-fueled heavy-heavy-duty truck trips. An operational HRA was performed to conservatively estimate health risk during the Alternative 2's operating hours. The maximum unmitigated risk from operation

of Alternative 2 would expose a sensitive receptor at the Winslowe townhomes to a cancer risk of 0.08 in one million, due to the receptor being adjacent to the truck route. In addition, the maximally exposed individual receptor chronic risk would have a hazard index of <0.0001. These cancer risks are the same as the proposed project's risk. These maximum operational cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or a hazard index of 1 for chronic risk. In addition, Alternative 2 would generate 14 round truck trips per day, well below the California Air Resource Board's (CARB's) threshold of 100 diesel-fueled truck trips per day. Therefore, Alternative 2 is consistent with CARB's siting recommendations for TAC emitting sources. Alternative 2 operations would not expose substantial TAC emissions to sensitive receptors and impact would be less than significant, and the same as the proposed project.

Combined Construction and Operation

The maximum unmitigated combined risk from construction and operation of Alternative 2 was identified for all sensitive receptors within 1,000 feet of the project site boundary and along the truck route on South Kellogg Avenue as detailed in Appendix R-2. The sensitive receptor across SR-217 at the mobile home park would be exposed to a cancer risk of 0.89 in one million. In addition, the residential receptor chronic risk would have a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or 1 for chronic risk. Alternative 2 combined health risk would not exceed regulatory thresholds and impacts would be less than significant, and similar to the proposed project.

Threshold: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Alternative 2 would generate oil and diesel fuel odors during construction from equipment use. The odors would be limited to the construction period and would be intermittent and temporary. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. Accordingly, construction of Alternative 2 would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people, and impacts would be less than significant, similar to the proposed project.

Alternative 2 includes an industrial warehouse and would not include industrial use development associated with odor complaints near sensitive receptors. In addition, it is likely that odors would not be distinguishable due to vehicle exhaust on State Route 217. Therefore, operation of Alternative 2 would not generate other emissions, such as those leading to odors, that would affect a substantial number of people. Operational odor impacts would be less than significant, similar to the proposed project.

c. Biological Resources

Threshold: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Belding's Savannah Sparrow and Nesting Birds

Alternative 2 would be located on the same project site as the proposed project and therefore would have a similar potential to directly or indirectly affect similar candidate, sensitive, and special-status

species. Foraging special-status birds, including the special-status Belding's savannah sparrow (BSS) and loggerhead shrike, have a low potential to be present as transients on the project site. Similar to the proposed project, Alternative 2 would not directly impact these species because they are mobile and would move away from construction or operational disturbance.

Although no BSS have been observed in the study area during field surveys, construction of Alternative 2 has the potential to indirectly impact BSS, in the event they are nesting in pickleweed habitat in Old San Jose Creek or San Jose Creek. Similar to the proposed project, Alternative 2 would have the potential to indirectly impact BSS due to disturbance from construction noise and vegetation clearing activities, which would be a potentially significant impact, requiring mitigation. In addition, construction of Alternative 2 has the potential to result in direct and indirect impacts to non-special status nesting birds protected under the Migratory Bird Treaty Act if they are nesting within the project site and/or immediate vicinity during construction activities. Direct impacts including the destruction of nests and mortality of eggs, nestlings, and birds would occur if active nests were present within the project site during clearing and grading. Indirect impacts could also occur if active nests are located in the project site and vicinity and are abandoned due to visual and acoustic construction -related disturbance. This impact would be potentially significant, requiring mitigation. Alternative 2 would require implementation of Mitigation Measures BIO-1 and BIO-2, which would establish avoidance buffers around nests during construction in the nesting season and require focused surveys and avoidance of BSS for ground disturbance during the BSS nesting season. With implementation of Mitigation Measures BIO-1 and BIO-2, Alternative 2 would have a less than significant impact on nesting birds, similar to the proposed project.

Similar to the proposed project, Alternative 2's operational noise would not result in excessive ambient noise and therefore would not indirectly disturb bird species. Similar to the proposed project, Alternative 2 would include landscaping consisting of native California riparian and upper wetland habitat which would provide visual screening from pickleweed habitat where the BSS could be present. Therefore, operation of Alternative 2 would have a less than significant impact on candidate, sensitive, and special-status species, similar to the proposed project.

Tidewater Goby and Steelhead

Similar to the proposed project, noise and vibration from construction of Alternative 2 could result in temporary impacts to individual tidewater gobies and steelhead. However, work within the San Jose Creek channel would be completed using hand tools and concrete saws and heavy vibration equipment would not be utilized which would minimize vibration from construction. Alternative 2 would require implementation of Mitigation Measure NOI-1, which requires use of a sound barrier at the edge of San Jose Creek. Implementation of this measure would minimize the potential for construction noise to disturb tidewater goby and steelhead, similar to the proposed project.

Construction of Alternative 2 would be carried out in accordance with a Storm Water Pollution Prevention Plan (SWPPP), which is required to include the use of best management practices (BMPs) to control stormwater pollutants. However, even with implementation of the SWPPP, construction of Alternative 2 could result in impact from fuel, oil, lubricants, paints, release agents, and other construction materials; erosion; increased turbidity; excessive sedimentation; and accidental fuel spills during construction could also lead to contamination of soils and habitat degradation. Alternative 2 would require implementation of Mitigation Measure BIO-3 which requires implementation of a Toxic Materials Control and Spill Response Plan for materials that may be used/stored on-site, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials. Implementation of Mitigation Measure BIO-3 would reduce Alternative 2's potential

to impact tidewater goby and steelhead from the release of construction materials to a less than significant level, similar to the proposed project.

Similar to the proposed project, construction of Alternative 2's drainage outfall in the San Jose Creek Channel has the potential to directly affect aquatic habitat and species, including for tidewater goby and steelhead. Alternative 2 would require dewatering the work area which could injure or kill these species, or could increase turbidity and affect juvenile steelhead. Construction of Alternative 2's drainage outfall would take three to four weeks to complete and would be scheduled to avoid peak high tides if the Goleta Slough mouth is open. No heavy equipment would be used or operated within this staging area in the creek bed. Crews would use hand tools (i.e., shovels, rakes and brooms, dust pans, and wheelbarrows) to collect and remove any debris that falls or washes into the staging area. A crane would lower sandbags and plastic sheeting into the creek bed to create a temporary cofferdam to prevent water from entering the work area. The cofferdam used for Alternative 2 would be a physical barrier that would prevent high tides and aquatic species from entering the work area. Similar to the proposed project, installation of Alternative 2's cofferdam could potentially result in impacts to tidewater goby and steelhead if improperly installed. Alternative 2 would require implementation of Mitigation Measure BIO-3, which would ensure the cofferdam would be installed during the dry season and removed after concrete has cured prior to coming into contact with tidal surface water. With implementation of Mitigation Measure BIO-3, impacts associated with construction of Alternative 2's drainage outfall would be reduced to a less than significant impact on tidewater goby and steelhead, similar to the proposed project.

Alternative 2 would include two detention basins to retain stormwater flows and treat pollutants. Alternative 2's detention basins would total 17,625 square feet, which is 9,304 square feet larger than the proposed project's detention basin. Operation of Alternative 2 could result in similar impacts to San Jose Creek as the proposed project from the introduction of a new outfall structure and reduction in the stormwater flows into the creek from increased onsite detention. The detention basins would retain stormwater flows and treat pollutants in compliance with the County's adopted *Stormwater Technical Guide for Low Impact Development* guidelines which is designed to ensure post-construction requirements described in the Central Coast Regional Water Quality Control Board's (RWQCB) *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* are satisfied. Implementation of Alternative 2 conducted in compliance with applicable regulatory requirements related to stormwater runoff would minimize the potential for pollutants to degrade water quality to a greater degree than the proposed project because of the additional square footage and treatment capacity of the detention basins. Operation of Alternative 2's drainage outfall would not affect the physical or biological habitat features essential to migrating adult steelhead (e.g., water quantity to allow for juvenile and adult mobility; cover, shelter, and holding areas; and adequate water quality) or the tidewater goby (e.g., water depth, substrate, and seasonally open sandbar mouth). No long-term effect would result to steelhead habitat since the in-creek work is the replacement of existing concrete in-kind, similar to the proposed project. Given the volume of water present in the creek during storm events, the size of the watershed, and volume of flood flows and daily tidal shifts (when the Goleta Slough mouth is open), Alternative 2's stormwater flows would not substantially impact tidewater goby and steelhead individuals or San Jose Creek habitat. The drainage outfall design would be subject to similar regulatory requirements as the proposed project, such as United States Fish and Wildlife Service (USFWS) and National Marines Fisheries Service (NMFS) consultation, and United States Army Corps of Engineers (USCACE) 404 Certification. Similar to the proposed project, compliance with required permits would reduce Alternative 2's operational impact to tidewater goby and steelhead to a less than significant level.

California Red-Legged Frog and Western Pond Turtle

Due to similar construction activities as the proposed project, construction of Alternative 2 would have a potential to kill or injure California red-legged frog and western pond turtle. If present, injury or mortality could occur through accidental crushing, either by construction equipment or foot traffic from workers. Displacement from cover due to construction could expose these species to predators and desiccation. Additionally, amphibians or reptiles moving through the construction area could become trapped in open trenches left overnight. The initial construction noise and disturbance may also indirectly impact species, if present in the San Jose Creek and Old San Jose Creek corridor, by altering their migration behaviors. Alternative 2 would require implementation of Mitigation Measure BIO-4 and BIO-5, which would require preconstruction surveys and biological monitoring throughout construction and avoidance and relocation of California red-legged frog and western pond turtle, if found. With implementation of Mitigation Measure BIO-4, Alternative 2's construction impacts to California red-legged frog and western pond turtle would be reduced to a less than significant level, similar to the proposed project.

Operation of Alternative 2 and the proposed project would not occur within California red-legged frog or western pond turtle habitat and would be limited to the developed portion of the project site. Therefore, operation of Alternative 2 would have a less than significant impact on California red-legged frog and western pond turtle, similar to the proposed project.

Insects and Bats

Construction of Alternative 2 has a similar potential as the proposed project to result in direct effects to special-status insects (monarch butterfly and Crotch bumble bee) if present during vegetation clearing. The potential is low that either the foraging monarch butterfly or Crotch bumble bee would be present at the initiation of construction since the coastal sage scrub foraging habitat on-site lacks preferred host plants, the site is limited in size, was previously developed, and surrounded by disturbance. Furthermore, due to the expanse of food sources and habitat south of the project site in the Goleta Slough and along the coast, the removal of marginal disturbed native shrubland would not substantially impact regional nectar sources. Alternative 2's operation would not affect these insect species given that noise and dust would not be above existing ambient levels, lighting would be shielded, and vegetative screening would reduce glare. Therefore, Alternative 2 would have a less than significant impact on special-status insects, similar to the proposed project.

Special-status bat species (Pallid bat, Townsend's big-eared bat, Western red bat, and Western mastiff bat) have a low potential to forage over the project site. Alternative 2's construction would not interfere with nocturnal foraging behavior by bats as no nighttime construction would be required. Existing project site buildings are sealed and maintained and are not expected to host bat roosts; therefore, demolition would not directly impact bat roosts. Because of the low potential for bats to occur at the project site, Alternative 2 would have a less than significant impact on special-status bats, similar to the proposed project.

Threshold: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Alternative 2 would be located on the same project site as the proposed project and therefore would include similar vegetation in the disturbance area. No sensitive communities are present on the project site; therefore, Alternative 2 would not result in direct impacts on sensitive communities or Environmentally Sensitive Habitat Area (ESHA) communities.

Sensitive communities and ESHA that could be indirectly affected are found in San Jose Creek and Old San Jose Creek. Alternative 2's construction activities could result in similar dust generation, introduction of fuel spills, and introduction of invasive species as the proposed project which could indirectly impact sensitive communities and ESHA communities adjacent to the project site. Dust impacts would be addressed through adherence to Santa Barbara County Air Pollution Control District requirements. Alternative 2's fuel spill impacts would be reduced to a less than significant level with implementation of Mitigation Measure BIO-3, similar to the proposed project. Similar to the proposed project, Alternative 2's potential impacts related to invasive species would be reduced to a less than significant level with implementation of Mitigation Measures BIO-5, BIO-6, and BIO-7, which requires biological monitoring, prohibits non-native invasive species from being used as landscaping, and requires implementation of an Invasive Species Control Plan, respectively.

Threshold: Would the project have a substantial adverse effect on state or federally-protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Alternative 2 would include similar construction activities as the proposed project and would therefore have a similar potential to result in temporary impacts to jurisdictional wetland features. Construction of the drainage outfall and use of cofferdam could damage wetlands habitat; however, Alternative 2 would require implementation of Mitigation Measure BIO-3 which would ensure construction of the drainage outfall and use of the cofferdam occurs during the dry season. Implementation of Mitigation Measure BIO-3 would reduce Alternative 2's indirect construction impacts on wetlands to a less than significant level. Implementation of Mitigation Measure BIO-5, requiring construction monitoring with 100 feet of ESHA, and Mitigation Measure BIO-8, requiring the construction contractor to install fencing around the ESHA and requiring replacement of ESHA habitat if temporary or permanent impacts occur during construction, would reduce Alternative 2's potential to directly impact wetlands to a less than significant level. Implementation of Mitigation Measures BIO-6 and BIO-7, prohibiting invasive and exotic species, would reduce Alternative 2's potential impacts to wetlands due to the introduction of invasive species to a less than significant level, similar to the proposed project.

Threshold: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Alternative 2 would be located at the same project site as the proposed project and therefore would have a similar potential to result in interference with fish and wildlife migration. Construction of Alternative 2 would adhere to typical working hours and noise would not affect terrestrial nocturnal mammal wildlife movement, which is most pronounced during dusk, nighttime, and dawn.

Approximately 170 feet west of the project site, Old San Jose Creek is mapped as a wildlife migration corridor for terrestrial and avian species. The Old San Jose Creek corridor is 300 feet from the structure in the development area and 40 feet from the utility trenching and would be subject to at least 75 decibels[2] of construction noise. Alternative 2's construction noise would generate similar noise at Old San Jose Creek as the proposed project, which would not result in a significant impact to Old San Jose Creek avian habitat within 300 feet of project construction during breeding season. Outside the breeding season, the initial increase in construction noise would cause bird species to

[2] Based on a 400-foot distance to 908 South Kellogg Avenue under Section 4.11 Table 4.11-7 and this distance under Table 4.11-11 in Section 4.11, *Noise*.

permanently relocate to adjacent habitat, where they would not be affected by construction noise. Alternative 2 would implement Mitigation Measure NOI-1 which would reduce short-term noise construction impacts to wildlife movement in the San Jose Creek to a less than significant level. Alternative 2 would require implementation of Mitigation Measure BIO-1, which would reduce potential impacts to migratory birds to a less than significant level, similar to the proposed project. Therefore, similar to the proposed project, construction of Alternative 2 would have a less than significant impact on migration with mitigation incorporated.

Alternative 2 would create similar operational noise at the project site. Similar to the proposed project, operational noise would not substantially impact wildlife. Due to the vegetation buffers between the San Jose Creek and the industrial building, Alternative 2 would not substantially impact wildlife movement due to the introduction of the new uses and human presence. As with the proposed project, Alternative 2's lighting would be contained on the project site and therefore would not substantially interfere with wildlife movement in San Jose Creek or Old San Jose Creek due to lighting. Due to Alternative 2's increase in proposed landscaping, Alternative 2 has a marginally greater potential to result in adverse effects on wildlife and habitat from the use of pesticides (including rodenticides), herbicides, and fertilizers, compared to the proposed project. Alternative 2 would require implementation of Mitigation Measures BIO-6, BIO-7, and BIO-9, which would reduce Alternative 2's impact on migratory wildlife from landscaping to a less than significant level, similar to the proposed project.

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Similar to the proposed project, Alternative 2 would be consistent with General Plan Policies CE 2, CE 3, CE 5, CE, 6, and CE 8 with implementation of Mitigation Measures BIO-1 through BIO-9. The City's Conservation Element Policy CE 2.2, *Stream Protection Areas* requires a 100-foot setback in San Jose Creek and portions of Old San Jose Creek. Unlike the proposed project which includes a 25-foot SPA buffer, Alternative 2 would include a 100-foot SPA buffer consistent with Policy CE 2.2. Development within the 100-foot SPA buffer would be limited to access road improvements, installation of the underground utility trench, and the addition of landscaping, which are allowed uses in the SPA. Accordingly, Alternative 2 would not result in disturbances to wildlife associated with the reduction in SPA buffer that would occur with the proposed project. Furthermore, Alternative 2 would allow for restoration of San Jose Creek in compliance with Policy CE-2.6. Therefore, Alternative 2 would reduce the proposed project's significant and unavoidable impact related to conflicts with Policy CE 2.2 to a less than significant level.

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Alternative 2 would be located on the same project site as the proposed project. The project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, Alternative 2 would have no impact related to conflicts with these plans, which is the same as the proposed project.

d. Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Alternative 2 would be located on the same project site as the proposed project and remove the same structures, including the Twin Screens Drive-In theater. According to the *Historic Resources Technical Report*, the Twin Screens Drive-In theater is ineligible for historic resource listing. Therefore, no historical resources are present on the project site. Alternative 2 would have no impact on historical resources, which is the same as the proposed project.

Threshold: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Alternative 2 would be located on the same project site as the proposed project. The 2017 *Archaeological Resources Assessment* completed to evaluate the project site concluded there is no potential for archaeological cultural resources to exist within the project site. Alternative 2 would not substantially affect archaeological resources, and this impact would be less than significant, which is the same as the proposed project.

Threshold: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Because Alternative 2 would be located on the same project site as the proposed project, Alternative 2 would have a similar, low likelihood of encountering human remains. In the event of unanticipated discovery of human remains during construction, the construction contractor would be required to comply with the State of California Health and Safety Code Section 7050.5 which requires that all construction activities halt in the vicinity of the discovery and the County Coroner be contacted immediately. The County Coroner would make a determination of origin and disposition of the human remains pursuant to Public Resources Code Section 5097.98, including identification of a most likely descendent to provide recommendations if human remains are determined to be prehistoric. With compliance with existing regulations prescribed in the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8, Alternative 2's impacts to human remains would be less than significant, which is the same as the proposed project.

e. Energy

Threshold: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

Alternative 2 would include similar components as the proposed project and would be constructed on the same project site as the proposed project. Alternative 2 would involve the same project phases and construction schedule as the proposed project; however Alternative 2 would include import of an additional 1,200 cubic yards of soil. This would marginally increase Alternative 2's diesel consumption in comparison to the proposed project (approximately 39,310 gallons of diesel fuel use in comparison to the proposed project's approximately 39,306 gallons of diesel fuel use) (Appendix R-3). Similar to the proposed project, Alternative 2's fuel use during construction represents

approximately 0.002 percent of the annual gasoline use and approximately 0.2 percent of the annual diesel use in Santa Barbara County (See Table 4.5-1 in Section 4.5, *Energy)*. During construction of Alternative 2, contractors would be required to comply with the provisions of the California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Heavy-duty equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Although Alternative 2 would use slightly more diesel fuel than the proposed project, adherence to regulatory requirements would ensure construction of Alternative 2 would not involve the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant, similar to the proposed project.

Operation

Alternative 2 would include the same components as the proposed project, including the 70,594 square foot industrial building, and be located on the same project site as the proposed project but in a different configuration. Therefore, operation of Alternative 2 would utilize an equal amount of energy resources (approximately 13,964 gallons of gasoline, 5,546 gallons of diesel, 788 megawatts of electricity, and 1,394 therms of natural gas annually) as the proposed project. This fuel use represents approximately 0.01 percent of the annual gasoline use, 0.03 percent of annual diesel use, 0.02 percent of annual electricity use, and 0.001 percent of natural gas use in Santa Barbara County (See Table 4.5-1, Table 4.5-2, and Table 4.5-3 in Section 4.5, *Energy*). Similar to the proposed project, Alternative 2's electricity would be supplied by 3CE using 100 percent renewable energy sources. Similar to the proposed project, Alternative 2 would comply with standards set in California Building Code Title 24, including the California Green Building Code (CALGreen) Standards and the California Building Energy Efficiency Standards. Compliance with these standards would minimize Alternative 2's potential to result in the wasteful, inefficient, or unnecessary consumption of energy. During operation, trucks entering and existing the project site would limit idling to five consecutive minutes in accordance with California Code of Regulations Title 13 Section 2485 which would minimize energy use of trucks entering and exiting the project site. With the implementation of applicable energy efficiency measures, Alternative 2 would minimally increase energy demand and petroleum demand due to the development of Alternative 2, compared with existing conditions. Operation of Alternative 2 would not result in substantial adverse environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant, and the same as the proposed project.

Threshold: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City's Climate Action Plan (CAP), Strategic Energy Plan, General Plan, and Municipal Code contain measures intended to increase energy efficiency and expand the use of renewable energy in Goleta. Similar to the proposed project, Alternative 2 would comply with CALGreen and the Building Energy Efficiency Standards. Alternative 2 would include LED lighting, and indoor water use efficiency measures to limit the energy consumption necessary for operation of Alternative 2 and assist to meet the City's renewable energy goals. Furthermore, Alternative 2 would be supplied electricity by 3CE using 100 percent renewable energy sources consistent with the measures of the CAP, Strategic Energy Plan, General Plan, and Municipal Code to expand the use of renewable energy in Goleta.

Alternative 2's design includes 92 parking spaces, and 9 EV spaces. The CALGreen intervening code update, which went into effect July 1, 2024, requires nonresidential development providing between

76-100 parking spaces to provide a minimum of 17 electric vehicle (EV) capable parking spaces with 4 parking spaces including EV supply equipment. In addition, the City's EV Reach Code for new construction would require Alternative 2 to provide a minimum of 40 EV-capable parking spaces with 13 parking spaces including EV supply equipment, which are less EV spaces than that required the proposed project. The EV Reach Code was adopted by the City Council on September 17, 2024; therefore, the project applicant would be required to install the additional EV parking infrastructure in order to comply with the EV Reach Code. Accordingly, Alternative 2 would not conflict with state or local EV parking requirements, similar to the proposed project.

Similar to the proposed project, Alternative 2 would also include bicycle parking space and would connect to existing bicycle facilities in Goleta, encouraging the use of alternative modes of transportation and a reduction in vehicle fuel consumption. These design features would ensure Alternative 2 would not conflict with or obstruct the City's CAP, Strategic Energy Plan, General Plan, or Municipal Code. As stated above, Alternative 2, similar to the proposed project, would be supplied electricity by 3CE using 100 percent renewable electricity which would ensure consistency with the requirements of Senate Bill 100. Therefore, Alternative 2 would have a less than significant impact related to conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency, similar to the proposed project.

f. Geology and Soils

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Alternative 2 would be located on the same project site as the proposed project and therefore would have a similar impact related to geologic hazards, including fault rupture, as the proposed project. No active or potentially active faults are located on the project site, and therefore the potential for surface fault rupture to occur is low. Therefore, Alternative 2 would have no impact involving fault rupture, which is the same as the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. Alternative 2, similar to the proposed project, would be designed to consider seismic loads, as required by the California Building Code (CBC). Alternative 2 would also require implementation of Mitigation Measure GEO-1, which would require incorporation of building foundation recommendations into the design of Alternative 2 in order to reduce adverse effects associated with future groundshaking events. Implementation of Mitigation Measure GEO-1 would reduce Alternative 2's impact related to seismic ground shaking to a less than significant level, similar to the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

and

Threshold: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site is not at risk of landslides, lateral spreading, or collapse. Both liquefaction and settlement are potential concerns for project site soils. During an earthquake-induced liquefaction event, the total vertical movement of the ground surface could reach approximately 4 inches, while the variation in settlement between different areas or structures within the affected zone could be up to approximately 2 inches. Additionally, if dry sand on the project site is subjected to seismic activity, the total vertical movement of the ground surface could reach approximately 2 inches. Similarly, the variation in settlement between different areas or structures within the affected zone could be up to approximately 1 inch. As with the proposed project, settlement resulting from liquefaction and seismic activity may damage Alternative 2's building foundation. Alternative 2 would require implementation of Mitigation Measure GEO-1, which would reduce Alternative 2's potential impacts due to liquefaction resulting in settling of soils on the project site to a less than significant level, similar to the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site is not located in a landslide hazard area and is not subject to landslide risk. Alternative 2 would have no impact involving landslides, which is the same as the proposed project.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Construction

Project site soils are highly erodible. Alternative 2's grading operations would disturb 0.12-acre greater during construction in comparison to the proposed project. If grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site.

Similar to the proposed project, construction of Alternative 2 would comply with the requirements of the Construction Stormwater General Permit and the construction contractor would implement a SWPPP to control the discharges of pollutants, including sediment, into local surface water drainages. The SWPPP prepared for Alternative 2 would include information on BMPs that would be used during construction to retain sediment on-site, minimize erosion, and utilize vegetation for erosion control, as well as a summary of precautionary measures to be taken to ensure vehicle use does not result in erosion, pursuant to the requirements of Chapter 15.09 of the City's Municipal Code. As with the proposed project, soils on the project site are highly erodible and construction of Alternative 2 could result in substantial erosion. Alternative 2 would require implementation of Mitigation Measure GEO-1 which would require incorporation of drainage and grading recommendations into Alternative 2 to reduce soil erosion on-site. Similar to the proposed project, Alternative 2's construction-related impacts to soil erosion would be less than significant with mitigation incorporated.

Operation

During operation of Alternative 2, runoff generated from storm events may transport sediment off-site and contribute to project site erosion and the loss of topsoil. However, similar to the proposed project, Alternative 2's design would be required to meet the same regulatory requirements as the proposed project to reduce erosion. These requirements include the standards of the Central Coast Regional Water Quality Control Board's (RWQCB) *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region and the County's Stormwater Technical Guide for Low Impact Development*. Alternative 2 would comply with the Phase II Municipal Separate Storm Sewer System (MS4) Permit which requires that a Storm Water Quality Management Plan (SWQMP) be prepared for projects that create and/or replace 5,000 or more square feet of impervious surface. SWQMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. However, soils on the project site would remain highly erodible, requiring implementation of long-term maintenance activities to ensure proper drainage and the stabilization of surface soils are necessary to reduce the potential of erosion damage during operation. Alternative 2 would require implementation of Mitigation Measure GEO-1 which would incorporate drainage and grading recommendations into Alternative 2. Similar to the proposed project, Alternative 2's operational impacts related to soil erosion would be less than significant with mitigation incorporated.

Threshold: Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Soils on the project site are non-expansive. Alternative 2 would not create substantial direct or indirect risks to life or property due to expansive soils and no impact would occur, which is the same as the proposed project.

Threshold: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Similar to the proposed project, Alternative 2 would include an underground sewer line that would connect to an existing sewer line located underneath South Kellogg Avenue. Sewer services at the project site would be provided by the Goleta Sanitary District. Alternative 2 would not involve the use of septic tanks or alternative wastewater disposal systems and, as with the proposed project, no impact would occur.

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no documented paleontological resources at the project site. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth. The geologic unit that underlies the project site, Holocene and upper Pleistocene (Quaternary-era) alluvium and colluvium (Qac), has a low paleontological sensitivity. Similar to the proposed project, grading activities for Alternative 2 would be unlikely to encounter previously unidentified paleontological resources due to the low paleontological sensitivity of the geologic unit underlying the project site. Accordingly, Alternative 2 would have a less than significant impact on paleontological resources, similar to the proposed project.

g. Greenhouse Gas Emissions

Threshold: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Alternative 2 construction would generate temporary GHG emissions from operation of construction equipment on-site, and vehicles transporting construction workers to and from the project site and heavy trucks to transport soil import, building, concrete, and asphalt materials. As shown in Table 6-4, construction associated with Alternative 2 would generate 602 MT of CO_2e, an increase of 3 MT of CO_2e compared to construction of the proposed project. Amortized over a 50-year period, construction associated with the Alternative 2 would generate 12 MT of CO_2e per year, similar to the proposed project. Greenhouse gas modeling results for Alternative 2 are included in Appendix R-1.

Table 6-4 Construction GHG Emissions – Alternative 2

Year	Emissions (MT of CO_2e)
2027	271
2028	205
Utility Pipelines	126
Total	**602**
Amortized over 50 years	**12**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: CalEEMod worksheets in Appendix R-1. See Table 2.3, "Construction Emissions by Year, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Alternative 2 GHG emissions from worker trips to and from the site would be approximately 0.4 MT of CO_2e per year when amortized over the project life. In other words, construction worker trips would represent less than four percent of the total construction emissions. Therefore, GHG emissions from worker trips during construction activity would be minimal.

Operation and Total Emissions

Operation of Alternative 2 would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips (employee and warehousing activities), and wastewater and solid waste generation. The implementation of nine EV charging stations would reduce gasoline GHG emissions per year, as shown in Table 6-5. Approximately 352,125 VMT per year would be reduced from the nine EV charging stations. Alternative 2's gasoline GHG emissions would be approximately 81 MT of CO_2e per year[3] (based on employee and warehousing activities), and the GHG emissions from electric vehicles would be approximately 0 MT of CO_2e per year, since Alternative 2 would be supplied with 100 percent carbon free electricity from 3CE Prime option. Therefore, installing nine parking spaces with EV charging stations would reduce

[3] GHG emissions from gasoline vehicles = (352,125 reduced VMT per year*229 grams of CO_2e per mile*1^{-6} MT per gram)

mobile GHG emissions by 81 MT of CO_2e per year.[4] Annual operational emissions resulting from Alternative 2 are summarized in Table 6-5, and are the same as the proposed project.

The annual operational GHG emissions are combined with the amortized construction emissions. Alternative 2 would emit approximately 133 MT of CO_2e per year or 1.77 MT of CO_2e per employee per year (for 75 employees), which is similar to the proposed project. Therefore, Alternative 2 would not exceed the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT CO_2e per employee per year. Therefore, Alternative 2 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and impacts would be less than significant, and similar to the proposed project.

Table 6-5 Combined Unmitigated Annual GHG Emissions – Alternative 2

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**12**
Operational	**121**
Area	1
Energy	7
Mobile	156
EV Charging Stations	(81)
Solid Waste	21
Water, Wastewater	17
Total	**133**
Total GHG per Service Population[2]	**1.77**
Santa Barbara County GHG Service Population Criterion for Nonresidential Land Uses	**2.63 MT of CO_2e per service population per year**
Exceeded?	**No**

MT CO_2e = metric tons of carbon dioxide equivalent.

Note: parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: CalEEMod worksheets and EV charging station worksheets are in Appendix R-1. See Table 2.6 "Operations Emissions by Sector, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

[1]Construction emissions were amortized by 50 year project lifetime.

[2]The project would add approximately 75 employees.

Threshold: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

2022 Scoping Plan

The State's 2022 Scoping Plan aims to achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The Scoping Plan's Appendix D, Local Actions, provides suggestions for on-site GHG-reducing design features, methods to reduce VMT and

[4] Alternative 2 would be required to comply with the City of Goleta's EV Reach Code for new construction, which was adopted by the City Council on September 17, 2024. The EV Reach Code would require Alternative 2 to provide a minimum of 40 EV-capable parking spaces with 13 parking spaces including electric vehicle supply equipment. The greenhouse gas emissions analysis assumes that Alternative 2 would include 9 EV spaces, and therefore presents a conservative analysis.

support building decarbonization, access to shared mobility services or transit, and EV charging. It does not address other land use types such as industrial. The Scoping Plan's Transportation Electrification priority area supports an EV fleet, which Alternative 2 would allocate at least nine EV charging stations, and would be served by 3CE Prime option, which would supply 100 percent carbon free electricity to the project site. The Scoping Plan's VMT Reduction priority area supports increased access to public transit and walking, development located on infill sites, and development that does not result in the loss or conversion of natural and working lands. Alternative 2 is an infill development in an urban area that would not convert natural lands and would contribute to the job and housing balance. The City anticipates residential and work-based projects in these areas would generate low VMT because of the higher density of existing residential and commercial uses and increased transit access relative to other areas of the City. These features allow for shorter vehicle trip lengths and promote the use of alternative transportation in these areas. In addition, Alternative 2 would implement ten bicycle parking spaces to promote alternative modes of transportation. Alternative 2 would be consistent with the State's long-term climate goals of carbon neutrality by 2045, similar to the proposed project.

SBCAG 2050 RTP/SCS

The SBCAG 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The Environment Objective 1 of the RTP/SCS is to "promote better balance of jobs and housing to reduce long-distance commuting." Alternative 2 would site new jobs within close proximity to residents within the urban boundary of Goleta and therefore would be consistent with Objective 1. Furthermore, in support of Environment Objective 5 of "reduce vehicle miles traveled," the surrounding area is anticipated to generate low VMT because of the higher density of existing residential and commercial uses and increased transit access near the site. Therefore, these features would allow for shorter vehicle trip lengths and promote alternative modes of transportation, such as bicycling and transit. Alternative 2 would be consistent with the 2050 RTP/SCS, similar to the proposed project.

City of Goleta General Plan

The City General Plan addresses recently emerging topics of climate change and alternative energy. The General Plan lists several policies as part of its Transportation and Conservation Element that support GHG emission reductions. Alternative 2 would be consistent with Policy CE-15.3 of the Conservation Element by incorporating water efficient appliances to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards. In addition, the Alternative 2 would be consistent with the City's Policy TE-1.1, Alternative Modes, by incorporating ten bicycle parking spaces, which could promote alternative modes of transportation for the residential uses within half a mile of the site. In addition, Alternative 2 site is within half a mile of the Santa Barbara Metropolitan Transit District Route 6 and 11 on Fairview Avenue west of Alternative 2 site. Therefore, Alternative 2 would be consistent with the goals and policies in the General Plan to increase water efficiency, and potentially reduce the amount of motor trips with connectivity to surrounding neighboring residents, similar to the proposed project.

City of Goleta Climate Action Plan

The City's CAP contains policies and programs targeting energy efficiency policy. Alternative 2 would be consistent with the CAP measures, such as building designed and equipped with features that

conserve and reduce energy consumption. Alternative 2 would be consistent with the latest Title 24 Building Energy Efficiency Standards for solar readiness for nonresidential land uses, which would align with Policy RE-1. In addition, Alternative 2 would construct ten bicycle parking spaces, which could promote alternative modes of transportation with several residential uses within half a mile of the site, aligned with Policy T-8 of City's CAP. Alternative 2 would be consistent with the goals outlined in the CAP, similar to the proposed project

h. Hazards and Hazardous Materials

Threshold: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

Construction of Alternative 2 would result in similar temporary increases in the regional transport, use, and disposal of construction-related hazardous materials and petroleum products as the proposed project. These activities would be subject to applicable federal, State, and local regulations established by the United States Environmental Protection Agency (U.S. EPA), State of California, the County of Santa Barbara, and the City of Goleta for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. During construction of Alternative 2, existing on-site hazardous materials and waste would also be carried out in compliance with applicable federal, State, and local regulations, which would minimize potential impacts associated with the transport and disposal of these substances. Additionally, compliance with the Construction Stormwater General Permit would require implementation of Good Housekeeping BMPs to reduce potential impacts associated with hazardous materials spills. Similar to the proposed project, compliance with existing regulations governing transport, use, and disposal of hazardous materials would ensure construction of Alternative 2 would have a less than significant impact related to the routine transport, use, or disposal of hazardous materials during construction.

Operation

Alternative 2 would consist of an industrial warehouse building used for a variety of conforming uses allowed with the project site's M-S-GOL and M-1 zones. Similar to the proposed project, Alternative 2's industrial building could be leased to multiple tenants, whose operations could involve the transport, use, and disposal of hazardous materials for routine maintenance. all hazardous material transport, use, or disposal associated with the proposed industrial warehouse and office space would comply with existing hazardous materials regulations established by the U.S. EPA, the State of California, the County of Santa Barbara, and the City of Goleta. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of spills. Similar to the proposed project, compliance with these regulations would ensure Alternative 2's operational impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

Threshold: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

The project site contains existing drive-in theater structures which may contain asbestos-containing materials (ACM) and lead-based paints (LBP), and which would be demolished as part of Alternative 2. Demolition and construction activities would be required to adhere to Cal/OSHA regulations regarding asbestos and lead-based paint materials. The California Code of Regulations (CCR) requires testing, monitoring, containment, and disposal of lead-based materials (CCR Title 8, Section 1532.1) and asbestos (CCR Title 8, Section 15129). However, given the likelihood for the presence of ACM and LBP, demolition could result in a potentially significant release of ACM and LBP. Alternative 2 would require implementation of Mitigation Measures HAZ-1 and HAZ-2 in order to reduce potential impacts associated with ACM and LBP release to a less than significant level, similar to the proposed project.

Although the *Environmental Soils Analysis* prepared for the proposed project found that constituents of concern were not detected in project site soil samples at concentrations that exceed regulatory thresholds (Appendix O), there remains a potential that surficial soils to the west of the existing concessions stand could contain hazardous materials, should they exist in project site fill. The *Environmental Soils Analysis* concluded that the soil contamination is limited to the upper few inches in this location. In addition, adjacent properties to the north of the project site have handled or generated hazardous waste, with one property located at 891 South Kellogg Avenue (approximately 100 feet north of the project site) associated with two closed Cleanup Program cases (Appendix I). Past hazardous material releases from adjacent properties may have resulted in contaminated groundwater on the project site. Construction could potentially disturb hazardous materials in surficial soil to the west of the existing concession stand, leading to an accidental release of hazardous materials that could impact both construction workers and the environment. In addition, based on the depth to groundwater, it is reasonable to assume that groundwater could be encountered during grading activities and groundwater dewatering would be required during construction. Similar to the proposed project, Alternative 2 would comply with an individual NPDES permit, waste discharge, or Limited Threat Discharge Permit, to ensure proper treatment and disposal. However, given the likelihood for contamination, Alternative 2 would require implementation of Mitigation Measure HAZ-3 through HAZ-5 which, similar to the proposed project, would reduce potential impacts associated with the accidental release of hazardous materials to a less than significant level.

Operation

Similar to the proposed project, operation of Alternative 2 would involve the minimal transport, use, and disposal of hazardous materials used for routine maintenance and would not store large quantities of hazardous materials within the industrial building. However, Alternative 2's operational activities would comply with applicable federal, State, and local regulations, which prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce the risk of accidental spills. Therefore, operation of Alternative 2 would have a less than significant impact related to the accidental release of hazardous materials, similar to the proposed project.

Threshold: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The project site is not located within 0.25-mile of an existing or proposed school. Therefore, Alternative 2 would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school, which is the same as the proposed project.

Threshold: Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

There are no hazardous materials sites mapped within the project site. As such, Alternative 2 would not create a significant hazard to the public or the environment due to hazardous materials sites. No impact would occur, which is the same as the proposed project.

Threshold: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport and the entire project site is within the Airport Influence area of the Santa Barbara Municipal Airport. In addition, the project site falls within the 20,000-foot Federal Air Regulations (FAR) Part 77 Notification Area for the Santa Barbara Municipal Airport.

Alternative 2 would comply with the same regulations as the proposed project, including the 1993 Santa Barbara County Airport Land Use Plan (ALUP) development standard of a maximum intensity of 25 people per acre and the height restrictions of FAR Part 77. According to the 1993 Santa Barbara County ALUP, the project site is located within Airport Safety Zone II within the Airport Influence Area. The northern portion of the project site is located within Safety Area 1 (Clear Zone) and the southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone). The more restrictive development standards of Safety Area 1 apply to Alternative 2. Therefore, the ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to Alternative 2. Alternative 2's industrial building would employ 75 people daily, and would occupy approximately 1.62 acres of the total 11.77-acre project site, which represents an intensity of 6.37 people per acre. Therefore, development under Alternative 2 would comply with the standard specified in the 1993 Santa Barbara County ALUP, similar to the proposed project. The project site is located in the 60-65 dB CNEL noise contour for Santa Barbara Airport. Industrial land uses are identified as compatible within this contour in the 1993 Santa Barbara County ALUP. Therefore, Alternative 2 would not conflict with the 1993 Santa Barbara County ALUP, similar to the proposed project.

The 1993 Santa Barbara County ALUP does not specify a maximum height for structures in Safety Area 1, and states that objects should be limited in height consistent with airspace protection surfaces defined by FAR Part 77. Alternative 2's industrial building would have a maximum height of approximately 35 feet from finished grade, and would have a maximum height of approximately 39 to 41 feet, similar to the proposed project. Although Alternative 2 would increase building height on the project site, and would be built at a height taller than existing development in the area, Alternative 2 would be consistent with the City's development standards and zoning code that existed prior to 2020, which considered proximity to the Santa Barbara Municipal Airport.

Similar to the proposed project, Alternative 2 would not require Airport Land Use Commission review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County. Alternative 2 would comply with additional applicable FAR Part 77 and Federal Aviation Administration (FAA) standards, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration to FAA for review and approval. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow Alternative 2 to be revised. The applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 2's design, the FAA would then determine whether Alternative 2 poses a hazard to air navigation and could request changes to project design to minimize those hazards. The FAA would evaluate Alternative 2 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 2 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Similar to the proposed project, compliance with these existing regulations would ensure Alternative 2's impacts related to airport hazards would be less than significant.

Threshold: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Construction of Alternative 2 would not impair implementation of an adopted emergency response plan or emergency evacuation plan, as construction staging and construction worker parking would occur on-site and would not impede existing roadway traffic. Operation of Alternative 2 would consist of an industrial warehouse building used for similar activities as the proposed project and would not introduce activities that could impede or interfere with emergency plans or emergency evacuations. Similar to the proposed project, Alternative 2 would have a less than significant impact related to conflicts with an adopted emergency response plan or emergency evacuation plan.

Threshold: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is not within a SRA, or lands classified as VHFHSZ. Alternative 2 would be constructed in accordance with the same requirements as the proposed project, including the California Fire Code and Santa Barbara County Fire Department (SBCFD) standards. As with the proposed project, adherence to these regulations would ensure Alternative 2 would have a less than significant impact related to wildland fire.

i. Hydrology and Water Quality

Threshold: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Alternative 2 would result in similar demolition activities as the proposed project, but would disturb 0.12-acre greater during construction and therefore have marginally increased potential to violate water quality standards or waste discharge requirements. Alternative 2's potential to introduce stormwater pollutants would be minimized with adherence to SWRCB's Construction Stormwater General Permit which requires implementation of a SWPPP and construction BMPs to minimize pollutant discharge during demolition and construction. In addition to NPDES permit requirements,

Alternative 2's construction activities would be subject to the requirements of Chapter 15.09 of the City's Municipal Code which requires preparation and implementation of an erosion and sediment control plan. Nonetheless, due to the highly erodible on-site soils, mitigation would be required to reduce erosion. Similar to the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1, which would require implementation of construction measures to minimize erosion. Implementation of Mitigation Measure GEO-1 would reduce Alternative 2's impact on water quality due to erosion to a less than significant level, similar to the proposed project.

Construction of Alternative 2's drainage outfall also would have a similar potential as the proposed project to reduce water quality in San Jose Creek if installation of the cofferdam would occur during the wet season. Alternative 2's construction impacts on the water quality of San Jose Creek would be potentially significant. However, required implementation of Mitigation Measure BIO-3 would require the cofferdam to be installed during the dry season and implementation of a Toxic Materials Control and Spill Response Plan which would reduce Alternative 2's water quality impacts on San Jose Creek to a less than significant level, similar to the proposed project.

Similar to the proposed project, Alternative 2 could require groundwater dewatering activities during grading activities. Alternative 2 would be required to obtain coverage under the Limited Threat Discharge Permit if drained groundwater would be discharged into San Jose Creek. Adherence to the permit would reduce potential water quality impacts associated with dewatered groundwater. Similar to the proposed project, if dewatered groundwater is contaminated, the construction contractor for Alternative 2 could not obtain coverage from the Limited Threat Discharge Permit, and impacts would be potentially significant. Alternative 2 would require implementation of Mitigation Measure HAZ-3 which would require groundwater investigation and disposal in accordance with the requirements of the Central Coast RWQCB or City. Implementation of Mitigation Measure HAZ-3 would reduce Alternative 2's potential impact on water quality due to groundwater dewatering to a less than significant level, similar to the proposed project.

Operation

Alternative 2 would be used for similar purposes as the proposed project (i.e., indoor warehousing and storage, wholesaling and distribution, and construction and materials storage) and could introduce potential water pollutants through oil leaks, leaching of metals from roof and drains, and use of pesticides or fertilizers for landscape maintenance. Alternative 2 would not be subject to the NPDES Phase I industrial stormwater regulations because Alternative 2 would not include facilities that are included on the Standard Industrial Classification Codes specified in the permit. Similar to the proposed project, Alternative 2 would be required to comply with Chapter 13.04 of the City's Municipal Code and the Phase II MS4 Permit, which require the use of Source Control and Low-Impact Development (LID) BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 2 would provide a detention basin, hydrodynamic separator, swales, and catch basin inlet filters for stormwater runoff treatment. Alternative 2's detention basins would provide 9,304 square feet greater of stormwater facilities than the proposed project's detention basin. Alternative 2's larger detention basins would reduce Alternative 2's potential to result in degraded water quality during operation in comparison to the proposed project. Alternative 2's detention basins would be sized in accordance with the requirements of the Central Coast RWQCB. Regardless, due to the presence of erodible soils on-site, operation of Alternative 2 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil

stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 2's operational water quality impacts would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Alternative 2 has a similar potential to encounter groundwater during construction as the proposed project due to the shallow groundwater level on-site. Alternative 2's groundwater dewatering activities would be of similar length as the proposed project, lasting only during excavations required to insert utility connections and construction of the drainage basin. Alternative 2's groundwater dewatering would result in a similar local decrease of groundwater supplies as the proposed project, which would be minimal, and would not otherwise result in substantial groundwater losses in the Basin or result in changes which prohibit groundwater infiltration on-site compared to existing conditions. Therefore, construction of Alternative 2 would have a less than significant impact on groundwater, similar to the proposed project.

Alternative 2 would include approximately 183,675 square feet of impervious surfaces compared to the proposed project's 184,543 square feet of impervious surfaces. The project site contains low permeability soils and high groundwater elevation, thereby rendering groundwater infiltration infeasible. Accordingly, Alternative 2 would not result in substantial interference to groundwater recharge, similar to the proposed project.

Operation of Alternative 2 would include similar activities as the proposed project and therefore would not require groundwater extraction on-site. Alternative 2 would generate the same 19.8 acre-feet per year demand as the proposed project because Alternative 2 would not change the size of the proposed industrial building or maximum employees. Groundwater provided to Alternative 2 from the Goleta Water District (GWD) would be provided in accordance with the allocations determined by the Wright Judgement which would ensure the groundwater provided to Alternative 2 is sustainably managed. Furthermore, existing regulatory measures requiring water conservation during times of drought prevent the overdraft of the Basin that GWD would use to supply water demand of Alternative 2. Therefore, Alternative 2 would not substantially increase water supplies and this impact would be less than significant, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Construction

Alternative 2's construction activities would disturb approximately 6.87 acres in comparison to the proposed project's 6.75-acre disturbance area and therefore result in marginally greater potential for erosion and sedimentation. Similar to the proposed project, Alternative 2 would adhere to the requirements of the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the City Municipal Code, as well as implementation of the required SWPPP and construction BMPs would minimize pollutant discharge in stormwater runoff. However, due to the erodibility of the project site, Alternative 2's impacts would be potentially significant and require mitigation. Alternative 2 would require implementation of Mitigation Measure GEO-1 which, similar to the

proposed project, would incorporate erosion control measures and reduce Alternative 2's construction impacts related to erosion to a less than significant level.

Operation

Similar to the proposed project, Alternative 2 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 2's detention basins would provide 9,304 square feet greater of stormwater facilities for stormwater detention and treatment than the proposed project's detention basin. Regardless, due to the presence of erodible soils on-site, operation of Alternative 2 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 2's operational impacts related to erosion would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Construction

Similar to the proposed project, Alternative 2 would comply with the requirements of the Construction Stormwater General Permit, including requiring the construction contractor to implement a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff. Construction would not include activities which could result in the channelization of San Jose Creek or relocation of a natural drainage bed which could increase the rate of surface water runoff. Therefore, Alternative 2's construction activities would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. This impact would be less than significant, similar to the proposed project.

Operation

Alternative 2 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff. Alternative 2's detention basins would provide 9,304 square feet greater of stormwater facilities for stormwater detention and treatment than the proposed project's detention basin. The detention basins would meet the requirements of the Central Coast RWQCB. These requirements mandate Alternative 2's stormwater infrastructure be designed to provide treatment up to two times the 85th percentile storm event. Adherence to the regulatory requirements of the Central Coast RWQCB would ensure Alternative 2 would have a less than significant impact to on- or off-site flooding, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would

exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction

Alternative 2 would comply with the same regulations as the proposed project intended to control stormwater runoff and reduce pollutants and ensure construction activities would not result in substantial runoff which would exceed the capacity of San Jose Creek. These include requiring the construction contractor to implement a SWPPP and construction BMPs that would direct and manage stormwater to minimize impacts to the capacity of San Jose Creek. However, even with adherence to regulatory requirements, construction activities could result in additional sources of polluted runoff due to construction within San Jose Creek and/or groundwater dewatering activities. Alternative 2 would require implementation of Mitigation Measures GEO-1, BIO-3 and HAZ-3, which would reduce Alternative 2's potential impacts associated with substantial runoff and polluted runoff to a less than significant level, similar to the proposed project.

Operation

Alternative 2 would be required to implement stormwater infrastructure in accordance with Central Coast RWQCB requirements which would provide for substantial stormwater and runoff control on-site. Alternative 2 would also adhere to the Central Coast RWQCB and City LID requirements for treatment of stormwater which would minimize polluted runoff generated during operation of Alternative 2. However, as with the proposed project, highly erodible on-site soils could lead to Alternative 2's operation introducing polluted runoff. Alternative 2 would require implementation of Mitigation Measure GEO-1 which would mandate procedures during operation to minimize on-site soil erosion. With implementation of Mitigation Measure GEO-1, Alternative 2's impact associated with substantial runoff and polluted runoff would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Flooding

Alternative 2 would be located on the same project site as the proposed project and therefore is subject to similar flood hazards. Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site.

Although the project site in its current condition would not be inundated by 100-year flood flows, Alternative 2 would require additional flood-proofing design measures are required because the berm is not an accredited levee recognized by FEMA. Alternative 2 would require implementation of flood-proofing design measures in accordance with the City Municipal Code. These include the use of between 4 to 6 feet of fill to elevate the proposed building above the 100-year floodplain elevation. Alternative 2 would also be required to be certified by a registered professional engineer or architect that the City's floodplain development standards. In the event of a 100-year flood event, stormwater flows on the project site would be conveyed to Alternative 2's detention basins for eventual discharge

to the San Jose Creek. Because Alternative 2 would direct stormwater flows to San Jose Creek, the introduction of fill material for Alternative 2 would not substantially alter off-site flooding or drainage. Due to the earthen berm, flood water from the project site does not discharge to surrounding parcels. Similar to the proposed project, Alternative 2 would not change the flood carrying capacity of the project site, permanently alter a water course, or raise flood elevations. Due to the existing flood protection offered by the earthen berm, project design, and compliance with City requirements governing development within a floodplain, Alternative 2 would have a less than significant impact related to flooding, similar to the proposed project.

Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA*] v. *Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. For informational purposes only, sea level rise is discussed below.

Alternative 2 would occur on the same project site as the proposed project and would therefore be subject to similar risks of sea level rise. Alternative 2 would require approximately 4 to 6 feet of fill to raise the industrial building above the floodplain. Based on a scenario with 100-year storm event with 6.6 feet of sea level rise, Alternative 2's industrial building would not be inundated because the industrial building would be elevated above San Jose Creek's anticipated water surface elevation of 14.78 feet. However, in the northeastern most portion of the project site, the access road to the industrial building, San Jose Creek maintenance road, and the creek's bank would below the water level elevation during a 100-year storm event. Therefore, should the worst-case 100-year water level elevation of 14.78 feet occur within San Jose Creek, the northern portion of the access road to the industrial building would be inundated, potentially preventing access to the industrial building. The City would incorporate recommendations made in the *Sea Level Rise and Coastal Hazards Analysis* prepared for the proposed project into Alternative 2 as conditions of approval. The recommendations would require the applicant to monitor future sea level rise and flood levels within San Jose Creek, and construct on-site flood control measures as determined appropriate by the City and other Responsible Agencies including but not limited to elevating the access road to the proposed industrial building above the 100-year floodplain elevation and continuing to provide maintenance access to San Jose Creek (e.g., constructing a levee, etc.). As part of the condition of approval, the potential effects of sea level rise on Alternative 2 would be evaluated 50 years after the start of construction in conjunction with the Santa Barbara County Flood Control District. With these conditions of approval, the potential for sea level rise to result in an impediment or redirection of flood flows at the project site would be minimized, similar to the proposed project.

Threshold: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is located outside of a tsunami hazard zone and is not proximate to a large body of water and therefore is not subject to seiche. Therefore, as with the proposed project, Alternative 2 would not risk release of pollutants in a tsunami hazard zone or seiche hazard zone.

Alternative 2 would be subject to similar flood hazards as the proposed project, as described above. Alternative 2 would be designed and constructed in accordance with the floodproofing requirements of the City's Municipal Code which would elevate Alternative 2 two feet above the 100-year flood elevation. Accordingly, in the event the earthen berm fails, pollutants would not be released because

Alternative 2's industrial building would be elevated above the 100-year flood elevation. Furthermore, implementation of Mitigation Measure GEO-1 would require Alternative 2's design to include specific measures to minimize the release of stormwater pollutants. Due to regulatory requirements and required implementation of Mitigation Measure GEO-1, Alternative 2 would not risk release of pollutants due to flood hazards, similar to the proposed project.

The project site is within the inundation zone of the Rancho Del Ciervo dam. Alternative 2 and the proposed project would not include any features which would preclude routine dam inspection or otherwise increase the risk for dam failure and inundation. Therefore, Alternative 2's potential impacts related to pollutant release due to dam inundation would be less than significant, similar to the proposed project.

Threshold: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. Alternative 2 would comply with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. These include the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the Central Coast RWQCB's Post-Construction Requirements, the County's Stormwater Technical Guide for Low Impact Development, and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code. However, Alternative 2, has a similar potential as the proposed project to result in water quality impacts related to erosion, construction in San Jose Creek, and groundwater dewatering, which could conflict with the goal of the Basin Plan. Alternative 2 would require implementation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 to reduce potential surface water quality impacts related to erosion, groundwater dewatering, and construction within San Jose Creek. With implementation of these measures, Alternative 2's impact related to conflicts with the Basin Plan would be reduced to a less than significant level, similar to the proposed project.

GWD's Groundwater Management Plan Goleta Groundwater Basin (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement. As described above, Alternative 2 would not adversely impact groundwater supplies or the management of the Goleta Groundwater Basin in accordance with the Wright Judgement. Existing regulatory measures requiring water conservation during times of drought prevent the overdraft of groundwater that GWD would use to supply the demand induced by Alternative 2. Accordingly, Alternative 2 would have a less than significant impact related to conflicts with a sustainable groundwater management plan, similar to the proposed project.

j. Land Use and Planning

Threshold: Would the project physically divide an established community?

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood. Alternative 2 would not include components such as roads that could divide an established community. As with the proposed project, Alternative 2 would not result in the physical division of an established community, and no impact would occur.

Threshold: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Similar to the proposed project, Alternative 2 includes development of an industrial warehouse building that would be consistent with the permitted uses in the City's M-1 zone. Alternative 2 would be consistent with the setback, coverage, height, and landscaping requirements within the M-S-GOL and M-1 zones as Alternative 2's proposed industrial building would be located more than 50 feet from the centerline and 20 feet from the right-of-way of South Kellogg Avenue and setback more than 10 feet from the property line; would not increase the 5.73-acre coverage of the proposed project; would not increase the height of the proposed project's building approximately 35 feet from the finished grade; and would not decrease landscaping compared to the proposed project.

As with the proposed project, Alternative 2 would be subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code). Section 35-97.2 of the previous zoning code states that if the project site is determined to be outside of this district, then the regulations of the overlay district shall not apply. A small portion of San Jose Creek to the southeast of the project site is located within the ESHA Overlay District. Alternative 2 would include utility development within 50 feet of this area. Section 35-97.19 of the previous zoning code states that no structures shall be allowed within stream corridors when located in the ESHA Overlay District. Because the utility trench would be subsurface and not considered structural development, Alternative 2's utility trench would be consistent with the previous zoning code.

Alternative 2's detention basin outfall would be located within the boundary of the Goleta Slough State Marine Conservation Area (SMCA), similar to the proposed project. Authorization for any activities in the Goleta Slough SMCA would be provided by California Department of Fish and Wildlife as part of the Lake and Streambed Alteration Agreement notification process. Therefore, Alternative 2 would not conflict with land use policies within the Goleta Slough SMCA, similar to the proposed project.

The project site is located within the Airport Influence Area of Santa Barbara Airport. Alternative 2 would comply with the ALUP development standard of a maximum intensity of 25 people per acre, as Alternative 2 would employ up to 75 people daily which would represent an intensity of up to 6.37 people per acre, the same as the proposed project. The project site is located in the 60-65 dB CNEL noise contour for the Santa Barbara Airport; however, industrial land uses are classified as compatible in this contour in the 1993 Santa Barbara County ALUP. Similar to the proposed project, Alternative 2 would not conflict with the safety and noise policies of the 1993 Santa Barbara County ALUP.

Mitigation Measures BIO-1 through BIO-4 in Section 4.3, *Biological Resources*, and Mitigation Measure NOI-1 in Section 4.11, *Noise*, would reduce Alternative 2's impacts involving conflicts with land use plans, policies, or regulations that were adopted for purposes of reducing environmental impacts to the extent feasible. Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to special-status species, and Mitigation Measure NOI-1 would reduce project construction noise. These mitigation measures would reduce impacts involving conflicts with the Goleta General Plan as they would minimize potential impacts to protected environmental resources within the Goleta General Plan.

Due to the requested reduction in the 100-foot SPA buffer, the proposed project was determined to be potentially inconsistent with Goleta General Plan Policy CE 1.6, CE 2.2, and CE-2.6 intended to protect ESHAs, SPAs, and creeks, respectively. Unlike the proposed project, Alternative 2 would limit development within the San Jose Creek 100-foot SPA buffer to access road improvements, installation

of the underground utility trench, and the addition of landscaping, which are allowable uses within the SPA buffer. Accordingly, Alternative 2 would reduce development within the 100-foot SPA buffer in comparison to the proposed project and would therefore provide increased protection for ESHAs and SPAs and would allow for restoration of San Jose Creek in compliance with Policy CE-2.6. Therefore, Alternative 2 would reduce the proposed project's significant and unavoidable impact related to conflicts with Goleta General Plan Policies CE 1.6, CE 2.2, and CE 2.6 to a less than significant level.

Due to the height of the proposed project and Alternative 2's proposed industrial building 35 feet above the finish grade, both the proposed project and Alternative 2 would impair views of the Santa Ynez Mountains and foothills experienced from the SR 217 local scenic corridor and therefore would be potentially inconsistent with the following Goleta General Plan policies:

- Policy LU 1.8: New Development and Neighborhood Compatibility
- Policy VH 1.1: Scenic Resources
- Policy VH 2.2: Preservation of Scenic Corridors
- Policy VH 2.3 Development Projects Along Scenic Corridors

Similar to the proposed project, feasible mitigation is unable to be implemented to reduce Alternative 2's potential impact on scenic views. Accordingly, Alternative 2 would conflict with the Goleta General Plan and result in a significant and unavoidable impact, similar to the proposed project.

k. Noise

Threshold: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Construction activities under Alternative 2 would be the same as the proposed project, and would include demolition, grading, and building construction that would temporarily increase noise levels at noise-sensitive receptors in the project site vicinity. The site plan adjustments under Alternative 2 would potentially move construction equipment closer to the residence at 1150 S Fairview Avenue, with construction occurring as close as 300 feet (as opposed to 425 feet under the proposed project). Construction would generally be moved further from the Rancho Goleta Community under Alternative 2, although would still be within 325 feet at the closest point from entrance road construction as with the proposed project.

Estimated construction noise levels from Alternative 2 are provided in Table 6-6, using the same construction equipment assumed for the proposed project. As shown in the table, construction noise levels may exceed Goleta's 65 dBA standard at both residences to the west and the Rancho Goleta mobile home community to the east. The proposed project's construction would occur at a sufficient distance from the residence to the west (1150 S Fairview) to be below Goleta's standard. However, Alternative 2 would result in greater construction noise impacts than the proposed project (up to 4 dBA greater compared to the proposed project). The overall significance conclusion would be the same, as both the proposed project and Alternative 2 would exceed Goleta's standard to the east. Similar to the proposed project, Alternative 2 would implement Mitigation Measure NOI-1, which would need to include an additional temporary noise barrier on a portion of the western project

boundary to mitigate construction noise below Goleta's 65 dBA standard. Impacts would be less than significant with mitigation, and greater than the proposed project.

Table 6-6 Construction Noise Levels – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Distance from Construction (feet)[2]	Noise Level (dBA Leq)[1]		Exceed Threshold?[3]
				General Construction	Joint Utility Trench Construction	
1150 S Fairview Ave	Single-family	West	300	66	68	**Yes**
Rancho Goleta Community	Mobile Home	East	325	66	67	**Yes**

[1] The loudest construction scenario analyzed for both activities was assumed to be a grader, excavator, and loader.

[2] Noise calculated using a sound attenuation formula with the proposed project for a reference noise and distance: SPL2=SPL1−20log(*R*2*R*1),SPL2=SPL1−20log(*R*1*R*2), where SPL1=sound pressure level at point 1; SPL2=sound pressure level at point 2; R1=Distance from the sound source to point 1, and; R2=Distance from the sound source to point 2

[3] The City of Goleta threshold is if construction noise exceeds 65 dBA.

Operation

Loading Bay Activities

Potential on-site truck activities from Alternative 2 include eight loading bays (two more than the proposed project), which would be located on the western side of the building. Noise from truck and unloading activities at the loading docks would generate noise that has the potential to increase noise at nearby sensitive receptors. Loading bay noise from Alternative 2 is shown in Table 6-7.

Table 6-7 Loading Bay Noise – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Eight Loading Bays – West End		Exceed Threshold?[1]
			Distance from Source	Noise Level (dBA)	
1150 S Fairview Ave	Single-family	West	540	53	No
Rancho Goleta Community	Mobile Home	East	690	51	No

[1] The City of Goleta threshold is if operational noise increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or if existing noise levels already exceed 65 dBA CNEL, if the operation noise increases noise levels by 3 dBA CNEL or more.

The combined loading dock noise level is highest at 1150 South Fairview Avenue, with a noise level of 53 dBA. However, these noise levels would be well below the City's 65 dBA CNEL standard. In addition, ambient noise levels were measured as 63 dBA CNEL near 1150 South Fairview Avenue, with similar ambient noise levels expected at Rancho Goleta mobile home community due to the exposure of the community to SR 217 and Santa Barbara Airport noise levels; therefore, the loading dock noise levels from Alternative 2 would not exceed existing ambient noise levels. These noise levels are slightly higher than the proposed project's, with an increase in noise levels of 2 dBA at 1150 South Fairview Avenue and 1 dBA at Rancho Goleta mobile home community due to the closer placement of loading docks. Therefore, Alternative 2 would result in greater loading dock noise impacts than the proposed project. Impacts would be less than significant, and greater than the proposed project.

Mechanical Equipment

The proposed industrial building for Alternative 2 would include HVAC units that would generate noise that could increase ambient noise levels at nearby sensitive receptors. Seven HVAC units were assumed to be located in a cluster on the rooftop; for each sensitive receptor, it was conservatively assumed that they would be located at the closest building edge to that receptor. The rooftop would be lined with a parapet wall that would provide noise screening and was assumed to result in a 5 dBA reduction. HVAC noise levels are shown in Table 6-8.

Table 6-8 HVAC Noise – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Distance from Source	HVAC Units Noise Level (dBA)	Exceed Threshold?[1]
1150 S Fairview Ave	Single-family	West	390	44	No
Rancho Goleta Community	Mobile Home	East	480	42	No

[1] The City of Goleta threshold is if operation increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or if operation increases noise levels by 3 dBA CNEL or more if existing noise levels already exceed 65 dBA CNEL.

Table 6-8 shows that the HVAC noise level from Alternative 2 is highest at the residence to the west, with a noise level of 44 dBA. The noise levels would be well below the City's 65 dBA CNEL standard. In addition, ambient noise levels were measured as 63 dBA CNEL near 1150 South Fairview Avenue, with similar ambient noise levels expected at Rancho Goleta mobile home community; therefore, the HVAC noise levels from Alternative 2 would not exceed existing ambient noise levels. These noise levels are slightly higher than the proposed project's, with an increase in noise levels of 3 dBA to 1150 South Fairview Avenue. Therefore, Alternative 2 would result in greater HVAC noise impacts than the proposed project. Impacts would be less than significant, and greater than the proposed project.

Combined Operational Noise Levels

The combined noise levels from loading bay activities and HVAC equipment for Alternative 2 are shown in Table 6-9. These noise levels would be well below the City's 65 dBA CNEL standard, and below the existing ambient noise levels. Therefore, operational noise from Alternative 2 would be less than significant. These noise levels are slightly higher than the proposed project's, with an increase in noise levels of 2 dBA to 1150 South Fairview Avenue. Therefore, Alternative 2 would result in greater operational noise impacts than the proposed project due to the adjusted location of the building. Impacts would be less than significant, and greater than the proposed project.

Table 6-9 Combined Operational Noise Levels – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Loading Bays Noise Level (dBA)	HVAC Units Noise Level (dBA)	Combined Noise Level (dBA)	Exceed Threshold?[1]
1150 S Fairview Ave	Single-family	West	53	44	53	No
Rancho Goleta Community	Mobile Home	East	51	42	51	No

[1] The City of Goleta threshold is operation increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or operation increases noise levels by 3 dBA CNEL or more if existing noise levels already exceed 65 dBA CNEL.

Off-site Traffic Noise

CONSTRUCTION

Construction worker trips with Alternative 2 would be expected to be similar to the proposed project. Haul trips would be slightly increased from 1,100 to 1,148 total trips, which may slightly increase the 220 daily haul trips assumed for the proposed project's construction traffic noise analysis. This would result in a minor increase in construction traffic noise from Alternative 2 compared to the proposed project. The overall estimated increase on nearby roadways would reach up to 0.2 dBA, similar to the proposed project. Therefore, Alternative 2 would result in greater construction traffic noise impacts than the proposed project due to a slight increase in hauling trips. Impacts would be less than significant, and greater than the proposed project.

OPERATION

Operation of Alternative 2 would generate the same number of trips as the proposed project. The operational traffic noise increases would be the same as the proposed project, which were up to 0.2 dBA noise increase, which is well below the 3 dBA increase threshold. Therefore, Alternative 2 would result in less than significant traffic noise impacts from operation, which would be similar to the proposed project.

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be used to construct Alternative 2. Similar to the proposed project, the greatest anticipated source of vibration during general project construction activities would be from a dozer, which would be used as close as 50 feet during construction from the nearest buildings to the northeast. A dozer would create a vibration level of approximately 0.089 PPV in/sec. at a distance of 25 feet, similar to the proposed project. This would equal a vibration level of approximately 0.042 PPV in/sec at a distance of 50 feet. This vibration level would be well below the Caltrans vibration damage potential threshold for older structures of 0.3 PPV in/sec for continuous/frequent intermittent sources. Therefore, temporary vibration impacts from Alternative 2 associated with the dozer (and other potential equipment) would be less than significant, and similar to the proposed project.

Operational activities known to generate excessive ground-borne vibration include projects involving railroads and subways. Alternative 2 would not involve substantial vibration sources associated with operation such as this. Therefore, Alternative 2's operational groundborne vibration and noise impacts would be less than significant, similar to the proposed project.

Threshold: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in exposure of people residing or working in the project area to excessive noise levels?

The project site is located within the 60 to 65 CNEL noise contour from Santa Barbara Airport, which is approximately 1,100 feet to the west. This would be a noise exposure within the City's "normally acceptable" recommendation for noise levels for industrial uses, which is up to 70 CNEL. Therefore, construction workers building Alternative 2 or workers of the industrial building would not be

exposed to excessive airport noise levels, and impacts would be less than significant, similar to the proposed project.

I. Public Services

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Alternative 2 would result in the same maximum amount of employees as the proposed project (up to 75) and would not include residential uses. Accordingly, Alternative 2 could result in population growth of 198 people based on the city's average persons per household of 2.64, which is the same growth potential as the proposed project. The addition of 198 people to Goleta would maintain the existing SBCFD ratio of approximately 2.77 firefighters per 2,000 persons and thus not substantially diminish fire protection services such that new fire protection facilities would be needed. The project site is located approximately 1.3 miles from the County Station 12 and thus firefighters would be able to readily respond to the demand for fire services at the project site. Alternative 2 would be constructed in accordance with the same regulations as the proposed project, including the California Fire Code and SBCFD regulations, which would minimize the potential for fire protection services to be needed at the project site. As with the proposed project, the project applicant would be required to pay development impact fees which would provide funding for expanded fire protection facilities, including environmental compliance and permitting for new facilities. Due to the small potential increase in population and regulatory compliance, Alternative 2's impact to fire protection facilities would be less than significant, similar to the proposed project.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Alternative 2 would result in the same maximum population growth of 198 persons as the proposed project. This population growth represents less than one percent of Goleta's existing population which is not anticipated to substantially alter the existing service ratios provided by the contracted Deputy Service Units such that an additional officer would be required in order to provide adequate public services. Thus Alternative 2, similar to the proposed project, would not be expected to result in substantial additional police services or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. In addition, the project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel. Similar to the proposed project, Alternative 2 would have a less than significant impact on police facilities.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Alternative 2 would generate the same maximum amount of students as the proposed project, which could result in up to 15 additional students in the Goleta Unified School District (GUSD) and another 15 students in the Santa Barbara Unified School District (SBUSD). This student increase would not exceed the capacities of GUSD or SBUSD facilities. Furthermore, the applicant would pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from new development projects. Pursuant to Senate Bill 50, payment of this fee "…is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." With payment of school fees, Alternative 2 would have a less than significant impact on schools, similar to the proposed project.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

As with the proposed project, Alternative 2 could indirectly result in a population growth of approximately 198 people which would not place additional demand on library services or inhibit the ability for the Goleta Valley Library to maintain material circulation. The existing library facility would be sufficient to accommodate the potential incrementally increased use and circulation needs that may result from indirect population growth due to Alternative 2. Furthermore, the applicant would pay development impact fees which would fund the provision of new or expanded libraries. Therefore, Alternative 2 would have a less than significant impact on the need for new or physically altered libraries, similar to the proposed project.

m. Transportation and Circulation

Threshold: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Alternative 2 includes similar elements as the proposed project and would not introduce features that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Alternative 2 would be consistent with the City's Transportation Element policies. Alternative 2 would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. There is an existing sidewalk located on South Kellogg Avenue, and Class III bicycle lanes located on South Kellogg Avenue. Alternative 2 would include the same transportation components as the proposed project. Project site access would be provided via an existing driveway which connects to an access road. Alternative 2 would resurface the existing access road. Alternative 2 would also include installation of a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot. Alternative 2's design features would be subject to review and approval by the City, which would ensure Alternative 2 would conform to the City's driveway access control and vision clearance standards and minimize potential vehicle to pedestrian and vehicle to cyclist conflicts in accordance with City standards. Alternative 2, similar to the proposed project, would not generate a substantial increase in transit use due to the

increase in up to 75 employees as employees are anticipated to be residents of Goleta who area within the service area of the Santa Barbara Metropolitan Transit District.

Given the above considerations, Alternative 2 would have a less than significant impact on a program, plan, ordinance or policy that addresses the current circulation system including transit, roadway, bicycle, and pedestrian facilities, similar to the proposed project.

Threshold: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Construction of Alternative 2 would result in similar, short-term, temporary vehicle trips as the proposed projects, which would not result in long term changes to vehicle miles traveled (VMT) within Goleta. Therefore, Alternative 2's construction VMT would not be inconsistent with CEQA Guidelines Section 15064.3(b), similar to the proposed project. The project site is within an area identified by the City where work-based projects would generate an average VMT of 15 percent or more below baseline levels, would not require a VMT analysis, and would be presumed to have a less than significant impact on VMT. Therefore, similar to the proposed project, Alternative 2 would have a less than significant impact on VMT and would not conflict with CEQA Guidelines Section 15064.3(b).

Threshold: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Construction staging for Alternative 2 would be located at the project site which would minimize the potential for construction related vehicles and equipment to create a circulation related hazard in the immediate area. As with the proposed project, Alternative 2 would be required to widen the eastern portion of the driveway in order to accommodate WB-62 delivery truck turning requirements. WB-62 delivery trucks would be expected to access the project site via South Kellogg Avenue, Hollister Avenue, and SR 217, all of which can accommodate a WB-62 delivery truck. The transportation design of Alternative 2 would also be required to be reviewed by SBCFD and the City to ensure Alternative 2 would not introduce geometric design hazards. Alternative 2 would not introduce new incompatible uses, such as farm equipment, to roadways. Therefore, Alternative 2 would have a less than significant impact on transportation hazards, similar to the proposed project.

Threshold: Would the project result in inadequate emergency access?

Construction staging for Alternative 2 would occur on-site, similar to the proposed project, which would minimize the potential for construction-related vehicles and equipment to result in inadequate emergency access in the immediate area. Alternative 2 and the proposed project would be required to be designed in accordance with applicable SBCFD standards, including those that address minimum driveway width, signage and addressing, fire hydrants, fire sprinklers, and emergency access. Alternative 2 would also be required to widen the driveway which would also improve access for emergency vehicles. With compliance with SBCFD and City standards, Alternative 2's impacts to inadequate emergency access would be less than significant, similar to the proposed project.

n. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 2 would be located on the same project site as the proposed project, and therefore would have a similar potential to impact tribal cultural resources. Based on Native American consultation conducted for the proposed project, no tribal cultural resources have been identified on the project site. The Archaeological Resources Assessment completed for the project site determined there is a very low potential for subsurface resources to exist within the project site. Therefore, similar to the proposed project, Alternative 2 would not cause a substantial adverse change to tribal cultural resources, and impacts would be less than significant.

o. Utilities and Service Systems

Threshold: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Alternative 2 would require similar water utility infrastructure as the proposed project, including a water line to connect to existing GWD infrastructure that would connect underneath the sidewalk adjacent to South Kellog Avenue. Alternative 2 would result in the same water demand as the proposed project and therefore Alternative 2 would not generate substantial water demand and would not necessitate new or expanded facilities in order to meet Alternative 2's water demand. Therefore, Alternative 2's impact on water infrastructure would be less than significant, similar to the proposed project.

Wastewater

Alternative 2 would require similar sewer infrastructure as the proposed project in order to connect to the sewer line located underneath South Kellogg Avenue. Alternative 2 would generate the same amount of wastewater during operation as the proposed project. Therefore, wastewater generated by Alternative 2 would not exceed the existing capacity of the Goleta Sanitary District's (GSD) wastewater treatment plant (WWTP). Alternative 2 would not require new or expanded wastewater treatment facilities beyond the sewer line connection. Similar to the proposed project, Alternative 2's impact on wastewater infrastructure would be less than significant.

Stormwater

Similar to the proposed project, Alternative 2 would include development of a detention basin and outlet discharge into San Jose Creek. These stormwater facilities would be sized in accordance with Central Coast RWQCB and City requirements. Because the proposed stormwater drainage facilities would allow for stormwater filtration and detention on-site, and excess runoff would be directed to San Jose Creek, no additional stormwater infrastructure would be needed beyond the stormwater infrastructure included as part of Alternative 2. Similar to the proposed project, Alternative 2's impact on stormwater infrastructure would be less than significant.

Electric, Natural Gas, and Telecommunications Facilities

Alternative 2 would install a transformer pad and utility lines which would connect to existing electric, natural gas, and telecommunications infrastructure proximate to the project site, similar to the proposed project. Alternative 2's demand for electric and natural gas facilities would be the same as the proposed project. Southern California Edison (SCE) and the Southern California Gas Company (SCG) would have sufficient electricity and natural gas supplies for Alternative 2 without the installation of additional electric or natural gas infrastructure. Similarly, Alternative 2 would have the generate the same demand for telecommunications facilities as the proposed project and therefore would use existing telecommunications facilities during operation and would not require upgrades to existing facilities or create a demand for service unable to be met by existing providers. Therefore, similar to the proposed project, Alternative 2's impact to electric, natural gas, and telecommunications facilities would be less than significant.

Threshold: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Alternative 2 would include an industrial building the same size as the proposed project. According to the County's 2021 *Environmental Thresholds and Guidelines Manual*, Light Industry land uses are anticipated to have a water demand of 0.28 AFY per 1,000 square feet of development. Therefore, development of Alternative 2's 70,594 square foot industrial warehouse building would generate a water demand of approximately 19.8 acre-feet per year, the same as the proposed project. The project site has been allocated water based on historical water credits from the prior on-site use. Due to the similar proposed uses of Alternative 2 and the proposed project, adequate water supply would be available for Alternative 2 and could be served by GWD at the time of development. As with the proposed project, Alternative 2's anticipated demand of 19.8 AFY represents approximately 0.4 percent of GWD's anticipated 2040 surplus in a normal year, 0.6 percent of GWD's dry year one surpluses, and 0.8 percent of GWD's dry year two surpluses. Alternative 2 would comply with the same GWD-imposed water shortage restrictions as the proposed project during drought periods which would reduce its water demand in times of drought. Therefore, Alternative 2 would not result in substantial water supply reductions and this impact would be less than significant, similar to the proposed project.

Threshold: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Alternative 2 would result in the same amount of wastewater generated as the proposed project. The anticipated wastewater demand of 7,059 gallons per day, or 0.007 million gallons per day (MGD), represents approximately 0.6 percent of the 1.11 MGD capacity available at the GSD WWTP for GSD

customers. Similar to the proposed project, Alternative 2 would not generate wastewater in excess of existing capacity, and this impact would be less than significant.

Threshold: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

and

Threshold: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Alternative 2 would result in the same demolition activities as the proposed project and would generate the same amount of demolition debris, which is approximately 443 tons of debris. The U.S. EPA utilizes a solid waste generation factor of 3.89 pounds per square foot for construction. Based on Alternative 2's disturbance area of 299,487 square feet, construction of Alternative 2 would result in approximately 583 tons of solid waste. In total, demolition and construction activities would generate approximately 1,026 tons of solid waste, approximately 97 tons greater than the proposed project. Demolition and construction of Alternative 2 would occur in a similar timeframe as the proposed project over the course of 14 months; therefore, construction activity would result in a waste generation rate of approximately 879 tons per year. Pursuant to Chapter 8.10, Article IV of the Goleta Municipal Code, construction contractors are required to divert 65 percent of all construction and demolition waste by weight from landfill disposal for any new structure. The applicant is required to submit a Waste Management Plan which would indicate how solid waste generated during demolition and construction would be diverted in accordance with City requirements. With compliance with City requirements, Alternative 2's demolition and construction activities would generate an estimated 359 tons of non-recyclable waste during the 14-month construction period, or approximately 308 tons per year. This amount of nonrecyclable waste would exceed the City's project-specific threshold of 196 tons per year. Similar to the proposed project, Alternative 2 would require implementation of Mitigation Measure UTIL-1 to implement a Waste Management Plan and further increase waste diversion. Alternative 2's reduction in waste generation that requires a landfill cannot be fully determined until implementation of Mitigation Measure UTIL-1 is completed, and therefore Alternative 2's short-term impacts related to demolition and construction waste would remain significant and unavoidable, similar to the proposed project. In addition, Alternative 2's short-term construction waste would have a cumulatively considerable contribution on cumulative impacts related to solid waste, similar to the proposed project.

Pursuant to the methodology of County's 2021 Environmental Thresholds and Guidelines Manual, which estimates solid waste generation for warehouse development using a factor of 0.0016 tons multiplied by the square footage of a project, operation of Alternative 2 would generate approximately 113 tons per year of solid waste, which is the same amount of solid waste as the proposed project. This solid waste would be reduced to 56.5 tons of non-recyclable solid waste per year, consistent with a 50 percent solid waste diversion rate, which is the same as the proposed project. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. Accordingly, operation of Alternative 2 would have a less than significant impact related to solid waste, similar to the proposed project.

6.3.3 Alternative 3: Outdoor Storage

Impacts Summary

Alternative 3 would develop an outdoor storage facility and small office building. Compared to the proposed project, Alternative 3 would result in a shorter construction duration, fewer employees, and less daily operational passenger and truck trips. Accordingly, Alternative 3's impacts related to per-capita generation, such as impacts related to population and housing, public services, and utilities and service systems would be less in comparison to the proposed project. Additionally, Alternative 3 would result in less air pollutant emissions, greenhouse gas emissions, and operational noise in comparison to the proposed project. Due to the low visual profile of Alternative 3, Alternative 3 would reduce the proposed project's significant unavoidable impacts related to aesthetics to less than significant. However, due to the location of Alternative 3 on the project site which would require a reduction in the 100-foot SPA buffer to 25 feet, Alternative 3 would have a significant and unavoidable impact on biological resources, the same as the proposed project.

Alternative 3 would fail to meet the following project objectives as Alternative 3 would not provide tenant space or an industrial building:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan (General Plan) designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).

In addition, Alternative 3 would only partially meet the following project objectives due to a reduction in employees compared to the proposed project:

- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.

a. Aesthetics

Threshold: Would the project have a substantial adverse effect on a scenic vista?

Unlike the proposed project, Alternative 3 would construct an outdoor storage facility with storage bays for construction materials and RV storage. The storage bays would be concrete "U" shaped walls with a maximum height of eight feet from finished grade. In addition, Alternative 3 would include a 500 square foot office building with a height of approximately 10 feet from the finished grade. Alternative 3 would include placement of fill to elevate the structures above the floodplain, and the corresponding height of the storage bays and office building would be 13 feet above existing grade and 15 feet above existing grade, respectively. Alternative 3 would reduce the maximum height of the proposed project's structures by 25 feet. The heights of the structures included in Alternative 3 would be consistent with height limits of the M-S-GOL and M-1 zones, pursuant to the City's previous

Coastal Zoning Ordinance. Similar to the proposed project, Alternative 3 would include aesthetic features such as architectural detailing and landscaping, which would reduce building massing and integrate the proposed building with natural areas of vegetation growing along SR 217.

Given the site's distance (0.9 mile and 0.7 mile respectively) from U.S. 101 and Hollister Avenue, the proposed outdoor storage area and office building would not degrade views from these locally designated scenic corridors. The project site is visible from the locally designated scenic corridor along SR 217. Unlike the proposed project, Alternative 3 would include structures that are similar heights to the existing on-site structures. Although Alternative 3's structures would be elevated above the heights of existing structures due to the use of fill material on-site, Alternative 3's structures would not rise above existing and proposed vegetation or the surrounding one- to two-story industrial development and would not obstruct northward scenic views of the foothills and Santa Ynez mountains from SR 217. In addition, Alternative 3 would not substantially alter public views of the project site from Kellogg Avenue and South Fairview Avenue as existing industrial development between these roads and the project site would obscure views of the project site and Alternative 3's structures would be similar heights to the surrounding industrial development. Accordingly, Alternative 3 would reduce the proposed project's significant and unavoidable impact to scenic resources to a less than significant level.

Threshold: Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Alternative 3 would be constructed on the same project site as the proposed project. The project site is approximately 0.9 mile south of U.S. 101, which is eligible for designation as a State Scenic Highway. Similar to the proposed project, given the distance of U.S. 101 from the project site, as well as the presence of intervening vegetation and structures, construction of the proposed outdoor storage area and office building under Alternative 3 would not substantially degrade views from U.S. 101. Alternative 3 would result in no impacts to scenic highways, which is the same as the proposed project.

Threshold: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative 3 would develop an approximately 70,594 square foot outdoor storage facility with storage bays ranging from 5 to 8 feet from the finished grade and an office building 10 feet above the finished grade. The use of fill to elevate the structures above the floodplain would bring the total height of the storage bays to 13 feet above existing grade and the total height of the office building to 15 feet above existing grade. Similar to the proposed project, Alternative 3's landscaping would include approximately 60,939 square feet of the project site and would be comprised of native and climate-appropriate plantings.

Similar to the proposed project, Alternative 3 would not obstruct or substantially degrade views of the Pacific Ocean, beach, or other coastal areas, as those scenic resources are currently not visible from the site and southward views are blocked by intervening buildings, SR 217, and vegetation. Therefore, Alternative 3 would not conflict with Section 30251 of the California Coastal Act, which requires that development projects in the Coastal Zone protect scenic and visual qualities, including views of the ocean and scenic coastal areas

Alternative 3's operational activities would consist of storage which is considered a permitted use for the M-S-GOL zone under Section 35-84A of the City's previous Coastal Zoning Ordinance. Alternative 3's facilities would not exceed 35 feet from finished grade and would comply with the maximum

height limitation for the M-S-GOL zone established in Section 35-84A of the previous Coastal Zoning Ordinance.

Although Alternative 3 would alter the site's existing visual character by introducing an outdoor storage facility, the proposed intensity and height of development would be generally consistent with the Goleta General Plan. For example, Alternative 3 would be consistent with Policy VH 4.6, Industrial Areas, which requires industrial development to include architectural detailing to break building massing; adequate lighting; protected bicycle parking; screened outdoor storage, maintenance, or trash areas; and buffers or screens to protect residential development from industrial land uses. Alternative 3 would comply with Policy VH 4.6 as it would use landscaping to screen the site from SR 217 and residential development, would provide sufficient parking (including bicycle spaces), would screen outdoor maintenance or trash areas and would provide adequate lighting in accordance with City requirements.

Unlike the proposed project, Alternative 3 would not obstruct scenic views of the Santa Ynez Mountains and foothills experienced by northward travelers along SR 217, a designated local scenic corridor. Therefore, Alternative 3 would be consistent with Goleta General Plan Policy VH 1.1, Scenic Resources, which identifies scenic resources in the City; Policy VH 2.2, Preservation of Scenic Corridors, which requires preservation of aesthetic qualities of scenic corridors; and Policy VH 2.3, Development Projects Along Scenic Corridors, which requires development adjacent to scenic corridors to not degrade or obstruct views of scenic areas. Accordingly, Alternative 3 would reduce the proposed project's significant and unavoidable impact on scenic quality to a less than significant level.

Threshold: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Similar to the proposed project, construction of Alternative 3 is not anticipated to occur during evening or nighttime hours and would thus not introduce new light sources to the site during the construction time period. Consequently, the following discussion focuses on Alternative 3's operational impact involving light and glare.

Alternative 3 would introduce new sources of light from parking and the exterior of the office building and storage areas once operational. Lighting would be similar to the proposed project, consisting of a combination of exterior building-mounted wall packs as well as pole-mounted fixtures in the parking lot and storage areas. All lighting would use LED fixtures and would include semi- and fully cut-off light fixtures. Alternative 3's lighting would be designed in accordance with City standards, including Goleta General Plan Policy 4.12, Lighting, which requires outdoor lighting fixtures to be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow.

Alternative 3's design, including lighting, would be subject to FAR Part 77, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow the project to be revised. The project applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 3's design, the FAA would then determine whether Alternative 3 poses a hazard to air navigation and could request changes to Alternative 3's design to minimize those hazards. The FAA would evaluate Alternative 3 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 3 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Therefore, similar to the proposed

project, Alternative 3's lighting would not be substantial to the extent that it would interfere with aviation activity and interfere with views.

Moving sources of light would come from the headlights of vehicles driving on roadways near the project site and entering or exiting the site early in the morning and evening. While Alternative 3's operation would involve vehicle travel, and thus potential light from vehicles, these lighting sources would be similar to existing conditions surrounding the site, as commercial and industrial vehicles are frequent in the area.

Alternative 3 would introduce new sources of glare in the form of focused light from the office building and parked car and RV windows. The storage bays would not cause glare as they would be constructed from concrete. Because Alternative 3's office building would be constructed of light-colored exteriors with elements of glass (windows), Alternative 3 has the potential to reflect sunlight and produce glare from this building. However, vegetative screening along the perimeter of the project site would reduce off-site impacts of glare from both the proposed building and from vehicles associated with building and storage operation. Considering adjacent land uses include few glare-sensitive receptors, the potential for glare-related impacts would be limited. Overall, Alternative 3 would have a less-than-significant impact associated with light and glare, which would be similar to the proposed project.

b. Air Quality

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Alternative 3 would involve the construction and operation of an outdoor storage area, RV storage, and an office building. Alternative 3 does not propose residential uses and would not directly increase population growth. Alternative 3 is estimated to add approximately 5 new employees. While these jobs would likely come from the local workforce, it is conservatively assumed that all 5 new employees would become new residents. In a conservative scenario, there would be a population growth of 13 based on the city's average persons per household of 2.64. Goleta has a current population of approximately 32,591 persons (California Department of Finance [DOF] 2022). SBCAG's growth forecast estimates that the population in Goleta would increase from an existing population of 32,591 residents to 34,700 residents by 2050. In addition, the growth forecast estimates that jobs would increase from 25,580 jobs in 2020 to 31,070 jobs by 2050. The population in Goleta would increase by 2,109 residents by 2050, and the jobs in Goleta would increase by 5,490 jobs by 2050. Therefore, the addition of 5 employees and 13 new residents to Goleta would be accommodated in the City's growth forecasts, and Alternative 3 would not exceed SBCAG's growth forecasts of population and jobs for Goleta (SBCAG 2019).

In addition, in accordance with standard practices in the City, Alternative 3 would follow SBCAPCD fugitive dust control measures, in the *Scope and Content of Air Quality Sections in Environmental Documents*. For these reasons, Alternative 3 impacts would be less than significant, which would be similar to the proposed project

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Construction

Alternative 3 would involve temporary and short-term construction emissions. Construction activities such as demolition, grading, construction worker travel to and from the project site, delivery and hauling of construction supplies and debris to and from the project site, hauling of import soil to the site, and fuel combustion by on-site construction equipment would generate air quality emissions.

Alternative 3 construction would be completed six months sooner than the proposed project. Table 6-10 summarizes construction emissions that would be generated from Alternative 3. Air quality modeling results for Alternative 3 are included in Appendix R-1. As shown in Table 6-10, construction emissions would not exceed the SBCAPCD construction thresholds used by the City of Goleta for this analysis. In addition, Alternative 3 construction would result in less construction emissions in 2028 compared to the proposed project, due to a shorter construction schedule and less building construction. Therefore, Alternative 3 would not contribute substantially to an existing or projected air quality violation. Impacts would be less than significant and would result in a lesser impact than the proposed project.

Table 6-10 Estimated Alternative 3 Annual Construction Emissions

	Annual Emissions (tons per year)					
Construction Year	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2027	<1	1	1	<1	<1	<1
2028	<1	<1	<1	<1	<1	<1
Overlap						
Utility Pipelines	<1	1	1	<1	<1	<1
Maximum Annual Emissions	**<1**	**2**	**2**	**<1**	**<1**	**<1**
Threshold	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rules 345, 323.1, and 329).

Operation

Operation of Alternative 3 would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 6-11 summarizes Alternative 3's operational emissions by emission source (area, energy, and mobile). As shown therein, the emissions generated by the operation of Alternative 3 would not exceed County operational thresholds used by the City of Goleta for this analysis. In addition, Alternative 3 operation would result in less operational emissions compared to

the proposed project due to less vehicle trips, fewer employees, and less intense land use. Therefore, Alternative 3 would not contribute substantially to an existing or projected air quality violation. Impacts would be less than significant and would result in a lesser impact than the proposed project.

Table 6-11 Estimated Alternative 3 Operation Emissions

	Maximum Daily Emissions (pounds per day)					
Emissions Source	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	1	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	1	<1	<1	<1
Total	**1**	**1**	**4**	**<1**	**<1**	**<1**
Threshold (area + energy + mobile)	55	55	N/A	N/A	80	N/A
Threshold Exceeded?	No	No	N/A	N/A	No	N/A
Threshold (mobile only)	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not sum precisely due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rule 323.1) and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations

Construction

Alternative 3 construction activities would result in temporary project generated DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Alternative 3 construction is anticipated to begin in July 2027 and end in March 2028. Project construction would be phased, and each construction phase would be periodic and short-term. Construction-related TAC emissions would cease with the completion of construction activities. The detailed results of the construction HRA are provided in Appendix R-2 and summarized below.

The maximum unmitigated risk from construction of Alternative 3 was identified for all sensitive receptors within 1,000 feet of the project site boundary as detailed in Appendix R-2. The maximum off-site residential cancer risk would be 0.26 in one million at one of the mobile homes east of the project site across SR-217. In addition, the chronic risk at the maximum off-site receptor would be exposed to a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or hazard index of 1 for chronic risk. In addition, Alternative 3 construction health risk would result in less health risk impacts compared to the proposed project due to a shorter construction schedule and less building construction. Given that neither the cancer risk nor the chronic risk would exceed regulatory thresholds, health risk from construction of the Alternative 3 would be less than significant and impacts would be less than the proposed project.

Operation

Alternative 3 would result in six less round trips per day compared to the proposed project and would generate approximately 8 trucks round trips per day (16 one-way trips) from the project site, based on ITE trip rates for High-Cube Transload and Short-Term Storage Warehouse for the outdoor/RV storage use and General Office for the office building (ITE 2021). The truck trips are assumed to all be diesel-fueled heavy-heavy-duty truck trips. An operational HRA was performed to conservatively estimate health risk during the Alternative 3's operating hours. The maximum unmitigated risk from operation of Alternative 3 would expose a sensitive receptor at the Winslowe townhomes to a cancer risk of 0.05 in one million, due to the receptor being adjacent to the truck route. In addition, the maximally exposed individual receptor chronic risk would have a hazard index of <0.0001, similar to the proposed project. These maximum operational cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or a hazard index of 1 for chronic risk. In addition, Alternative 3 operational health risk impact would be less than the proposed project due to less daily truck trips. Furthermore, Alternative 3 would generate 8 round truck trips per day, well below CARB's threshold of 100 diesel-fueled truck trips per day. Therefore, the Alternative 3 is consistent with CARB's siting recommendations for TAC emitting sources. Alternative 3 operations would not expose substantial TAC emissions to sensitive receptors. Impact would be less than significant and would have a lesser impact than the proposed project.

Combined Construction and Operation

The maximum unmitigated combined risk from construction and operation of Alternative 3 was identified for all sensitive receptors within 1,000 feet of the project site boundary and along the truck route on South Kellogg Avenue as detailed in Appendix R-2. The sensitive receptor across SR-217 at the mobile home park would be exposed to a cancer risk of 0.28 in one million. In addition, the residential receptor chronic risk would have a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or 1 for chronic risk. Alternative 3 combined health risk would not exceed regulatory thresholds. Impacts would be less than significant and would have a lesser impact than the proposed project.

Threshold: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Alternative 3 would generate oil and diesel fuel odors during construction from equipment use. The odors would be limited to the construction period and would be intermittent and temporary. The duration of odor emissions would be 9 months, which is less than the 15 month construction duration of the proposed project. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. Accordingly, construction of Alternative 3 would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. Impacts would be less than significant, and less than the proposed project.

Alternative 3 includes an outdoor storage use and would not include development associated with odor complaints near sensitive receptors. In addition, it is likely that odors would not be distinguishable due to vehicle exhaust on State Route 217. Therefore, operation of Alternative 3 would not generate other emissions, such as those leading to odors, that would affect a substantial number of people. Operational odor impacts would be less than significant, similar to the proposed project.

c. Biological Resources

Threshold: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Belding's Savannah Sparrow and Nesting Birds

Alternative 3 would be located on the same project site, and in the same location on the project site, as the proposed project and therefore would have a similar potential to directly or indirectly affect similar candidate, sensitive, and special-status species. Foraging special-status birds, including the special-status BSS and loggerhead shrike, have a low potential to be present as transients on the project site. Similar to the proposed project, Alternative 3 would not directly impact these species because they are mobile and would move away from construction or operational disturbance.

Although no BSS have been observed in the study area during field surveys, construction of Alternative 3 has the potential to indirectly impact BSS, in the event they are nesting in pickleweed habitat in Old San Jose Creek or San Jose Creek. Similar to the proposed project, Alternative 3 would have the potential to indirectly impact BSS due to disturbance from construction noise and vegetation clearing activities, which would be a potentially significant impact, requiring mitigation. In addition, construction of Alternative 3 has the potential to result in direct and indirect impacts to non-special status nesting birds protected under the Migratory Bird Treaty Act if they are nesting within the project site and/or immediate vicinity during construction activities. Direct impacts including the destruction of nests and mortality of eggs, nestlings, and birds would occur if active nests were present within the project site during clearing and grading. Indirect impacts could also occur if active nests are located in the project site and vicinity and are abandoned due to visual and acoustic construction -related disturbance. This impact would be potentially significant, requiring mitigation. Alternative 3 would require implementation of Mitigation Measures BIO-1 and BIO-2, which would establish avoidance buffers around nests during construction in the nesting season and require focused surveys and avoidance of BSS for ground disturbance during the BSS nesting season. With implementation of Mitigation Measures BIO-1 and BIO-2, Alternative 3 would have a less than significant impact on nesting birds, similar to the proposed project.

Operation of Alternative 3 would result in reduced operational noise levels in comparison to the proposed project and therefore operation of Alternative 3 would not result in excessive ambient noise and therefore would not indirectly disturb bird species. Similar to the proposed project, Alternative 3 would include landscaping consisting of native California riparian and upper wetland habitat which would provide visual screening from pickleweed habitat where the BSS could be present. Therefore, operation of Alternative 3 would have a less than significant impact on candidate, sensitive, and special-status species, similar to the proposed project.

Tidewater Goby and Steelhead

Similar to the proposed project, noise and vibration from construction of Alternative 3 could result in temporary impacts to individual tidewater gobies and steelhead. However, work within the San Jose Creek channel would be completed using hand tools and concrete saws and heavy vibration equipment would not be utilized which would minimize vibration from construction. Alternative 3 would require implementation of Mitigation Measure NOI-1, which requires use of a sound barrier at

the edge of San Jose Creek. Implementation of this measure would minimize the potential for construction noise to disturb tidewater goby and steelhead, similar to the proposed project.

Construction of Alternative 3 would be carried out in accordance with a SWPPP, which is required to include the use of BMPs to control stormwater pollutants. However, even with implementation of the SWPPP, construction of Alternative 3 could result in impact from fuel, oil, lubricants, paints, release agents, and other construction materials; erosion; increased turbidity; excessive sedimentation; and accidental fuel spills during construction could also lead to contamination of soils and habitat degradation. Alternative 3 would require implementation of Mitigation Measure BIO-3 which requires implementation of a Toxic Materials Control and Spill Response Plan for materials that may be used/stored on-site, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials. Implementation of Mitigation Measure BIO-3 would reduce Alternative 3's potential to impact tidewater goby and steelhead from the release of construction materials to a less than significant level, similar to the proposed project.

Similar to the proposed project, construction of Alternative 3's drainage outfall in the San Jose Creek Channel has the potential to directly affect aquatic habitat and species, including for tidewater goby and steelhead. Alternative 3 would require dewatering the work area which could injure or kill these species, or could increase turbidity and affect juvenile steelhead. Construction of Alternative 3's drainage outfall would take three to four weeks to complete and would be scheduled to avoid peak high tides if the Goleta Slough mouth is open. No heavy equipment would be used or operated within this staging area in the creek bed. Crews would use hand tools (i.e., shovels, rakes and brooms, dust pans, and wheelbarrows) to collect and remove any debris that falls or washes into the staging area. A crane would lower sandbags and plastic sheeting into the creek bed to create a temporary cofferdam to prevent water from entering the work area. The cofferdam used for Alternative 3 would be a physical barrier that would prevent high tides and aquatic species from entering the work area. Similar to the proposed project, installation of Alternative 3's cofferdam could potentially result in impacts to tidewater goby and steelhead if improperly installed. Alternative 3 would require implementation of Mitigation Measure BIO-3, which would ensure the cofferdam would be installed during the dry season and removed after concrete has cured prior to coming into contact with tidal surface water. With implementation of Mitigation Measure BIO-3, impacts associated with construction of Alternative 3's drainage outfall would be reduced to a less than significant impact on tidewater goby and steelhead, similar to the proposed project.

Alternative 3 would include the same sized detention basin as the proposed project to detain and treat stormwater flows. Operation of Alternative 3 could result in similar impacts to San Jose Creek as the proposed project from the introduction of a new outfall structure and reduction in the stormwater flows into the creek from increased onsite detention. The detention basin would retain stormwater flows and treat pollutants in compliance with the County's adopted *Stormwater Technical Guide for Low Impact Development* guidelines which is designed to ensure post-construction requirements described in the Central Coast Regional Water Quality Control Board's (RWQCB) *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* are satisfied. Implementation of Alternative 3 conducted in compliance with applicable regulatory requirements related to stormwater runoff would minimize the potential for pollutants to degrade water quality. Operation of Alternative 3's drainage outfall would not affect the physical or biological habitat features essential to migrating adult steelhead (e.g., water quantity to allow for juvenile and adult mobility; cover, shelter, and holding areas; and adequate water quality) or the tidewater goby (e.g., water depth, substrate, and seasonally open sandbar mouth). No long-term effect would occur to steelhead habitat since the in-creek work is the replacement of existing concrete

in-kind, similar to the proposed project. Given the volume of water present in the creek during storm events, the size of the watershed, and volume of flood flows and daily tidal shifts (when the Goleta Slough mouth is open), Alternative 3's stormwater flows would not substantially impact tidewater goby and steelhead individuals or San Jose Creek habitat. The drainage outfall design would be subject to similar regulatory requirements as the proposed project, such as USFWS and NMFS consultation, and USACE 404 Certification. Similar to the proposed project, compliance with required permits would reduce Alternative 3's operational impact to tidewater goby and steelhead to a less than significant level.

California Red-Legged Frog and Western Pond Turtle

Due to similar construction activities as the proposed project, construction of Alternative 3 would have a potential to kill or injure California red-legged frog and western pond turtle. If present, injury or mortality could occur through accidental crushing, either by construction equipment or foot traffic from workers. Displacement from cover due to construction could expose these species to predators and desiccation. Additionally, amphibians or reptiles moving through the construction area could become trapped in open trenches left overnight. The initial construction noise and disturbance may also indirectly impact species, if present in the San Jose Creek and Old San Jose Creek corridor, by altering their migration behaviors. Alternative 3 would require implementation of Mitigation Measure BIO-4 and BIO-5, which would require preconstruction surveys and biological monitoring throughout construction and avoidance and relocation of California red-legged frog and western pond turtle, if found. With implementation of Mitigation Measure BIO-4, Alternative 3's construction impacts to California red-legged frog and western pond turtle would be reduced to a less than significant level, similar to the proposed project.

Operation of Alternative 3 and the proposed project would not occur within California red-legged frog or western pond turtle habitat and would be limited to the developed portion of the project site. Therefore, operation of Alternative 3 would have a less than significant impact on California red-legged frog and western pond turtle, similar to the proposed project.

Insects and Bats

Construction of Alternative 3 has a similar potential as the proposed project to result in direct effects to special-status insects (monarch butterfly and Crotch bumble bee) if present during vegetation clearing. The potential is low that either the foraging monarch butterfly or Crotch bumble bee would be present at the initiation of construction since the coastal sage scrub foraging habitat on-site lacks preferred host plants, is limited in size, was previously developed, and surrounded by disturbance. Furthermore, due to the expanse of food sources and habitat south of the project site in the Goleta Slough and along the coast, the removal of marginal disturbed native shrubland would not substantially impact regional nectar sources. Alternative 3's operation would not affect these insect species given that noise and dust would not be above existing ambient levels, lighting would be shielded, and vegetative screening would reduce glare. Therefore, Alternative 3 would have a less than significant impact on special-status insects, similar to the proposed project.

Special-status bat species (Pallid bat, Townsend's big-eared bat, Western red bat, and Western mastiff bat) have a low potential to forage over the project site. Alternative 3's construction would not interfere with nocturnal foraging behavior by bats as no nighttime construction would be required. Existing project site buildings are sealed and maintained and are not expected to host bat roosts; therefore, demolition would not directly impact bat roosts. Because of the low potential for bats to

occur at the project site, Alternative 3 would have a less than significant impact on special-status bats, similar to the proposed project.

Threshold: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Alternative 3 would be located on the same project site as the proposed project and therefore would include similar vegetation. No sensitive communities are present on the project site; therefore, Alternative 3 would not result in direct impacts on sensitive communities or ESHA communities.

Sensitive communities and ESHA that could be indirectly affected are found in San Jose Creek and Old San Jose Creek. Alternative 3's construction activities would result in less overall dust generation, introduction of fuel spills, and introduction of invasive species as the proposed project due to a reduced construction schedule; however, these could still indirectly impact sensitive communities and ESHA communities adjacent to the project site. Dust impacts would be addressed through adherence to Santa Barbara County Air Pollution Control District requirements. Alternative 3's fuel spill impacts would be reduced to a less than significant level with implementation of Mitigation Measure BIO-3, similar to the proposed project. Similar to the proposed project, Alternative 3's potential impacts related to invasive species would be reduced to a less than significant level with implementation of Mitigation Measures BIO-5, BIO-6, and BIO-7, which requires biological monitoring, prohibits non-native invasive species from being used as landscaping, and requires implementation of an Invasive Species Control Plan, respectively.

Threshold: Would the project have a substantial adverse effect on state or federally-protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Alternative 3 would include similar construction activities as the proposed project and would therefore have a similar potential to result in temporary impacts to jurisdictional wetland features. Construction of the drainage outfall and use of cofferdam could damage wetlands habitat; however, Alternative 3 would require implementation of Mitigation Measure BIO-3 which would ensure construction of the drainage outfall and use of the cofferdam occurs during the dry season. Implementation of Mitigation Measure BIO-3 would reduce Alternative 3's indirect construction impacts on wetlands to a less than significant level. Implementation of Mitigation Measure BIO-5, requiring construction monitoring with 100 feet of ESHA, and Mitigation Measure BIO-8, requiring the construction contractor to install fencing around the ESHA and requiring replacement of ESHA habitat if temporary or permanent impacts occur during construction, would reduce Alternative 3's potential to directly impact wetlands to a less than significant level. Implementation of Mitigation Measures BIO-6 and BIO-7, prohibiting invasive and exotic species, would reduce Alternative 3's potential impacts to wetlands due to the introduction of invasive species to a less than significant level, similar to the proposed project.

Threshold: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Alternative 3 would be located at the same project site as the proposed project and therefore would have a similar potential to result in interference with fish and wildlife migration. Construction of

Alternative 3 would adhere to typical working hours and noise would not affect terrestrial nocturnal mammal wildlife movement, which is most pronounced during dusk, nighttime, and dawn.

Approximately 170 feet west of the project site, Old San Jose Creek is mapped as a wildlife migration corridor for terrestrial and avian species. The Old San Jose Creek corridor is 300 feet from the structure in the development area and 40 feet from the utility trenching and would be subject to at least 75 decibels[5] of construction noise. Alternative 3's construction noise would generate similar noise at Old San Jose Creek as the proposed project, which would not result in a significant impact to Old San Jose Creek avian habitat within 300 feet of project construction during breeding season. Outside the breeding season, the initial increase in construction noise would cause bird species to permanently relocate to adjacent habitat, where they would not be affected by construction noise. Alternative 3 would implement Mitigation Measure NOI-1 which would reduce short-term noise construction impacts to wildlife movement in the San Jose Creek to a less than significant level. Alternative 3 would require implementation of Mitigation Measure BIO-1, which would reduce potential impacts to migratory birds to a less than significant level, similar to the proposed project. Therefore, similar to the proposed project, construction of Alternative 3 would have a less than significant impact on migration with mitigation incorporated.

As described in the Alternative 3 *Noise* discussion, Alternative 3 would create less operational noise at the project site compared to the proposed project and therefore would not substantially impact wildlife movement due to operational noise. Due to the vegetation buffers between the San Jose Creek and the outdoor storage area, Alternative 3 would not substantially impact wildlife movement due to the introduction of the new uses and human presence. As with the proposed project, Alternative 3's lighting would be contained on the project site and therefore would not substantially interfere with wildlife movement in San Jose Creek or Old San Jose Creek due to lighting. Alternative 3 would include the same amount of landscaping as the proposed project and therefore result in the same potential to result in adverse effects on wildlife and habitat from the use of pesticides (including rodenticides), herbicides, and fertilizers, as the proposed project. Alternative 3 would require implementation of Mitigation Measures BIO-6, BIO-7, and BIO-9, which would reduce Alternative 3's impact on migratory wildlife from landscaping to a less than significant level, similar to the proposed project.

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Alternative 3 would be located on the same project site, in the same location, as the proposed project. Similar to the proposed project, Alternative 3 would be consistent with General Plan Policies CE 2, CE 3, CE 5, CE, 6, and CE 8 with implementation of Mitigation Measures BIO-1 through BIO-9. The City's Conservation Element Policy CE 2.2, *Stream Protection Areas* requires a 100-foot setback in San Jose Creek and portions of Old San Jose Creek. In addition Policy CE 2.6 requires the restoration of degraded creeks in Goleta. Similar to the proposed project, Alternative 3 would include a request to reduce the SPA buffer to 25 feet.

The existing development on the project site, 25 feet west of the channelized creek top-of-bank, includes the 20-foot Santa Barbara County Flood Control District dirt road and easement, concrete creek access ramp, ice plant, ruderal vegetation, and chain link and wooden fencing at the 25-foot boundary. From 25 to 100 feet of the channelized creek top-of-bank, existing development on the project site includes the asphalt access driveway, the movie screen with laurel sumac shrubs, fallow

[5] Based on a 400-foot distance to 908 South Kellogg Avenue under Section 4.11 Table 4.11-7 and this distance under Table 4.11-11 in Section 4.11, *Noise*.

landscape, and deteriorating asphalt formerly used as vehicle parking for the drive-in movie theater. Given the lack of creek channel streamside vegetation and project site buffer vegetation, impacts to streamside vegetation would be less than significant.

The biotic quality and function of the San Jose Creek SPA on the project site and in the development area is impaired by altered hydrology, existing compaction and disturbance, State Route 217, and the concrete creek channel. The function and value of the San Jose Creek for regional terrestrial and semi-aquatic wildlife movement is compromised due to a lack of vegetation. However, the channelized creek provides aquatic habitat and the area within the 100-foot buffer may be used by foraging avian and other mobile species. Wildlife, such as birds and raptors, are sensitive to disturbance and would not be able to use the stream area as effectively if new development and uses are sited within the buffer. Pollutants and other human-related stressors such as trash associated with Alternative 3 could be exposed to wildlife from the stream. This SPA buffer reduction to 25 feet would substantially increase existing adverse effects on wildlife which utilize the SPA. In addition, the reduction in SPA buffer would eliminate the potential for restoration of San Jose Creek as directed in Policy CE 2.2. Alternative 3's construction and operational impacts on the biotic quality of the SPA from a buffer reduction to 25 feet would therefore be potentially significant. In addition, new development and uses not otherwise allowed in the SPA buffer would eliminate the potential for preservation in a natural state envisioned under Policy CE 2.2 and restoration directed under Policy CE 2.6. As with the proposed project, no feasible mitigation measures are available that would reduce the impact from development inconsistent with Policy CE 2.2 and Policy CE 2.6 to a less than significant level. Therefore, Alternative 3's impact related to conflicts with Policy CE 2.2 and CE 2.6 would remain significant and unavoidable, similar to the proposed project.

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Alternative 3 would be located on the same project site as the proposed project. The project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, Alternative 3 would have no impact related to conflicts with these plans, which is the same as the proposed project.

d. Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Alternative 3 would be located on the same project site as the proposed project which does not contain any historical resources. Alternative 3 would have no impact on historical resources, which is the same as the proposed project.

Threshold: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Alternative 3 would be located on the same project site as the proposed project. The 2017 *Archaeological Resources Assessment* completed to evaluate the project site concluded there is no potential for archaeological cultural resources to exist within the project site. Alternative 3 would not substantially affect archaeological resources, and this impact would be less than significant, which is the same as the proposed project.

Threshold: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Because Alternative 3 would be located on the same project site as the proposed project, Alternative 3 would have a similar, low likelihood of encountering human remains. In the event of unanticipated discovery of human remains during construction, the construction contractor would be required to comply with the State of California Health and Safety Code Section 7050.5 which requires that all construction activities halt in the vicinity of the discovery and the County Coroner be contacted immediately. The County Coroner would make a determination of origin and disposition of the human remains pursuant to Public Resources Code Section 5097.98, including identification of a most likely descendent to provide recommendations if human remains are determined to be prehistoric. With compliance with existing regulations prescribed in the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8, Alternative 3's impacts to human remains would be less than significant, which is the same as the proposed project.

e. Energy

Threshold: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

Alternative 3 would be constructed 6 months faster than the proposed project and therefore would require less use of heavy-duty vehicles and construction equipment and less worker travel. Alternative 3's construction activities would require approximately 1,624 gallons of gasoline and 24,258 gallons of diesel fuel (Appendix R-3). These construction fuel requirements are 1,101 gallons of gasoline and 14,922 gallons of diesel fuel less than the proposed project. Therefore, construction of Alternative 3 would result in less energy consumption in comparison to the proposed project. Alternative 3's fuel use during construction represents approximately 0.001 percent of the annual gasoline use and approximately 0.1 percent of the annual diesel use in Santa Barbara County (See Table 4.5-1 in Section 4.5, *Energy)*. Similar to the proposed project, Alternative 3's project contractors would be required to comply with the provisions of the California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Heavy-duty equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Adherence to regulatory requirements would ensure construction of Alternative 3 would not involve the wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant, and less than the proposed project.

Operation

Alternative 3 would include an 70,594 sf outdoor storage facility on the same project site as the proposed project. The storage areas would be used for construction materials storage and RV storage and would include a 500 square-foot office building. During operation, Alternative 3 would require approximately 5,196 gallons of gasoline, 3,109 gallons of diesel fuel, 15 megawatts of electricity, and 133 therms of natural gas annually (Appendix R-3). In comparison to the proposed project, Alternative 3 would require 8,768 less gallons of gasoline, 2,437 less gallons of diesel, 773 less megawatts of electricity, and 1,261 less therms of natural gas annually. This fuel use represents

approximately 0.003 percent of the annual gasoline use, 0.01 percent of annual diesel use, 0.005 percent of annual electricity use, and 0.0001 percent of natural gas use in Santa Barbara County. Similar to the proposed project, Alternative 3's electricity would be supplied by 3CE using 100 percent renewable electricity sources. Similar to the proposed project, Alternative 3 would comply with standards set in California Building Code Title 24, including CALGreen and the California Building Energy Efficiency Standards. Compliance with these standards would minimize Alternative 3's potential to result in the wasteful, inefficient, or unnecessary consumption of energy. During operation, trucks entering and existing the project site would limit idling to five consecutive minutes in accordance with California Code of Regulations Title 13 Section 2485 which would minimize energy use of trucks entering and exiting the project site. With the implementation of applicable energy efficiency measures, Alternative 3 would minimally increase energy demand and petroleum demand due to the development of Alternative 3, compared with existing conditions. Operation of Alternative 3 would not result in substantial adverse environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant, and less than the proposed project.

Threshold: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City's CAP, Strategic Energy Plan, General Plan, and Municipal Code contain measures intended to increase energy efficiency and expand the use of renewable energy in Goleta Similar to the proposed project, Alternative 3 would comply with CALGreen and the Building Energy Efficiency Standards. Alternative 3 would implement LED lighting, and indoor water use efficiency measures to limit the energy consumption necessary for operation of Alternative 3 and assist to meet the City's renewable energy goals. Furthermore, Alternative 3 would be supplied electricity by 3CE using 100 percent renewable electricity consistent with the measures of the CAP, Strategic Energy Plan, General Plan, and Municipal Code to expand the use of renewable energy in Goleta.

Alternative 3's design would include a minimum of 9 parking spaces, which would be comprised of one parking space reserved for EVs and eight parking spaces available for both EV and gasoline-powered vehicles. Alternative 3's parking design would be required to comply with the CALGreen intervening code update and the City's EV Reach Code for new construction. Accordingly, Alternative 3 would not conflict with state or local EV parking requirements, similar to the proposed project.

Similar to the proposed project, Alternative 3 would also include bicycle parking space for the office use and would connect to existing bicycle facilities in Goleta, encouraging the use of alternative modes of transportation and a reduction in vehicle fuel consumption. These design features would ensure Alternative 3 would not conflict with or obstruct the City's CAP, Strategic Energy Plan, General Plan, or Municipal Code. As stated above, Alternative 3, similar to the proposed project, would be supplied electricity by 3CE using 100 percent renewable electricity which would ensure that Alternative 3 would be consistent with the requirements of Senate Bill 100. Therefore, Alternative 3 would have a less than significant impact related to conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency, similar to the proposed project.

f. Geology and Soils

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as

delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Alternative 3 would be located on the same project site as the proposed project and therefore would have a similar impact related to geologic hazards, including fault rupture, as the proposed project. No active or potentially active faults are located on the project site, and therefore the potential for surface fault rupture to occur is low. Therefore, Alternative 3 would have no impact involving fault rupture, which is the same as the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. Alternative 3's office building would be designed to consider seismic loads, as required by the CBC. Similar to the proposed project, Alternative 3 would also require implementation of Mitigation Measure GEO-1 which would require incorporation of building foundation recommendations into the design of Alternative 3 to minimize the risk of loss, injury, or death involving seismic ground shaking. Implementation of Mitigation Measure GEO-1 would reduce Alternative 3's impact related to seismic ground shaking to a less than significant level, similar to the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

and

Threshold: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site is not at risk of landslides, lateral spreading, or collapse. Both liquefaction and settlement are potential concerns for project site soils. During an earthquake-induced liquefaction event, the total vertical movement of the ground surface could reach approximately 4 inches, while the variation in settlement between different areas or structures within the affected zone could be up to approximately 2 inches. Additionally, if dry sand on the project site is subjected to seismic activity, the total vertical movement of the ground surface could reach approximately 2 inches. Similarly, the variation in settlement between different areas or structures within the affected zone could be up to approximately 1 inch. As with the proposed project, settlement resulting from liquefaction and seismic activity may damage Alternative 3's office building foundation. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would reduce Alternative 3's potential impacts due to liquefaction resulting in settling of soils on the project site to a less than significant level, similar to the proposed project.

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site is not located in a landslide hazard area and is not subject to landslide risk. Alternative 3 would have no impact involving landslides, which is the same as the proposed project.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Construction

Project site soils are highly erodible. Alternative 3 would require the same amount of grading as the proposed project which would increase the potential for erosion and sedimentation. If grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site.

Similar to the proposed project, construction of Alternative 3 would comply with the requirements of the Construction Stormwater General Permit and the construction contractor would implement a SWPPP to control the discharges of pollutants to control the discharges of pollutants, including sediment, into local surface water drainages. The SWPPP prepared for Alternative 3 would include information on BMPs that would be used during construction to retain sediment on-site, minimize erosion, and utilize vegetation for erosion control, as well as a summary of precautionary measures to be taken to ensure vehicle use does not result in erosion, pursuant to the requirements of Chapter 15.09 of the City's Municipal Code. As with the proposed project, soils on the project site are highly erodible and construction of Alternative 3 could result in substantial erosion. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require incorporation of drainage and grading recommendations into Alternative 3 to reduce soil erosion on-site. Similar to the proposed project, Alternative 3's construction-related impacts to soil erosion would be less than significant with mitigation incorporated.

Operation

During operation of Alternative 3, runoff generated from storm events may transport sediment off-site and contribute to project site erosion and the loss of topsoil. However, similar to the proposed project, Alternative 3's design would be required to meet the same regulatory requirements as the proposed project to reduce erosion. These requirements include the standards of the Central Coast RWQCB's *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region and the County's Stormwater Technical Guide for Low Impact Development*. Alternative 3 would comply with the Phase II MS4 Permit which requires that a SWQMP be prepared for projects that create and/or replace 5,000 or more square feet of impervious surface. SWQMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. However, soils on the project site would remain highly erodible, requiring implementation of long-term maintenance activities to ensure proper drainage and the stabilization of surface soils are necessary to reduce the potential of erosion damage during operation. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would incorporate drainage and grading recommendations into Alternative 3. Similar to the proposed project, Alternative 3's operational impacts related to soil erosion would be less than significant with mitigation incorporated.

Threshold: Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Soils on the project site are non-expansive. Alternative 3 would not create substantial direct or indirect risks to life or property due to expansive soils and no impact would occur, which is the same as the proposed project.

Threshold: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Similar to the proposed project, Alternative 3 would include an underground sewer line that would connect to an existing sewer line located underneath South Kellogg Avenue. Sewer services at the project site would be provided by the Goleta Sanitary District. Alternative 3 would not involve the use of septic tanks or alternative wastewater disposal systems and, as with the proposed project, no impact would occur.

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no documented paleontological resources at the project site. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth. The geologic unit that underlies the project site, Holocene and upper Pleistocene (Quaternary-era) alluvium and colluvium (Qac), has a low paleontological sensitivity. Similar to the proposed project, grading activities for Alternative 3 would be unlikely to encounter previously unidentified paleontological resources due to the low paleontological sensitivity of the geologic unit underlying the project site. Accordingly, Alternative 3 would have a less than significant impact on paleontological resources, similar to the proposed project.

g. Greenhouse Gas Emissions

Threshold: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Alternative 3 would involve construction and operation of an outdoor/RV storage area, office building, and parking lot. Alternative 3 construction would generate temporary GHG emissions from operation of construction equipment on-site, and vehicles transporting construction workers to and from the project site and heavy trucks to transport soil import, building, concrete, and asphalt materials. As shown in Table 6-12, construction associated with Alternative 3 would generate 447 MT of CO_2e, a decrease of 152 MT of CO_2e compared to the proposed project. Amortized over a 50-year period, construction associated with the Alternative 3 would generate 9 MT of CO_2e per year. Greenhouse gas modeling results for Alternative 3 are included in Appendix R-1.

Table 6-12 Construction GHG Emissions – Alternative 3

Year	Emissions (MT of CO_2e)
2027	258
2028	63
Utility Pipelines	126
Total	**447**
Amortized over 50 years	**9**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: CalEEMod worksheets in Appendix R-1. See Table 2.3, "Construction Emissions by Year, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Alternative 3 GHG emissions from worker trips to and from the site would be approximately 0.3 MT of CO_2e per year when amortized over the project life. In other words, construction worker trips would represent less than four percent of the total construction emissions. Therefore, GHG emissions from worker trips during construction activity would be minimal.

Operational and Total Emissions

Operation of Alternative 3 would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips (employee and warehousing activities), and wastewater and solid waste generation. The implementation of nine EV charging stations would reduce gasoline GHG emissions per year, as shown in Table 6-13. Approximately 352,125 VMT per year would be reduced from the nine EV charging stations. Alternative 3's gasoline GHG emissions would be approximately 81 MT of CO_2e per year[6] (based on employee and storage activities), and the GHG emissions from electric vehicles would be approximately 0 MT of CO_2e per year, since Alternative 3 would be supplied with 100 percent carbon free electricity. Therefore, installing nine parking spaces with EV charging stations would reduce mobile GHG emissions by 81 MT of CO_2e per year. Annual operational emissions resulting from Alternative 3 are summarized in Table 6-13. The annual operational GHG emissions are combined with the amortized construction emissions. Alternative 3 would emit approximately 4 MT of CO_2e per year or 0.80 MT of CO_2e per employee per year (5 employees), which is less than the proposed project. Therefore, Alternative 3 would not exceed the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT CO_2e per employee per year. Therefore, Alternative 3 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and impacts would be less than significant. Impacts would be less than the proposed project.

[6] GHG emissions from gasoline vehicles = (352,125 reduced VMT per year*240 grams of CO_2e per mile*1^{-6} MT per gram)

Table 6-13 Combined Unmitigated Annual GHG Emissions-Alternative 3

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**9**
Operational	**(5)**
Area	1
Energy	1
Mobile	74
EV Charging Stations	(81)
Solid Waste	<1
Water, Wastewater	<1
Total	4
Total GHG per Service Population[2]	**0.8**
Santa Barbara County GHG Service Population Criterion for Nonresidential Land Uses	2.63 MT of CO_2e per service population per year
Exceeded?	**No**

MT CO_2e = metric tons of carbon dioxide equivalent.

Note: parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: CalEEMod worksheets and EV charging station worksheets are in Appendix R-1. See Table 2.6 "Operations Emissions by Sector, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

[1]Construction emissions were amortized by 50 year project lifetime.

[2]The project would add approximately 5 employees.

Threshold: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

2022 Scoping Plan

The State's 2022 Scoping Plan aims to achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The Scoping Plan's Appendix D, Local Actions, provides suggestions for on-site GHG-reducing design features, methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging. It does not address other land use types such as industrial. The Scoping Plan's Transportation Electrification priority area supports an EV fleet, which Alternative 3 would allocate at least nine EV charging stations, and would be served by 3CE Prime option, which would supply 100 percent carbon free electricity to the project site. The Scoping Plan's VMT Reduction priority area supports increased access to public transit and walking, development located on infill sites, and development that does not result in the loss or conversion of natural and working lands. Alternative 3 is an infill development in an urban area that would not convert natural lands and would contribute to the job and housing balance. The City anticipates residential and work-based projects in these areas would generate low VMT because of the higher density of existing residential and commercial uses and increased transit access relative to other areas of the City. These features allow for shorter vehicle trip lengths and promote the use of alternative transportation in these areas. Alternative 3 would be consistent with the State's long-term climate goals of carbon neutrality by 2045, similar to the proposed project.

SBCAG 2050 RTP/SCS

The SBCAG 2050 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The Environment Objective 1 of the RTP/SCS is to "promote better balance of jobs and housing to reduce long-distance commuting" (SBCAG 2021). Alternative 3 would site new jobs within close proximity to residents within the urban boundary of Goleta and therefore would be consistent with Objective 1. Furthermore, in support of Environment Objective 5 of "reduce vehicle miles traveled," the surrounding area is anticipated to generate low VMT because of the higher density of existing residential and commercial uses and increased transit access near the site. Therefore, these features would allow for shorter vehicle trip lengths and promote alternative modes of transportation, such as bicycling and transit. Alternative 3 would be consistent with the 2050 RTP/SCS, similar to the proposed project.

City of Goleta General Plan

The City General Plan addresses recently emerging topics of climate change and alternative energy. The general plan lists several policies as part of its Transportation and Conservation Element that support GHG emission reductions. Alternative 3 would be consistent with Policy CE-15.3 of the Conservation Element by incorporating water efficient appliances to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards. In addition, the Alternative 3 would be consistent with the City's Policy TE-1.1, Alternative Modes, by incorporating ten bicycle parking spaces, which could promote alternative modes of transportation for the residential uses within half a mile of the site. In addition, Alternative 3 site is within half a mile of the Santa Barbara Metropolitan Transit District Route 6 and 11 on Fairview Avenue west of Alternative 3 site. Therefore, Alternative 3 would be consistent with the goals and policies in the City of Goleta General plan to increase water efficiency, and potentially reduce the amount of motor trips with connectivity to surrounding neighboring residents, similar to the proposed project.

City of Goleta Climate Action Plan

The City's CAP contains policies and programs targeting energy efficiency policy. Alternative 3 would be consistent with the CAP measures, such as building designed and equipped with features that conserve and reduce energy consumption. Alternative 3 would be consistent with the latest Title 24 Building Energy Efficiency Standards for solar readiness for nonresidential land uses, which would align with Policy RE-1. In addition, would construct ten bicycle parking spaces, which could promote alternative modes of transportation with several residential uses within half a mile of the site, aligned with Policy T-8 of City's Climate Action Plan. Alternative 3 would be consistent with the goals outlined in the CAP, similar to the proposed project.

h. Hazards and Hazardous Materials

Threshold: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

Construction of Alternative 3 would result in similar temporary increases in the regional transport, use, and disposal of construction-related hazardous materials and petroleum products as the proposed project. These activities would be subject to applicable federal, State, and local regulations

established by the United States Environmental Protection Agency USEPA, State of California, the County of Santa Barbara, and the City of Goleta for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. During construction of Alternative 3, existing on-site hazardous materials and waste would also be carried out in compliance with applicable federal, State, and local regulations, which would minimize potential impacts associated with the transport and disposal of these substances. Additionally, compliance with the Construction Stormwater General Permit would require implementation of Good Housekeeping BMPs to reduce potential impacts associated with hazardous materials spills. Similar to the proposed project, compliance with existing regulations governing transport, use, and disposal of hazardous materials would ensure construction of Alternative 3 would have a less than significant impact related to the routine transport, use, or disposal of hazardous materials during construction.

Operation

Alternative 3 would involve the operation of an outdoor storage facility for construction materials and RVs rather than industrial operations and is therefore generally anticipated to require less transport, use, and disposal of hazardous materials in comparison to the proposed project. All hazardous material transport, use, or disposal associated with the proposed industrial warehouse and office space would comply with existing hazardous materials regulations established by the U.S. EPA, the State of California, the County of Santa Barbara, and the City of Goleta. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of spills. Similar to the proposed project, compliance with these regulations would ensure Alternative 3's operational impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

Threshold: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Alternative 3 would be located on the same project site as the proposed project and therefore contain similar potential hazards, including ACM and LBP in existing buildings, potential contaminated surficial soils, and potentially contaminated groundwater.

Construction of Alternative 3 would require demolition of existing drive-in theater structures, which could potentially contain ACM and LBP. Demolition and construction activities would be required to adhere to Cal/OSHA regulations regarding asbestos and lead-based paint materials. The CCR requires testing, monitoring, containment, and disposal of lead-based materials (CCR Title 8, Section 1532.1) and asbestos (CCR Title 8, Section 15129). However, given the likelihood for the presence of ACM and LBP, demolition could result in a potentially significant release of ACM and LBP. Alternative 3 would require implementation of Mitigation Measures HAZ-1 and HAZ-2 in order to reduce potential impacts associated with ACM and LBP release to a less than significant level, similar to the proposed project.

In addition, construction could potentially disturb hazardous materials in surficial soil to the west of the existing concession stand, leading to an accidental release of hazardous materials that could impact both construction workers and the environment. Based on the depth to groundwater, it is reasonable to assume that groundwater could be encountered during grading activities and groundwater dewatering would be required during construction. Similar to the proposed project, Alternative 3 would comply with an individual NPDES permit, waste discharge, or Limited Threat

Discharge Permit, to ensure proper treatment and disposal. However, given the likelihood for contamination, Alternative 3 would require implementation of Mitigation Measures HAZ-3 through HAZ-5 which, similar to the proposed project, would reduce potential impacts associated with the accidental release of hazardous materials to a less than significant level.

Operation

Operation Alternative 3 would involve minimal handling of hazardous materials, and is anticipated to require less transport, use, and disposal of hazardous materials in comparison to the proposed project because Alternative 3 would only be used for storage and office uses. Alternative 3's operational activities would comply with applicable federal, State, and local regulations, which prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce the risk of accidental spills. Therefore, operation of Alternative 3 would have a less than significant impact related to the accidental release of hazardous materials, similar to the proposed project.

Threshold: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The project site is not located within 0.25-mile of an existing or proposed school. Therefore, Alternative 3 would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school, which is the same as the proposed project.

Threshold: Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

There are no hazardous materials sites mapped within the project site. As such, Alternative 3 would not create a significant hazard to the public or the environment due to hazardous materials sites. No impact would occur, which is the same as the proposed project.

Threshold: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport and the entire project site is within the Airport Influence area of the Santa Barbara Municipal Airport. In addition, the project site falls within the 20,000-foot FAR Part 77 Notification Area for the Santa Barbara Municipal Airport.

Alternative 3 would comply with the same regulations as the proposed project, including the 1993 Santa Barbara County ALUP development standard of a maximum intensity of 25 people per acre and the height restrictions of FAR Part 77. According to the 1993 Santa Barbara County ALUP, the project site is located within Airport Safety Zone II within the Airport Influence Area. The northern portion of the project site is located within Safety Area 1 (Clear Zone) and the southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone). The more restrictive development standards of Safety Area 1 apply to Alternative 3. Therefore, the ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to Alternative 3. Alternative 3's outdoor storage facility would employ 5 people daily, and would occupy approximately 1.62 acres of the total 11.77-acre project site, which represents an intensity of 0.42 people per acre. Therefore, development under Alternative 3 would comply with the standard specified in the 1993

Santa Barbara County ALUP, and impacts would be slightly reduced compared to the proposed project. The project site is located in the 60-65 dB CNEL noise contour for Santa Barbara Airport. Industrial land uses are identified as compatible within this contour in the 1993 Santa Barbara County ALUP. Therefore, Alternative 3 would not conflict with the 1993 Santa Barbara County ALUP, similar to the proposed project

The 1993 Santa Barbara County ALUP does not specify a maximum height for structures in Safety Area 1, and states that objects should be limited in height consistent with airspace protection surfaces defined by FAR Part 77. Alternative 3's outdoor storage facility and office would have a maximum height of approximately 15 feet from finished grade, which represents a 25-foot reduction in building height compared to the proposed project. Alternative 3 would therefore be consistent with the City's development standards and zoning code that existed prior to 2020, which considered proximity to the Santa Barbara Municipal Airport.

Similar to the proposed project, Alternative 3 would not require Airport Land Use Commission review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County. Alternative 3 would comply with additional applicable FAR Part 77 and FAA standards, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration to FAA for review and approval. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow Alternative 3 to be revised. The applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 3's design, the FAA would then determine whether Alternative 3 poses a hazard to air navigation and could request changes to project design to minimize those hazards. The FAA would evaluate Alternative 3 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 3 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Due to the reduction in height compared to the proposed project, Alternative 3 would have less potential to result in hazards related to proximity to an airport. Compliance with these existing regulations would ensure Alternative 3's impacts related to airport hazards would be less than significant, similar to the proposed project.

Threshold: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Construction of Alternative 3 would not impair implementation of an adopted emergency response plan or emergency evacuation plan, as construction staging and construction worker parking would occur on-site and would not impede existing roadway traffic. Operation of Alternative 3 would consist of an outdoor storage facility and would not introduce activities that could impede or interfere with emergency plans or emergency evacuations. Similar to the proposed project, Alternative 3 would have a less than significant impact related to conflicts with an adopted emergency response plan or emergency evacuation plan.

Threshold: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is not within a SRA, or lands classified as VHFHSZ. Alternative 3 would be constructed in accordance with the same requirements as the proposed project, including the California Fire Code and SBCFD standards. As with the proposed project, adherence to these regulations would ensure Alternative 3 would have a less than significant impact related to wildland fire.

i. Hydrology and Water Quality

Threshold: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Alternative 3 would result in similar demolition activities as the proposed project which could generate stormwater pollutants. Alternative 3's potential to introduce stormwater pollutants would be minimized with adherence to SWRCB's Construction Stormwater General Permit which requires implementation of a SWPPP and construction BMPs to minimize pollutant discharge during demolition and construction. In addition to NPDES permit requirements, Alternative 3's construction activities would be subject to the requirements of Chapter 15.09 of the City's Municipal Code which requires preparation and implementation of an erosion and sediment control plan. Nonetheless, due to the highly erodible on-site soils, mitigation would be required to reduce erosion. Similar to the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require implementation of construction measures to minimize erosion. Implementation of Mitigation Measure GEO-1 would reduce Alternative 3's impact on water quality due to erosion to a less than significant level, similar to the proposed project.

Construction of Alternative 3's drainage outfall also would have a similar potential as the proposed project to reduce water quality in San Jose Creek due to if installation of the cofferdam would occur during the wet season. Alternative 3's construction impacts on the water quality of San Jose Creek would be potentially significant. However, required implementation of Mitigation Measure BIO-3 would require the cofferdam to be installed during the dry season and implementation of a Toxic Materials Control and Spill Response Plan which would reduce Alternative 3's water quality impacts on San Jose Creek to a less than significant level, similar to the proposed project.

Similar to the proposed project, Alternative 3 could require groundwater dewatering activities during grading activities. Alternative 3 would be required to obtain coverage under the Limited Threat Discharge Permit if drained groundwater would be discharged into San Jose Creek. Adherence to the permit would reduce potential water quality impacts associated with dewatered groundwater. Similar to the proposed project, if dewatered groundwater is contaminated, the construction contractor for Alternative 3 could not obtain coverage from the Limited Threat Discharge Permit, and impacts would be potentially significant. Alternative 3 would require implementation of Mitigation Measure HAZ-3 which would require groundwater investigation and disposal in accordance with the requirements of the Central Coast RWQCB or City. Implementation of Mitigation Measure HAZ-3 would reduce Alternative 3's potential impact on water quality due to groundwater dewatering to a less than significant level, similar to the proposed project.

Operation

Alternative 3 could introduce potential water pollutants through oil leaks, leaching of metals from roof and drains, and use of pesticides or fertilizers for landscape maintenance. Alternative 3 would not be subject to the NPDES Phase I industrial stormwater regulations because Alternative 3 would not include facilities that are included on the Standard Industrial Classification Codes specified in the permit. Similar to the proposed project, Alternative 3 would be required to comply with Chapter 13.04 of the City's Municipal Code and the Phase II MS4 Permit, which require the use of Source Control and LID BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 3 would provide a detention

basin, hydrodynamic separator, swales, and catch basin inlet filters for stormwater runoff treatment. Alternative 3's detention basin would provide the same amount of stormwater treatment as the proposed project, in accordance with the requirements of the Central Coast RWQCB. Regardless, due to the presence of erodible soils on-site, operation of Alternative 3 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 3's operational water quality impacts would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Alternative 3 has a similar potential to encounter groundwater during construction as the proposed project due to the shallow groundwater level on-site. If groundwater dewatering is required, Alternative 3 would result in a similar local decrease of groundwater supplies as the proposed project, which would be minimal, and would not otherwise result in substantial groundwater losses in the Basin or result in changes which prohibit groundwater infiltration on-site compared to existing conditions. Therefore, construction of Alternative 3 would have a less than significant impact on groundwater, similar to the proposed project.

Alternative 3 would decrease the existing 188,963 square feet of impervious surfaces on-site to 184,543 square feet, the same as the proposed project. The project site contains low permeability soils and high groundwater elevation, thereby rendering groundwater infiltration infeasible. Accordingly, Alternative 3 would not result in substantial interference to groundwater recharge, similar to the proposed project.

Operation of Alternative 3 would not require groundwater extraction on-site. As described further in the *Utilities and Service Systems* discussion of this alternative, Alternative 3's water demand would be approximately 19.72 AFY less than the proposed project. Groundwater provided to Alternative 3 from the GWD would be provided in accordance with the allocations determined by the Wright Judgement which would ensure the groundwater provided to Alternative 3 is sustainably managed. Furthermore, existing regulatory measures requiring water conservation during times of drought prevent the overdraft of the Basin that GWD would use to supply water demand of Alternative 3. Therefore, Alternative 3 would not substantially increase water supplies and this impact would be less than significant, and less than the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Construction

Alternative 3's construction activities would disturb the same area as the proposed project and therefore have the same potential for erosion and sedimentation. Similar to the proposed project, Alternative 3 would adhere to the requirements of the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the City Municipal Code, as well as implementation of the required

SWPPP and construction BMPs would minimize pollutant discharge in stormwater runoff. However, due to the erodibility of the project site, Alternative 3's impacts would be potentially significant and require mitigation. Alternative 3 would implement Mitigation Measure GEO-1 which, similar to the proposed project, would incorporate erosion control measures and reduce Alternative 3's construction impacts related to erosion to a less than significant level.

Operation

Similar to the proposed project, Alternative 3 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 3's detention basin would provide the same amount of stormwater treatment as the proposed project, in accordance with the requirements of the Central Coast RWQCB. Regardless, due to the presence of erodible soils on-site, operation of Alternative 3 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 3's operational impacts related to erosion would be reduced to a less-than-significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Construction

Similar to the proposed project, Alternative 3 would comply with the requirements of the Construction Stormwater General Permit, including requiring the construction contractor to implement a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff. Construction would not include activities which could result in the channelization of San Jose Creek or relocation of a natural drainage bed which could increase the rate of surface water runoff. Therefore, Alternative 3's construction activities would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. This impact would be less than significant, similar to the proposed project.

Operation

Alternative 3 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff. Alternative 3's detention basin would provide the same amount of stormwater drainage control as the proposed project, in accordance with the requirements of the Central Coast RWQCB. These requirements mandate Alternative 3's stormwater infrastructure be designed to treat the to provide treatment up to two times the 85th percentile storm event. Adherence to the regulatory requirements of the Central Coast RWQCB would ensure Alternative 3 would have a less than significant impact to on- or off-site flooding, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction

Alternative 3 would comply with the same regulations as the proposed project intended to control stormwater runoff and reduce pollutants and ensure construction activities would not result in substantial runoff which would exceed the capacity of San Jose Creek. These include requiring the construction contractor to implement a SWPPP and construction BMPs that would direct and manage stormwater to minimize impacts to the capacity of San Jose Creek. However, even with adherence to regulatory requirements, construction activities could result in additional sources of polluted runoff due to construction within San Jose Creek and/or groundwater dewatering activities. Alternative 3 would require implementation of Mitigation Measure GEO-1,BIO-3, and HAZ-3, which would reduce Alternative 3's potential impacts associated with substantial runoff and polluted runoff to a less than significant level, similar to the proposed project.

Operation

Alternative 3 would be required to implement stormwater infrastructure in accordance with Central Coast RWQCB requirements which would provide for substantial stormwater and runoff control on-site. Alternative 3 would also adhere to the Central Coast RWQCB and City LID requirements for treatment of stormwater which would minimize polluted runoff generated during operation of Alternative 3. However, as with the proposed project, highly erodible on-site soils could lead to Alternative 3's operation introducing polluted runoff. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would mandate procedures during operation to minimize on-site soil erosion. With implementation of Mitigation Measure GEO-1, Alternative 3's impact associated with substantial runoff and polluted runoff would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Flooding

Alternative 3 would be located on the same project site as the proposed project and therefore is subject to similar flood hazards. Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site.

Although the project site in its current condition would not be inundated by 100-year flood flows, Alternative 3 would require additional flood-proofing design measures are required because the berm is not an accredited levee recognized by FEMA. Alternative 3 would require implementation of flood-proofing design measures in accordance with the City Municipal Code. These include the use of between 4 to 6 feet of fill to elevate the proposed building and outdoor storage area above the 100-

year floodplain elevation. Alternative 3 would also be required to be certified by a registered professional engineer or architect that the City's floodplain development standards. In the event of a 100-year flood event, stormwater flows on the project site would be conveyed to Alternative 3's detention basin for eventual discharge to the San Jose Creek. Because Alternative 3 would direct stormwater flows to San Jose Creek, the introduction of fill material for Alternative 3 would not substantially alter off-site flooding or drainage. Due to the earthen berm, flood water from the project site does not discharge to surrounding parcels. Similar to the proposed project, Alternative 3 would not change the flood carrying capacity of the project site, permanently alter a water course, or raise flood elevations. Due to the existing flood protection offered by the earthen berm, project design, and compliance with City requirements governing development within a floodplain, Alternative 3 would have a less than significant impact related to flooding, similar to the proposed project.

Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA*] v. *Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. For informational purposes only, sea level rise is discussed below.

Alternative 3 would occur on the same project site as the proposed project and would therefore be subject to similar risks of sea level rise. Alternative 3 would require approximately 4 to 6 feet of fill to raise the office building and outdoor storage area above the floodplain. Based on a scenario with 100-year storm event with 6.6 feet of sea level rise, Alternative 3's outdoor storage facility and office would not be inundated because these facilities would be elevated above San Jose Creek's anticipated water surface elevation of 14.78 feet. However, in the northeastern most portion of the project site, the access road to the office building, San Jose Creek maintenance road, and the creek's bank would below the water level elevation during a 100-year storm event. Therefore, should the worst-case 100-year water level elevation of 14.78 feet occur within San Jose Creek, the northern portion of the access road to the outdoor storage facility would be inundated, potentially preventing access to the outdoor storage facility and office. The City would incorporate recommendations made in the *Sea Level Rise and Coastal Hazards Analysis* prepared for the proposed project into Alternative 3 as conditions of approval. The recommendations would require the applicant to monitor future sea level rise and flood levels within San Jose Creek, and construct on-site flood control measures as determined appropriate by the City and other Responsible Agencies including but not limited to elevating the access road to the outdoor storage facility above the 100-year floodplain elevation and continuing to provide maintenance access to San Jose Creek (e.g., constructing a levee, etc.). As part of the condition of approval, the potential effects of sea level rise on Alternative 3 would be evaluated 50 years after the start of construction in conjunction with the Santa Barbara County Flood Control District. With these conditions of approval, the potential for sea level rise to result in an impediment or redirection of flood flows at the project site would be minimized, similar to the proposed project.

Threshold: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is located outside of a tsunami hazard zone and is not proximate to a large body of water and therefore is not subject to seiche. Therefore, as with the proposed project, Alternative 3 would not risk release of pollutants in a tsunami hazard zone or seiche hazard zone.

Alternative 3 would be subject to similar flood hazards as the proposed project. Alternative 3 would be designed and constructed in accordance with the floodproofing requirements of the City's Municipal Code which would elevate Alternative 3 two feet above the 100-year flood elevation. Accordingly, in the event the earthen berm fails, pollutants would not be released because Alternative 3's outdoor storage facility would be elevated above the 100-year flood elevation. Furthermore, implementation of Mitigation Measure GEO-1 would require Alternative 3's design to include specific measures to minimize the release of stormwater pollutants. Due to regulatory requirements and required implementation of Mitigation Measure GEO-1, Alternative 3 would not risk release of pollutants due to flood hazards, similar to the proposed project.

The project site is within the inundation zone of the Rancho Del Ciervo dam. Alternative 3 and the proposed project would not include any features which would preclude routine dam inspection or otherwise increase the risk for dam failure and inundation. Therefore, Alternative 3's potential impacts related to pollutant release due to dam inundation would be less than significant, similar to the proposed project.

Threshold: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. Alternative 3 would comply with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. These include the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the Central Coast RWQCB's Post-Construction Requirements, the County's Stormwater Technical Guide for Low Impact Development, and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code. However, Alternative 3, has a similar potential as the proposed project to result in water quality impacts related to erosion, construction in San Jose Creek, and groundwater dewatering, which could conflict with the goal of the Basin Plan. Alternative 3 would require implementation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 to reduce potential surface water quality impacts related to erosion, groundwater dewatering, and construction within San Jose Creek. With implementation of these measures, Alternative 3's impact related to conflicts with the Basin Plan would be reduced to a less-than-significant level, similar to the proposed project.

GWD's Groundwater Management Plan Goleta Groundwater Basin (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement. As described above, Alternative 3 would not adversely impact groundwater supplies or the management of the Goleta Groundwater Basin in accordance with the Wright Judgement. Existing regulatory measures requiring water conservation during times of drought prevent the overdraft of groundwater that GWD would use to supply the demand induced by Alternative 3. Accordingly, Alternative 3 would have a less than significant impact related to conflicts with a sustainable groundwater management plan, similar to the proposed project.

j. Land Use and Planning

Threshold: Would the project physically divide an established community?

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood. Alternative 3 would not include components such as roads that could divide an established community. As with the

proposed project, Alternative 3 would not result in the physical division of an established community, and no impact would occur.

Threshold: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Alternative 3 includes development of an outdoor storage facility and office building that would be consistent with the permitted uses in the City's M-1 zone. Alternative 3 would be consistent with the setback, coverage, height, and landscaping requirements within the M-S-GOL and M-1 zones as Alternative 3's proposed office building would be located more than 50 feet from the centerline and 20 feet from the right-of-way of South Kellogg Avenue and setback more than 10 feet from the property line; would not occupy more than 50 percent of the net area of the project site with buildings; would not exceed the height limits of the M-S-GOL and M-1 zones; and would not decrease landscaping compared to the proposed project.

As with the proposed project, Alternative 3 would be subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code). Section 35-97.2 of the previous zoning code states that if the project site is determined to be outside of this district, then the regulations of the overlay district shall not apply. A small portion of San Jose Creek to the southeast of the project site is located within the ESHA Overlay District. Alternative 3 would include utility development within 50 feet of this area. Section 35-97.19 of the previous zoning code states that no structures shall be allowed within stream corridors when located in the ESHA Overlay District. Because the utility trench would be subsurface and not considered structural development, Alternative 3's utility trench would be consistent with the previous zoning code.

Alternative 3's detention basin outfall would be located within the boundary of the Goleta Slough SMCA, similar to the proposed project. Authorization for any activities in the Goleta Slough SMCA would be provided by California Department of Fish and Wildlife as part of the Lake and Streambed Alteration Agreement notification process. Therefore, Alternative 3 would not conflict with land use policies within the Goleta Slough SMCA, similar to the proposed project.

The project site is located within the Airport Influence Area of Santa Barbara Airport. Alternative 3 would comply with the ALUP development standard of a maximum intensity of 25 people per acre, as Alternative 3 would employ 5 people daily which would represent an intensity of up to 0.42 people per acre on the 11.77-acre project site. The project site is located in the 60-65 dB CNEL noise contour for the Santa Barbara Airport; however, industrial land uses are classified as compatible in this contour in the 1993 Santa Barbara County ALUP. Similar to the proposed project, Alternative 3 would not conflict with the safety and noise policies of the 1993 Santa Barbara County ALUP.

Mitigation Measures BIO-1 through BIO-4 in Section 4.3, *Biological Resources*, and Mitigation Measure NOI-1 in Section 4.11, *Noise*, would reduce Alternative 3's impacts involving conflicts with land use plans, policies, or regulations that were adopted for purposes of reducing environmental impacts to the extent feasible. Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to special-status species, and Mitigation Measure NOI-1 would reduce project construction noise. These mitigation measures would reduce impacts involving conflict with the Goleta General Plan as they would minimize potential impacts to protected environmental resources within the Goleta General Plan. However, Alternative 3, similar to the proposed project, would include a request to reduce the 100-foot SPA buffer at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek. This reduction in the SPA buffer would be potentially inconsistent with following Goleta General Plan policies:

- Policy CE 1.6: Protection of ESHAs
- Policy CE 2.2: Streamside Protection Areas
- Policy CE 2.6 Restoration of Degraded Creeks

With regards to Policy CE 1.6, Alternative 3 would place fill within the SPA buffer. Because alternative site configurations for Alternative 3 that reduce development within the SPA are feasible (See Alternative 2), Alternative 3 would be inconsistent with this policy. With regards to Policy CE 2.2 and CE 2.6, construction and operational impacts on the biotic quality of the SPA from a buffer reduction to 25 feet would be significant and unavoidable. Additionally, development in the SPA buffer would eliminate the potential for future preservation in a natural state. Accordingly, due to the proposed SPA buffer reduction, Alternative 3 would result in a significant and unavoidable impact from conflicts with Policies CE 1.6, CE 2.2, and CE 2.6 of the Goleta General Plan, similar to the proposed project.

Unlike the proposed project, Alternative 3's the overall height of storage bays and office building would be a maximum of 13 feet above existing grade and 15 feet above existing grade, respectively. As discussed in the *Aesthetics* discussion of this alternative, Alternative 3 would reduce the maximum building height of the proposed project by 25 feet which would ensure the Alternative 3 facilities would not interfere with views of the Santa Ynez Mountains or foothills from SR 217. Several Goleta General Plan policies are intended to protect scenic views and ensure development is consistent in size, bulk, scale, and height with surrounding development. These polices include LU 1.8, VH 1.1, VH 2.2, and VH 2.3. While the proposed project would conflict with these policies due to the height of the industrial building, Alternative 3's facilities would be consistent with surrounding development and would not result in substantial interference with views of the Santa Ynez Mountains or foothills from SR 217; therefore, Alternative 3 would not conflict with the Policies LU 1.8, VH 1.1, VH 2.2, or VH 2.3. Alternative 3 would reduce the proposed project's significant and unavoidable impact related to conflicts with Goleta General Plan Policies LU 1.8, VH 1.1, VH 2.2, or VH 2.3 to a less than significant level.

k. Noise

Threshold: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Construction activities under Alternative 3 would be the same as the proposed project, and would include demolition, grading, and building construction that would temporarily increase noise levels at noise-sensitive receptors in the project site vicinity. As the overall footprint for Alternative 3 would be the same as the proposed project, the distances from construction to the nearest sensitive receptors would be the same. Estimated construction noise levels from Alternative 3 are provided in Table 6-14, using the same construction equipment assumed for the proposed project. As shown in the table, construction noise levels may exceed Goleta's 65 dBA standard at the Rancho Goleta mobile home community to the east but would not exceed the standard at the residence to the west. Therefore, construction noise impacts from Alternative 3 would be the same as the proposed project, which would be mitigated to less than significant through Mitigation Measure NOI-1.

Table 6-14 Construction Noise Levels – Alternative 3

Receptor	Land Use Type	Direction from Project Site	Distance from Construction (feet)	Noise Level (dBA Leq)[1]		Exceed Threshold?[2]
				General Construction	Joint Utility Trench Construction	
1150 S Fairview Ave	Single-family	West	425	65	64	No
Rancho Goleta Community	Mobile Home	East	325	66	67	**Yes**

[1] The loudest construction scenario analyzed for both activities was assumed to be a grader, excavator, and loader.

[2] The City of Goleta threshold is if construction noise exceeds 65 dBA.

Operation

Stationary Noise

Alternative 3 would not involve loading dock activities such as the proposed project. Therefore, the main source of operational noise would be from mechanical equipment for the office building. Given the relatively small size of the 500-square foot office building, it was assumed that one HVAC unit would be necessary. It was conservatively assumed that the office building would be located at the closest feasible distance to each sensitive receptor; therefore, HVAC noise was analyzed at 275 feet to 1150 S Fairview Avenue and 400 feet from the Rancho Goleta mobile home community. Noise from one HVAC unit from Alternative 3 would be 38 dBA at 1150 S Fairview Avenue and 35 dBA at the Rancho Goleta mobile home community. These noise levels are lower than the proposed project's estimated noise levels by 3 dBA and 7 dBA, respectively. Therefore, operation noise from Alternative 3 would be less than significant, and less than the proposed project.

Off-site Traffic Noise

CONSTRUCTION

Construction worker trips with Alternative 3 would be similar to the proposed project. Haul trips would also be similar at 1,100 trips each. Therefore, the less than significant construction traffic noise impacts determined for the proposed project would also apply to Alternative 3.

OPERATION

Operation of Alternative 3 would generate a smaller number of operational trips compared to the proposed project, as the employee count would be reduced from approximately 75 employees to 5 employees, and as the daily operational truck trips would be reduced from approximately 28 to 16. Traffic noise increases under Alternative 3 would be less than the 0.2 dBA noise increase estimated for the proposed project. Therefore, operation traffic noise from Alternative 3 would be less than significant, and less than the proposed project.

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be used to construct Alternative 3. Similar to the proposed project, the greatest anticipated source of vibration during general project construction activities would be from a dozer, which would be used as close as 50 feet during construction from the nearest buildings to the northeast. A dozer

would create a vibration level of approximately 0.089 PPV in/sec. at a distance of 25 feet, similar to the proposed project. This would equal a vibration level of approximately 0.042 PPV in/sec. at a distance of 50 feet. This vibration level would be well below the Caltrans vibration damage potential threshold for older structures of 0.3 PPV in/sec for continuous/frequent intermittent sources. Therefore, temporary vibration impacts from Alternative 3 associated with the dozer (and other potential equipment) would be less than significant, similar to the proposed project.

Operational activities known to generate excessive ground-borne vibration include projects involving railroads and subways. Alternative 3 would not involve substantial vibration sources associated with operation such as this. Therefore, Alternative 3's operational groundborne vibration and noise impacts would be less than significant, similar to the proposed project.

Threshold: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in exposure of people residing or working in the project area to excessive noise levels?

The project site is located within the 60 to 65 CNEL noise contour from Santa Barbara Airport, which is approximately 1,100 feet to the west. This would be a noise exposure within the City's "normally acceptable" recommendation for noise levels for industrial uses, which is up to 70 CNEL. Therefore, construction workers building Alternative 3 or workers of the outdoor storage facility would not be exposed to excessive airport noise levels, and impacts would be less than significant, similar to the proposed project.

I. Public Services

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Alternative 3 would require 5 employees as opposed to the 75 employees anticipated for the proposed project. In a conservative scenario wherein all projected employees and their families were to relocate to Goleta, there would be a population growth of approximately 13 residents based on the city's average persons per household of 2.64. The addition of 13 residents to the City would maintain the existing SBCFD ratio of approximately 2.77 firefighters per 2,000 persons and would result in marginally less change to the SBCFD ratio in comparison to the proposed project. The project site is located approximately 1.3 miles from the County Station 12 and thus firefighters would be able to readily respond to the demand for fire services at the project site. Alternative 3 would be constructed in accordance with the same regulations as the proposed project, including the California Fire Code and SBCFD regulations, which would minimize the potential for fire protection services to be needed at the project site. As with the proposed project, the project applicant would be required to pay development impact fees which would provide funding for expanded fire protection facilities, including environmental compliance and permitting for new facilities. Alternative 3 would reduce demand for fire protection facilities in comparison to the proposed project, and Alternative 3's impact to fire protection facilities would be less than significant.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Alternative 3 would result in a maximum population growth of 13 residents, which is 185 less residents than the proposed project. Accordingly, Alternative 3 would result in a marginally reduced demand for police services compared to the proposed project. Similar to the proposed project, the population growth that could occur with Alternative 3 represents less than one percent of Goleta's existing population which is not anticipated to substantially alter the existing service ratios provided by the contracted Deputy Service Units such that an additional officer would be required in order to provide adequate public services. Thus Alternative 3, similar to the proposed project, would not be expected to result in substantial additional police services or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. The project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel. Alternative 3 would reduce demand for police protection facilities in comparison to the proposed project, and Alternative 3 would have a less than significant impact on police facilities.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Alternative 3 would result in a maximum population growth of 13 residents, which is 185 fewer residents than the proposed project. This growth would require approximately 13 residential units based on the City's average persons per household of 2.64 Using a student generation factor of 0.2 students per residential unit per school district, consistent with the City's General Plan Final EIR, Alternative 3 could generate approximately three students in GUSD and five students in SBUSD from indirect population growth, which is ten less students in each district compared to the proposed project. Because Alternative 3 would generate less students than the proposed project and the proposed project would not exceed the existing capacities of school facilities, Alternative 3 would also not induce indirect population growth such that the existing capacities of school facilities would be exceeded. Similar to the proposed project, the applicant would pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from new development projects. Pursuant to Senate Bill 50, payment of this fee "…is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Alternative 3 would reduce demand for school facilities and with payment of school fees, Alternative 3 would have a less than significant impact on schools.

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Alternative 3 could indirectly result in a population growth of 13 residents, which is 185 fewer residents than the proposed project which would place less demand on library services than the

proposed project. The small population increase that could occur would not inhibit the ability for the Goleta Valley Library to maintain material circulation. The existing library facility would be sufficient to accommodate the potential incrementally increased use and circulation needs that may result from indirect population growth due to Alternative 3. Furthermore, the applicant would pay development impact fees which would fund the provision of new or expanded libraries. Alternative 3 would reduce demand for library facilities compared to the proposed project and Alternative 3 would have a less than significant impact on the need for new or physically altered libraries.

m. Transportation and Circulation

Threshold: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Similar to the proposed project, Alternative 3 would not introduce features that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As described in the *Land Use and Planning*, discussion of this alternative, Alternative 3 would be consistent with the City's Transportation Element policies. Alternative 3 would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. There is an existing sidewalk located on South Kellogg Avenue, and Class III bicycle lanes located on South Kellogg Avenue. Project site access would be provided via an existing driveway which connects to an access road. Alternative 3 would resurface the existing access road. Alternative 3 would also include installation of a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot. Alternative 3's design features would be subject to review and approval by the City, which would ensure Alternative 3 would conform to the City's driveway access control and vision clearance standards and minimize potential vehicle to pedestrian and vehicle to cyclist conflicts in accordance with City standards. Alternative 3, would not generate a substantial increase in transit use due to the increase in up to 5 employees as employees are anticipated to be residents of Goleta who area within the service area of the Santa Barbara Metropolitan Transit District.

Given the above considerations, Alternative 3 would have a less than significant impact on a program, plan, ordinance or policy that addresses the current circulation system including transit, roadway, bicycle, and pedestrian facilities, similar to the proposed project.

Threshold: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Construction of Alternative 3 would result in similar, short-term, temporary vehicle trips as the proposed project, which would not result in long term changes to VMT within Goleta. Therefore, Alternative 3's construction VMT would not be inconsistent with CEQA Guidelines Section 15064.3(b), similar to the proposed project. The project site is within an area identified by the City where work-based projects would generate an average VMT of 15 percent or more below baseline levels, would not require a VMT analysis, and would be presumed to have a less than significant impact on VMT. Therefore, similar to the proposed project, Alternative 3 would have a less than significant impact on VMT and would not conflict with CEQA Guidelines Section 15064.3(b).

Threshold: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Construction staging for Alternative 3 would be located at the project site which would minimize the potential for construction related vehicles and equipment to create a circulation related hazard in the immediate area. Alternative 3 would store construction materials which could reasonably be transported to construction sites with the use of a WB-62 delivery truck. As with the proposed project, Alternative 3 would be required to widen the eastern portion of the driveway in order to accommodate WB-62 delivery truck turning requirements. WB-62 delivery trucks would be expected to access the project site via South Kellogg Avenue, Hollister Avenue, and SR 217, all of which can accommodate a WB-62 delivery truck. The transportation design of Alternative 3 would also be required to be reviewed by SBCFD and the City to ensure Alternative 3 would not introduce geometric design hazards. Alternative 3 would not introduce new incompatible uses, such as farm equipment, to roadways. Therefore, Alternative 3 would have a less than significant impact on transportation hazards, similar to the proposed project.

Threshold: Would the project result in inadequate emergency access?

Construction staging for Alternative 3 would occur on-site, similar to the proposed project, which would minimize the potential for construction-related vehicles and equipment to result in inadequate emergency access in the immediate area. Alternative 3 and the proposed project would be required to be designed in accordance with applicable SBCFD standards, including those that address minimum driveway width, signage and addressing, fire hydrants, fire sprinklers, and emergency access. Alternative 3 would also be required to widen the driveway which would also improve access for emergency vehicles. With compliance with SBCFD and City standards, Alternative 3's impacts to inadequate emergency access would be less than significant, similar to the proposed project.

n. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 3 would be located on the same project site as the proposed project, and therefore would have a similar potential to impact tribal cultural resources. Based on Native American consultation conducted for the proposed project, no tribal cultural resources have been identified on the project site. The Archaeological Resources Assessment completed for the project site determined there is a very low potential for subsurface resources to exist within the project site. Therefore, similar to the proposed project, Alternative 3 would not cause a substantial adverse change to tribal cultural resources, and impacts would be less than significant.

o. Utilities and Service Systems

Threshold: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

As with the proposed project, Alternative 3 would require water utility infrastructure to connect to the existing GWD pipeline underneath the sidewalk adjacent to South Kellog Avenue in order to supply water to the project site. Alternative 3 would generate a reduced water demand compared to the proposed project due to a reduction in employment and therefore would not generate substantial water demand and would not necessitate new or expanded facilities in order to meet Alternative 3's water demand. Therefore, Alternative 3's impact on water infrastructure would be less than significant, similar to the proposed project.

Wastewater

Alternative 3 would require similar sewer infrastructure as the proposed project in order to connect to the sewer line located underneath South Kellog Avenue. Alternative 3 would generate less wastewater during operation than the proposed project due to a reduction in employment. Therefore, wastewater generated by Alternative 3 would not exceed the existing capacity of the GSD WWTP. Alternative 3 would not require new or expanded wastewater treatment facilities beyond the sewer line connection. Similar to the proposed project, Alternative 3's impact on wastewater infrastructure would be less than significant.

Stormwater

Alternative 3 would require implementation of stormwater facilities sized in accordance with Central Coast RWQCB and City requirements in order to treat and dispose of on-site stormwater. Alternative 3 would discharge stormwater to San Jose Creek, similar to the proposed project, as the underlying groundwater levels make infiltration infeasible. No additional stormwater drainage facilities, such as additional off-site drains of underground pipelines, would be required beyond the infrastructure needed for Alternative 3.

Electric, Natural Gas, and Telecommunications Facilities

As with the proposed project, Alternative 3 would install a transformer pad and utility lines which would connect to existing electric, natural gas, and telecommunications infrastructure proximate to the project site. Alternative 3's demand for electric, natural gas, and telecommunications facilities would be less than the proposed project because Alternative 3 would only include storage and office uses rather than more energy intensive uses such as wholesaling and distribution. SCE and SCG would have sufficient electricity and natural gas supplies for Alternative 3 without the installation of additional electric or natural gas infrastructure. Similarly, Alternative 3 would use existing telecommunications facilities during operation and would not require upgrades to existing facilities or create a demand for service unable to be met by existing providers. Therefore, similar to the proposed project, Alternative 3's impact to electric, natural gas, and telecommunications facilities would be less than significant.

Threshold: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Alternative 3 would not include an industrial building. Rather, Alternative 3 would utilize the project site as an outdoor storage facility and would include a 500 square foot office building. The storage of construction materials and RVs would not generate water demand. Therefore, Alternative 3's water demand is based upon the demand that would be generated from the 500 square foot office building. According to the County's 2021 *Environmental Thresholds and Guidelines Manual*, Office land uses are anticipated to have a water demand of 0.15 AFY per 1,000 square feet of development. Therefore, development of Alternative 3's 500 square foot office space would generate a water demand of approximately 0.08 AFY, approximately 19.72 AFY less than the proposed project. The project site has been allocated water for the proposed project based on historical water credits from the prior on-site use. Because Alternative 3 would have a reduced water demand compared to the proposed project, adequate water supply would be available for Alternative 3 and could be served by GWD at the time of development. Alternative 3's anticipated water demand of 0.08 AFY represents less than one percent of GWD's anticipated 2040 surpluses in a normal year, dry year, and multiple dry years. Alternative 3 would comply with the same GWD-imposed water shortage restrictions as the proposed project during drought periods which would reduce its water demand in times of drought. Alternative 3 would not result in substantial water supply reductions. This impact would be less than significant, and less than the proposed project.

Threshold: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Anticipated wastewater generation is calculated consistent with the wastewater generation factor of 100 gallons per day per 1,000 square feet of habitable space used in the City's General Plan Final EIR. Alternative 3's 70,594 square foot outdoor storage facility would not include restroom facilities; therefore, Alternative 3's wastewater generation is based upon the 500 square foot office building. Alternative 3's wastewater generation would then be 50 gallons per day which is 7,009 gallons less than the proposed project. This wastewater generation represents less than 0.01 percent of the 1.11 MGD capacity available at the GSD WWTP for GSD customers. Alternative 3 would not generate wastewater in excess of existing capacity. This impact would be less than significant, and less than the proposed project.

Threshold: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

and

Threshold: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Alternative 3 would result in the same demolition activities as the proposed project and would generate the same amount of demolition debris, which is approximately 443 tons of debris. Alternative 3 would result in the same disturbance area as the proposed project and therefore would generate the same amount of construction debris, which would total 486 tons of debris based on the U.S. EPA's solid waste generation factor of 3.89 pounds per square foot for construction. In total, Alternative 3's demolition and construction activities would generate 929 tons of solid waste, the

same as the proposed project. Alternative 3's construction period is estimated to occur over 9 months. Pursuant to Chapter 8.10, Article IV of the Goleta Municipal Code, construction contractors are required to divert 65 percent of all construction and demolition waste by weight from landfill disposal for any new structure. The applicant is required to submit a Waste Management Plan which would indicate how solid waste generated during demolition and construction would be diverted in accordance with City requirements. With compliance with City requirements, the proposed project's demolition and construction activities would generate an estimated 325 tons of non-recyclable waste, the same as the proposed project. This amount of nonrecyclable waste would exceed the City's project-specific threshold of 196 tons per year. Similar to the proposed project, Alternative 3 would require implementation of Mitigation Measure UTIL-1 to implement a Waste Management Plan and further increase waste diversion. Similar to the proposed project, Alternative 3's reduction in waste generation that requires a landfill cannot be fully determined until implementation of Mitigation Measure UTIL-1 is completed. Although construction of Alternative 3 would generate less solid waste than the proposed project, Alternative 3's short-term impacts related to demolition and construction waste would remain significant and unavoidable. In addition, Alternative 3's short-term construction waste would have a cumulatively considerable contribution on cumulative impacts related to solid waste.

Alternative 3's outdoor storage facility would not generate solid waste; therefore, operational solid waste generation is based upon the 500 square foot office building. Pursuant to the methodology of County's 2021 *Environmental Thresholds and Guidelines Manual*, which estimates solid waste generation for an office using a factor of 0.0013 tons multiplied by the square footage of a project, operation of Alternative 3 would generate approximately 0.65-ton of solid waste annually, which is 112.35 tons less than the proposed project. This solid waste would be reduced to 0.33 tons of non-recyclable solid waste per year, consistent with a 50 percent solid waste diversion rate. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. Solid waste impacts during operation would be less significant, and less than the proposed project.

6.4 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative among the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

This discussion identifies the environmentally superior alternative by assessing the degree to which each alternative avoids significant and unavoidable environmental impacts. In some cases, an alternative will avoid one or more significant and/or unavoidable impacts identified for the proposed project but then introduce one or more new significant impacts. Therefore, selection of the environmentally superior alternative requires an overall assessment of the changes in the number and type of significant impacts.

The *CEQA Guidelines* do not define a specific methodology for determining the environmentally superior alternative. For the purposes of this analysis, the project alternatives have been compared within each issue area to the proposed project, and a determination has been made as to whether the potential environmental effects of each alternative would be reduced, increased, or is similar in comparison to the proposed project (refer to Table 6-15). For the purpose of this EIR, each impact is equally weighted. Decision makers and the community in general may choose to emphasize one issue or another, which could lead to differing conclusions regarding environmental superiority.

As shown in Table 6-15, the No Project Alternative would be the environmentally superior alternative because the No Project Alternative would result in no impact to any environmental issue area. However, the No Project Alternative would not fulfill any of the project objectives.

As stated above, *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The environmentally superior alternative among the other alternatives would be Alternative 3. Neither Alternative 2 nor Alternative 3 create additional environmental impacts in comparison to the proposed project. Alternative 3 would reduce the proposed project's significant and unavoidable aesthetics impacts to a less than significant level. Unlike Alternative 2, Alternative 3 would result in lesser impacts to air quality, energy, greenhouse gas emissions, hydrology and water quality, operational noise, public services, and utilities and service systems, although Alternative 3 would not reduce the proposed project's impact conclusions in these issue areas. However, Alternative 3 would result in similar biological resources impacts as the proposed project, including a significant and unavoidable impact related to conflicts with local ordinances that protect biological resources. In addition, Alternative 3 would fail to meet the following project objectives as Alternative 3 would not provide tenant space or an industrial building:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan (General Plan) designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).

In addition, Alternative 3 would only partially meet the following project objectives due to a reduction in employees compared to the proposed project:

- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.

Alternative 2 would reduce the proposed project's significant and unavoidable impact to biological resources to a less than significant level by complying with the 100-foot SPA buffer. Alternative 2 would result in a greater noise impact compared to the proposed project and would marginally increase greenhouse gas emissions and energy use during construction compared to the proposed project, although impacts would remain less than significant with mitigation. Alternative 2 would result in similar impacts to all other issue areas, including significant and unavoidable impacts related to aesthetics and solid waste disposal. However, unlike Alternative 3, Alternative 2 would fulfill all of the project objectives.

Table 6-15 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Aesthetics				
Scenic vistas	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Less Than Significant (+)
Scenic highways	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Scenic quality	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Less Than Significant (+)
Light and glare	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Air Quality				
Conflicts with an Air Quality Plan	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Cumulatively considerable increases of criteria pollutants	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Sensitive receptor exposure to pollutant concentrations	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Odors	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Biological Resources				
Effects on candidate, sensitive, or special-status species	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5 and NOI-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5 and NOI-1 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and NOI-1 (=)
Effects on riparian habitat or sensitive natural communities	Less Than Significant with Incorporation of Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7 (=)
Effects on state- or federally-protected wetlands	Less Than Significant with Incorporation of Mitigation Measures BIO-5, BIO-6, BIO-7, and BIO-8	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures BIO-5, BIO-6, BIO-7, and BIO-8 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-5, BIO-6, BIO-7, and BIO-8 (=)
Wildlife movement	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-6, BIO-7, and BIO-9	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure BIO-1, BIO-6, BIO-7, BIO-9, and NOI-1 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-6, BIO-7, BIO-9, and NOI-1 (=)
Conflicts with local polices protecting biological resources	Significant and Unavoidable	No Impact (+)	Less Than Significant (+)	Significant and Unavoidable (=)
Conflicts with Habitat Conservation Plans	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Cultural Resources				
Effects on historical resources	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Effects on archaeological resources	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Disturbance of human remains	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Energy				
Wasteful, inefficient, or unnecessary consumption of energy resources	Less Than Significant	No Impact (+)	Less Than Significant (-)	Less Than Significant (+)
Conflicts with a state or local plan for renewable energy or energy efficiency	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Geology and Soils				
Alquist-Priolo earthquake fault zones	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Seismic ground shaking	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Liquefaction and Unstable soils	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Landslides	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Substantial erosion and loss of topsoil	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Expansive soils	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Use of septic tanks or alternative wastewater disposal systems	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Destruction of paleontological resources or unique geologic features	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Greenhouse Gas Emissions				
Generation of GHG emissions	Less Than Significant	No Impact (+)	Less Than Significant (-)	Less Than Significant (+)
Conflicts with plans, policies, or regulations adopted to reduce GHG emission	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Hazards and Hazardous Materials				
Transport, use, and disposal of hazardous materials	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Upset and accident conditions involving hazardous material release	Less Than Significant with Incorporation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, and HAZ-5	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, and HAZ-5 (=)	Less Than Significant with Incorporation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, and HAZ-5 (=)
Emit hazardous emissions or handle hazardous materials within 0.25-mile of a school	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Hazardous materials sites	No Impact	No Impact (+)	No Impact (=)	No Impact (=)
Airport hazards	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Impairment of or interference with emergency response plans and emergency evacuation plans	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Exposure of people or structures to risk involving wildland fires	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Hydrology and Water Quality				
Violate water quality standards, waste discharge requirements, or degrade surface or groundwater quality	Less Than Significant with Incorporation of Mitigation Measures GEO-1, BIO-3, and HAZ-3	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, BIO-3, and HAZ-3 (=)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, BIO-3, and HAZ-3 (=)
Decrease groundwater supplies or interfere with groundwater recharge	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in substantial erosion or siltation	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Result in on-or off-site flooding	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Exceed the capacity of stormwater drainage systems or provide substantial additional polluted runoff	Less Than Significant with Incorporation of Mitigation Measure GEO-1 and BIO-3	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1, BIO-3, and HAZ-3 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1, BIO-3, and HAZ-3 (=)
Impede or redirect flood flows	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Risk release of pollutants due to project inundation	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan	Less Than Significant with Incorporation of Mitigation Measures GEO-1, HAZ-3, and BIO-3	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 (=)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 (=)
Land Use				
Physically divide an established community	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Significant and Unavoidable (=)
Noise				
Result in substantial temporary or permanent ambient noise increases	Less Than Significant with Incorporation of Mitigation Measure NOI-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure NOI-1 (-)	Less Than Significant with Incorporation of Mitigation Measure NOI-1 (+)
Generate excessive gorundborne vibration or groundborne noise levels	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Expose residents or employees to excessive airport noise	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Public Services				
Result in the need for new or physically altered fire protection facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in the need for new or physically altered police protection facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in the need for new or physically altered school facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in the need for new or physically altered other public facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)

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Transportation and Circulation				
Conflict with a program, plan, ordinance, or policy addressing the circulation system	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Conflict or be inconsistent with CEQA Guidelines section 15064.3(b)	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Substantially increase hazards due to geometric design features or incompatible equipment	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Result in inadequate emergency access	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Tribal Cultural Resources				
Cause a substantial adverse change in the significance of a tribal cultural resources	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Utilities and Service Systems				
Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Have sufficient water supplies to serve the project in normal, dry, and multiple dry years	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Be adequately served by a wastewater treatment provider	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
General solid waste in excess of State or local standards or of the capacity of local infrastructure and Comply with federal, state, and local management and reduction statutes and regulations related to solid waste	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Significant and Unavoidable (=)

+ Superior to the proposed project (reduced level of impact)
- Inferior to the proposed project (increased level of impact)
= Similar level of impact to the proposed project