

6 Alternatives

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines provides guidance for the identification and evaluation of project alternatives in an environmental impact report (EIR). CEQA Guidelines Section 15126.5 states: “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The Housing Plan evaluated by this Program Environmental Impact Report (Program EIR) includes programs that would implement the adopted and certified 6th Cycle Housing Element. Alternatives have been selected for analysis based on their ability to reduce or avoid potentially significant impacts of the Housing Plan while still meeting most of the basic project objectives. The Housing Plan would result in potentially significant impacts to air quality, biological resources, cultural and tribal cultural resources, hazards and hazardous materials, and noise that would be mitigated to less than significant levels of impact. As such, this Program EIR examines reasonable alternatives consistent with the requirements of CEQA Guidelines Section 15126.6.

6.1 Alternatives Development and Screening Process

In selecting a range of potential reasonable alternatives to the project, the lead agency shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially reduce one or more of the significant effects. Among the factors that a lead agency may use to eliminate alternatives from detailed consideration are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).

Unlike a site development project or an update to the general plan initiated by a local agency, the Housing Plan is the implementation plan for the City’s 6th Cycle Housing Element, which was adopted in response to the State-mandated 6th Cycle Regional Housing Needs Assessment (RHNA) that identified a specific number of new housing units the City is required to plan for and accommodate during the 8-year planning period from 2023-2031. As described in Section 3.1, *6th Cycle Housing Element Background*, regional housing needs are determined by the California Department of Housing and Community Development, which decides the numerical housing targets for each regional council of governments, including the Santa Barbara County Association of Governments (SBCAG). Each regional council of governments across the State then allocates the regional housing number (known as the RHNA) to every city and county within its jurisdiction. For the 6th Cycle Housing Element, SBCAG determined that the City’s RHNA is 8,001 housing units.

The RHNA is a targeted housing number; cities and counties are required by State housing law to plan for the RHNA and show that under applicable land use and development standards, there is capacity to accommodate this number of new dwelling units. If the California Department of Housing and Community Development determines that a Housing Element fails to substantially comply with State housing law, there are potentially serious consequences for the public, including limited access to State funding and potential for lawsuits. The City’s Housing Plan is the implementation plan and therefore is integral to ensure the City’s 6th Cycle Housing Element facilitates housing development in compliance with State law. Nevertheless, pursuant to the

requirements of CEQA, alternatives to the Housing Plan were identified and either retained for further analysis or eliminated, as described below.

A screening process to identify the selection of EIR alternatives was completed to determine which alternatives could avoid or reduce significant effects and also feasibly meet the Project Objectives described in Section 3.2 of this Program EIR. The alternatives selection process consisted of the following steps:

- **Step 1:** Review the environmental effects that could occur with the implementation of the Housing Plan and identify possible alternatives to avoid or reduce such impacts. As described in detail in Section 4, no significant and unavoidable impacts have been identified for the Housing Plan.
- **Step 2:** Evaluate each alternative in the context of the following criteria:
 - The extent to which the alternative would avoid or substantially reduce one or more of the identified environmental effects of the Housing Plan;
 - The extent to which the alternative would accomplish most of the Project Objectives described in Section 3.2, *Project Objectives*; and
 - The feasibility of the alternative, taking into account factors such potential to demonstrate the ability to meet the City's RHNA; availability of infrastructure; and consistency with applicable plans, policies, and regulatory limitations such as the SBCAG 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
- **Step 3:** Determine the suitability of the proposed alternatives for full analysis in the Program EIR based on Steps 1 and 2 above. In the final phase of the screening analysis, the environmental advantages and disadvantages of the remaining alternatives were carefully weighed with respect to their potential for overall environmental advantage, technical feasibility, and consistency with the Project Objectives. Alternatives that did not clearly offer the potential to reduce significant environmental impacts, would not achieve all or most Project Objectives, and/or would not be feasible were rejected from further consideration and analysis. For the Housing Plan, characteristics used to eliminate alternatives from further consideration included:
 - Inability to feasibly implement;
 - Inability to reduce environmental impacts associated with the Housing Plan, and;
 - Inability to meet all or most of the Project Objectives.

As stated in Section 3, *Project Description*, the CEQA objectives for the Housing Plan, are as follows:

- Meet the State-mandated 6th Cycle RHNA for the City.
- Locate housing close to jobs, transit, and services.
- Increase production of deed-restricted affordable housing, and housing for special needs households.
- Streamline and increase predictability in the residential development approval process.
- Implement processes and procedures to comply with state housing laws and regulations.
- Facilitate a variety of housing types and equitable housing access in areas that historically excluded diverse housing opportunities.
- Protect historic, cultural, biological, and other environmental resources.
- Provide financial resources and supportive services for members of the community who need housing assistance.

- Maintain and improve the physical condition of existing housing at all affordability levels.
- Promote greater housing stability for tenants.
- Prioritize permanent housing over other uses where possible.

6.1.1 Alternatives Evaluated in this Program EIR

Included in this analysis are two alternatives, including the CEQA-required “no project” alternative. In addition to the alternatives selected for detailed analysis, other alternatives were considered by the City but ultimately rejected either because they were infeasible or failed to satisfy the basic objectives of the project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Additional Housing

Table 6-1 provides a summary comparison of the potential development characteristics of the Housing Plan and each of the alternatives considered. It is noted here that Alternative 1, the required “no project” alternative, is not legally feasible for the reasons discussed below. This alternative is analyzed herein solely for the purpose of comparison to the proposed Housing Plan. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. Each alternative is analyzed in Section 6.2 and Section 6.3 to determine whether environmental impacts would be similar to, less than, or greater than those of the preferred scenario in the Housing Plan in Sections 6.2 and 6.3. As required by CEQA, Section 4 includes a discussion of the “environmentally superior alternative” among those studied.

Table 6-1 Comparison of Residential Growth Assumptions for each Project Alternative

Feature	Project: Proposed Housing Plan	Alternative 1: No Project	Alternative 2: Additional Housing
Dwelling Units	8,001	2,760	8,808
Population ¹	99,900	92,284 ²	106,376 ²

¹ Growth assumptions for all alternatives are based on scenarios for projected residential growth between the years 2020 and 2035.

² Population is calculated by multiplying the anticipated dwelling units by the Department of Finance’s estimated average persons per household size of 2.33 for the City of Santa Barbara and summing the calculated value with the City’s population of 85,853 estimated by the Department of Finance for January 1, 2023.

6.1.2 Alternatives Considered but Rejected

The CEQA Guidelines state that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts. (CEQA Guidelines Section 15126.6[a][c].)

Alternatives considered included alternate locations and a range of different potential residential growth scenarios in comparison to the proposed Housing Plan. Several potential alternatives have been rejected on the basis that they are practically infeasible or would fail to accomplish the basic project objectives. Environmental and feasibility constraints, such as historic resources, fire hazard severity zones, and biological resources were considered during the development of the proposed

Housing Plan as well as project alternatives. Alternatives that analyze residential development outside of the City limits or alternatives that evaluate an extended development period horizon are not feasible because the California Department of Housing and Community Development requires the 6th Cycle Housing Element, on which the proposed Housing Plan is based, to accommodate the RHNA assigned to the City of Santa Barbara within the 6th Cycle Housing Element timeframe. Therefore, alternative locations were rejected from further consideration. Reduced potential residential buildout in comparison to the proposed Housing Element were also considered as alternatives; however, alternatives with reduced potential residential growth would not meet the City's RHNA allocation and thus would fail to plan for potential future residential development in Santa Barbara consistent with State housing law.

CEQA Guidelines Section 15126.6(a) 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 only examine in detail those that the Lead Agency determines could feasibly attain most of the basic objectives of the Housing Plan. Other alternatives can be considered but are not required to satisfy the requirements of CEQA. Therefore, with the exception of the "no project" alternative described in Section 6.2, this EIR does not consider reduced levels of residential growth in comparison to the proposed Housing Plan and 6th Cycle Housing Element.

6.2 Alternative 1: No Project Alternative

6.2.1 Description

Section 15126.6(e) of the *CEQA Guidelines* requires a "no project" alternative be evaluated in an EIR to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. *CEQA Guidelines* Section 15126.6(e)(3) describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). Because the project is a plan to implement programs in the adopted and certified 6th Cycle Housing Element, the No Project Alternative would result in not implementing the programs within the proposed Housing Plan that are necessary to meet the City's obligations under State housing law, including the requirement to plan for and accommodate the City's RHNA allocation. Therefore, for the purposes of this Program EIR, the No Project Alternative comprises existing development standards and policies contained in the City of Santa Barbara General Plan, Zoning Ordinance, and Coastal Land Use Plan.

Residential development growth under this alternative is anticipated to be generally similar to the existing growth rate of residential development in much of the city but would not implement the programs within the Housing Plan that are necessary to meet the housing needs of current and future City residents.

Growth projected under the No Project Alternative was estimated using the City's 2015-2022 permitting data, which shows an average of 230 housing units have been permitted annually from 2015-2022. For the purposes of this analysis, the number of residential units under the No Project

Alternative is assumed to be equivalent to the average housing units permitted annually from 2015-2022. Accordingly, the increase in residential units from 2023 to 2035 in Santa Barbara would be 2,760. The No Project Alternative would be expected to increase the City's population by approximately 7.5 percent. As a result, the overall rate of residential development and anticipated population growth under the No Project Alternative would be similar to the existing rate of housing production, but would not result in as much housing as the proposed Housing Plan (refer to Table 6-1).

6.2.2 Impact Analysis

a. Aesthetics and Visual Resources

The No Project Alternative would result in a lower rate of residential development than the Housing Plan. Residential development forecasted in accordance with the No Project Alternative would adhere to pre-existing City General Plan, Local Coastal Program, and Municipal Code requirements which regulate building height, setbacks, and lighting, minimizing impacts to aesthetics and visual resources. However, if the State rescinded the City's Housing Element compliance, the No Project Alternative's impact on aesthetics and visual resources would be greater in comparison to the project because applicants could propose development that is inconsistent with General Plan and Zoning regulations. Therefore, the No Project Alternative would result in greater impacts to aesthetics and visual resources than the Housing Plan. Potential impacts to aesthetics and visual resources, while speculative, would have the potential to be significant and unavoidable.

b. Air Quality

The No Project Alternative would result in a lower rate of residential development than the Housing Plan. Potential residential development under the No Project Alternative would be consistent with anticipated population growth in Santa Barbara County Association of Government (SBCAG) 2050 Connected – Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)¹ and the Santa Barbara County Air Pollution Control District (SBCAPCD) 2022 Ozone Plan². Accordingly, the No Project Alternative would not result in a cumulatively considerable net increase of a criteria pollutant for which the South Central Coast Air Basin is in non-attainment because the No Project Alternative would be consistent with the 2022 Ozone Plan. The No Project Alternative would result in reduced impacts for criteria pollutants in comparison to the Housing Plan due to a lower level of anticipated new residential development and associated population growth.

The construction and operation of new residential development under the No Project Alternative would continue to be subject to SBCAPCD'S regulations which would continue to minimize the potential for development to substantially impact sensitive receptors. However, the No Project Alternative would not be required to implement Mitigation Measure AQ-1 and therefore would not require the construction of large residential projects to utilize California Air Resources Board (CARB) Tier 3 or higher equipment. Therefore, the No Project Alternative would result in greater impacts to sensitive receptors, and these impacts would be significant and unavoidable.

¹ Population forecast of 99,900 in 2035.

² Countywide population growth rate from 2018 to 2035 of 11%, using Department of Finance data, similar to SBCAG's Regional Growth Forecast.

c. Biological Resources

The No Project Alternative would result in a lower level of residential development than the Housing Plan. However, due to the absence of objective resource protection standards for certain biological resources for the inland areas of the City in the City's Municipal Code, residential projects outside of the Coastal Zone and subject solely to ministerial review and approval or objective standards per State housing law would continue to have the potential to substantially adversely affect creek and riparian habitats, nesting birds, and oak woodlands. The No Project Alternative would not implement Mitigation Measures BIO-1, BIO-2, and BIO-3 requiring measurable and objective creek protection requirements, riparian vegetation buffers, tree protection standards, and pre-construction bird surveys. The No Project Alternative would have the potential to result in greater impacts to biological resources than the Housing Plan. In the absence of mitigation to reduce these impacts, the No Project Alternative's impact on biological resources would be significant and unavoidable.

d. Cultural and Tribal Cultural Resources

Although the No Project Alternative would result in a lower level of residential development than the Housing Plan, new residential development would continue to occur, including potential development in Santa Barbara's historic districts. Residential development would continue to be subject to State law and the City's Municipal Code requirements, which are intended to minimize impacts to historical resources, Historic Districts, and Landmark Districts. Based on existing policy, future residential development may cause a substantial adverse change in the significance of the City's historic resources. With adoption of AB 130 (2025) and ministerial and streamlined housing approvals under state law, unevaluated structures may be redeveloped without the City's determination of historic significance. While the No Project Alternative would result in a lower level of residential development than the Housing Plan, this alternative would not implement Mitigation Measure CUL-1 to identify potential historic resources, and the No Project Alternative would result in greater impacts to historic resources compared to the Housing Plan. Impacts would be significant and unavoidable.

Under the No Project Alternative, new residential development outside of the Coastal Zone and subject solely to ministerial review and approval are not subject to the City's MEA Guidelines for Archaeological Resources. This development would continue to have the potential to result in disturbance of subsurface archaeological resources due to ground-disturbing activities such as grading and construction. The No Project Alternative would not implement Mitigation Measures CUL-2 and CUL-3 to require review of projects within a City-delineated archaeological sensitivity area prior to ground disturbing activities, including completion of a Phase I Archaeological Resources Report, if applicable, and tribal consultation. As a result, the No Project Alternative would have greater potential impacts to archaeological resources than the Housing Plan. In the absence of mitigation to reduce this impact, the No Project Alternative's impact on archaeological resources would be significant and unavoidable.

As described above, the No Project Alternative would not implement Mitigation Measures CUL-2 and CUL-3; therefore, projects subject solely to ministerial review and approval or objective standards could result in the disturbance of tribal cultural resources because no tribal consultation processes are required unless specifically required in State housing law. As a result, the No Project Alternative would have greater potential impacts to tribal cultural resources than the Housing Plan. In the absence of mitigation to reduce this impact, the No Project Alternative's impact on tribal cultural resources would be significant and unavoidable.

e. Greenhouse Gas Emissions

The No Project Alternative would result in a lower level of residential development than the Housing Plan, which would reduce potential greenhouse gas emissions from construction and residential operational activities. Similar to the proposed project, the No Project Alternative does not propose any changes in land use to meet the City's RHNA allocation and therefore would be consistent with the existing land use designations and zoning implemented by the City. Therefore, the No Project Alternative would meet the criteria presented within the *Master Environmental Assessment Guidelines for Greenhouse Gas Emissions Analysis*, for consistency with the CAP's analysis of communitywide GHG emissions. However, if projected housing growth is not met within Santa Barbara under the No Project Alternative, it is anticipated GHG emissions from vehicle travel would increase as residential populations would commute to work and school in Santa Barbara from longer distances if they are unable to secure housing within the city. As a result, the No Project Alternative would have incrementally greater GHG impacts compared to the Housing Plan, but this impact would be expected to remain less than significant.

f. Hazards and Hazardous Materials

Similar to the Housing Plan, due to the presence of Clean Up Program sites, sites containing potentially contaminated artificial fill material, and sites with building materials containing hazardous materials throughout the city, the No Project Alternative would have potential to result in the release of hazardous materials to the environment. Unlike the Housing Plan, the No Project Alternative would not implement Mitigation Measures HAZ-1 through HAZ-3 and therefore would not implement requirements for Phase I Environmental Site Assessments, implementation of standard procedures for the inadvertent discovery of contamination, and implementation of standard procedures for inadvertent discovery of oil wells. Accordingly, the No Project Alternative would result in a greater risk of release of hazardous materials and contamination. Therefore, the No Project Alternative would have greater impacts compared to the Housing Plan. Potential impacts associated with hazardous materials and contamination, while speculative, would have the potential to be significant and unavoidable.

g. Noise

The No Project Alternative would result in a lower level of residential development than the Housing Plan, resulting in less construction noise and groundborne vibration. However, the No Project Alternative would not implement Mitigation Measures N-1, N-2 or N-3. Therefore, the No Project Alternative would not include policies requiring implementation of construction noise management plans or vibration control plans. As a result, the No Project Alternative would have the potential to result in greater impacts than the Housing Plan related to construction noise and groundborne vibration. Potential impacts from construction noise and groundborne vibration, while speculative, would have the potential to be significant and unavoidable.

As a result of the reduced residential development associated with the No Project Alternative, this alternative would result in less potential for noise from HVAC equipment, hauling trucks, outdoor activities, and traffic noise. Therefore, the No Project Alternative would have fewer potential impacts on operational noise compared to the Housing Plan. These impacts would remain less than significant.

h. Schools

The No Project Alternative would result in a lower level of residential development than the Housing Plan, which would result in less student population growth. Therefore, the No Project Alternative would have fewer impacts on schools than the Housing Plan. New residential development would continue to be required to pay school impact fees which, pursuant to Senate Bill 50 (1998), reduce potential impacts associated with the future development of individual residential projects to a less than significant level. Therefore, the No Project Alternative's impact on public school facilities would remain less than significant.

i. Transportation and Circulation

The No Project Alternative would result in a lower level of residential development than the Housing Plan. The No Project Alternative would be expected to increase the City's population by approximately 7.5 percent while the Housing Plan would have the potential to increase the City's population by approximately 16 percent. Accordingly, the No Project Alternative would result in fewer vehicle trips within the City compared to the Housing Plan. Vehicle Miles Traveled (VMT) is a transportation analysis metric that represents all trips beginning or ending in the city. If the projected housing growth is not met within the city, it is anticipated that regional VMT will increase as residential populations would commute to work and school from longer distances. Although trip lengths under the No Project Alternative are anticipated to result in a higher VMT than the Housing Plan, the overall per capita VMT is expected to remain below the threshold of significance identified in the Housing Plan. Although the No Project Alternative may result in increased per capita VMT in comparison to the Housing Plan, this impact would remain less than significant.

j. Utilities and Service Systems

The No Project Alternative would result in a lower level of residential development than the Housing Plan, which would reduce the demand on utilities and service systems. The No Project Alternative would result in fewer utility connections, lower water demand, lower wastewater infrastructure demand, lower electricity demand, and reduced telecommunications needs. As a result, the No Project Alternative would result in fewer potential utilities and service systems impacts. The No Project Alternative's impacts on utilities and service systems would remain less than significant.

6.3 Alternative 2: Additional Housing

6.3.1 Description

This alternative assumes the implementation of the Housing Plan increases density and results in more residential development than anticipated under the Housing Plan as proposed in Section 3, *Project Description*, (up to 807 additional dwelling units; refer to discussion below and Table 6-1). The accelerated housing production assumed under this alternative would result in the growth of 8,808 residential units by the horizon year 2035. This includes the City's RHNA Allocation with an 11 percent buffer. The Additional Housing Alternative accounts for additional growth that would result from expansion of programs HE-1: Facilitate Conversion of Nonresidential Buildings to Housing, HE-10: Multi-Unit Housing Program, and HE-12: Prioritize Deed-Restricted Affordable Housing, as described below. This alternative would provide the opportunity to increase the percentage of affordable units along with a moderate increase in the number of housing units overall. In addition,

this alternative assumes that the City would pursue additional measures to facilitate additional housing, including the following:

- **Require Minimum Density.** Currently, areas zoned for medium high and high density can be developed at lower densities. The City could adopt a minimum density requirement to require minimum densities for residential development.
- **Increase Density.** Currently, the density range in the AUD Program Medium-High Density tier is 15-27 dwelling units per acre (du/ac). The City would increase this to 20-27 du/ac or higher. The state deems 20 units per acre as the “default density” for the City of Santa Barbara to accommodate housing for lower income households.
- **Increase Density in Targeted Areas.** The City would change densities in areas such as State Street from Arrellaga St to Mission St, De la Vina St from Constance to State Street, and State Street from De la Vina to Calle Real from Medium High Density Residential (15-27 du/ac) to High Density Residential (28-36 du/ac).

Additional measures may be needed in order to attain the projected additional housing units under this Alternative.

In addition to representing a higher-density development scenario relative to the proposed Housing Plan, the Additional Housing Alternative provides an analytical framework for evaluating conditions in which housing production within the City exceeds the RHNA allocation of 8,001 units. While the Housing Plan programs are designed to accommodate the suitable sites inventory and RHNA allocation, actual buildout may vary due to State housing laws, market conditions, and site-specific development proposals. As such, this alternative provides an informative comparison for decision-makers, outlining the potential environmental trade-offs associated with additional housing growth above the RHNA allocation.

6.3.2 Impact Analysis

As a higher-growth scenario, the Additional Housing Alternative would increase in the overall amount of construction, intensity of development, and population generated, relative to the Housing Plan. Environmental impacts under this alternative would be similar in type to those identified for the proposed Housing Plan; however, they may be incrementally greater in magnitude. For most issue areas, the degree to which impacts are more severe would depend on the location, density, and design of future development projects.

Increased development under this alternative could cumulatively result in significant and unavoidable impacts in cases where residential growth exceeds the growth assumptions embedded in regional air quality attainment plans and greenhouse gas reduction strategies. This may conflict with the region’s ability to achieve air quality standards and greenhouse gas emissions reduction targets. At the same time, the higher-density development pattern under this alternative could provide potentially lower per capita vehicle miles traveled.

The mitigation measures identified for the proposed Housing Plan are largely performance-based and tied to applicable regulatory standards. Therefore, they would also apply to development projects under the Additional Housing Alternative. These mitigation measures are designed to address impacts at the project level and are not tied to a fixed cap on residential units. Furthermore, individual projects under this alternative would continue to be subject to further environmental review as required by CEQA, at the time specific development projects are proposed.

a. Aesthetics and Visual Resources

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, which could alter the visual character of the city. Similar to the Housing Plan, new residential development within transit priority areas may be exempt from a significant impact determination under CEQA pursuant to Public Resources Code Section 21099 and would continue to be subject to review by the City's Design Review boards and commissions. New residential development would still be subject to development standards within the Santa Barbara Municipal Code, such as building heights and setbacks, and transitional height requirements. However, it is important to acknowledge that recent and evolving State housing laws substantially constrain local governments' authority to regulate certain aspects of residential development, including the extent to which a local agency may impose standards that would reduce allowable building envelopes, or constrain feasible project design. As a result, while the City retains design review authority, its ability to require reductions in building size, bulk, height, or scale may be more limited than in the past.

In order to facilitate the construction of increased units consistent with state mandates, there may need to be changes in standards that could allow for buildings with greater massing or other design changes, which could result in more visual change to neighborhoods in Santa Barbara in comparison to the Housing Plan. While these changes would represent a more pronounced shift in visual character compared to the Housing Plan, the combination of City design review process and applicable Municipal Code standards, and State-mandated housing implementation requirements would continue to guide development toward context-sensitive design where feasible. In addition, due to the increase in residential development under the Additional Housing Alternative, this alternative would introduce more sources of light and glare in comparison to the Housing Plan. Although individual development projects would be required to comply with City design standards and lighting requirements, which would reduce the potential for visual incompatibility or light or glare to affect surrounding areas, the Additional Housing Alternative would result in a greater amount of visual changes and an increase in overall ambient lighting than the Housing Plan. Therefore, the Additional Housing Alternative would result in greater impacts than the Housing Plan, though impacts would remain less than significant.

b. Air Quality

The Additional Housing Alternative is anticipated to result in residential development of 8,808 residential units, which could increase the total City population to 106,376 people in 2035. Unlike the Housing Plan, the population increase from the Additional Housing Alternative would not be consistent with SBCAG's 2050 Regional Growth Forecast, and therefore would not be consistent with the 2022 Ozone Plan. The 2050 Regional Growth Forecast forms the basis for regional air quality planning assumptions, including those used in the 2022 Ozone Plan. Accordingly, the level of growth associated with the Additional Housing Alternative would represent development that exceeds the growth projections anticipated and planned for in regional air quality attainment strategies. Because the Additional Housing Alternative would introduce a level of population and housing growth that is not accounted for in the 2022 Ozone Plan, the resulting emissions of ozone precursors such as reactive organic gases (ROG) and nitrogen oxides (NOx), would likewise not be fully incorporated into the emissions inventories and control strategies relied upon to demonstrate attainment. As a result, the Additional Housing Alternative would result in a greater impact than the Housing Plan. As with the Housing Plan, the potential for the Additional Housing Alternative to result in a cumulatively considerable net increase of criteria pollutants in the South Central Coast Air

Basin (SCCAB) is evaluated based on the Additional Housing Alternative's consistency with the 2022 Ozone Plan. While the nature of the impact (i.e., increased emissions associated with population growth) is similar to that identified for the Housing Plan, the magnitude and policy inconsistency associated with unplanned growth under the Additional Housing Alternative results in a comparatively greater impact. Accordingly, the Additional Housing Alternative would have the potential to result in a cumulatively considerable net increase of a criteria pollutant for which the SCCAB is in non-attainment because the Additional Housing Alternative would not be consistent with the 2022 Ozone Plan. This impact would be significant and unavoidable. In this context, the significant and unavoidable impact is not necessarily caused by the absolute increase in emissions, but rather, is triggered by the unplanned growth that falls outside the assumptions used in regional air quality planning.

The Additional Housing Alternative's higher residential buildout potential would result in increased localized emissions compared to the Housing Plan. However, similar to the Housing Plan, construction and operation of development forecasted under the Additional Housing Alternative would be subject to SBCAPCD regulations which would continue to minimize the potential for development to substantially impact sensitive receptors. In addition, the Additional Housing Alternative would be required to implement Mitigation Measure AQ-1 and, therefore, would require large residential projects to utilize CARB Tier 4 equipment during construction as feasible. Therefore, the Additional Housing Alternative's impacts on sensitive receptors would remain less than significant with mitigation incorporated.

c. Biological Resources

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan. As a result, this alternative may result in more residential development in proximity to creek habitat, riparian habitat, nesting bird habitat, oak woodland, or other biologically sensitive locations. Therefore, the Additional Housing Alternative would result in incrementally greater impacts to biological resources than the Housing Plan. Similar to the Housing Plan, the Additional Housing Alternative would be required to implement Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 to reduce potential impacts to creek habitat, riparian habitat, nesting birds, and oak woodland. Similar to the Housing Plan, these mitigation measures would reduce the Additional Housing Alternative's impact on biological resources to a less than significant level.

d. Cultural and Tribal Cultural Resources

The Additional Housing Alternative would have a higher level of residential development than the Housing Plan; some of which would be concentrated downtown, which includes El Pueblo Viejo Landmark District. Residential development would continue to be subject to State law and the City's Municipal Code requirements, which are intended to minimize impacts to historical resources, Historic Districts, and Landmark Districts. The Additional Housing Alternative would result in incrementally greater impacts on historical resources compared to the Housing Plan, but these impacts would remain less than significant.

The Additional Housing Alternative would be expected to result in more ground-disturbing activity than the Housing Plan; however, the residential development would occur in areas subject to previous disturbance, which would lower the potential for the Additional Housing Alternative to disturb subsurface archaeological resources. Residential development subject to discretionary review and approval must comply with the City's Master Environmental Assessment (MEA) Guidelines which requires review of projects located in a City-delineated archaeological sensitivity

area prior to ground-disturbing activities. Similar to the Housing Plan, the Additional Housing Alternative would be required to implement Mitigation Measures CUL-1, CUL-2, and CUL-3 to identify potential historic resources and amend the Municipal Code with requirements applicable to all projects within a City-delineated archaeological sensitivity area; this may include completion of a Phase I Archaeological Resources Report and tribal consultation, if applicable. With implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3, the Additional Housing Alternative's impacts on archaeological and tribal cultural resources would remain less than significant.

e. Greenhouse Gas Emissions

The Additional Housing Alternative would have a higher level of residential development than the Housing Plan, which would increase potential greenhouse gas emissions from construction and operation of individual residential projects. As a result, the Additional Housing Alternative would result in incrementally higher greenhouse gas emissions than the Housing Plan. The increased housing constructed by the Additional Housing Alternative may require increased residential densities exceeding existing maximum allowed densities. In some cases, higher development densities could facilitate more intensive land use patterns than previously anticipated in the City's adopted land use framework. While higher-density development can provide certain efficiency benefits on a per capita basis such as reduced per-unit energy consumption and potentially lower vehicle miles traveled compared to lower-density alternatives, the overall increase in housing production would still result in higher total emissions at the Citywide scale.

Because the Additional Housing Alternative assumes a level of growth that exceeds the projections used in the City's Climate Action Plan (CAP), there is greater potential for inconsistency between projected emissions under this alternative and the emissions reduction strategies and targets identified in the CAP. The CAP is based on assumptions regarding population growth, land use densities, and transportation patterns that align with adopted regional planning forecasts. To the extent that actual development under this alternative exceeds those assumptions, the ability of existing CAP measures to fully offset resulting emissions would be reduced. This would represent a potential conflict with the City's Climate Action Plan in the context of unanticipated or unprogrammed growth beyond CAP assumptions, which would be a significant and unavoidable impact.

f. Hazards and Hazardous Materials

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, resulting in more construction activity and use of household hazardous materials. Accordingly, the Additional Housing Alternative would have a higher likelihood of resulting in impacts related to the accidental release of hazardous materials. Similar to the Housing Plan, new residential development would be subject to federal, State, and local requirements that minimize the risk of exposure to hazardous materials, ensure adequate emergency access is provided, and minimize fire risk. In addition, the Additional Housing Alternative would implement Mitigation Measures HAZ-1 through HAZ-3 requiring Phase I Environmental Site Assessments, implementation of standard procedures for the inadvertent discovery of contamination, and implementation of standard procedures for inadvertent discovery of oil wells. Because the Additional Housing Alternative would result in increased use of hazardous materials, this alternative would have the potential to result in greater impacts compared to the Housing Plan, but these impacts would remain less than significant with mitigation incorporated.

g. Noise

The Additional Housing Alternative would result in more construction noise and groundborne vibration than the Housing Plan due to the increased residential development under this alternative. Therefore, the Additional Housing Alternative would have greater impacts related to construction noise and groundborne vibration than the Housing Plan. Similar to the Housing Plan, the Additional Housing Alternative would be required to implement Mitigation Measures N-1, N-2, and N-3 to reduce construction noise. With implementation of Mitigation Measures N-1, N-2, and N-3, the Additional Housing Alternative's impact on construction noise and groundborne vibration would remain less than significant.

The increased number of housing units and increased population under the Additional Housing Alternative would lead to more operational noise associated with HVAC equipment, hauling trucks, outdoor activities, traffic noise, and other sources of ambient noise in the urban environment. Noise from stationary equipment and noise from outdoor activities would be subject to Municipal Code requirements which would limit the potential for stationary equipment and outdoor activities associated with residences to result in a substantial permanent increase in ambient noise levels. Increased delivery trucks and trash hauling trucks would be required to abide by existing State law which limits the noise these vehicles can generate. The Additional Housing Alternative would not result in a doubling of traffic compared to existing conditions and therefore would not result in a perceptible noise increase of 3 dBA or more. As a result, the Additional Housing Alternative's impacts related to operational noise would remain less than significant.

h. Schools

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, and would therefore generate a greater number of students within the City's school districts. This alternative would result in a student population growth of approximately 2,809 students (based on a student generation factor of 0.3189 students per household and a projected 8,808 new housing units) which is 258 more students anticipated under the Housing Plan. The incremental increase in student generation could place additional enrollment pressure on school districts serving the City, including smaller community-funded districts such as Hope School District. As noted in comments received from the Hope School District, these districts operate within constrained interdistrict transfer policies and generally rely on capital project planning and operational changes to accommodate enrollment changes. While these operational considerations are relevant to district planning, CEQA analysis of school impacts focuses on whether a project would result in the need for new or physically altered school facilities that could cause a significant physical environmental impact.

Although the Additional Housing Alternative would generate a more students than the Housing Plan, the analysis of citywide capacity across multiple districts indicates that existing school facilities, when considered systemwide, are able to accommodate projected enrollment growth. To the extent that localized constraints occur at individual school sites or within specific districts, such conditions are addressed through district-level planning and are not assumed to result in the construction of new or expanded school facilities as a direct environmental consequence of the Housing Plan or alternatives.

While the Additional Housing Alternative would place a greater number of students into schools serving Santa Barbara, which would increase operational strain on some districts, new residential development would continue to be required to pay developer impact fees. Pursuant to Senate Bill

50 and California Government Code Section 65995 et seq., payment of these fees is deemed full and complete mitigation for school facility impacts under CEQA. These fees provide a proportional funding contribution toward school facility needs generated by new residential development. Therefore, the Additional Housing Alternative's impact on public school facilities would be less than significant, as they are for the Housing Plan.

i. Transportation and Circulation

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan. The Additional Housing Alternative would increase the City's population by approximately 24 percent while the Housing Plan would increase the City's population by approximately 16 percent. The Additional Housing Alternative would increase overall VMT in the City compared to the Housing Plan due to the increased population. However, based on VMT modeling results for the Housing Plan (Appendix F) and anticipated increased residential densities under the Additional Housing Alternative, per capita VMT for this alternative would be slightly lower than the Housing Plan due to reductions in trip lengths that result from a more balanced ratio of residents to local employers and increased residential density in proximity to existing commercial areas. The overall per capita VMT is expected to remain below the threshold of significance identified for the Housing Plan. Therefore, the Additional Housing Alternative is anticipated to result in less per capita VMT impacts, and these impacts would remain less than significant.

j. Utilities and Service Systems

The Additional Housing Alternative would result in a higher level of residential development than the Housing Plan, which would increase the demand on utilities and service systems. The Additional Housing Alternative would result in more utility connections, increased water demand, increased wastewater generation, increased electricity demand, and increased telecommunications needs in comparison to the Housing Plan. As a result, the Additional Housing Alternative would result in greater potential utilities and service systems impacts in comparison to the Housing Plan. Using the City's multi-family water demand factor, the Additional Housing Alternative would result in increased water demand of approximately 913 acre-feet per year above 2035 demand projected in the Enhanced Urban Water Management Plan (refer to water demand factors in Table 4.10-4). However, supply projections in the EUWMP support the City's ability to meet these additional demands (Hoffenberg 2023). Consistent with the wastewater generation rates presented in Section 4.10, *Utilities and Service Systems*, wastewater generation is assumed to be approximately 87 percent of total increased water demand. Accordingly, the Additional Housing Alternative is also anticipated to increase wastewater generation in the City by an additional 1.1 million gallons per day which would not exceed the design capacity of El Estero Water Resource Center. Although the Additional Housing Alternative would have a greater impact on utilities and service systems than the Housing Plan, the Additional Housing Alternative's impact would remain less than significant.

6.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse environmental impacts associated with the project or program. The Lead Agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible (CEQA Guidelines Section 15126.6[a], [c] and [f]). In

many cases, the No Project alternative would have the fewest or least intense impacts. However, the CEQA Guidelines Section 15126.6(e)(2) states that “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

For the implementation of a planning program such as the Housing Plan, there may not be a clear Environmentally Superior Alternative. Selection of the Environmentally Superior Alternative may be difficult, especially when the differences between the impacts of the alternatives involve trade-offs between types of impacts. An alternative may reduce environmental impacts to certain resource areas and increase impacts to other resource areas as compared to the proposed project, while another alternative may reduce different environmental impacts. Although CEQA does not provide specific guidance in this matter, where an alternative is anticipated to result in reduced impacts for a majority of resource areas and/or substantially reduced impacts in especially critical resource areas, this can support a finding that the alternative is environmentally superior. In such instances, the EIR may disclose the differences between the alternatives and identify how each alternative may be superior. The Lead Agency retains the authority to identify the Environmentally Superior Alternative based on the evidence in the EIR, agency and public input, Lead Agency standards and policies, and the Lead Agency’s independent decision-making.

Table 6-2 indicates whether each alternative’s environmental impact is greater than, less than, or similar to that of the Housing Plan for each of the issue areas studied. Based on the alternatives analysis provided in Section 6.2.2 and Section 6.3.2, the Housing Plan would be the environmentally superior to either of the two evaluated project alternatives. The Housing Plan would result in the fewest impacts to air quality, biological resources, archaeological resources, tribal cultural resources, operational GHG emissions, hazardous materials, noise, and VMT compared to other alternatives. The Housing Plan’s potentially significant impacts to air quality, biological resources, archaeological resources, tribal cultural resources, hazards and hazardous materials, and noise would be mitigated to less than significant levels of impact. Ultimately, the Housing Plan would result in an overall reduction in the severity of impacts in comparison to the two evaluated project alternatives.

Unlike the Housing Plan, the No Project Alternative would not implement mitigation measures designed to reduce impacts from residential development to air quality, biological resources, archaeological and tribal cultural resources, hazardous materials, and noise. Therefore, the No Project Alternative would result in greater impacts on these environmental issue areas compared to the Housing Plan. The No Project Alternative also would not implement programs designed to meet Santa Barbara’s affordable housing needs, discourage conversion of housing to non-residential uses, or provide programmatic CEQA analysis for future environmental review of projects. Furthermore, the No Project Alternative would not be consistent with the City’s 6th Cycle Housing Element, which was adopted to demonstrate the City’s ability to meet its RHNA allocation; therefore, the No Project Alternative would fail to plan for growth in Santa Barbara in compliance with state housing law.

The Additional Housing Alternative is a potential version of the Housing Plan that would provide additional measures and incentives to increase housing production to build up to 8,808 units by 2035. This includes the City’s RHNA Allocation with an 11 percent buffer recommended by the California Department of Housing and Community Development. Aside from additional programs and incentives to increase housing production, the Additional Housing Alternative would include the same programs as the Housing Plan and therefore would meet the project objectives of the Housing Plan. As a higher-growth scenario, Additional Housing Alternative would result in an increase in the overall intensity of development relative to the proposed project. Environmental impacts under this

alternative would be similar in type to those identified for the proposed Housing Plan but may be greater in magnitude due to the construction of additional residential units and associated population growth. The degree to which impacts increase would depend on the location, density, and design of future development projects. However, the analysis of Alternative 2 provides a reasonable upper-bound assessment of these potential effects at the program level. The Additional Housing Alternative would increase adverse environmental effects in nine of the ten issue areas evaluated in this discussion, including potentially significant impacts to air quality and greenhouse gas emissions due to the Additional Housing Alternative's higher residential buildout potential than the Housing Plan.

Therefore, the Housing Plan is identified as the environmentally superior alternative that would fulfill all the project objectives among all project alternatives evaluated in this EIR.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: (No Project)	Alternative 2: (Additional Housing)
Aesthetics and Visual Resources	Less than Significant	Significant and Unavoidable ↑	Less than Significant ↑
Air Quality	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Significant and Unavoidable ↑
Biological Resources	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Cultural and Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Greenhouse Gas Emissions	Less than Significant	Less than Significant ↑	Significant and Unavoidable ↑
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Noise	Less than Significant with Mitigation Incorporated	Significant and Unavoidable ↑	Less than Significant with Mitigation Incorporated ↑
Schools	Less than Significant	Less than Significant ↓	Less than Significant ↑
Transportation and Circulation	Less than Significant	Less than Significant ↑	Less than Significant ↓
Utilities and Service Systems	Less than Significant	Less than Significant ↓	Less than Significant ↑