NOTICE OF PREPARATION

TO: State Clearinghouse Governor's Office of Planning and Research 1400 Tenth Street Sacramento, CA 95812 FROM: Nicole Lieu, Planner Santa Barbara County Planning & Development 123 East Anapamu Street Santa Barbara, CA 93101

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report

PROJECT NAME: 8501 Hollister Ave. LLC Residence

PROJECT LOCATION: 8501 Hollister Ave. Santa Barbara, CA 93117

PROJECT CASE Nos: 13CDH-00000-00030, 19CUP-00000-00056

PROJECT APPLICANT: 8501 Hollister Ave. LLC.

Santa Barbara County (SB County) is currently processing an application for a project that requires preparation of an Environmental Impact Report under the California Environmental Quality Act (CEQA). The County of Santa Barbara will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified above and will use the EIR when considering approval of the proposed project. Responsible Agencies, Trustee Agencies or other public agencies that have a role in approving or implementing the proposed project may also need to use this EIR when considering your permit or other approval for this project. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project.

Due to the time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this notice. Please provide the following information in your response:

1. NAME OF CONTACT PERSON. (Please include address, e-mail and telephone number)

2. PERMIT(S) or APPROVAL(S) AUTHORITY. Please provide a summary description of these and send a copy of the relevant sections of legislation, regulatory guidance, etc.

3. ENVIRONMENTAL INFORMATION. Please detail what environmental information must be addressed in the Environmental Impact Report to enable your agency to use this documentation as a basis for your permit issuance or approval.

4. PERMIT STIPULATIONS/CONDITIONS. Please provide a list and description of standard conditions that your agency will likely apply to features of this project as well as any project specific conditions that may be developed to address project specific impacts.

5. ALTERNATIVES. Please provide alternatives your agency recommends to be analyzed in the EIR.

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6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS or PLANS. Please name any future project, programs or plans that may have the potential to combine with and/or compound or increase environmental impacts associated with the project as proposed.

7. FURTHER COMMENTS. Please provide any further comments, information or documentation that may help the County to scope the document and determine the appropriate level of environmental assessment.

The project description, location and the potential environmental effects are contained in the attached materials. A copy of the Scoping Document is attached.

If we do not receive your comments or recommendations, we will assume that you have no comment as to the impacts the project may have on affected resources. Please send your response to Nicole Lieu, project planner, at the address shown above or email them to nlieu@countyofsb.org.

Additionally, a scoping meeting has been scheduled for the Project on November 5, 2019, Tuesday at 5:30 PM in the Santa Barbara County Engineering Building, Planning Commission Hearing Room, 123 East Anapamu Street, Santa Barbara, CA 93101.

The Scoping Meeting will be limited to understanding the proposed project and associated environmental concerns including potential mitigation measures and possible alternatives to the project. <u>The merits of the project will not be discussed</u>. The attached Scoping Document prepared by P&D staff will be used as a starting point for discussion during the scoping meeting, but other environmental concerns may be raised by the public at this meeting.

Please contact the project planner at (805) 884-8068 or nlieu@countyofsb.org for more information or if you have any questions. We thank you for your time and consideration.

Date: 10/21/19

Planner: Nicole Lieu

Division: Development Review South

Telephone: (805) 884-8068

cc: Clerk of the Board (please post for 30 days)

Encl: Scoping Paper



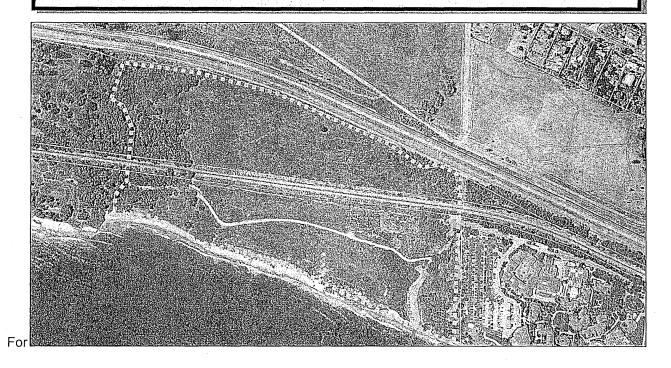
COUNTY OF SANTA BARBARA

Planning and Development

EIR Scoping Paper

8501 Hollister Ave. LLC Residence 13CDH-00000-00030, 19CUP-00000-00056

October 18, 2019



Owner/Applicant

8501 Ave. LLC P.O. Box 5217 Santa Barbara, CA 93150

Agent

SEPPS Laurel Fisher-Perez 1625 State St., Suite1 Santa Barbara, CA 93101 Engineer

Michael Viettone 1900 State Street, Suite A Santa Barbara, CA 93101

.sbcountyplanning.org

More Information Contact Nicole Lieu, Development Review Division, Senior Planner (805) 884-8068



1.0 REQUEST/PROJECT DESCRIPTION

Residential Development

Proposed development includes a single-family residence of 8,515 square feet (including 1,985) square feet of subterranean development for a recreation room and mechanical room) with an attached semi-subterranean 985 square foot garage, a detached 420 square foot guesthouse, and a pool. Retaining walls of approximately 6.5 feet in height are proposed. Grading for the proposed residential development would include 1,670 cubic yards of cut and 3,030 cubic yards of fill. Access to the home would be provided via a private driveway extending off of Hollister Avenue. An existing driveway covered in compacted base, AC pavement, and dirt presently measuring approximately 10-12 feet in width of paved surface would be widened, where necessary, to 12 feet to provide access to the home site. The driveway would be AC pavement with a chip seal. The portion of the existing asphalt road leading to the oil pier, presently measuring approximately 20-22 feet in width of asphalt paved surface would be widened, where necessary to 22 feet and paved per Fire Department standards. The existing security access gate at the terminus of Hollister Avenue would be relocated south of the private driveway serving the proposed residence in order to continue to provide secure ingress/egress to the oil pier. Two (2) new entry gates would be located on the private driveway serving the proposed residence; one would be located on the east side of the private driveway, and one would be located on the west side of the private driveway. A section of 6-foot tall chain link fence of approximately 300 feet in length is proposed in the northeast corner of the oceanfront parcel in order to separate the proposed public trail and parking area from the private property on-site. A 50-foot long section of 6-foot tall chain link fence is proposed on either side of the western entry gate in order to prevent public access to the private development area from the public trail. Water for domestic use would be provided by a private water well. One (1) 2,000 gallon underground raw water storage tank would be located north of the proposed residence and motor court and the water treatment equipment consisting of a booster pump and bladder tanks would be located in the basement of the residence. Water for fire protection would be provided by Goleta Water District through an existing fire water meter. Water for landscape irrigation would be provided by reclaimed water from the Goleta Water District. Fire water lines would be extended in the utility trench along the private driveway to serve the residence. Wastewater treatment would be provided by a dry well septic system as approved by Environmental Health Services.

Development Envelope

All proposed and future residential and agricultural development and ground disturbance would be confined to a 2.03-acre (88,427 square foot) development envelope, with the exception of the proposed public trail, public parking lot, fencing, fuel management areas, access driveway and utilities.

Public Access Offerings:

• Public Trail. The project would include construction of a 2,950 linear foot multi-use trail system located within a 10 -oot wide easement. The trail would be 4-6 feet wide, with a maximum 8-foot wide and 10-foot tall disturbance area to allow for trail clearance. One retaining wall of approximately 4 feet in height will be required on the west end of the trail route. Split rail fencing with a maximum height of 3 feet 6 inches is proposed along the southern edge of the

majority of the proposed trail. Grading for the proposed trail would not exceed 50 cubic yards of cut and fill.

- Parking Lot. The existing asphalt parking lot located at the northeast corner of APN 079-200-005 would be expanded on the west end to increase the number of parking spaces to 12 spaces. The parking lot expansion will require approximately 66 cubic yards of cut within an approximate 2,000 square foot area. The new paved area within the expansion will be permeable aggregate base. Following expansion, the parking lot will be approximately 5,600 square feet and the majority surfaced with asphalt.
- Offer-to-Dedicate. An offer-to-dedicate (OTD) a trail easement for a bridge crossing at Eagle Creek is proposed to allow future connectivity between the on-site trail system and other segments of the California Coastal Trail. The OTD will be offered to the County of Santa Barbara.
- Offer-to-Dedicate. An OTD for public lateral beach access at the oceanfront terminus of the public trail.

Grading for the proposed trail and parking lot would not exceed 50 cubic yards of cut and fill. Fee ownership of the property beneath the public access offerings would remain with the property owner. An easement granting unrestricted public use of the trail and parking lot, and the OTDs would be recorded prior to Coastal Development Permit issuance.

Conservation Easement

The project includes a 21.3-acre Conservation Easement on APN: 079-200-002 to be preserved for its scenic, habitat, open space and agricultural values. The Conservation Easement is proposed to be granted to the Land Trust for Santa Barbara County, with fee ownership of the property remaining with the property owner. No grant of public access is proposed within the Conservation Easement.

2.0 PROJECT LOCATION

The subject property is located immediately adjacent to the western edge of the City of Goleta, north of the Pacific Ocean and south of U.S. Highway 101. The project includes two parcels, 21.62-acre APN: 079-200-002 and 38.2-acre APN: 079-200-002, which are bisected by the Southern Pacific Railroad.

2.1 Site Information		
Comprehensive Plan	Rural area, Rural Residential, 40-acre minimum parcel size, coastal zone	
Designation		
Zoning District, Ordinance	RR-40, Article II Coastal Zoning Ordinance	
Site Size	21.62 acres (079-200-002), 38.2 acres (079-200-005)	
Present Use & Development	Undeveloped	
Surrounding Uses/Zoning	North: Agriculture, AG-II-100	
	South: Pacific Ocean	
	East: Bacara Hotel, City of Goleta jurisdiction	
	West: Undeveloped (future residential), AG-II-100	

8501 Hollister Residence EIR Scoping Document

Access	Private driveway off the terminus of Hollister Ave	
Public Services	Water Supply:	Private water well and the Goleta Water District
	Sewage:	Septic system
	Fire:	Santa Barbara County Fire Department

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The subject property is located in unincorporated Santa Barbara County, immediately adjacent to the western edge of the City of Goleta, north of the Pacific Ocean and south of U.S. Highway 101. The project includes two parcels, 21.62-acre APN: 079-200-002 and 38.2-acre APN: 079-200-002, which are bisected by the Southern Pacific Railroad. The property to the east is developed with the Bacara Resort, the two properties to the west are under the initial stages of the construction of two single-family residences, and the properties north of U.S. Highway 101 are in agriculture.

The subject property is undeveloped with the exception of an entry gate and two asphalt parking lots on the eastern side of the property, and an existing dirt road that traverses the property from east to west. The parking lots and gate are currently used by Exxon Mobil employees and contractors to access the Ellwood pier, which serves offshore oil platforms. Portions of the site were recently restored with native habitat to address unpermitted vegetation removal that occurred on-site in 2007.

The topography of the site is varied, with areas of steep slopes at the eastern and western edges of the property and along the portions of the property that abut the railroad. The central portion of the property, and the area of proposed residential development, is relatively flat, with slopes of generally less than 10%. The southern boundary of the property abuts the Pacific Ocean, gradually sloping from a steep coastal bluff at the east edge of the property to a sandy beach at the west. Eagle Creek and riparian Environmentally Sensitive Habitat (ESH) associated with Eagle Creek run along the western edge of the property. Other sensitive habitat types known to occur on-site include coastal sage scrub, native perennial grassland and riparian woodland. Sensitive species known to exist on or adjacent to the site include black flowered figwort (Scrophularia atrata), Santa Barbara honeysuckle (Lonicera subspicata var. subspicata), southern tarplant (Centromadia parryi subsp. australis), California Redlegged frog (Rana draytonii), monarch butterfly (Danus plexippus) (aggregation site), raptor nests, western pond turtle (Emys marmorata), and white-tailed kite (Elanus leucurus) (nests and winter communal roosts).

Multiple archeological sites are known to exist on-site and ongoing AB 52 consultation with Native American representatives has the potential to result in a determination that a Tribal Cultural Resource is present on-site. Soils on-site consist primarly of Milpitas-Positas fine sandy loam, but also include areas of Diablo clay and Agueda-Goleta complex.

4.0 POTENTIALLY SIGNIFICANT EFFECTS

AESTHETICS/VISUAL RESOURCES

Impact Discussion:

Environmental assessment of a proposed project's impacts to the aesthetics/visual resources of a site begins with identification of the existing visual resources on and off the site, including the site's physical attributes, its relative visibility, and its relative uniqueness. Assessment must also address the role a site plays in any larger visual context. The Visual Impact Guidelines of the *County of Santa Barbara Environmental Thresholds and Guidelines Manual* identify five specific landscapes of particular value, including mountainous areas, public parks, urban fringes, scenic travel corridors, and coastal areas. The project site encompasses two of these landscapes: scenic travel corridors and coastal areas. In addition, the County's Comprehensive Plan identifies views of mountains, coastal bluffs, and scenic areas as significant visual resources and the project is located within a designated view corridor overlay.

All proposed structural development associated with the proposed project would be confined to a 2.03-acre (88,427 square foot) development envelope located on the oceanfront parcel (079-200-005). No development is proposed on the landward parcel (079-200-002). The proposed structural development has been designed such that it is graded down into the existing topography in order to minimize the visible height of the structure. In addition, the grading and landscape plans incorporate vegetated earthen mounds placed against portions of the proposed structures in order to integrate the structures into the landscape. Proposed materials include reclaimed barnwoord, natural sandstone and a green (vegetated) roof. Visually permeable split rail and chain-link fencing is proposed on-site in order to prevent public access to private portions of the site and to keep the public from going offtrail into private areas. Visual simulations prepared by the project architect show that during the daytime the home would be minimally visible from motorists traveling U.S. Highway 101, that the development would be somewhat visible from Farren Road, and that the home would not extend beyond the ocean skyline. The proposed structures incorporate a significant amount of glazing (windows) which could result in glare and a nighttime "lantern effect" and adverse visual impacts due to light trespass. Lighting associated with the project could create glare off-site, light spillage and/or night sky light pollution, thereby resulting in potentially significant impacts to the nighttime character of the surrounding rural area, which currently experiences low amounts of nighttime lighting. The proposed project would likely contribute incrementally to cumulative impacts to aesthetics/visual resources associated with increasing residential development along the Gaviota Coast.

Potential Mitigation:

Mitigation could include design requirements (including building height limitations), vegetative screening, development envelope reduction, minimization of lighting, window/glass treatments, fencing material, height and location limitations or other similar measures in order to preserve the visual character of the area and not contribute to the degradation of mountain or ocean views. Additional mitigation would likely include standard conditions related to hooded and shielded exterior lights, directing light downward and preventing spillover onto adjacent properties.

Scope of EIR:

- Identify the existing visual resources of the property and its surroundings, including the site's physical attributes, its relative visibility from area roads, trails, residences, the railroad, and the beach, and assess potential impacts to these resources from development of the proposed project including future residences and accessory structures.
- Identify the existing character of public views across, into, and out of the site and assess potential impacts to these views from residential development on the property. Assess impacts to private views from development of the project.

- Identify how long (in seconds) the development will be visible from motorists traveling along U.S. Highway 101 North and South and analyze any associated visual resource impacts.
- Prepare massing studies to identify the potential impact of future structural development (in addition to currently proposed development) within the proposed development (assuming currently applicable height limits).
- Prepare day and nighttime visual simulations from public viewing places including trails, U.S. Highway 101 north and south, and Farren Road to aid in the analysis of visual impacts of the proposed project during daytime and nighttime.
- Identify the night time setting and character of the property and surrounding area and assess the potential impacts to this nighttime character from proposed development. Develop simulations of the proposed lighting.
- Analyze cumulative impact levels and the contribution of the proposed project to these cumulative impacts.
- The EIR shall include visual simulations along with any other tools as necessary to inform the impact discussion.
- Identify mitigation measures as necessary and residual impacts.

Sources of Information:

- Visual Simulations/Site photos: plan sheets A-0.5., A-0.6, A-0.7 and A-0.8
- Visual Impact Guidelines of the County of Santa Barbara Environmental Thresholds and Guidelines Manual

AGRICULTURAL RESOURCES

Impact Discussion:

The subject property is zoned Rural Residential. The Rural Residential classification is applied to rural areas generally of marginal agricultural value where low density residential and agricultural uses are appropriate. There are no prime soils on the subject property with the exception of a narrow, approximately 200 foot wide band of soils extending north to south adjacent to Eagle Creek and a small pocket in the far northeastern corner of the site. Oil operations were conducted at the subject property from around 1933 to 1970 and included oil production, storage and transmission facilities. The subject property is bounded by U.S. Highway 101 to the north, the Bacara Hotel to the east, and a property approved for residential development to the west. The project would not result in the conversion of property out of agricultural use or production or in the disruption of off-site agricultural production. Therefore, the project is not expected to result in significant impacts to agricultural resources.

Scope of EIR:

- Evaluate the agricultural viability of the property.
- Analyze cumulative impacts to agriculture in the area and the contribution of the proposed project to these cumulative impacts.
- Identify mitigation measures if necessary to reduce impacts.
- Identify residual impacts after implementation of mitigation measures

Sources of Information:

Santa Barbara County Environmental Thresholds and Guidelines Manual

AIR QUALITY

Impact Discussion:

Development of the project would potentially result in construction-related air quality impacts, including dust generation from grading for the access roads and building pads, and air pollution emissions from construction equipment and construction vehicles. Long-term air quality impacts are not expected from the use of the property for residential purposes.

Potential Mitigation:

Standard dust and ozone precursor control measures would help to mitigate these impacts.

Scope of EIR:

- Assess air quality impacts associated with grading and construction activities from development of the proposed project, including greenhouse gases.
- Identify mitigation measures as necessary, including standard emission control conditions applied by the Santa Barbara County Air Pollution Control District.
- Assess cumulative air quality impacts as well as the project's contribution to those impacts.
- Assess residual impacts of the project.

Sources of Information:

- County Air Pollution Control District staff Carly Barham, (805) 961-8890
- Santa Barbara County Clean Air Plan (2013)

BIOLOGICAL RESOURCES

Impact Discussion:

Eagle Creek and riparian Environmentally Sensitive Habitat (ESH) associated with Eagle Creek run along the western edge of the property. Other sensitive habitat types known to occur on-site include coastal sage scrub, native perennial grassland, and riparian woodland. Sensitive species known to exist on or adjacent to the site include black flowered figwort (Scrophularia atrata), Santa Barbara honeysuckle (Lonicera subspicata var. subspicata), southern tarplant (Centromadia parryi subsp. australis), California Red-legged frog (Rana draytonii), monarch butterfly (Danus plexippus) (aggregation site), raptor nests, western pond turtle (Emys marmorata), and white-tailed kite (Elanus leucurus) (nests and winter communal roosts).

The proposed project is expected to result in direct impacts to coastal sage scrub due to fuel management activities, driveway expansion, fence installation, expansion of the on-site parking lot and construction of the proposed trail. Construction of the proposed trail and fencing may also result in impacts to ESH associated with Eagle Creek and potential monarch butterfly roosting

habitat. Southern tarplant, native perennial grasses (including purple needlegrass), and Santa Barbara honeysuckle are known to exist on-site and could be impacted to due to the close proximity of the sensitive vegetation to areas of proposed development. California Red-legged frogs and western pond turtles are known to exist at Eagle Creek, along the western edge of the property. Trail development and increased public use of the area could result in direct and indirect impacts to these species through water quality impacts, human and domestic animal presence and vegetation disturbance. White-tailed kites have been known to use the site for foraging and have been observed perching in a Monterey Cypress tree located near the intersection of the proposed new driveway and the existing gravel access road. If foraging habitat and nest locations are determined to exist on-site, vegetation removal and construction activities could impact white-tailed kites. Increased development and human activity (and domestic animals) could disrupt the foraging patterns and nesting or roosting habitat for white-tailed kite and other raptor species. Dogs, and especially cats, are significant sources of harassment and/or predation of wildlife, particularly the same prey species on which raptors depend for food.

Noise and lighting associated with buildout of the project could disturb wildlife and hinder their normal activities. Development of the proposed project could result in water quality impacts to the area drainages due to storm water runoff and increased pollutants from typical residential development and activities (e.g. oil, grease, etc.), soil erosion and sedimentation, and construction activities and waste. This could result in a degradation of the aquatic habitat and impacts to species dependent on healthy aquatic systems. The use of non-native plant materials in landscaping and restoration could invade native habitats and affect the long-term integrity and persistence of native plant communities in the project area.

Potential Mitigation:

- Relocation/redesign of portions of the proposed trail to avoid sensitive habitat associated with Eagle Creek.
- Mitigation plantings to replace impacted native vegetation where avoidance is infeasible.
- Temporary fencing and buffers to protect individual and groupings of sensitive plants.
- Implementation of Best Management Practices to minimize disturbance to riparian vegetation and aquatic habitat during construction.
- Implementation of lighting guidelines and lighting fixture requirements to reduce indirect impacts to wildlife resulting from night lighting.
- Requirements for the use of only local, native plant species or other non-invasive plant material.
- The use of biological monitors prior to and during construction in or near biologically sensitive areas, for example:
 - Preconstruction surveys for red-legged frog and western pond turtle.
 - Nesting bird and raptor surveys and associated buffers and construction timing limitations.

Scope of EIR:

• Complete peer review of the January 27, 2017 biological analysis prepared by Watershed Environmental and recommend additional biological survey and review as necessary.

- Where not previously addressed in the January 27, 2017 biological analysis, or where information is outdated, assess current baseline conditions throughout the site (including the beach and coastal bluff top), with particular emphasis on identifying endangered, threatened, rare, and locally sensitive species, habitats, and plant communities within and in close proximity to proposed development.
- Confirm mapping completed in the January 27, 2017 biological analysis prepared by Watershed Environmental and conduct additional or updated mapping as necessary; accurately map native and non-native habitat and individuals or groupings of sensitive plant species as well as any identified white-tailed kite nests or monarch butterfly roosting site.
- Identify if the eucalyptus grove on-site serves as monarch butterfly habitat.
- Conduct surveys for raptor (including white-tailed kite, specifically) nests and foraging habitat.
- Assess impacts to existing biological resources from proposed development, including loss of habitat, sedimentation from grading and site preparation efforts, Fire Department vegetation clearance requirements, and increased human activity.
- Identify biological impacts associated with public use of the site, including beach use.
- Consider impacts to listed species and other regulated resources, if any, and discuss role of other regulatory agencies (e.g. USFWS, CDFG, USACOE, etc.).
- Analyze impacts to wildlife corridor/movement areas, including access to habitat in adjacent areas. This should include an analysis of indirect impacts from increased human activity and night lighting (interior and exterior).
- Assess biological impacts associated with use of groundwater to serve the proposed residence (see water resources/flooding section for more detail).
- Assess cumulative impacts to biological resources and the project's contribution to those impacts.
- Identify feasible mitigation measures, if any, and identify residual impacts.

Sources of Information:

- Revised Biological Analysis for Single Family Residence and Trail, Watershed Environmental, January 27, 2017.
- August 16, 2015 Storrer Environmental Peer Review of "Biological Assessment of Proposed Residential Development at 8501 Hollister Ave, Goleta, California, Watershed Environmental, March 18, 2015."

CULTURAL RESOURCES

Impact Discussion:

Two archaeological sites are recorded in the vicinity of proposed project work areas: CA-SBA-76 and CA-SBA-3945. Archaeological sites are also recorded on adjacent properties, including the parcel to the west, on the opposite side of Eagle Creek canyon. CA-SBA-3945 is a low-density scatter of shellfish fragments containing traces of flaked stone and bone in association with recent debris. The site was tested in 2009 to define its boundary, evaluate its significance, and assess

impacts from unpermitted vegetation removal and proposed habitat restoration activities (Munns et al. 2010). That effort revealed that site materials are entirely within disturbed contexts, and two radiocarbon age determinations returned modern dates. As a result, CA-SBA-3945 was evaluated as not significant due to its lack of archaeological data potential, and therefore ineligible for listing on the California Register of Historical Resources (CRHR). In addition, the site was found to lack contextual integrity. CA-SBA-76 is recorded as a large site believed to contain evidence of occupation during the Middle and Late Periods. Artifacts observed on-site include flaked and ground stone artifacts and faunal remains (bone and shell). Overall, the recorded site boundary is poorly defined, and is based primarily on observations of surface artifact distribution, with the exception of a number of surface surveys and limited subsurface investigation (see Analysis of Archeological Constraints for the Proposed Single Family Dwelling at 8501 Hollister Ave, Applied Earthworks, May 12, 2014). The AB 52 consultation process with Native American representatives is currently underway and may likely yield a determination that a Tribal Cultural Resource (TCR) is present on-site.

Disturbance on-site would occur as a result of the development of residential structures, utilities, roadway improvements, trail construction, parking lot improvements, fencing, landscaping, and fuel clearance. While archeological surveys have occurred in some areas of the site, portions of the site that would be disturbed as a part of the proposed project have not been the subject of archeological survey. Due to the known archeological significance of CA-SBA-76 and the potential for additional archeological resources to be discovered, impacts to known archaeological resources could be potentially significant. In addition to the potential for direct disturbance to archaeological remains, construction in close proximity to known archaeological sites could increase the potential for illicit artifact collection, as well as increase the intensity use of the site by residents of the home and recreational users of the proposed parking lot and trail, both of which have the potential to create significant indirect impacts to a Tribal Cultural Resource could be identified.

Potential Mitigation:

Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (2008, revised February 27, 2018) contains guidelines for the identification, significance evaluation, and mitigation of impacts to cultural resources, including archaeological, historic, and tribal cultural resources. Projects are generally required to avoid impacting significant archaeological resources to the extent feasible. Some potential mitigation measures that could be used in association with the proposed project are as follows:

- Avoidance by adjusting the development envelope, access road alignment, trail alignment, parking lot location, landscaping, fencing and utility locations, and through the use of buffers.
- Avoidance by limiting the type and//or location of fencing.
- Specifications on how earth disturbance will occur in certain areas.
- Specifications on how fuel management outside of the development envelope will occur (e.g. no disking of soil or other removal of vegetation through disturbance of the ground surface).
- Monitoring during construction by a County-qualified archaeologist and Chumash representative.
- Phase 2 or 3 archaeological investigations if avoidance is infeasible.

• Other mitigations, as appropriate, identified by Native American representatives through consultation.

Scope of EIR:

- Review the literature search prepared by Applied Earthworks to assess survey coverage and previously identified resource locations within the proposed project area.
- Conduct a Phase 1 pedestrian survey of previously unsurveyed portions of areas (e.g. locations of fencing, utilities, roadway, etc.) proposed for development as appropriate (based on slope, development potential/envelopes, etc).
- Compare the location of archaeological resources to proposed development and determine whether proposed development would have a significant impact on archaeological resources.
- Coordinate with the project planner to understand the results of AB 52 consultation, the nature of any Tribal Cultural Resources and mitigation measures recommended by Native American representatives through AB 52 consultation.
- Participate in additional consultation meetings with local Native American representatives, as appropriate, and incorporate the results of consultation into the EIR analysis.
- Identify mitigation measures as necessary to avoid archaeological resources, such as modifying portions of the project's siting and design. Mitigation measures need to be developed in consultation with the appropriate Native American tribes and interest groups.
- Conduct a significance determination (extended Phase 1 or Phase 2) for areas of the site where earth disturbance would occur that have not already been surveyed (see sources of information listed below) and identify mitigation measures if it is infeasible to avoid significant archaeological resources.
- Evaluate the potential for ethnographic impacts associated with the proposed project (including the presence of pedestrians walking over a portion of CA-SBA-76) and propose mitigation as appropriate.
- Evaluate the potential for impacts associated with long-term trail, utility, and fencing maintenance and propose mitigation as appropriate.
- Identify residual impacts of the proposed project after implementation of mitigation measures.
- Evaluate cumulative cultural resources impacts of the proposed project and other similar past, present and probable future projects in the area.

Sources of Information:

- Analysis of Archeological Constraints for the Proposed Single Family Dwelling at 8501 Hollister Ave, Applied Earthworks, May 12, 2014
- Eagle Canyon Ethnographic & Ethnohistoric Study Cover Memorandum, Applied Earthworks, April, 30, 2019
- Eagle Canyon Ethnographic & Ethnohistoric Study, Earle & Associates, April 28, 2019
- Archaeological Assessment of Coastal Trail Crossing, email Ann Munns, January 11, 2017
- Phase 2 Archeological Study at CA-SBA-76 and CA-SBA-3945 for the Gaviota Holdings Habitat Restoration Project, Applied Earthworks, 2010

ENERGY

Impact Discussion:

The proposed project would receive electricity from Southern California Edison. New development of the site would not place a substantial increase in demand upon existing sources of energy or require the development of new sources of energy. Thus, the project would not result in significant impacts to energy resources and no further evaluation in the EIR is necessary. Mitigation measures would not be required.

FIRE PROTECTION

Impact Discussion:

The subject property is located in a designated High Fire Hazard Area, as is the entire surrounding Gaviota Coast and the portions of the City of Goleta adjacent to the property. Existing sources of ignition include vehicles traveling along U.S. Highway 101, power lines, and agricultural activities (e.g. tractors emitting sparks, sparks generated by welding irrigation lines and other maintenance activities, as in the case of the Zaca Fire, etc.). The project would not significantly increase existing fire hazards in or around the project site as the level of residential development would be low and the majority of the property would remain in open space. Increased human activity associated with the proposed public access trail through the property could increase the chances of a fire starting. Vegetation management and fire clearance per County Fire Department standards around the proposed residential development as well as along access roads and public trails would minimize fire danger.

It is critical that the project provide adequate access, fire hydrants and water pressure and flows to ensure an adequate level of fire protection. In this sense, the proposed project could result in potentially significant impacts to fire protection if these elements are not adequately provided in the project description. The project has already been conditioned by the County Fire Department to ensure these standard fire protection features are in place prior to any future residential development and has stamped "approved" a Conceptual Site Access and Water System Improvements plan for the project. The applicant must still demonstrate that the proposed water well will provide adequate water pressure for fire protection purposes.

Fire service at the site would be provided by the County Fire Department. The nearest fire station is Station 11 located on Storke Road near Hollister Avenue, approximately 4 miles to the east of the property. This distance would be beyond safe fire response time of five minutes, thus resulting in a potential fire hazard to future residents of the project site. Impacts are potentially significant.

Potential Mitigation:

Mitigation would include installation of the improvements required by County Fire for adequate access and fire protection. Other possible mitigation could include funding a fair share of a new fire station to be constructed in western Goleta that would serve the site in the future.

Scope of EIR:

- Assess impacts of development of the proposed project on fire protection and fire hazards, including the ability of the private water system to meet County Fire Department standards and the fire response times.
- Identify mitigations as necessary to mitigate project impacts. Identify residual impact levels.
- Assess the cumulative impacts on fire protection and assess the project's contributions to those impacts.

GEOLOGIC PROCESSES

Impact Discussion:

The northern and central portions of the property are situated on an elevated marine terrace, south of Highway 101. The southern portion of the property includes a sea bluff with a beach area to the south. The proposed residence would be located on the elevated terrace, approximately 40 feet north of the current top of sea bluff and approximately 135 feet north of the toe of the sea bluff. Based on review of historic aerial photos of the site, bluff retreat at the property is estimated at approximately 3 inches per year (Updated Preliminary Geologic Investigation, Adam Simmons, August 26, 2018), which translates to an approximately 19 foot bluff setback for the 75-year design life of the residence. However, potential landslide activity could result in additional slope failure and therefore the Updated Preliminary Geologic Investigation recommends a 40-foot bluff setback. The bluff would be subject to wave action from time to time and could experience increased erosion due to sea level rise. Erosion due to concentrated runoff from the site could occur during construction and following completion of the project due to grading activity and an increase in impermeable surfaces. Drainage over the bluff face could result in accelerated bluff retreat.

There are no known mapped landslides on the subject property, however, evidence of past small landslide features and rock fall areas were observed on the sea bluff up and down the coast during site visits and based upon review of historical aerial photographs (Updated Preliminary Geologic Investigation, Adam Simmons, August 26, 2018). The site is located within the highest seismic risk classification area (Zone 3) as identified in the Santa Barbara County Seismic and Safety Element. The closest known fault is located approximately 3,200 feet from the site and the closest known active fault is located approximately 4,000 feet from the site (Updated Preliminary Geologic Investigation, Adam Simmons, August 26, 2018).

Potential Mitigation:

- Implementation of grading and erosion control Best Management Practices (BMP) designed to stabilize the site, protect natural watercourses/creeks, prevent erosion, and to convey storm water runoff to existing drainage systems keeping contaminants and sediments onsite. Measures may include retention basins, provisions to reseed exposed graded surfaces with ground cover to minimize erosion, use of straw wattles and silt fence during construction.
- Implementation of recommendations from geologic and soils reports.

Scope of EIR:

- Confirm analysis provided in past geologic reports for the project site, including as it relates to the impact of sea level rise on bluff erosion.
- Assess the geologic impacts associated with grading and site preparation for the proposed project.

- Assess the adequacy of recommended mitigation measures in past geologic reports and revise, add to, or amplify as necessary.
- Assess cumulative geologic impacts in the area and evaluate the project's contribution to those cumulative impacts.
- Identify residual impact levels of the project after mitigation.

Sources of Information:

- Preliminary Geologic Investigation, Adam Simmons, May 13, 2014
- Geologic Investigation Addendum Report, Adam Simmons, August 13, 2015
- Updated Preliminary Geologic Investigation, Adam Simmons, August 26, 2018
- Engineering Geology & Geotechnical Review letter, GeoDynamics, December 15, 2016
- Santa Barbara County Seismic and Safety Element, 1979, amended February 2015

HAZARDOUS MATERIALS/RISK OF UPSET

Impact Discussion:

Oil operations were conducted at the subject property from around 1933 to 1970 and included oil production, storage and transmission facilities. Oil operations have been discontinued on the property, but Exxon Mobil employees and contractors currently use the property for parking and to access the Ellwood pier, which serves offshore oil platforms. Various investigations have been conducted at the site over the years by environmental engineering and consulting firm Haley and Aldrich. A delineation of impacted soils completed by Haley and Aldrich in 2009 identified thirteen areas of concern throughout the property. The areas of concern are generally located along or adjacent to the existing access road to the proposed area of development, and along the existing access road and parking area serving Ellwood pier. Three of the areas of concern are located within 50 feet or less of the proposed trail alignment, with one area of concern overlapping the proposed trail alignment. Additional testing for total petroleum hydrocarbons (TPH) was conducted within the area of the proposed development envelope and within the area of the proposed water well. Pursuant to a Supplemental Investigation Report (Haley & Aldrich July 2017) low levels of TPH and Volatile Organic Compounds (VOCs) were found with the soil testing, but all were below screening criteria at all but one location. Additional testing of that location as a part of an October 2017 Haley & Aldrich Addendum to the Supplemental Investigation Report did not detect TPH and consequently Haley & Aldrich did not recommend additional testing. Additional testing beyond the 2009 testing and identification of areas of concern has not occurred for areas outside of the proposed development envelope and water well area, including the public trail alignment. Disturbance of contaminated soils during use or construction of the trail, driveway, parking lot expansion, and other components of the project could result in adverse effects on human health. Based on County Environmental Health Services (EHS) review of the project and hazardous materials reports todate, the applicant will be required to submit a corrective action plan for contamination identified outside of the proposed development envelope and to submit a Soil Management Plan that covers the proposed development envelope and access road.

Potential Mitigation:

• Specify required components of the corrective action plan and Soil Management Plan.

Scope of EIR:

- Assess the adequacy of reports completed to-date and conduct additional work as necessary.
- Coordinate with County EHS staff, where appropriate.
- Conduct additional testing in areas of concern located in close proximity to proposed public use areas, as necessary.
- Assess cumulative impacts in the area and evaluate the project's contribution to those cumulative impacts.
- Identify residual impact levels of the project after mitigation.

Sources of Information:

- Haley and Aldrich Delineation of Impacted Soils, 2009
- Haley & Aldrich Supplemental Work Plan for Subsurface Investigation, April 18, 2017
- Haley & Aldrich Supplemental Investigation Report, July 2017
- EHS letter re: Supplemental Investigation Report, August 3, 2017
- Haley & Aldrich Addendum to Supplemental Investigation Report, October 2017
- EHS letter re: Addendum to Supplemental Investigation Report, February 15, 2018
- Haley & Aldrich Conceptual Soil Management Plan, October 2018

LAND USE

Impact Discussion:

The subject property is zoned RR-40 (Rural Residential, 40-acre minimum parcel size). The Rural Residential classification is applied to rural areas generally of marginal agricultural value where low density residential and agricultural uses are appropriate. The two existing legal lots associated with the proposed project are 21.62 acres (APN: 079-200-002) and 38.2 acres (APN: 079-200-005) in size. The subject property is bounded by U.S. Highway 101 and agricultural property (zoned AG-II-100) to the north, a property zoned AG-II-110 and approved for residential development to the west, and the Bacara Hotel, located within the City of Goleta, to the east. Generally, properties to the northwest of the subject property are zoned and used for agriculture. Properties to the east are within the City of Goleta and are generally urban in nature. The zoning of the property anticipates low density residential use. However, the subject property and many of the coastal-adjacent properties on the Gaviota coast have been historically undeveloped with residential structures. The proposed project includes the development of a large estate-style residence that, due to its large size, is potentially out of character with the surrounding rural agricultural area and existing development, continuing the current trend of project applications seeking to expand estate-style residential development along the Gaviota Coast. Development of the project would contribute incrementally to cumulative impacts to land use associated with additional residential development along the rural Gaviota Coast and northern Goleta area and the partial conversion from agriculture and open space to residential uses.

Potential Mitigation:

Mitigation to reduce land use impacts relative to the potential incompatibility of uses and structures would primarily come from mitigations to address aesthetics/visual resources to ensure development is compatible with surrounding uses and the rural agricultural character of the area.

Scope of EIR:

- Assess the character of surrounding land use and development and analyze the compatibility of the proposed project development with that character.
- Identify mitigation measures, if any, to reduce land use impacts and resulting residual environmental effects.
- Assess cumulative impact levels and the contribution of the proposed project to these cumulative impacts.

<u>NOISE</u>

Impact Discussion:

Significant sources of noise are generally associated with transportation facilities such as major roadways, airports, railroads, etc., as well as certain commercial and industrial uses. The residential development envelope is located in close proximity to the Union Pacific Railroad, which could result in the exposure of the residents to noise levels above 65dB. However, averaged throughout the day, noise levels would likely be below County thresholds since the trains only operate periodically and for short periods at a time. Noise generated by vehicles traveling along Highway 101 is likely below the 65 dB County threshold for a significant noise impact. Standard construction methods and building materials required by the Building Code would ensure interior noise levels of less than 45 dB CNEL, consistent with the County's adopted thresholds. As such, impacts to noise-sensitive receptors on-site from these noise impacts are expected to be less than significant.

The nearby Bacara Hotel would be considered a sensitive noise receptor. Development of the project could expose guests of the hotel, located within 1,600 feet of construction activities, to short-term construction generated noise levels exceeding the County threshold of 65 dB CNEL. This is considered a potentially significant impact but can be mitigated by standard conditions of approval.

The project would not generate new long-term sources of noise. Residential and recreational activity on the property is not expected to generate long-term noise above ambient levels. The project would contribute incrementally to cumulative noise impacts in combination with other planned and pending projects in the vicinity, though its contribution is not expected to be significant.

Implementation of the following mitigation measures would effectively reduce short-term construction-related noise impacts associated with development of the project. No further analysis in the EIR is required to address this issue.

Mitigation Measures:

1. Construction activity for site preparation and development shall be limited to the hours between 8:00 a.m. and 5:00 p.m., Monday through Friday. No construction shall occur on State holidays

(e.g. Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions. **Plan Requirements:** Signs stating these restrictions shall be provided by the applicant and posted on site. **Timing:** Signs shall be in place prior to beginning of and throughout grading and construction activities for each element of buildout. Violations may result in suspension of permits. **Monitoring:** Building Inspectors and Permit Compliance shall spot check and respond to complaints.

2. Stationary construction equipment that generates noise which exceeds 65 dBA at the parcel boundaries shall be shielded to P&D's satisfaction and shall be located as far as possible from occupied residences. Plan Requirements and Timing: The equipment area with appropriate acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities for each element of buildout. Monitoring: Permit Compliance shall perform site inspections to ensure compliance.

PUBLIC FACILITIES

Impact Discussion:

The proposed project would not cause a substantial increase in the residential population in this area. Hence, the project is not expected to result in a need for new or altered police protection and/or health care services, nor would buildout of the project generate students in excess of school capacity. Impacts to these public facilities would be less than significant.

In Santa Barbara County, solid waste is transferred to the Tajiguas Landfill on the Gaviota Coast. Solid waste disposal is a significant issue for the County as the Tajiguas Landfill is nearing capacity. In September 1989, the California Integrated Solid Waste Management Act (also known as AB 939) was enacted into law. It required each municipality in the state to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 2000. As of 2004, 63 percent of all solid waste generated in the unincorporated areas of the County of Santa Barbara was diverted for recycling or re-use (as certified by the California Integrated Waste Management Board). This diversion level is the result of implementation of the County Source Reduction and Recycling Element adopted by the Board of Supervisors in February 1992. Despite these diversion levels, landfill space is still limited. Considering solid waste impacts of new development and providing mitigation to reduce solid waste will help the County maintain its Statemandated diversion rates and minimize impacts to the County's limited landfill space. Waste is generated both during construction and during residential occupancy.

Pursuant to the *County Thresholds and Guidelines Manual*, solid waste generation from construction of the proposed residence would equal:

15 1bs/SF X 9,920 SF = 148,800 lbs of construction waste (74.4 tons)

The *County Thresholds and Guidelines Manual* identifies the threshold for a significant impact due to new residential construction as 47,000 square feet of development. At 9,920 square feet of development, the proposed project would be below the threshold for construction waste generation. Nonetheless, standard conditions requiring the recycling of demolition waste would be imposed at the time of future development.

Pursuant to the *County Thresholds and Guidelines Manual*, solid waste generation from long-term occupancy of the proposed residence would equal:

3.01 people/unit x 1 units x 0.95 tons/year = 2.85 tons of solid waste/year

The *County Thresholds and Guidelines Manual* identifies the threshold for a significant impact due to solid waste generation from long term residential occupancy at 196 tons per year. At 2.85 tons of solid waste per year, the proposed project would be below the threshold for waste generation associated with long term occupancy of the new residence. Therefore, impacts to solid waste would be less than significant. Additionally, the project's contribution to cumulative solid waste impacts would also be less than significant. These impacts will not be further evaluated in the EIR.

Sewer service for the project would be provided by an on-site private septic system. Thus, the project would have no impact on the public sewer system system. Water service for domestic use would be provided by an on-site water well and therefore domestic water use would not impact the public water system. Water for fire protection would be provided by Goleta Water District through an existing fire water meter. Landscape irrigation would be provided by reclaimed water provided by the Goleta Water District. The Goleta Water District has issued a Conditional Can and Will Serve Letter indicating that they are able to provide reclaimed water for landscape irrigation purposes. Impacts are expected to be less than significant and no further analysis in the EIR is proposed.

RECREATION

Impact Discussion:

The proposed project includes construction of a 2,950 linear foot public multi-use trail system located within a 10-foot easement, a 12-space public parking lot and offer-to-dedicate (OTD) lateral beach access at the oceanfront terminus of the trail, and an offer-to-dedicate (OTD) a trail easement for a bridge crossing at Eagle Creek (to allow future connectivity between the on-site trail system and other segments of the California Coastal Trail). As such, the project would result in beneficial impacts to recreation by providing public access to previously inaccessible areas. No further impacts to public recreation are anticipated as part of the proposed project.

Potential Mitigation:

The proposed project would result in beneficial recreational impacts. No mitigation is necessary.

Scope of the EIR:

- Analyze the impacts of the proposed trail easement locations on safe recreational use of the site and coastal access.
- Evaluate cumulative impacts to recreation and identify the project's contribution to those impacts.
- Assess residual impacts of the project after mitigation.

TRANSPORTATION/CIRCULATION

Impact Discussion:

The proposed project would not significantly increase traffic generation to or from the property associated with future residential development of the site or public use of the recreational trail. The project includes the construction of one single family dwelling, which would be expected to generate up to 10 average daily trips and 1 AM and 1 PM peak hour trip. An increase of visitors to the public trail and parking lot would be expected to generate a small increase in traffic trips to the area as well. These levels would not affect the level of service on Highway 101 or Hollister Avenue. Due to the small number of trips associated with development of the proposed project, nearby intersections in the project vicinity are not expected to experience adverse impacts in terms of maintaining appropriate levels of service. The project site is accessed via a driveway off of Hollister Ave, which will lead to the proposed 12-car public parking lot and will continue on to the residence. The entrance to the property and the first segment of the entry drive will continue to be used by Exxon Mobil to access Ellwood pier at the eastern edge of the property. Appropriate parking lot design and clear signage will be important to ensure that parking and circulation conflicts between the various users of the site do not occur.

Potential Mitigation:

Potential mitigation would likely include a measure to require preparation of a signage plan coordinated with County Public Works.

Scope of EIR:

- Prepare a traffic analysis analyzing the ingress/egress and circulation at the project site.
- Assess impacts of the project on area roads and intersections, and traffic hazards.
- Assess cumulative impacts to transportation/circulation and identify the project's contribution to those impacts.
- Identify mitigation measures to reduce impacts to less than significant levels.
- Assess residual impacts of the project after mitigation.

WATER RESOURCES/FLOODING

Impact Discussion:

Water bodies near the site include the Pacific Ocean, which abuts the southern edge of the property, and Eagle Creek, which runs along the western edge of the site. The project would result in an increase of impervious surfaces associated with proposed residential development. Standard County Project Cleanwater requirements would require the preparation of a storm water management plan to reduce and treat runoff. Grading activities and vegetation removal during development of of the residence, parking lot, driveway improvements and trail could result in short-term water quality impacts associated with increased erosion and the potential transport of pollutants into nearby water bodies. Oil leaks, grease, brake fluid and other similar pollutants could result in water quality impacts associated with the proposed public parking lot. Overall drainage patterns would not likely change as a result of buildout of the proposed project, but impacts could occur if drainage is directed over the bluff face.

Water for domestic use would be provided by a private water well. Water for fire protection would be provided by Goleta Water District through an existing fire water meter. Water for landscape irrigation would be provided by reclaimed water from the Goleta Water District. Pursuant to a Water Well Safe Yield Analysis prepared by Adam Simmons dated December 7, 2016, the property is located in the Eagle Canyon watershed of the "Ellwood to Gaviota Groundwater Area" and is estimated to have an average annual safe yield of approximately 220 acre feet per year (AFY). Simmons estimates the existing water use within the watershed (for agricultural purposes) at 160 AFY, leaving a potential 60

AFY available. Domestic water use for the proposed residence is estimated at 0.4 AFY. Therefore, it appears, based on the analysis provided by Simmons, that adequate water would be available to serve the proposed project. Nonetheless, impacts of this increase in water demand on the safe yield of the aquifer and the water supply available for neighboring properties should be considered in the EIR. Due to the proximity of the well to the ocean, saltwater intrusion is a potential concern. The quality of the well water is such that it would require treatment in order to be suitable for domestic use. Treatment of the well water is proposed to include sand filtration and reverse osmosis treatment. Inadequate water treatment or a reduction in water quality could expose residents to inadequately treated water. In addition, impacts on biological resources from the additional water extraction in terms of the effects on water availability for surface water bodies will be evaluated in the biological resources section of the EIR.

Potential Mitigation:

Water quality mitigation would likely include a combination of structural and non-structural Best Management Practices during construction and operation of the project to minimize water quality impacts, such as erosion and sedimentation control, vegetated swales and other drainage features to treat runoff before it enters nearby water bodies, minimization of impervious surfaces, etc. Potential measures to address long term water quality and quantity are as follows

- Semiannual water well monitoring using an on-site flow meter to document water availability.
- Semiannual water quality analysis to avoid the possibility of salt water intrusion into groundwater.

Scope of EIR:

- Assess impacts to water resources and flooding associated with buildout of the proposed project, including water quality, flood hazards, and long-term hydrological changes. Include an analysis of short-term impacts due to construction activities.
- Peer review water well analysis reports prepared for the project.
- Evaluate the water demand for the project and assess its impact on the safe yield of the underground aquifer and water supplies for neighboring properties.
- Evaluate the potential for impacts to surface waterbodies.
- Evaluate the potential for impacts associated with saltwater intrusion and long-term water quality degradation.
- Identify mitigation measures necessary to reduce impacts to less than significant levels.
- Evaluate cumulative impacts to water resources and flooding and identify the project's contribution to those impacts.
- Assess residual impacts of the project after mitigation.

Sources of Information:

- Storm Water Data Form and Runoff Reduction Measures, Michael Viettone, December 19, 2016
- Water Well Drillers Report, Loren Worthington, July 20, 2016
- Estimated Water Use, Mike Viettone, October 2016
- Water Well Completion Report, Adam Simmons, September 22, 2016

- Water Well Safe Yield Amendment, Adam Simmons, December 7, 2016
- Water Treatment System Summary, Mike Viettone, January 2017
- Goleta Water District Conditional Can and Will Serve Letter, April 5, 2016
- Goleta Water District Preliminary Conditions Letter, January 29, 2016

5.0 **PROJECT ALTERNATIVES**

Pursuant to Section 15126.6 of the CEQA Guidelines, the EIR shall consider and analyze a reasonable range of alternatives to the proposed project. The alternatives selected should be capable of avoiding or lessening any significant environmental effects of the proposed project. The EIR shall include a discussion and analysis of the following three alternatives:

- No Project Alternative
- Reduced Envelope Alternative
- Redesigned Project Alternative

The specific features of these alternatives will be worked out early on in the EIR analysis.

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