

CHAPTER FOUR - EVALUATION OF ALTERNATIVES

Introduction

The California Environmental Quality Act and the implementing State CEQA Guidelines require that alternatives to the proposed project be discussed in the EIR. The value of such discussion is to inform public decision-makers of the differential environmental impacts which may be associated with each potential alternative, and to enable a reasoned judgment to be made as to which alternative to the proposed project may be environmentally superior. The *CEQA Guidelines* (§15126.6, revised in 1998) provide the following description of what should be included in the alternatives discussion in an EIR:

15126.6 Consideration and Discussion of Alternatives to the Proposed Project

- (a) **Alternatives to the Proposed Project.** *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553 and Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376).*
- (b) **Purpose.** *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*
- (c) **Selection of a range of reasonable alternatives.** *The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also 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. Additional information explaining the choice of alternatives may be included in the administrative record. 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.*

- (d) **Evaluation of alternatives.** *The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles (1981) 124 Cal.App.3d 1).*
- (e) **"No Project" Alternative.**
- (1) *The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125).*
 - (2) *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.*
 - (3) *A discussion of the "no project" alternative will usually proceed along one of two lines:*
 - (A) *When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.*
 - (B) *If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the No*

Project Alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

(C) *After defining the No Project Alternative using one of these approaches, the lead agency should proceed to analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.*

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

(1) **Feasibility.** *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential v. City of West Hollywood (1992) 9 Cal. App.4th 1745, 1753, fn.1).*

(2) **Alternative locations.**

(A) **Key question.** *The key questions and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.*

(B) **None feasible.** *If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.*

(C) **Limited new analysis required.** *Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for project with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553,573).*

(3) *An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (Residents Ad Hoc Stadium Committee v. Board of Trustees (1979) 89 Cal.App.3d 274).*

Pursuant to the guidelines stated above, a range of alternatives to the Project are considered and evaluated in this EIR. These alternatives were developed in the course of preparing this EIR to determine whether alternatives to the Project, particularly any land use or design changes, could reduce or eliminate the significant adverse affects to air quality and traffic conditions. The discussion in this chapter provides:

1. A description of alternatives considered;
2. An analysis of whether the alternatives meet or partially meet most of the objectives of the Project; and
3. A comparative analysis of the alternatives under consideration with the Project. The focus of this analysis is to determine whether alternative are capable of eliminating or reducing the significant environmental effects of the Project to below a level of significance.

In evaluation of the alternatives to the Project, it is useful to again review the project objectives:

The project objective is to reduce the current overcrowded conditions and accommodate the rapid population growth and associated increased enrollment in the Hartnell College District area. At full buildout, the West Campus will be able to accommodate approximately 12,000 students.

This EIR describes a range of reasonable alternatives to the proposed project that could feasibly attain or partially attain the Project's basis objectives. This review and analysis is focused on alternatives capable of either eliminating any significant adverse environmental effects or reducing them to a level of insignificance. Reasonable project alternatives that have been considered include: the No Project Alternative; a Reduced Project Size alternative; and an Alternative Site Location. Finally, this chapter presents an analysis of the comparative environmental superiority of the various alternatives required by CEQA.

4.1 No Project Alternative

Under this Alternative, the District would not construct additional, nor renovate existing buildings. The college itself is currently operating over maximum capacity and students would be required to seek other college locations.

A No Project Alternative would have the following impacts relative to the proposed Project.

4.1.1 Air Quality: Air emissions would remain significant resulting from vehicle trips to other colleges within the North Central Coast Air Basin. Significant differential impacts of this alternative would include increased air quality emissions due to longer vehicle trip-lengths for students who must travel to alternate campus sites.

4.1.2 Traffic Conditions: While the No Project Alternative would eliminate potential traffic impacts to the intersections and roadways described in the *Hartnell College Master Plan Traffic Impact Report*, the increased traffic to other colleges could also have an adverse impact on City and State roadways.

4.2 Reduced Project Size

A project of reduced size is defined, for comparison purposes, as one which accommodates less students by restricting the construction available for instructional facilities and one which reduces the general education enrollment and facilities.

4.2.1 Air Quality: Total Air Basin emissions would remain significant with expected vehicle trips transferred to other college locations resulting in longer vehicle trip-lengths.

4.2.2 Traffic Conditions: Potential traffic impacts would be reduced on roadways near the Project site, but a concurrent adverse effect could occur in the community resulting from vehicle trips to other college locations.

4.3 Alternate Project Sites

The Project objective is the construction and operation of the Hartnell College Educational and Facilities Master Plan to serve existing and future students. Locating facilities to accommodate an additional 3,000 students at an alternate site would have the following impacts relative to the preferred site:

4.3.1 Air Quality: Adverse air emissions would be the same as the Project site.

4.3.2 Traffic Conditions: Mitigation measures needed to address the project-related traffic would be very similar to the Project.

4.4 Comparative Analysis of Project Alternatives

Table 4-1 summarizes the significant environmental impacts associated with the project site, the alternative sites and the other alternatives considered above. Although the no-project alternative is environmentally superior, it will not meet the basic objectives of the Project.

Table 4-1
Summary Comparison of Significant Environmental Impacts
of the Project and Project Alternatives

	Meet Project Objective	Air Quality	Traffic	Environmental Ranking
Project	Yes	Significant	Significant	2
No Project	No	Greater	Significant	1
Reduced Project Size	No	Greater	Significant	3
Alternate Sites	Yes	Same	Significant	2