Chapter 6
Alternatives

6.1 Introduction

The California Environmental Quality Act (CEQA) Guidelines state that an Environmental Impact Report (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" (Section 15126.6[a]).

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 in detail alternatives that are infeasible or that would not attain most of the basic objectives of the project (Section 15126.6[f]). Furthermore, an EIR need not consider an alternative with an unlikely or speculative potential for implementation or an alternative that would result in effects that cannot be reasonably ascertained (Section 15126.6[f][3]).

The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. Section 15126.6(a) of the CEQA Guidelines also states that "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.).

An EIR is not required to include alternatives that are not feasible. The term "feasible" is defined in the CEQA Guidelines Section 15364, as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." In defining feasibility of alternatives, the CEQA Guidelines state that "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, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site" (Section 15126.6[f][1]).

The alternatives considered must adequately represent the spectrum of environmental concerns to facilitate a reasonable choice of alternatives. The EIR must provide the rationale for selecting or defining the alternatives, including identifying any alternatives that were considered by the Lead Agency but rejected as infeasible during the scoping process. The analysis of project alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, the CEQA Guidelines state that an EIR shall include "sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project (Section 15126.6[d])". These alternatives must be prepared at a sufficient level of detail to permit their consideration for adoption by Santa Barbara County (County). When considered with information contained in the body of this EIR, the analysis contained in these alternatives must adequately characterize the potential associated impacts. However, depending upon the degree of design changes associated with any given alternative, an

additional environmental review may be required to refine mitigation measures and assess detailed changes in the project description associated with the adoption of one of these alternatives.

The alternatives analysis for this EIR is presented in five major parts. Section 6.2 describes the objectives of the Cate School Master Plan Update (Project). Section 6.3 summarizes the site selection process for proposed buildings and structures under the Project. Section 6.4 lists all alternatives that were considered but discarded, and provides the rationales for those decisions. Section 6.5 describes those alternatives carried forward for analysis, and discusses potential impacts under the Project alternatives. Each alternative considers the ability to substantially reduce or eliminate the Project's significant environmental impacts while still meeting basic Project objectives. The EIR also includes a No Project Alternative which reflects continuation of existing conditions as required by CEQA.

Section 6.6 then identifies an environmentally superior alternative, based on the Project Description, with the fewest or least severe significant impacts while meeting the intent of the greatest number of Project objectives. CEQA Guidelines Section 15126.6[b] states that the alternatives analysis "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."

6.2 Project Objectives

The purpose of the Project is to provide additional facilities to meet the academic and boarding needs of Cate School, including educational space (e.g., classrooms and faculty offices) and boarding and recreational space (e.g., dormitories, dining commons, faculty housing, and recreational facilities). These additions would take place over the life of the Master Plan and would incorporate designs intended to preserve the character of the existing setting at Cate School in terms of landscaping, views, and architectural design, as well as incorporate green building principles to minimize the environmental impacts of new buildings and structures. For a detailed explanation of Cate School's Project objectives, please see Section 2.5, *Project Objectives*. As noted above in Section 6.1, CEQA Section 15126.6(f) requires that a Project alternative attain "most of the basic objectives of the project".

6.3 Building/Structure Site Selection Process

The Applicant engaged in an extensive review of the Project site prior to identifying the proposed locations of new buildings and structures. The proposed siting took into consideration the following factors:

- Siting building and structures on remaining undeveloped areas of the Project site that have slopes under 30 percent to the maximum extent feasible;
- Avoiding development where possible in areas with existing trees, especially mature oak trees, and biologically sensitive areas; and
- Siting and designing buildings and structures such that they are aesthetically consistent with the existing development and are visually unobtrusive.

6.4 Alternatives Considered but Discarded

As discussed above, Section 15126.6(c) of the CEQA Guidelines requires that an EIR disclose alternatives that were considered and discarded and provide a brief explanation as to why such alternatives were not fully considered in the EIR. In particular, as required by the CEQA Guidelines, the selection of alternatives included a screening process to determine which alternatives could reduce significant effects but also feasibly meet Project objectives. The following alternatives were considered but eliminated from further analysis by the County due to infeasibility or inconsistency with primary Project objectives.

6.4.1 Relocating New Dormitories Offsite

This alternative considered relocating the proposed new dorms to a new location off the main campus and on one of the surrounding Cate School-owned, agriculturally zoned parcels. This alternative would impede the core function of Cate School as a boarding school in that students would no longer be located on the main campus where there is an established faculty presence to oversee the student population. Additionally, this alternative would require students to travel from the new boarding facilities to the main campus, increasing traffic at the intersection of Cate Mesa Road and Lillingston Canyon Road, as well as additional intersections (depending on the new location). Further, this alternative would have potential impacts to existing agricultural operations. Given that this alternative would not fully support the existing function of the school and would increase potential traffic and agricultural impacts, this alternative was eliminated from consideration.

6.4.2 Renovate 1925 Dormitory

This alternative considered renovating the 1925 Dormitory in order to provide students with improved living spaces, instead of demolishing it and constructing the Replacement Dorms A and B and Freshman Quad Dormitories. The 1925 Dormitory was constructed in 1970 and is a large split-level building that the applicant finds too constrained to address their educational and residential needs, as identified in several site studies conducted by the Applicant. The school desires a more effective dormitory design to improve use of the site area, reduce the current bedroom densities to improve students' quality of life, and enhance pedestrian accessibility along a key movement axis and view corridor. The realigned access would restore the historic access corridor of the Olive Walk portion of campus. Renovations could improve some of the existing issues but the number of students housed in the building would be reduced and new dormitory space would still be required. This alternative would not reduce any potentially significant environmental issues as additional dorms would still need to be constructed and therefore it was eliminated from consideration.

6.4.3 Relocating New Faculty Housing Offsite

The Applicant presented two potential alternative offsite locations for relocating proposed faculty housing. These sites were considered, with particular consideration given to the existing land use and biological sensitivity of the proposed parcels. Both parcels were found to be inadequate for the reasons explained below, and therefore this alternative was eliminated from further consideration.

6.4.3.1 Cate-Owned Parcel APN 001-040-013

This parcel is located south of the Cate School main campus in a relatively flat area of Gobernador Canyon, adjacent to and north of Gobernador Creek and Gobernador Canyon Road. The site is approximately 18.59 acres, zoned as agricultural land. The parcel is currently in an agricultural preserve and supports an avocado orchard. Additionally, there are some riparian areas along the banks of the creek. This farmland is designated as unique farmland by the California Department of Conservation, Division of Land Resource Protection. There is one small structure located on the parcel that is approximately 900 sf in size. Because this parcel is currently zoned agricultural, the parcel would need to be included in the Cate School CUP boundary in order to allow for new residential development on this parcel. The proposed development result in a reduction in the existing agricultural use of this parcel, and including this parcel in the CUP may result in increased future development on the site. Given that this alternative would require a reduction in agricultural use on farmland that is designated as unique and is currently enrolled in a Williamson Act contract, development on this land would significantly increase the Project's impacts on agricultural resources. Moreover, such a use would be inconsistent with the County's *Uniform Rules for Agricultural Preserves* and therefore would not be permitted absent non-renewal of the Williamson Act contract. Similar to relocating the dorms offsite, relocating faculty housing offsite would not support the objective for faculty to be present onsite to oversee the student population. Additionally, this alternative would require faculty members to travel from the new residences to the main campus, increasing traffic at the intersection of Cate Mesa Road and Lillingston Canyon Road, as well as additional intersections (depending on the new location). Therefore, this parcel was eliminated from consideration as an alternative site for the faculty residences.

6.4.3.2 Cate-Owned Parcel APN 001-040-040

This 3.91-acre parcel is located west of the Cate School main campus, in Lillingston Canyon. Carpinteria Creek runs through a portion of the site and Lillingston Canyon Road is located immediately to the east. The majority of the parcel is planted with mature avocado trees. The site is zoned as agricultural, and is designated as unique farmland by the California Department of Conservation, Division of Land Resource Protection. As with APN 001-040-013, the parcel would need to be included in the Cate School CUP boundary in order to allow for new residential development on this parcel, which may result in additional future development on the site. Given that this alternative would require a reduction in agricultural use on designated unique farmland, development on this land would significantly increase the Project's impacts on agricultural resources. Further, as discussed above, locating faculty residences offsite fails to meet a core Project objective of having faculty onsite to oversee students and would also create additional traffic on area roadways. As a result, this alternative was eliminated from consideration.

6.4.4 Relocated Squash Pavilion and Faculty Residences

Under this alternative, the proposed Project would be implemented with the exception of the proposed Squash Pavilion. The Squash Pavilion would be relocated adjacent to the existing sports fields and would be constructed above grade; one of the proposed faculty residences would then be relocated to the previous Squash Pavilion location, to avoid steeper slopes and preserve additional oak trees from removal. While construction of the Squash Pavilion above grade could reduce grading, additional visual impacts would result compared to the Project. The athletic fields are currently developed with low lying sports facilities and the introduction of a new, three story building would

be considered a substantial change to the existing visual environment. Further, the Squash Pavilion requires vehicle access. Under this alternative the access road located along the northern side of the campus would be extended; therefore, total grading would remain similar to the Project requirements. As this alternative would not reduce any potentially significant environmental impacts and could increase visual impacts compared to the Project, it was eliminated from consideration.

6.4.5 Conversion of All Students to Boarding Students

This alternative considers revising the CUP to allow for 300 students, as under the proposed Project, but to define all students as residential students, thereby eliminating the commuting population of students. Currently, Cate School has approximately 280 students, with approximately 220 of them residing on the campus. This alternative would allow for an additional 20 students, with all new students residing on campus and the 60 commuting students converting to residential students. The overall result would be an additional 80 students residing on the campus. This change would reduce peak hour traffic from commuting students; however, it would result in additional impacts at the Project site related to development and fire hazards. Given that this alternative would result in 60 more students residing on the campus than under the proposed Project, additional dormitory space would be required to house these students. Construction of this space would result in additional impacts to air quality, noise, water quality, and biological resources. Additionally, because more people would be residing on the campus, emergency evacuation in the case of a fire or other hazard would be potentially impacted. Given that this alternative would result in increased adverse impacts to air quality, noise, safety, and other resources, it has been removed from consideration. Further, this alternative would end a long-standing tradition of allowing a percentage of the student population to be day students, which provides a more economical educational experience for families that cannot afford the boarding option.

6.5 Project Alternatives

As required by CEQA, this Draft EIR considers a range of reasonable alternatives to the Project, which would feasibly achieve most of the basic objectives of the Project but would avoid or substantially lessen significant effects of the Project. These alternatives were developed during EIR preparation in response to potential impacts to aesthetics, biology, and geologic resources from implementation of the Project. The alternatives selected for analysis include:

- *Alternative 1 – Redesigned Project*
- *Alternative 2 – Reduced Project*
- *Alternative 3 - No Project Alternative*

The presentation of each alternative consists of a brief description of the alternative itself followed by an analysis of potential impacts and a comparison to those impacts associated with the proposed Project. This allows report reviewers to determine the general significance of impacts (if any) associated with the alternative and their relative severity when compared to those associated with the proposed Project. Any substantial new mitigation measures not included in the analysis of Project impacts in Sections 3.0 and 4.0 are also briefly described.

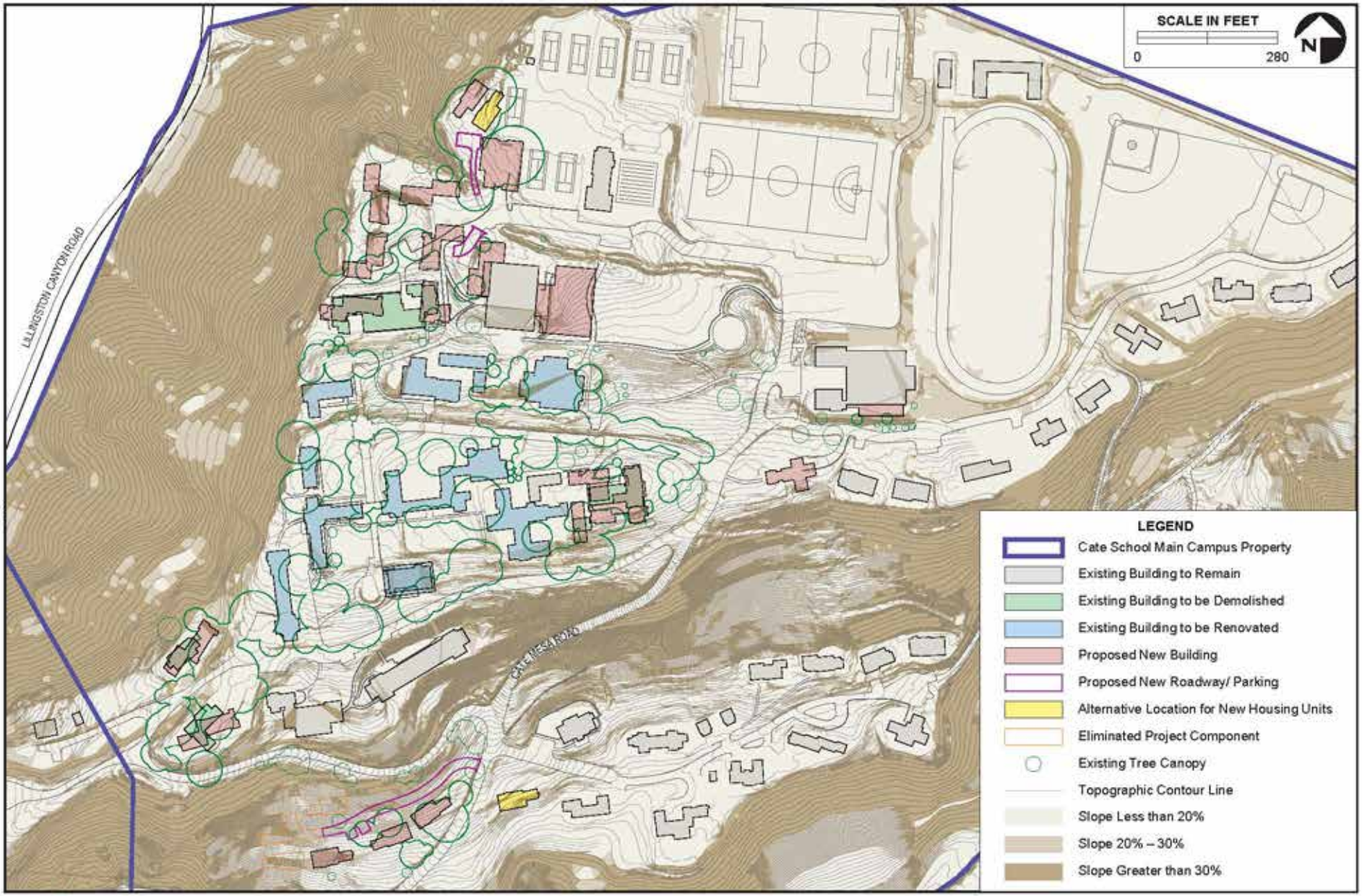
6.5.1 Alternative 1 – Redesigned Project

Under this alternative, the proposed Project remains unchanged, with the exception of two of the proposed faculty residences. The two faculty residences at the end of the proposed road spur would be relocated to other areas of the site. This alternative was designed in order to address environmental impacts resulting from development on steep slopes in excess of 30 percent and containing native vegetation and to reduce overall visual impacts.

Under the proposed Project there are five faculty houses in the southern portion of the Project site west of Cate Mesa Road (Figure 6-1) that are proposed both on steep slopes and in areas containing sensitive native vegetation (including native oak trees)(see regions colored dark brown shading). The proposed access road and new houses would result in a substantial amount of site disturbance and vegetation removal to accommodate the new houses. In order to reduce impacts to geological and biological resources, this alternative would involve removing two of this group of five houses from their proposed location. One would be relocated across the street from the child care center and adjacent to existing faculty residences east of Cate Mesa Road, and one would be clustered with the northernmost proposed faculty residence, adjacent to the existing tennis courts. This alternative would cluster development along existing access roads and in areas containing non-native vegetation or disturbed soils and would reduce cut and fill into steep slopes. This alternative includes:

- Relocating two of the proposed faculty residences out of the faculty housing cluster;
- Clustering one new residence with the existing faculty housing to the east of Cate Mesa Road;
- Clustering one new residence with the northernmost proposed faculty residence, adjacent to the existing tennis courts; and
- Reducing the length of the faculty housing road spur by approximately 140 feet and reducing the associated grading.

Under this alternative, proposed daily operations would not change. Cate School would still be designed to house 20 additional students and all core facilities proposed (including additional educational space, classrooms and faculty office space, and boarding and recreational, dining commons, and recreational facilities) would be constructed in some way. Additionally, the portable PA system for sports events would be approved for use, the childcare facility would be open to the community, and the new drainage system would also remain as proposed within Section 2.6, *Project Components*. This alternative could reduce potential resource impacts and would also meet Project objectives outlined in Section 2.5 *Project Objectives*.



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Alternative 1 – Redesigned Project Alternative

FIGURE 6-1

6.5.1.1 Effect of Alternative on Resource Areas

Aesthetics/Visual Resources

Similar to the Project, this alternative would alter the site with proposed demolition, renovations, and development of new facilities and associated lighting, as well as a new drainage system. By developing structures in locations that require less cut and fill and less vegetation removal, this alternative would be more aesthetically consistent with the existing environment. However, this alternative only affects a small portion of the overall Project development. Overall aesthetic impacts under this alternative would be similar to the proposed Project and require mitigation measures to ensure that aesthetic and visual characteristics are consistent with the surrounding visual character and architectural design. Therefore, under this alternative, impacts to aesthetics/visual resources would remain *less than significant with mitigation* (Class II), though slightly reduced relative to the proposed Project.

Agricultural Resources

While the redesign would result in less grading, impacts to agriculture would remain the same as the Project, as the storm drainage system would not be altered and its installation would result in the removal of up to 0.57 acre of avocado orchard west of the campus, and approximately 9-10 avocado trees south of the campus. Consistent with the proposed Project, this alternative would therefore also result in a total of 56 points using the Santa Barbara County Agricultural Resource Guidelines weighted point system. Impacts to agricultural resources would remain *less than significant* (Class III).

Air Quality and Greenhouse Gas Emissions

Under this alternative, impacts to air quality and GHG emissions associated with the Cate School Master Plan Update would be reduced compared to the Project as a result of the reduction in earthwork required. This alternative would result in a reduction of approximately 5,300 cubic yards of earthwork, and emissions associated with the operation of heavy equipment would be similarly reduced. The associated decrease in emissions would not change the impact classification associated with the Project and impacts to air quality and GHG would remain *less than significant with mitigation* (Class II).

Biological Resources

Under Alternative 1, the faculty residences would be modified to preserve approximately 0.8 acre of lemonade berry scrub habitat and 0.1 acre of ashy-leaf buckwheat dominated plant communities. However, as this alternative only applies to modifications at a few locations of the Project, mitigation would still be required to reduce impacts to biological resources. Therefore, while construction impacts and overall Project impacts to biological resources under Alternative 1 would be incrementally less compared to the proposed Project, impacts would still be *less than significant with mitigation* (Class II).

Cultural Resources

Based on the fundamental nature of construction, potential impacts to cultural resources would continue to exist as described under the proposed Project and would remain *less than significant with mitigation* (Class II). The changes in impacts to cultural resources under this alternative compared to the proposed Project would be minimal.

Energy

With more clustered structures and reduced grading and site disturbance, this alternative would require incrementally less energy during construction and operation than the proposed Project. Impacts to energy would remain *less than significant* (Class III).

Fire Protection

The modification of faculty housing to reduce the amount of grading on steep slopes and reduce native vegetation removal would not reduce the total number of separate habitable structures requiring protection; however, it would limit the number of habitable structures located in constrained areas during an emergency event. This could reduce the potential fire protection demands in comparison to the proposed Project. However, as this alternative only applies to modifications at one location of the Project, mitigation would still be required elsewhere to reduce impacts to fire protection. Therefore, this alternative would generate negligibly different fire protection impacts compared to the proposed Project and would require similar mitigation. Impacts would be *less than significant with mitigation* (Class II).

Geologic Processes

The reduction of residential development on the steep hillside would result in a decrease in exposure of people to geologic and seismic hazards during construction and operation. However, given the general condition of the Project site which contains numerous slopes, this alternative would not completely avoid all construction on steep slopes. Therefore, mitigation to prevent slope-related impacts and to reduce erosion would still be required. While this alternative would result in incrementally reduced impacts to geology and soils as compared to the proposed Project due to a reduction in grading operations on hillsides, impacts would remain *less than significant with mitigation* (Class II).

Hazardous Materials/Risk of Upset

Changes to the Project under this alternative would not result in changes in the risk of exposure of people to hazards. Therefore, Alternative 1 would generate similar impacts as identified for the proposed Project related to hazards and would remain *less than significant* (Class III).

Historic Resources

Under Alternative 1, historic structure modification and design standards for new facilities would occur as described under the proposed Project. As Alternative 1 presents no modifications to the existing redevelopment of historic structures or development proposed in the vicinity of historic structures, it would generate similar impacts for disturbance to existing historic structures. The redesign of faculty housing to better fit with the topography would require mitigation measures similar to those identified for the proposed Project. Therefore, Project related impacts to historic resources would remain *less than significant with mitigation* (Class II).

Land Use and Planning

Under this alternative, land use and planning impacts and consistency with plans and policies related to daily operation of Alternative 1 would be similar. The redesign of the proposed faculty structures would reduce development on steep slopes (with an associated reduction in grading quantities) and

reduce the extent of native vegetation removal, consistent with Hillside and Watershed Protection Policies of the Coastal Land Use Plan. Alternative 1 would not change land use impacts for Parcel 001-040-008 when compared to the proposed Project. Similarly, changes to the adjacent orchards for construction of storm water systems would remain the same. Therefore, impacts would remain *adverse but less than significant* (Class III), though slightly reduced as compared to the proposed Project.

Noise

The redesign of structures under this alternative would not generate substantial noise differences to those under the proposed Project. The reduced grading in the area of the faculty residences would incrementally reduce short-term noise impacts associated with construction. There would be no change in operational elements of the school. Impacts would remain *less than significant with mitigation* (Class II).

Public Facilities

Public facility demands from the fire department, sheriff's department and highway patrol, schools, healthcare facilities, waste and storm water would remain the same. The total amount of construction generated solid waste would not change and overall solid waste would still require mitigation. Compared to the Project, impacts on public facilities would remain *less than significant with mitigation* (Class II).

Recreation

The continued use of nearby public trails with existing permitted access trails would remain and impacts to recreation would be the same as the proposed Project as the total student population growth would remain unaltered. Impacts would be *less than significant with mitigation* (Class II).

Transportation and Circulation

Under Alternative 1, construction and daily operational traffic associated with the Cate School Master Plan Update would occur as described under the proposed Project. This alternative would generate similar travel to and from the site, and impacts would remain *less than significant with mitigation* (Class II).

Water Resources/Flood Water

Impacts identified under the proposed Project related to runoff, flooding, and water use would remain, though would be slightly reduced relative to the proposed Project. The clustered building design and reduced impervious surfaces associated with the shortened driveway west of Cate Mesa Road could decrease the total amount of storm water runoff generated by the development, and the reduction in grading on steep slopes would result in slightly reduced construction-related water quality impacts associated with reduced erosion and sedimentation. Overall, Alternative 1 would slightly reduce water resource and flood water impacts, but they would remain *less than significant with mitigation* (Class II).

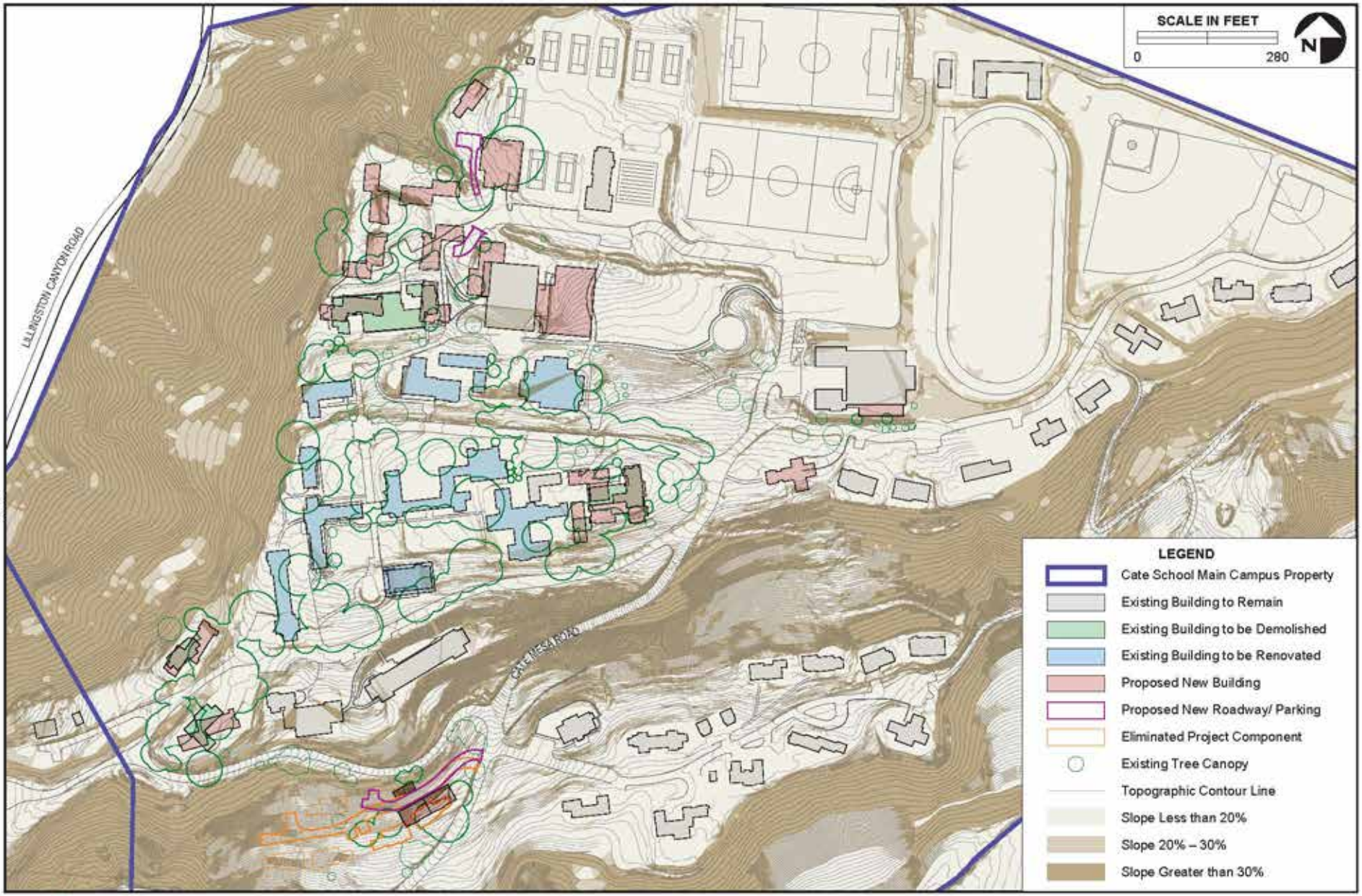
Conclusion and Relationship to Project Objectives

This alternative would reduce development on slopes in excess of 30 percent and reduce total grading by about 5,300 cubic yards of earthwork. However, overall impacts to geologic processes and biological resources would not be reduced to a less than significant level without mitigation. This alternative would decrease air quality emissions as a result of the reduced grading, and would decrease water quality impacts during construction and operation by reducing the area of disturbance and the extent of impervious surfaces. This alternative has similar impacts compared to the proposed Project for most resource areas since adverse effects associated with overall campus development would not be avoided.

This alternative would achieve most of the Project objectives, namely preserving the character of the existing setting at Cate School (including existing landscaping, views, and architectural design) while providing additional facilities (classrooms, faculty office space, dormitories, dining commons, and recreational facilities). This alternative would achieve the Project objectives of providing additional, sufficient on-site multi-room faculty housing while incrementally reducing environmental impacts associated with geology and soils, biological resources, air quality, aesthetics, and water resources.

6.5.2 Alternative 2 – Reduced Project Alternative

This alternative seeks to reduce geologic process, biologic resource, air quality and aesthetic impacts by reducing the overall scale of the faculty housing design and reducing the number of units in areas of steep slopes or where the removal of specimen trees can be avoided. Alternative 2 would address these impacts by reducing the number of faculty residences in constrained areas. As detailed in Figure 6-2, Alternative 2 would eliminate three of the five proposed faculty housing units west of Cate Mesa Road and convert the remaining two faculty housing units into a duplex with a reduced overall size compared to the Project. Individual housing units under this alternative would total approximately 2,000 sf compared to approximately 2,350 sf per unit under the Project. The duplex would avoid slopes in excess of 30 percent, avoid the removal of three oak trees, and reduce the length of the access road. A detached two car garage would be constructed across the access road from the units. Under this alternative, proposed daily operations would not change. This alternative would meet most of the Project objectives outlined in Section 2.5, *Project Objectives*; however, it would result in three fewer on-site single-family faculty residences than the proposed Project. This alternative would reduce impacts to geology and soils, air quality and GHG emissions, water resources, and aesthetics as a result of the reduced grading and site disturbance, and would reduce impacts to biological resources as a result of preserving additional oak trees and reducing the extent of native vegetation removal. Potential resource impacts would be lessened due to reduced facilities; however, environmental impact classifications for all resources and services would not change and all mitigation measures proposed under the Project would be required, as discussed below.



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Alternative 2 – Reduced Project Alternative

FIGURE 6-2

6.5.2.1 Effect of Alternative on Resource Areas

Aesthetics/Visual Resources

Similar to the Project, this alternative would alter the Project site with the demolition of existing structures and development of new facilities, new facility lighting, and installation of a new drainage system. While features of this alternative may be more consistent with the topography and environment at the site by proposing fewer units in order to preserve several specimen trees and reduce the amount of vegetation disturbance on the slope, the Project modifications are limited to the faculty housing. Therefore, overall aesthetic impacts associated with this alternative would be generally similar to the proposed Project, thus requiring mitigation measures to ensure aesthetic and visual characteristics are consistent with the surrounding visual character and architectural design. Impacts would be slightly reduced relative to the proposed Project, but would remain *less than significant with mitigation* (Class II).

Agricultural Resources

While the Reduced Project Alternative may impact fewer oak trees as a result of eliminating or relocating structures, impacts to agriculture would remain the same as the storm drainage system would not be altered. The removal of up to 0.57 acre of avocado orchard west of the campus and 9 to 10 avocado trees south of the campus would remain under this alternative, and agricultural impacts associated with this alternative would be similar to the proposed Project. Impacts would remain *less than significant* (Class III).

Air Quality and Greenhouse Gas (GHG) Emissions

Under this alternative, construction impacts to air quality and GHG emissions associated with the Cate School Master Plan Update would be reduced as a result of the reduced number of faculty residences and the associated reduction in grading and earthwork and shortened construction period. This would result in an overall reduction in emissions associated with construction. However, the reduction in onsite faculty family housing could result in an incremental increase in commuting trips to and from the Cate School campus by faculty, which would incrementally increase operational emissions. This associated change in emissions from construction and operations is anticipated to be nominal and negligible, and impacts would remain *less than significant with mitigation* (Class II).

Biological Resources

Under this alternative, an estimated three specimen oak trees would be preserved compared to the Project as a result of the reduced faculty housing. Additionally, this alternative would result in less removal of, and disturbance to, native vegetation including approximately one acre of lemonade berry scrub habitat and 0.1 acre of ashy-leaf buckwheat dominated plant communities. Therefore, construction impacts, and overall Project impacts under Alternative 2, would be reduced compared to the proposed Project. However, impacts would remain *less than significant with mitigation* (Class II).

Energy

The reduced number of faculty family housing units would require incrementally less energy during construction of the proposed Project. Operational emissions associated with facilities would decrease

slightly; however additional trips from faculty members commuting to the site could increase, as well as associated fuel consumption. Impacts to energy demand would incrementally decrease relative to the construction of proposed Project and would slightly increase relative to operation of the Project. Overall, impacts would remain *less than significant* (Class III).

Fire Protection

The reduction in the number of faculty housing units would reduce the total number of habitable structures requiring protection, and limit the number of habitable structures located in constrained areas during an emergency event, thus incrementally reducing potential fire protection demands in comparison to the proposed Project. However, preserving vegetation in close proximity to new development would retain the level of fire risk associated with the proposed Project and some proposed structures would continue to occur in the very high and high fire hazard zones. Although this alternative could incrementally reduce fire protection impacts compared to the proposed Project, fuel management and evacuation mitigations would still be required. Impacts would remain *less than significant with mitigation* (Class II).

Geologic Processes

Under Alternative 2, the elimination or relocation of structures to reduce development on steep slopes would result in reduced impacts to geologic processes. This alternative would require approximately 5,500 fewer cubic yards of grading compared to the Project. However, this alternative would still entail development on slopes, including spot locations that are between 20 and 30 percent (Figure 6-2), and would not completely eliminate impacts from slope-related geological risks during construction and operation. Therefore, mitigation to prevent slope-related impacts and to reduce erosion from exposed slopes would still be required. While this alternative would result in incrementally reduced impacts to geology and soils as compared to the proposed Project, impacts would remain *less than significant with mitigation* (Class II).

Hazardous Materials/Risk of Upset

The changes to the Project under this alternative would not result in changes in the risk of exposure of people to hazardous materials or risk of upset. Therefore, Alternative 2 would generate hazard-related impacts similar to those identified within the proposed Project and would remain *less than significant* (Class III).

Historic Resources

Under Alternative 2, historic structure modification and design standards for new facilities would occur as described under the proposed Project. As Alternative 2 presents no modifications to the existing redevelopment of historic structures, it would generate similar impacts for disturbance to existing historic structures. The reduction of faculty housing units would require similar mitigation measures as with the proposed Project. Therefore, Project related impacts to historic resources would remain *less than significant with mitigation* (Class II).

Land Use and Planning

As Alternative 2 only reduces the number faculty houses in contrast to the Project, land uses and daily operations would be similar to the proposed Project. Reduction of faculty residences would reduce grading quantities and removal of native vegetation, including oak trees, and therefore would achieve

potentially greater consistency with Hillside and Watershed Protection Policies and tree protection policies of the Coastal Land Use Plan. Alternative 2 would not change land use impacts for Parcel 001-040-008 when compared to the proposed Project. Similarly, changes to the adjacent orchards due to construction of storm water systems would remain the same as the Project. Impacts would remain *adverse but less than significant* (Class III).

Noise

The amount of noise generated by the reduction of faculty residences under Alternative 2 would not change substantially compared to the proposed Project. The reduced grading in the area of the faculty residences would incrementally reduce short-term noise impacts associated with construction. There would be no change to operational elements of the school. Impacts would remain *less than significant with mitigation* (Class II).

Public Facilities

Public facility demands from the fire department, sheriff's department and highway patrol, schools, healthcare facilities, waste, and storm water could decrease incrementally due to the decrease in residential facilities. Similarly, the smaller footprint from fewer faculty housing units would reduce the total amount of construction-generated solid waste. However, overall solid waste and storm water would still require mitigation. Compared to the Project, this alternative would generate incrementally reduced demands to public facilities but impacts would remain *less than significant with mitigation* (Class II).

Recreation

The reduction of faculty residential units would not generate a noticeable change in the use of recreational resources. Therefore, impacts would remain *less than significant with mitigation* (Class II).

Transportation and Circulation

With fewer faculty residences onsite, commuting traffic would be increased compared to the Project as there would be at least three fewer faculty members residing onsite who would need to commute to work. At the same time, commuting traffic associated with spouses who may work off-site could be slightly reduced as a result of the three fewer on-site faculty residences. Therefore, this alternative would generate generally similar operational traffic to and from the site as compared to the Project and would continue to require the proposed mitigation measures. Impacts would remain *less than significant with mitigation* (Class II).

Water Resources/Flood Water

The reduced number of faculty housing units and associated impervious surfaces would generate less storm water runoff. However, proposed storm water facilities would be the same as proposed under the Project and mitigation measures would still be required. Water quality impacts associated with grading and construction would be incrementally reduced due to the reduced grading and risk of erosion and sedimentation. Overall, impacts identified under the proposed Project related to runoff, flooding, and water use would remain *less than significant with mitigation* (Class II) under this alternative.

Conclusion and Relationship to Project Objectives

This alternative would result in reduced overall impacts compared to the Project as it would reduce total development by three faculty housing units, reduce the total square footage of new construction, reduce total impervious surfaces, reduce total cut and fill and earthwork, avoid slopes in excess of 30 percent, and preserve several specimen oak trees and areas of native vegetation. However, despite this reduction, overall Project impacts to geologic processes and biologic resources would not be reduced to a less than significant level without mitigation. Similarly, while this alterative would also result in the potential to decrease aesthetic/visual resource, air quality/GHG emissions, energy, geological resource, land use, noise, public service demands, and water quality impacts during construction and operation from a reduced number of units and disturbance area, impacts associated with Alternative 2 for these resource areas would remain generally similar to the proposed Project. Adverse effects associated with campus growth cannot be entirely avoided.

This alternative would achieve most of the basic Project objectives, namely preserving the character of the existing setting at the Cate School (including existing landscaping, views, and architectural design) while providing additional facilities (classrooms, faculty office space, dormitories, dining commons, and recreational facilities). However, it would reduce the number of faculty units by three and convert two of the proposed faculty residences to a duplex, which may not fully meet Cate School's objectives regarding faculty housing.

6.5.3 Alternative 3 - No Project Alternative

Section 15126(e)(1) of the State CEQA Guidelines requires consideration of a no project alternative to allow decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. This is particularly important where project implementation would result in unavoidable and significant impacts.

Section 15126.6(e) of the CEQA Guidelines explains the No Project Alternative as:

> *"...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."*

Section 15126.6(e) further states that:

> *"the 'no project' alternative shall discuss the existing conditions at the time the notice of preparation is published..., 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 consistency with available infrastructure and community services."*

If the No Project Alternative is implemented, Cate School would continue to operate under conditions approved under Santa Barbara County CUP No. 89-CP-062 (as amended under Case Nos. 89-CP-062 AM01, 89-CP-062 SC03, 02AMD-00000-00009, and 06RVP-00000-00013), which governs operation of the school. The existing CUP enrollment cap of 280 students would remain, the daycare center would not be opened to the general public, and the PA system would not be authorized and use would cease. None of the proposed construction, demolition, or remodeling would occur and the existing environmental setting would be maintained. Changes to that setting, including changes to the landscape (visual resources, habitat, and agriculture) and Project construction related noise, traffic, and air emissions would not occur. Existing infrastructure would remain in place.

The No Project Alternative would avoid all Project-related impacts. It would cause no new impacts on the physical environment; i.e., existing land uses would continue to affect environmental conditions as they are now. No legal, regulatory, or technical feasibility issues were identified that would eliminate the No Project Alternative from consideration. However, the No Project Alternative would not meet any of the Project objectives.

6.5.3.1 Effect of No Project Alternative on Resource Areas

Aesthetics/Visual Resources

Under the No Project Alternative, construction and expansion described under the Project would not occur. The site would remain in its existing condition and would retain its current visual character and operational capacity. No watershed or drainage systems would be altered, no new lighting would be installed, and no new campus structures including faculty and student housing, would be constructed. Under the No Project Alternative there would be *no impact* to aesthetic and visual resources.

Agricultural Resources

Under the No Project Alternative, parcels 001-040-041 and 001-040-012 would retain their orchard cover as agricultural land, retaining its current use. The conversion of 0.57 acre of avocado orchard on prime farmland for the development of storm drainage systems to serve campus facilities would not occur. Additionally, the new water sources from the proposed storm water retention system would not help to offset ongoing onsite agricultural irrigation needs. It is anticipated that no agricultural resources on or adjacent to the site would be converted under the existing CUP. As the Project site is anticipated to remain in its current condition, there would be *no impact* to agricultural resources.

Air Quality and Greenhouse Gas Emissions

Under the No Project Alternative, emissions generated during construction and from increased use of Project operation would not be generated. Ongoing campus, student and faculty generated emissions are expected to continue, with limited air quality impacts associated with current vehicle trips. These emissions are expected to be nominal and negligible. Air quality impacts would be *less than significant* (Class III).

Biological Resources

Under this alternative, existing use of the site would continue. There would be no increased potential for disturbance of sensitive or endangered species because no new construction or operational activities would occur. Therefore, under the No Project Alternative, there would be *no impact* on biological resources.

Cultural Resources

Although no cultural resources are known to be present within the Project site, under the No Project Alternative, there would be no potential for disturbance or damage to any potential unknown sites or human remains from construction of the Master Plan and CUP Update since no construction would take place. Additionally, the Project site has been previously disturbed for the development of the existing campus structures and the cultivation of avocados, and would be expected to continue to be

used and disturbed under the No Project Alternative. This ongoing disturbance has potential to impact unknown buried cultural resources; however, it is likely that past construction and cultivation would have already disturbed any buried cultural resources. Therefore, impacts to cultural resources would be *less than significant* (Class III).

Energy

Under the No Project alternative, existing use of the site would continue. There would be no increased energy demands because no construction or increase in campus operations would occur. Energy demand associated with operation of the campus would be unchanged. There would be *no impact*.

Fire Protection

Under the No Project Alternative, APNs 001-040-041 and 001-040-012 would retain their orchard cover, and would therefore maintain the existing level of fire hazard. The campus would continue to operate under its existing CUP, and therefore fire protection demands and services would remain as they currently operate. Fire risk impacts associated with increased population (up to 39 additional students, 11 childcare students, and 4 staff) and construction activities in the high and very high fire zones would not occur. Therefore, impacts would be *less than significant* (Class III).

Geologic Processes

Under the No Project Alternative, no construction work, structures, or activities would occur on the site; therefore, this alternative would not expose people or structures to adverse impacts resulting from geologic or seismic hazards from construction on slopes. Therefore, no direct geologic and soils impacts would occur under this alternative. This alternative would have *no impact*.

Hazardous Materials/Risk of Upset

Under the No Project Alternative, the site would continue to operate under its current CUP and capacity. No additional hazardous materials would be exposed or introduced. Hazardous material use associated with agricultural activities on the avocado orchards, such as fertilizers or pesticides, is expected to continue, as would chemical use associated with vehicle, pool, and facilities maintenance. However, since there would be no additional transport, use, storage, or risk of exposure to hazards related to construction or operation, this impact would be *less than significant* (Class III).

Historic Resources

The Project site is known to contain historic structures and landscaping. Under the No Project Alternative, there would be no potential for disturbance or damage to any existing historic structures from construction of the Master Plan and CUP Update since no construction would take place. Therefore, unlike the Project, the No Project Alternative would generate *no impact*.

Land Use and Planning

The No Project Alternative would be consistent with the zoning and comprehensive plan land use designations for the Project site. Continued academic use of APN 001-040-008 as approved under the existing CUP, and continued agricultural use of the adjacent Cate-owned parcels would not be inconsistent with any plans or policies. Use of the PA system would be discontinued. Therefore, there would be *no impact* to land use and planning policies.

Noise

Under the No Project Alternative, construction noise associated with the expansion of Cate School would not occur. The Project area would retain its current level of noise generated by educational facilities, special events, and sporting events without a PA system. Therefore, noise impacts would be reduced relative to the proposed Project and would be *less than significant* (Class III).

Public Facilities

Under the No Project Alternative, no new demands for police protection, fire protection, landfill, sewer system facilities, or storm water drainage would occur. Therefore, impacts to public services and utilities would be *less than significant* (Class III).

Recreation

Under the No Project Alternative, no changes to existing site use would occur and off- and on-site recreation activities would remain the same. Potential conflicts with student trespassing could continue but would not be exacerbated by an increased student population and the school would not exceed any local or state recreation thresholds. Impacts to recreational resources under this alternative would be *adverse but less than significant* (Class III).

Transportation/Circulation

Under the No Project Alternative, construction and operation of new educational and administrative facilities would not occur. No additional impacts to local roadways or regional highways would occur associated with construction or operation of the Project. This alternative would have a *less than significant* impact to transportation and circulation (Class III).

Water Resources/Flooding Water

Under the No Project Alternative, no construction would occur, and drainage patterns on the Project site would not be altered. The student and faculty population would also remain constant. Therefore, impacts to water demand, flood risks, and water quality under this alternative would not require mitigation as compared to the proposed Project and this impact would be *less than significant* (Class III).

Conclusion and Relationship to Project Objectives

This alternative would avoid all adverse environmental impacts, including the geologic processes and biological resource impacts, associated with the proposed Project. While this alternative would meet the Project objective of preserving the character of the campus, it would not achieve any of the Projects development objectives of providing additional facilities that include classrooms, faculty office space, dormitories, dining commons, and recreational facilities onsite. Nor would it allow for increased student population or new faculty housing, or the expansion of its child care facility for the community.

6.6 Identification of Environmentally Superior Alternative

As presented in the comparative analysis above, there are a number of factors in selecting the environmentally superior alternative. As required by CEQA, if the Environmentally Superior Alternative is the No Project Alternative, CEQA Section 15126.6 requires identification of an environmentally superior alternative from among the other alternatives.

Based on the analyses conducted in the preparation of this EIR, the No Project Alternative, followed by Alternative 2, was identified as the Environmentally Superior Alternative. Further, all impact classifications would remain the same as the Project under Alternative 2; however, the degree of impacts upon resources would be incrementally lessened. Most notably, Alternative 2 would reduce Project-specific impacts related to geologic process, construction-related air quality and GHG, biologic resources, and water resource impacts, although all resources would still require mitigation proposed under the Project. While Alternative 2 would provide three fewer single family faculty residences onsite, it meets most of the Project objectives. Therefore, Alternative 2 is the Environmentally Superior Alternative.

Table 6-1. Comparison of Cate School Master Plan Update Alternatives

Environmental Resource	Project	Alternative 1 — Redesign	Alternative 2 — Reduced	Alternative 3 - No Project Alternative
Aesthetics / Visual Resources	Less than significant with mitigation (Class II)	Similar (Class II)	Incrementally less (Class II)	No impact
Agricultural Resources	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	No impact
Air Quality/ Greenhouse Gas Emissions	Less than significant (Class III)	Incrementally less (Class III)	Incrementally less (Class III)	Incrementally less (Class III)
Biological Resources	Less than significant with mitigation (Class II)	Similar (Class II)	Incrementally less (Class II)	No impact
Cultural Resources	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	Incrementally less (Class III)
Energy	Less than significant (Class III)	Incrementally less (Class III)	Incrementally less (Class III)	No impact
Fire Protection	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	Incrementally less (Class III)
Geologic Processes	Less than significant with mitigation (Class II)	Incrementally less (Class II)	Incrementally less (Class II)	No impact
Hazardous Materials/ Risk of Upset	Less than significant (Class III)	Similar (Class III)	Similar (Class III)	Incrementally less (Class III)
Historic Resources	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	No impact
Land Use/ Planning	Less than significant (Class III)	Similar (Class III)	Similar (Class III)	No impact
Noise	Less than significant (Class II)	Incrementally less (Class II)	Incrementally less (Class II)	Less that significant (Class III)
Public Facilities	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	Less than significant (Class III)
Recreation	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	Less than significant (Class III)
Transportation and Circulation	Less than significant with mitigation (Class II)	Similar (Class II)	Incrementally more adverse (Class II)	Less than significant (Class III)

Table 6-1. Comparison of Cate School Master Plan Update Alternatives (Continued)

Environmental Resource	Project	Alternative 1 — Redesign	Alternative 2 — Reduced	Alternative 3 - No Project Alternative
Water Resources/Flooding Water	Less than significant with mitigation (Class II)	Similar (Class II)	Similar (Class II)	Less than significant (Class III)
Meet Project Objectives?	Yes	Yes	Lesser extent than the Project	No
Reduce Significant and Unavoidable Impacts?	--	n/a	n/a	n/a