CHAPTER 5
CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The EIR must also discuss (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, and (4) growth-inducing impacts of the proposed project. Chapter 2, Summary, and Sections 4.1 through 4.7 of this EIR provide a comprehensive identification and evaluation of the proposed project's environmental effects, mitigation measures, and the level of impact significance both before and after mitigation. This section addresses the other required topics identified above, as well as cumulative impacts and project alternatives.

5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

The State California Environmental Quality Act (CEQA) Guidelines require a description of any significant impacts, including those that can be mitigated but not reduced to a level of insignificance (section 15126.2(b)). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described. This EIR identified no significant unavoidable project impacts. Significant cumulative impacts were identified for traffic, water supply and schools, but the project's contribution is not cumulatively considerable, except for cumulative traffic impacts.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines require a discussion of significant irreversible environmental changes with project implementation, including uses of nonrenewable resources during the initial and continued phases of the project (section 15126.6(c)). The Guidelines indicate that use of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project. Section 15227 further requires this discussion only for adoption of a plan, policy or ordinance by a public agency; the adoption by a Local Agency Formation Commission (LAFCO) of a resolution making determinations; and projects which require preparation of an EIS under the National Environmental Policy Act (NEPA). Since the proposed project consists of amendments

to the Downtown Recovery Plan, General Plan and Local Coastal Plan, a discussion of significant irreversible changes is provided below.

As indicated, in section 15126.2(c):

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

According to section 15126.2(c), a project would generally result in a significant irreversible impact if:

- The project would involve a large commitment of nonrenewable resources during initial and continued phase of the project;
- Primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve uses in which irreversible damage could result from environmental accidents; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Future development accommodated by the proposed plan amendments could result in intensified development in the downtown on sites that are already utilized for urban development and are surrounded by urban development. Both the Downtown Plan and General Plan encourage a mix of land uses in this area. Thus, the proposed Plan would not commit future generations to uses that do not already exist.

Future development would result in the permanent and continued consumption of electricity, natural gas, and fossil fuels. Development accommodated by the proposed plan amendments would irretrievably commit nonrenewable resources to the construction and maintenance of buildings, infrastructure and roadways. Energy demands would result for construction, lighting, heating and cooling of residences, and transportation of people within, to and from the City. However, the consumption of these resources would not represent unnecessary, inefficient, or wasteful use of resources given the implementation of proposed policies that address water, lighting and energy conservation measures. Several policies in the General Plan 2030 promote energy conservation, which could minimize or incrementally reduce the consumption of these resources. Specifically, GOAL NRC7 seeks to reduce energy use with a significant production and

use of renewable energy. Its four policies and accompanying actions would promote reduction of electricity and natural gas consumption, use of renewable energy sources, and use of energy-efficient lighting, vehicles, and water fixtures and appliances. See Section 4.6 for further discussion.)

In addition, new structures will be required to be constructed in accordance with specifications contained in Title 24 of the California Code of Regulations, the City's Green Building Regulations and City regulations regarding water conservation. Anticipated changes in state building and energy efficiency requirements to help reduce greenhouse gas emissions will also reduce the rate of energy consumption increases. However, future construction activities would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment.

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with future development activities. However, environmental accidents would be minimized adherence to federal, state and local regulations. Future development accommodated by the proposed General Plan would be required to comply with all applicable federal, state and local laws regarding, transportation, storage, use and disposal of hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. Compliance with State and federal hazardous materials regulations would reduce the potential for accidental release of hazardous materials to a less-than-significant level.

No other irreversible changes are expected to result from the adoption and implementation of the proposed amendments.

5.3 GROWTH INDUCEMENT

CEQA requires that any growth-inducing aspect of a project be discussed in an EIR. This discussion should include consideration of ways in which the project could directly or indirectly foster economic or population growth in adjacent and/or surrounding areas. Projects which could remove obstacles to population growth (such as major public service expansion) must also be considered in this discussion. According to CEQA, it must not be assumed that growth in any area is necessarily beneficial, detrimental or of little significance to the environment.

The proposed project would result in a net increase of approximately 711 residential units and 2,200 square feet of office space as well as a net decrease of approximately 14,700 square feet of commercial building space over existing conditions within the study area. Thus, the project would directly foster population growth. The potential increase in office space would be offset by a potential reduction in commercial space, and thus, the project would not be expected to induce substantial economic growth.

The current City of Santa Cruz population is 64,632, and there are an estimated 23,635 housing units in the City. Census data for the tract that contains the downtown project shows an average household size of 1.83 (American Community Survey 5-year 2011-2015 Table S1101), which is slightly below the citywide average household size of 2.4 persons. Based on this data future development accommodated by the proposed plan amendments could result in a population increase of 1,301 to 1,706 persons based on household sizes of 1.83 and 2.4, respectively.

The Association of Monterey Bay Area Governments (AMBAG) develops population and housing forecasts for the region. The current forecast for the City of Santa Cruz in 2020 is 66,860 people and 26,890 housing units. With the additional housing units and population potentially resulting from the proposed project, the City of Santa Cruz will still be below these forecasts. Furthermore, it is expected that development pursuant to the proposed amendments will occur over a 25-year period. Therefore, population and housing growth due to the project is not substantial.

The project does not include offsite improvements or extension of water or sewer into undeveloped areas, and thus, the project site would not remove obstacles to development and population growth. Therefore, the project would not indirectly foster population or economic growth.

5.4 CUMULATIVE IMPACTS

State CEQA Requirements

The State CEQA Guidelines section 15130(a) requires that an EIR discuss cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." As defined in Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. As defined in section 15065(a)(3), "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," the lead agency need not consider the effect significant.

CEQA requires an evaluation of cumulative impacts when they are significant. When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. Furthermore, according to the California State CEQA Guidelines section 15130 (a)(1), there is no need to evaluate cumulative impacts to which the project does not contribute.

An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant when, for example, a project funds its fair share of a mitigation measure designed to alleviate the cumulative impact. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide detail as great as that provided for the impacts that are attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified project contributes.

CEQA section 21094(e)(1) states that if a lead agency determines that a cumulative effect has been adequately addressed in a prior environmental impact report, that cumulative effect is not required to be examined in a later EIR. The section further indicates that cumulative effects are adequately addressed if the cumulative effect has been mitigated or avoided as a result of the prior EIR and adopted findings or can be mitigated or avoided by site-specific revisions, imposition of conditions or other means in connection with the approval of the later project (subsection (e)(4)). If a cumulative impact was addressed adequately in a prior EIR for a general plan, and the project is consistent with that plan or action, then an EIR for such a project need not further analyze that cumulative impact, as provided in section 15183(j). Therefore, future projects that are determined to be consistent with the General Plan after it is adopted may rely on this analysis to streamline their environmental review. Since, the proposed project is not consistent with the adopted General Plan in that a General Plan amendment and rezoning are part of the project, the General Plan EIR analyses are not used.

Cumulative Analysis

Cumulative Growth and Projects

Discussion of cumulative impacts may consider either a list of past, present, and probable future projects producing cumulative impacts or a summary of growth projections contained in an adopted plan that evaluates conditions contributing to cumulative impacts, such as those contained in a General Plan. The Santa Cruz City Council adopted an updated General Plan in 2012 and certified the accompanying EIR. The analyses in the EIR provide an assessment of cumulative impacts within the City with projected growth in the next 20 years. The buildout estimated for the General Plan EIR assumed the following additional development in the downtown: 299 residential units, and approximately 38,900 and 4,500 square feet of commercial and office space, respectively. Most of this estimated development has occurred, is under construction or has approved permits. Table 5-1 identifies recently constructed, approved, and pending projects within the city of Santa Cruz. Projects within or near downtown are shown in bold typeface.

Table 5-1: City Cumulative Projects (As of May 31, 2017)

	Name/Address	Description	Status
Under Construction			
	2200 Delaware	395,400 sf industrial; 248 maximum residential units (197,100 sf)	1st phase complete
	912 Western Drive	3-lot minor land division	Under construction
	407 Broadway (Hyatt)	106-room hotel	Under construction
	150 Jewell	48 unit memory care facility	Under construction
	555 Pacific	**94 small ownership units (SOU's)/5,000 square feet of commercial space**	**Under construction**
	716-724 Seabright (Seabright Breakers)	11 Townhouses	Under construction
	710 Emeline	Demo. Single-family residence and construct triplex	Under construction
	716 Darwin	15 apartments	Under construction
	1804-1812 Ocean Street Extension	11 Townhouses	Under construction
	313-321-325 Riverside Ave. (Courtyard Marriott)	151-room hotel with meeting room, pool, exercise room - replace 3 existing motels (64 rooms and manager unit) for net increase in 87 rooms	Under construction
	618 Windsor	5 apartments	Under construction
	514 Frederick	4 townhome units	Under construction
	1314-1400 Ocean	8,400 sf commercial development	Under construction
	301 Beach	Add 5 rooms to an existing hotel	Under construction
	745 Ocean (Starbucks)	2,000 sf coffee shop	Under construction
	131 Bixby	Duplex	Under construction
Approved			
	1547 Pacific (Park Pacific)	**63 residential units and 5,750 square feet commercial**	**Approved**
	350 Ocean	63 apartments (with demolition of 20 existing apartments & 2 SFD) and 6,800 sf retail	Approved
	215 Beach (La Bahia)	165 Room Hotel	Approved
	430 South Branciforte	Lot split	Approved
	738 Pacheco	Three lot subdivision	Approved
	1800 Soquel	32 condominium units, 4,000 sq. ft. commercial space	Approved
	214 Plymouth	Three lot subdivision and construction of a duplex on each new lot.	Approved
	800 Soquel	Two units above 2,600 sq. ft. commercial space	Approved
	230 Grandview	Demolish SFR and construct 12 apartment units	Approved
	2415 Mission	14 apartment units	Approved
	413 Laurel	Convert office building to two residential units and one commercial space	Approved
	135 Vista Branciforte	Minor Land Division to create three lots from two	Approved
	108 Sycamore	10 room hotel	Approved
	630 Water	Add 20 SRO units to existing mixed use development	Approved
	716 Monterey	Lot split	Approved
	2424 Mission	Demolish 32 room hotel and construct 60 room hotel	Approved
	148 Sunnyside	Construct two units (demolish single family dwelling)	Approved
	225 Meder	Four townhouse units	Approved
	630 Water	Add 20 SRO units to existing mixed use development	Approved
Pending Applications			
	1930 Ocean Street Extension	40 condominium units	Pending application
	1013 Pacific	Demolish existing mixed-use building and construct 18	Pending application

Table 5-1: City Cumulative Projects (As of May 31, 2017)

Name/Address		Description	Status
		condos and 4,300 sq. ft. commercial space	
	232 River	**12 condominium units**	**Pending application**
	1024 Soquel	13 apartment units, 1,600 sq. ft. commercial space	Pending application
	515 Soquel	Demolish commercial building and construct 51 SRO units and two duplexes	Pending application
	708-720 Water	Demolish commercial buildings and residences and construct a 56-unit apartment complex	Pending application
	231 Surfside	Lot split	Pending application
	550 Second	60 room hotel	Pending application
	530 S. Branciforte	Four condominium units	Pending application
	2656 Mission	New industrial/warehouse building	Pending application
	769 N Branciforte	Three townhouse units	Pending application
	135 Dubois	Self-storage facility	Pending application
	335 Golf Club Drive	10-unit housing for developmentally disabled	Pending application
	724 Darwin	Two duplexes	Pending application
	515 Fair	Lot split, three condominiums, single family home, and ADU on historic site	Pending application
	1547 Pacific	Add 16 units to approved condominium building	Pending application
	801 River	Convert two story office building to triplex	Pending application

There are several projects that are being discussed within the City although there are no current permit applications or site plans:

- ❒ New Library and Public Parking Garage: 113; 119 Lincoln Street; (Cathcart/Cedar parking lot) that is being discussed that would result in relocation of the existing library with net increase of 14,000 square feet for library administration and increase in public parking spaces. The existing library (44,000 square feet) would be converted to office use.
- ❒ Calvary Church Residential Development: 524; 532; 538 Center Street and two City-owned parcels (Parking lot on Center Street) for which a 77-unit housing project is being discussed with retention of the existing church.
- ❒ Sports Stadium (Warriors): expansion is under consideration that would result in a net increase in Net increase of 1,100-1 600 seats from 2,400 existing to 3,500-4,000

These projects are considered reasonably foreseeable since they are under active discussion. Since the proposed project consists of plan amendments that could result in additional development over time, the General Plan EIR buildout assumptions is the scenario used for the following cumulative analyses. The cumulative scenario includes General Plan buildout and University of California Santa Cruz (UCSC) growth and development as addressed in the General Plan EIR plus the potential new development resulting from the proposed project plus the above three projects.

Cumulative Impact Analysis

Aesthetics. The geographic area for consideration of cumulative impacts would be the project study area from which project locations may be visible. There are no other cumulative projects that are within the same viewshed as the project site. Therefore, no cumulative aesthetics impacts have been identified.

Air Quality and Greenhouse House Emissions. The geographic area for consideration of cumulative impacts would be the North Central Coast Air Basin in which the project site is located. According to MBUAPCD CEQA Guidelines, "A consistency analysis and determination serve as the project's analysis of cumulative impacts on regional air quality. Project emissions which are not consistent with the AQMP (Air Quality Management Plan) are not accommodated in the AQMP and will have a significant cumulative impact unless offset." As discussed in Section 4.2 of this EIR, Air Quality and Greenhouse Gas Emissions, the project was found to be consistent with the AQMP based on use of the District's methodology. Therefore, the project's contribution to cumulative air emissions would not be cumulatively considerable. As further discussed in Section 4.2, GHG emissions and effects on global climate change extends beyond the local air basin and is a world-wide issue. Based on the analyses in that section, the project's contribution to global GHG emissions is not cumulatively considerable.

Biological Resources. The geographic area for consideration of cumulative impacts would be the project areas and areas adjacent to the San Lorenzo River. Since most of the development estimated as part of the General Plan EIR has occurred or is underway, and no projects are adjacent to the San Lorenzo River, no potential cumulative impacts to biological resources have been identified.

Cultural Resources. The geographic area for consideration of cumulative impacts would be the project site and areas supporting cultural resources similar to those found in the project area. This EIR considers all potential development in the downtown area. Additionally, impacts to cultural resources are site specific. There are no other areas where other cumulative projects and growth would overlap. Both the City's General Plan 2030 and the University's adopted 2005 LRDP and certified EIR include policies and measures to conduct appropriate review for cultural resources and provide site-specific mitigation as may be required. With implementation of measures required by the City and UCSC for review and mitigation of potential cultural resource impacts associated with new development, potential site-specific impacts would be less than significant. Thus, there would be no significant cumulative impacts related to cultural resources.

Geology and Soils. The geographic area for consideration of cumulative impacts would be the project site and areas within similar seismic or geologic hazard areas as the proposed project. All cumulative projects greater than four units in size would be subject to City requirements for preparation of geotechnical studies. Individual projects would be designed based on site-specific conditions. Therefore, no significant cumulative impacts have been identified regarding geology and soils.

Hydrology and Water Quality. The geographic area for consideration of cumulative impacts would be the project site and areas within the same drainage area in which the project site is located. There are no other cumulative projects that are within the same drainage area as the project site. Therefore, there are no known cumulative impacts related to hydrology and water quality.

Noise. The geographic area for consideration of cumulative impacts would be the project site and areas with similar exposure to noise levels as the project site. There are no other cumulative projects that would be exposed to noise levels similar to the proposed project, and the project would not contribute to cumulative noise impacts.

Public Services and Utilities. The geographic area for consideration of cumulative impacts would be the City of Santa Cruz service area in which the project site is located. All City services supplied to the project site include the entire City, except for water service, which also includes areas located outside the City.

Fire and Police Protection and Solid Waste. The City's Fire and Police Departments and the City's Resource Recovery Center (landfill) serve City residents. No significant cumulative impacts have been identified with buildout under the City's General Plan and other cumulative growth, i.e. UCSC growth, and no new or expanded police or solid waste facilities are needed to serve cumulative growth, including the proposed project.

Cumulative development and growth could result in the need for expanded fire facilities. According to the City's Fire Department, the existing downtown fire station is inadequate in terms of space and equipment to meet existing needs, which would be further impacted by development and growth that would be accommodated by the proposed project and other cumulative development. Should expansion be proposed, it is likely that expanded or new fire facilities would be within developed downtown and/or eastside locations. Expansion or new construction would be considered infill development on sites surrounded by development. However, existing and future growth may require new or physically altered fire protection facilities, but locations for expansion or construction are within developed areas and are not expected to result in significant physical impacts. Therefore, no significant cumulative impact related to fire protection services is anticipated.

Schools. Potential cumulative development that could affect school enrollment includes development and growth within the City and surrounding areas as well as the proposed project. As discussed in Section 4.6 of this EIR, Public Services and Utilities, approximately 80 new students would be generated by future development projects accommodated by the proposed project. The City's General Plan EIR reported a cumulative enrollment estimate of approximately 1,765 students over the next 20 years with cumulative growth in the City and as a result of growth at UCSC, and some schools may exceed capacity depending on the timing of growth. The General Plan 2030 EIR concluded that this is a potentially significant cumulative impact. With

required payment of school impact fees to fund necessary facility expansion and/or additions, in conjunction with use of the former Natural Bridges Elementary School, the impact would be mitigated to a less-than-significant level (City of Santa Cruz, April 2012, DEIR volume).

Potential addition or expansion of school classroom facilities is not expected to result in significant physical impacts due to the location of existing facilities within developed footprints, and future enrollment could accommodated without construction of new schools, although some expansion of existing facilities may be necessary (Ibid.). It is not known which campuses may need to be expanded in the future to accommodate the additional enrollment. The project's incremental contribution to this impact (approximately 80 students) is not cumulatively considerable as the required payment of school impact fees would mitigate the project's cumulative contribution such that it would no longer be considered cumulatively considerable.

Parks and Recreation. The General Plan 2030 EIR concluded that cumulative population growth accommodated by the proposed General Plan and UCSC would not result in significant cumulative impacts to parks as increased use of existing parks is expected to be spread out throughout the City so that no substantial deterioration would occur at any one facility. Cumulative impacts resulting from citywide development growth, including the proposed project and UCSC growth, would not result in a significant impact to parks such that a substantial deterioration would occur at any one facility. Furthermore, the City imposes a "Parks and Recreation Facilities Tax" (pursuant to Chapter 5.72 of the Municipal Code) on new residential development (including mobile homes) within the City, payable at the time of issuance of a building permit. The collected taxes collected are placed into a special fund, and "shall be used and expended solely for the acquisition, improvement and expansion of public park, playground and recreational facilities in the city" (section 5.72.100). Projects that have dedicated land or fees in accordance with Municipal Code Chapter 23.28 requirements for subdivisions are exempt from this tax.

Wastewater Treatment. The geographical area for the analysis of cumulative wastewater impacts includes the area served by the City's wastewater treatment facility (WWTF), which includes the City of Santa Cruz and lands within the Santa Cruz Sanitation District (south to Seascape) and two small county service areas. The City and County each have specified rights to treatment capacity. Wastewater generated by cumulative growth within the City is estimated at approximately 1.35 mgd (City of Santa Cruz, April 2012, DEIR volume). There is adequate remaining capacity within the City's treatment allocation (4.0 mgd remaining) to accommodate cumulative growth with the proposed project. There is adequate capacity to serve cumulative growth within the Santa Cruz County Sanitation District service area (Ibid.). Thus, cumulative impacts on wastewater treatment would be less than significant.

Water Supply. The geographical area for the analysis of cumulative water supply impacts includes the area served by the City's Water Department. Background on the existing and projected future demand and supplies is provided in Section 4.6, Water Supply – Service. As indicated, the 2015 UWMP predicts water supply shortfalls by the year 2035 of 40 approximately

MGY in normal rainfall years, 528 MGY during a single dry year, and 1,639 MGY in multiple dry year periods even though demand is forecast to decrease. Without augmented water supplies, cumulative future water demand during dry periods is considered a potentially significant cumulative impact on water supplies.

As discussed in Section 4.8, the City continues to administer its water conservation program, has completed a Conservation Master Plan, and is implementing a water augmentation plan. The City is has defined water supply augmentation strategies that are being studied in order to provide reliable production during drought shortages between 2020 and 2035 to address potential drought shortages. The plan includes the pursuit of the following portfolio of options: continued and enhanced conservation programs; passive recharge of regional aquifers; active recharge of regional aquifers; and a potable supply using advanced treated recycled wastewater or desalinated water (if recycled water did not meet City needs). A water transfer pilot program is underway for the passive recharge strategy. Supply volumes for the other augmentation elements have not yet been defined, and specific projects have not been selected or constructed, as these prospective sources are still under evaluation. Thus, the long-term provision of augmented water supplies is under development, but uncertain.

The proposed project would result in a net increase in water demand of approximately 29.0 MGY, which is not considered substantial in relation to the estimated future demand in the City's water service area of approximately 3,200 MGY. The project would be subject to City requirements for installation of water conserving fixtures and landscaping in accordance with City Municipal Code and building requirements. Under drought conditions, the project, like other City customers, would be required to curtail water use by varying amounts, depending on the severity of the drought and the level of curtailment set in place by the City. In addition, the project will pay the required "System Development Charge" for the required new service connection. This charge as set forth in Chapter 16.14 of the City's Municipal Code is intended to mitigate the water supply impacts caused by new development in the City of Santa Cruz water service area, and the funds are used for construction of public water system improvements t and conservation programs.

The increase in water demand due to the proposed project would not substantially exacerbate water supply reliability in the future or during a drought because the amount of additional demand when spread across all service area customers would not result in any noticeable increase in the curtailment in customer use that would otherwise be implemented during drought conditions. Additionally, the project payment of the System Development Charge and implementation of other water conservation measures would mitigate the project's contribution to cumulative water supply impacts. Therefore, the project's incremental contribution to a significant cumulative water supply impact would not be cumulatively considerable.

Traffic and Transportation. The geographic area for consideration of cumulative impacts would be those areas of the street network to which the project would contribute trips. Cumulative traffic impacts were analyzed in the *General Plan 2030* EIR based on estimated buildout

accommodated by the General Plan, a number of approved and reasonably foreseeable projects, and long-range growth anticipated for UCSC.

Cumulative traffic volumes were obtained from the City of Santa Cruz 2030 General Plan traffic model for this analysis, which included UCSC development, and was modified to account for a growth factor of 5 percent, which would cover the three projects being discussed that were not included in the General Plan buildout (see page 5-7). Improvements included in the City of Santa Cruz Traffic Impact Fee (TIF) program were assumed to be in place for the cumulative analysis. Weekday PM peak cumulative trips, including the proposed project, are shown on Figure 5-1 at the end of this section.

Cumulative intersection levels of service are summarized on Table 5-2. The following six intersections would operate at an unacceptable level of service under cumulative conditions:

- ❒ Front Street/Laurel Street,
- ❒ Pacific Avenue/Laurel Street,
- ❒ Front Street/Soquel Avenue,
- ❒ Ocean Street/Water Street,
- ❒ Highway 1/Highway 9, and
- ❒ Chestnut Street/Mission Street.

Improvements are planned as part of the City's TIF program at three intersections: Ocean Street/Water Street, Highway 1/ Highway 9, and Chestnut Street/Mission Street, but would not improve operations to an acceptable LOS, although delays may be reduced. The other three impacted intersections are not included in the City's Traffic Impact Fee program as significant cumulative impacts were not identified as part of the General Plan 2030 EIR analysis Cumulative traffic along state highways would contribute to existing and future unacceptable levels of service.

Review by the City's traffic consultant indicates that the other three intersections can be improved to an acceptable level. The Pacific/Laurel intersection LOS can be improved to D with the addition of a southbound left-turn lane, which would require shortening the median. The Front/Laurel intersection LOS can be improved to D with the addition of a westbound lane and right-turn overlap for the north and south right turns. The Front/Soquel intersection LOS can be improved to D with the modification of the signal phasing and separation of the combined westbound through/left turn lane.

The proposed project will contribute to significant cumulative traffic impacts at six locations in the project vicinity and along state highways. Future development projects within the area of the proposed plan amendments will be required to pay the City's traffic impact fee. However, payment of the traffic impact fee and the associated improvements would not mitigate impacts to a less-than-significant level at three intersections: Ocean Street/Water Street, Highway 1/ Highway 9, and Chestnut Street/Mission Street.

TABLE 5-2: Intersection Weekday Cumulative PM Peak Hour Levels of Service with Project

#	Intersection	Control Type	LOS Threshold[1]	Cumulative Plus Project Conditions[2]		
				PM Peak Hour		
				Movement	Delay[3]	LOS
1	Front Street / Laurel Street	Signal	D	**Overall**	**100.2**	**F**
2	Pacific Avenue / Laurel Street	Signal	D	**Overall**	**105.9**	**F**
3	Front Street / Cathcart Street	Signal	D	Overall	23.5	C
4	Front Street / Metro Station Driveway	Signal	D	Overall	6.4	A
5	Pacific Avenue / Metro Station Driveway	SSSC	D	Overall	1.7	A
		Worst Approach	D	WB	10.5	B
6	Pacific Avenue / Maple Street	AWSC	D	Overall	7.7	A
7	Pacific Avenue / Front Street / Mission-Water Street	Signal	D	Overall	32.3	C
8	Front Street / Soquel Avenue	Signal	D	**Overall**	**59.9**	**E**
9	Pacific Avenue / Cathcart Street	AWSC	D	Overall	8.3	A
10	Soquel Avenue / Pacific Avenue	SSSC	D	Overall	4.3	A
		Worst Approach	D	WB	9.5	A
11	Ocean Street / Water Street	Signal	D	**Overall**	**228.1**	**F**
12	Highway 1 / Highway 9	Signal	C-D	**Overall**	**269.2**	**F**
13	Chestnut Street / Mission Street / Highway 1	Signal	C-D	**Overall**	**344.0**	**F**

Source: Kimley-Horn, May 2017.

Notes:

1. The City of Santa Cruz has established LOS D as the minimum acceptable LOS for overall intersection operations during the AM and PM peak hours. However, under the existing General Plan, the City accepts a lower LOS (F) at some major regional intersections per existing Circulation Policy 5.1.2.
2. Analysis performed using HCM 2010 methodologies, except for Intersection 7 where HCM 2000 methodology was applied as explained above.
3. Delay is shown in seconds/vehicle.
4. Intersections that fall below the LOS threshold are shown in **bold**.

Intersection operations could be improved at the other three impacted intersections that the project would contribute cumulative trips. However, these improvements are not included in the TIF program as significant cumulative impacts were not identified in the General Plan 2030 EIR at

these locations. Thus, the proposed project's contribution at these three intersections would be considered cumulatively considerable due to resulting unacceptable LOS with addition of project trips. The following mitigation requires future development to contribute fair share contributions to fund the identified improvements at the following intersections: Front/Soquel, Front/Laurel and Front/Pacific.

MITIGATION 5-1: Require future development projects within the downtown area to contribute fair-share payments for improvements at the following intersections: Front/Soquel (signal timing and lane modifications); Front/Laurel (westbound lane addition and north and south right-turn overlap), and Pacific/Laurel (southbound left-turn lane addition).

With implementation of Mitigation 5-1, significant cumulative impacts at three intersections would be mitigated, and the project's contribution would not be cumulatively considerable. Future development projects in the downtown area would be required to pay the City's traffic impact fees for improvements at the other three intersections, but planned improvements would not result in acceptable levels of service, and no other feasible improvements have been identified. Therefore, cumulative traffic impacts remain significant at three City intersections and along state highways this is a significant cumulative impact, and the project's contribution to cumulative traffic impacts would be cumulatively considerable at these locations.

5.5 PROJECT ALTERNATIVES

According to State CEQA Guidelines (section 15126.6), 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. The guidelines further require that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project, or reducing them to a level of insignificance even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternatives analysis also should identify any significant effects that may result from a given alternative. 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 potentially feasible project alternatives for examination, and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the

project. Of those alternatives, the EIR need examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Alternatives in an EIR must be "potentially feasible." Agency decision makers ultimately decide what is "actually feasible."

"Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines, section 15364). 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 already owns the alternative site). None of these factors establishes a fixed limit on the scope of reasonable alternatives. The concept of feasibility also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. Moreover, feasibility under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Summary of Significant Impacts and Project Objectives

Significant Project Impacts

The following potentially significant impacts have been identified, all of which can be mitigated to a less-than-significant level, except for cumulative traffic, which would remain significant and unavoidable.

- **Biological Resources** - Impact 4.3-2: Indirect Impacts to Sensitive Riparian Habitat.
  Future development of taller buildings as a result of the proposed Downtown Plan amendments could result in indirect impacts to birds in the area that could lead to bird mortalities.

- **Biological Resources** - Impact 4.3-3: Indirect Impacts to Nesting Birds.
  Future development as a result of the proposed Downtown Plan amendments could result in disturbance to nesting birds if any are present in the vicinity of construction sites along the San Lorenzo River.

- **Public Services** - Impact 4.6-1c: Schools.
  Adoption of the proposed plan amendments could indirectly result in increased population associated with potential development that would generate elementary school student enrollments that could exceed capacity of existing schools.

- ❒ **Public Services** - Impact 4.6-2: Parks and Recreation.
  Adoption of the proposed plan amendments could indirectly result in increased population associated with potential development that could be accommodated by the Plan that would result in increased demand for parks and recreational facilities that could result in some deterioration of existing parks and recreational facilities.

- ❒ **Noise** - Noise-1: Exposure to Noise.
  Future development in the project area would be exposed to exterior and / or interior noise levels that exceed local and state requirements. However, the project area is not within locations that would expose people to noise in excess of established standards.

- ❒ **Cumulative Traffic Impacts.**
  The proposed project will contribute to significant cumulative traffic impacts at six locations.

Summary of Project Objectives

1. Support the following First Principles of the Downtown Plan:
   - *Form and Character.* New buildings should be allowed to develop individual character while retaining qualities of the historic townscape. Issues of articulation, materials, signage, setbacks, scale, massing, form, bulk, solar access and height are critical.
   - *Housing.* Significant new housing opportunities should be targeted throughout the downtown, including Pacific Avenue, the San Lorenzo riverfront, and South of Laurel. Housing should be comprised of a mix of apartments and condominiums. SRO housing should be replaced and dispersed throughout the downtown area.
   - *Accessibility.* A downtown that aesthetically integrates access as a primary design criterion for all improvements to ensure increased opportunities for the public to participate in commercial, governmental, residential, social and cultural activities.
   - *Open Space and Streetscape.* A strong network of public and private open spaces (streets, sidewalks, public parks, plazas, passageways and courtyards) that creates a socially active and pedestrian-oriented downtown core should be emphasized.
   - *Circulation.* Downtown should be predominantly pedestrian in nature; movement should be carefully structured to reinforce the character of the place. Pedestrian, bicycle, and transit access to the downtown should be enhanced.
   - *Parking.* Parking in the downtown core should continue to be provided by the Parking District in a centralized fashion, to maximize shared use and minimize the quantity of stored vehicles.
2. Increase opportunities for all types of housing in downtown.

3. Encourage and incentivize maximum public access to the San Lorenzo River.
4. Achieve superior connections to the San Lorenzo River above the existing DRP and existing SLURP policies consistent with Section 30211 of the Coastal Act.
5. Ensure that development adjacent to the Riverwalk will be designed to prevent impacts to the adjacent sensitive San Lorenzo River and will incentivize clean-up of degraded areas along the levee.
6. Enhance opportunities to view and interact with the San Lorenzo River as a coastal resource.
7. Create development standards that will incentivize development of key east-west public passageways between Pacific Avenue and the Riverwalk.

Alternatives Considered

Section 15126.6(c) of State CEQA Guidelines indicates that the range of potential alternatives 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 also should identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts. The City considered other locations for additional height zones in the downtown area, but none were identified. The Additional Height Zone A already exists along Pacific Avenue north of Cathcart.

Based on the above discussion, the following section evaluates the following alternatives:

- ❒ No Project – Required by CEQA
- ❒ Alternative 1 – Reduced Height for Expanded Additional Height Zone A to 75 feet and Elimination of Additional Height Zone B
- ❒ Alternative 2 – Reduced Height for Additional Height Zone A to 75 feet along Pacific/Front and Reduced Height for Additional Height Zone B to 60 feet along the San Lorenzo River with Development Standard Modifications: eliminate encroachment over property line and require 10-foot setback above 50 feet

Each alternative is described and analyzed below, and the ability to meet project objectives is addressed. Table 5-3 summarizes key components of the alternatives.

Table 5-3: Summary of Alternatives

	Proposed Project	No Project	Alternative 1	Alternative 2
Project Size-Net Change Over Existing Conditions				
▪ Residential Units	711	437	437	645
▪ Commercial Square Footage	(-14,695 sf)	(-23,990 sf)	(-14,695 sf)	(-14,695 sf)
▪ Office Square	2,190 sf	(-5,205 sf)	2,190 sf	2,190 sf
Impacts				
▪ Daily Trips	2,627	1,075	1,339	2,275
▪ Peak Hour Trips	293	119	132	214
▪ Annual Water Demand (MGY)	29	16.6	17.4	26.1

No Project Alternative

Section 15126.6(e) of the State CEQA Guidelines requires that the impacts of a "no project" alternative be evaluated in comparison to the proposed project. Section 15126(e) also requires that the No Project Alternative discuss the existing conditions that were in effect at the time the Notice of Preparation was 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 consistent with available infrastructure and community services.

Project Description. Under the No Project Alternative, none of the proposed DRP, General Plan, LCP or Municipal Code amendments would be implemented. Additional Height zones would not be extended along Pacific Avenue, Front Street or the San Lorenzo River. However, redevelopment could occur under the existing General Plan and Downtown Recovery Plan without the amendments. Under the No Project Alternative, none of the project impacts identified in this EIR would occur. However, since redevelopment of the downtown area could occur without the amendments, some level of development would be reasonably expected to occur over the next 25 years.

City Planning Department staff developed an estimate of potential buildout without the proposed amendments to identify potential development under the existing DRP. The affected area was divided into three segments as shown on Figure 3-6 in section 3, Project Description City staff identified broad development assumptions for these areas, which are included in Appendix D. Table 5-4 summarizes potential development under existing plans without the proposed project. City staff estimates indicate that development under existing plans could result in a net increase of approximately 437 residential units and a net decrease of approximately 23,990 square feet of commercial and 5,100 square feet of office space over existing conditions. Development under existing plans without the proposed amendment could result in approximately 274 fewer residential units than the proposed project and a greater decrease in commercial and office square footage than the proposed project.

TABLE 5-4: Potential Development/Buildout Assumptions With Existing General Plan and Downtown Recovery Plan

	Area X Riverfront	Area Y E. Pacific/W. Front Pacific Station	Area Z W. Pacific	Totals	Change from Existing Conditions (Includes demolition and reconstruction)
Baseline/Existing Conditions					
Property Area	146,000 sf (3.35 acres)	222,200 sf (5.10 acres)	148,800 sf (3.42 acres)	517,000 sf (11.87 acres)	N/A
Commercial	62,000 sf	74,864 sf	182,836 sf	**319,700 sf**	N/A
Office	N/A	56,105 sf	65,761 sf	**121,866 sf**	N/A
Residential	N/A	113 units	56 units	**169 units**	N /A
Parking	164 spaces	186 spaces	97 spaces	**447 spaces**	N /A
2030 General Plan – No Amendments (Units are totals, reflecting both demolition and reconstruction)					
Commercial	65,875 sf	47,000 sf	182,836 sf	**295,711 sf**	-23,989
Office	11,000 sf	40,000 sf	65,761 sf	**116,761 sf**	-5,105
Residential	190 units	360 units	56 units	**606 units**	+437
Parking	265 spaces	1,610 spaces	97 spaces	**1,972 spaces**	+1,525

SOURCE: City of Santa Cruz Planning and Community Development

Impacts. Since redevelopment of downtown properties could occur under existing conditions without the proposed plan amendments, some of the impacts identified in this EIR could result at some unknown time in the future and at an unknown magnitude depending on the proposal as discussed in the following section.

- ***Aesthetics:*** Under this alternative, the Additional Height Zones would not be extended along Pacific and Front Streets or along the San Lorenzo River. The existing base height would remain at 50 feet. Under the existing DRP, all buildings must conform to the 50-foot base height requirements. Along Pacific Avenue, the second story must be at least 50 percent of the first floor area and located toward the street frontage. Uninhabitable mechanical penthouses are permitted to a maximum height of 55 feet, provided that such penthouses are set back a minimum of 25 feet from any exposed face of the buildings and are out of the pedestrian's view. Sloping roofs also are permitted up to a maximum height of 55 feet, provided that they do not penetrate a 42 degree angle measured back from the 50-foot Base Height eaves line.

  The existing Additional Height Zone B would remain in effect under the No Project Alternative, which affects approximately 10 properties south of Cathcart Street. The additional building height limit for these properties, if they meet the eligibility criteria, is 60 feet. Uninhabitable mechanical penthouses are be permitted to project 5 feet above the approved additional height of building, provided that such penthouses are set back a

minimum of 25 feet from any exposed face of the building and are out of the pedestrian's view.

Under the No Project alternative, additional heights of 20 to 35 feet above the 50-foot base height limit would be eliminated. Figures 4.1-3A through 4.1-3C in Section 4.1, Aesthetics, show the base height limit under existing plans as well as with the potential additional heights with the proposed plan amendments as seen from the San Lorenzo River, Pacific Avenue and Front Street, respectively. The diagrams do not represent actual projects or architecture, but show potential building mass depicted, which may or may not occur. The diagrams do not show any architectural designs that typically would be employed to break up building mass.

The less-than-significant impacts on the visual character of the surrounding area would be reduced with elimination of the expanded Additional Height Zones. Future development would be allowed to construct buildings to the 50-foot base height limit, similar to existing downtown building heights north of Cathcart Street. Required street tree plantings, if similar to those along Pacific, would substantially screen upper levels from many pedestrian-level views. Since development would be consistent with development in the downtown area north of Cathcart, there would be no substantial change or degradation to visual character of the project area. Thus, eliminating the incremental height increase of 20 to 35 feet above the 50-foot base height with the No Project alternative would eliminate less-than-significant aesthetic impacts when compared to the Project.

- ***Air Quality and Greenhouse Gas Emissions:*** This alternative would result in potentially less future development than the proposed project with an accompanying reduction in vehicle trips, energy use and water use. Thus, this alternative would result in a reduced level of air emissions than the less-than-significant impact identified for the proposed project.
- ***Biological Resources:*** Under this alternative additional building heights of 20 to 35 feet above the 50-foot base height limit would be eliminated. While any new development would be taller than existing development in the study area, impacts related to shading would be reduced with minor shading impacts occurring only for a limited duration during the winter, which were not found to result in significant impacts to aquatic habitat or species. Potential indirect impacts to birds in the area would be reduced with the lower heights along the San Lorenzo River Riverwalk, but not eliminated, as potential concerns regarding reflective glass and lighting would also be a concern under the No Project Alternative. Similarly, potential construction-related disturbance to nesting birds could also occur under this alternative. Mitigation for both these impacts would be required as with the proposed project.
- ***Cultural Resources:*** Under this alternative, the potential for increased building heights would be eliminated, but future development could occur within the same overall development area as the proposed project. Since the overall development footprint

would not change, potential impacts to cultural resources (archaeological, tribal cultural, historical, or paleontological) would remain unchanged.

- ***Hydrology and Water Quality:*** Under this alternative, the potential for increased building heights would be eliminated, but future development could occur within the same overall development area as the proposed project. Potential impacts related to hydrology and water quality would remain unchanged.
- ***Public Services:*** Potential future development under the No Project alternative would result in 274 fewer residential units than the proposed project with a net decrease in commercial and office space. As a result, residential and employee population would be reduced with an accompanying reduction in demand for public services. Significant impacts related to schools and park and recreational facilities would be reduced but not eliminated. Other identified less-than-significant fire protection, police protection, and solid waste disposal impacts also would be reduced.
- ***Traffic and Transportation:*** Under this alternative, the potential for increased building heights would be eliminated, which would result in decreased potential development intensity. Thus, this alternative would result in reduced daily and peak hour trips as summarized on Table 5-4. Daily and peak hour trips would be reduced by approximately 60%. The less-than-significant impacts identified for the proposed project would be further reduced with the No Project alternative.
- ***Water Supply and Wastewater Utilities:*** Under this alternative, the potential for increased building heights would be eliminated, which would result in decreased potential development intensity. Potential future development under the No Project Alternative with existing General Plan and DRP provisions could lead to an increase in water demand of approximately 16.6 MGY based on water demand rates for multi-family homes identified in the City's adopted 2015 Urban Water Management Plan and commercial and office demand rates in the General Plan 2030 EIR. This alternative would reduce estimated project water use by more than half of the estimated project demand. Wastewater generation would also be substantially reduced, although no significant impacts were identified for either of these utilities.
- ***Noise:*** This alternative would result in fewer residential units potentially constructed in the downtown area. However, given the location portions of the study area adjacent to streets with future predicted higher noise levels, there would still be exposure of future residential units to roadway noise. The mitigation requiring an acoustical study to determine building design and materials still would still be needed.
- ***Cumulative Traffic Impacts:*** This alternative would result peak hour trips by approximately 60% of what is estimated with the proposed project. Significant cumulative traffic impacts would be reduced, but not to a less-than-significant level at three intersections that cannot be improved to acceptable levels (Highway 1/Highway 9, Mission/Chestnut, and Ocean/Water).
- ***Other Impacts:*** No new impacts have been identified with this alternative.

Ability to Meet Project Objectives. The No Project Alternative would meet three project objectives. With no proposed plan changes, the existing DRP would continue to support the First Principles of the plan (#1), and housing opportunities would continue to be encouraged (#2). Any development would need to meet existing DRP development standards for sensitive siting and design next to the river (#5). The No Project alternative would not include the incentives to create two new linkages to the San Lorenzo River and Riverwalk through extensions of Elm and Maple Streets, and would not fully meet the project objectives to increase public access. (#3, 4, 6, 7).

Alternative 1 - Reduced Height for Expanded Additional Height Zone A and Elimination of Additional Height Zone B

Project Description. This alternative includes expansion of Additional Height Zone A as with the proposed project, but the maximum height for the Additional Height Zone A would be limited to 75 feet with elimination of the 85 maximum height limit along the east side of Pacific Avenue and the west side of Front Street. This would result in an additional height limit that is consistent with existing limits for this zone as applied to Pacific Avenue north of Cathcart Street. Additionally, the proposed Additional Height Zone B would be eliminated so no additional height above the existing 50-foot base height would be permitted on the east side of Front Street and along the River.

Based on City Planning Department staff review, the maximum height limit change from 85 to 75 feet would affect the size of individual residential units, potentially eliminating a mezzanine feature, but the overall number of units and non-residential square footage would not change from the proposed project. Due to Building Code requirements, the increased height from 75 to 85 feet would allow for a mezzanine feature but would not allow for an additional building floor without changing the construction type to meet high-rise building standards. The elimination of the proposed Additional Height Zone B area would result in the same potential development as allowed under the existing DRP without the proposed plan amendments for the Front Street/Riverfront area. The commercial and office square footage estimated for the lower floors would not change from the proposed project in any location. Potential development under this alternative could result in a net increase of approximately 437 residential units, a net increase of approximately 2,190 square feet of office use, and a net decrease of approximately 14,690 square feet of commercial building space over existing conditions.

Impacts. Potential impacts of this Alternative are discussed in the following section.

- ❒ ***Aesthetics:*** Under this alternative, the Additional Height Zone A would be limited to 75 feet, resulting in a reduction of maximum building height from 85 to 75 feet along the east side of Pacific Avenue and the west side of Front Street. There would be no increase in additional building heights over the existing 50-foot base height along the east side of Front Street and along the San Lorenzo River Riverwalk.

Future development would be required to construct buildings to the 50-foot base height limit with a maximum floor area percentage above the 50-foot base height in Additional Height Zone A. Buildings developed to the existing base height limits would be similar to existing downtown building heights north of Cathcart Street. Required street tree plantings, if similar to those along Pacific, would substantially screen upper levels from many pedestrian-level views. Potential development along Pacific would be taller than existing development along Pacific south of Cathcart (except for the existing building at 1010 Pacific) and may be considered out of character with some existing buildings. However, development along Pacific and Front and adjacent to the San Lorenzo River would be consistent with development in the downtown area north of Cathcart and would not result in a significant degradation of the visual character of the surrounding area. Thus, Alternative 1 would reduce less-than-significant impacts on aesthetics compared to the proposed project.

- ***Air Quality and Greenhouse Gas Emissions:*** This alternative would result in potentially less future development than the proposed project with an accompanying reduction in vehicle trips, energy use and water use. Thus, this alternative would result in a reduced level of air emissions than the less-than-significant impact identified for the project.
- ***Biological Resources:*** Under this alternative additional building heights above the 50-foot base height limit along the San Lorenzo River would be eliminated. While any new redevelopment could be taller than existing development on the east side of Front Street, impacts related to shading would be reduced with minor shading effects occurring during winter, which were not found to result in significant impacts to aquatic habitat or species. Potential indirect impacts to birds in the area would be reduced with the lower heights, but not eliminated, as potential concerns regarding reflective glass and lighting would also be a concern under the No Project Alternative. Similarly, potential construction-related disturbance to nesting birds could also occur under this alternative. Mitigation for both these impacts would be required as with the proposed project.
- ***Cultural Resources:*** Under this alternative, the potential for increased building heights would be eliminated, but future development could occur within the same overall development area as the proposed project. Since the overall development footprint would not change, potential impacts to cultural resources (archaeological, tribal cultural, historical, or paleontological) would remain unchanged.
- ***Hydrology and Water Quality:*** Under this alternative, the potential for increased building heights would be eliminated, but future development could occur within the same overall development area as the proposed project. Potential impacts related to hydrology and water quality would remain unchanged.
- ***Public Services:*** Potential future development under the this alternative would result in 274 fewer residential units than the proposed project with a net increase in office space and a net decrease in commercial space the same as the project. As a result, residential population would be reduced with an accompanying reduction in demand for public

services. Significant impacts related to schools and park and recreational facilities would be reduced but not eliminated. Other identified less-than-significant fire protection, police protection, and solid waste disposal impacts also would be reduced.

- ***Traffic and Transportation:*** Under this alternative, the potential for increased building heights adjacent to the San Lorenzo River would be eliminated, which would result in decreased potential development intensity. Thus, this alternative would result in reduced daily and peak hour trips as summarized on Table 5-4. Daily and peak hour trips would be reduced by approximately 50%. The less-than-significant impacts identified for the proposed project would be further reduced with the No Project alternative.
- ***Water Supply and Wastewater Utilities:*** Under this alternative, the potential for increased building heights would be eliminated, which would result in decreased potential development intensity. Potential future development under the No Project Alternative with existing General Plan and DRP provisions could lead to an increase in water demand of approximately 17.4 MGY based on water demand rates for multi-family homes identified in the City's adopted 2015 Urban Water Management Plan and commercial and office demand rates in the General Plan 2030 EIR. This alternative would reduce estimated project water use by more than half of the proposed project demand. Wastewater generation would also be substantially reduced, although no significant impacts were identified for either of these utilities.
- ***Noise:*** This alternative would result in fewer residential units potentially constructed in the downtown area. However, given the location portions of the study area adjacent to streets with future predicted higher noise levels, there would still be exposure of future residential units to roadway noise. The mitigation requiring an acoustical study to determine building design and materials still would still be needed.
- ***Cumulative Traffic Impacts:*** This alternative would result peak hour trips by approximately 50% of what is estimated with the proposed project. Significant cumulative traffic impacts would be reduced, but not to a less-than-significant level at three intersections that cannot be improved acceptable levels (Highway 1/Highway 9, Mission/Chestnut, and Ocean/Water).
- ***Other Impacts:*** No new impacts have been identified with this alternative.

Ability to Meet Project Objectives. Alternative 1 would meet three project objectives. With no proposed plan changes, the existing DRP would continue to support the First Principles of the plan (#1), and housing opportunities would continue to be encouraged, although with reduced opportunities (#2). Any development would need to meet existing DRP development standards for sensitive siting and design next to the river (#5). This alternative would include the incentives to create two new linkages to the San Lorenzo River and Riverwalk through extensions of Elm and Maple Streets, although incentives may be limited with elimination of additional building heights. Thus, this alternative would partially meet the project objectives to increase public access. (#3, 4, 6, 7).

Alternative 2 - Reduced Height for Expanded Additional Height Zones A and B

Project Description. Under this alternative, the proposed expansion of the Additional Height Zones would be modified. The Alternative includes expansion of Additional Height Zone A as with the proposed project, but the maximum height for the Additional Height Zone A would be limited to 75 feet with elimination of the 85 maximum height limit along the east side of Pacific Avenue and the west side of Front Street. This would result in an additional height limit that is consistent with existing limits for this zone as applied to Pacific Avenue north of Cathcart Street. Additionally, the maximum building heights in the Additional Height Zone B would along the east side of Front Street and adjacent to the San Lorenzo River would be reduced from 70 to 60 feet. The proposed Development Standards would be modified under this alternative to eliminate encroachment over property line and to require a 10-foot setback for buildings above 50 feet.

Based on City Planning Department staff review, the maximum height limit change from 85 to 75 feet would affect the size of individual residential units, potentially eliminating a mezzanine feature, but the overall number of units and non-residential square footage would not change from the proposed project. Due to Building Code requirements, the increased height from 75 to 85 feet would allow for a mezzanine feature but would not allow for an additional building floor, without changing the construction type to meet high-rise building standards. However, reduction of maximum height from 70 to 60 feet in the Additional Height Zone B would in elimination of a top floor, resulting in a reduction of housing units from the proposed project. The commercial and office square footage estimated for the lower floors would not change from the proposed project. As a result, potential development under this alternative could result in a net increase of approximately 645 residential units, a net increase of approximately 2,190 square feet of office use, and a net decrease of approximately 14,690 square feet of commercial building space over existing conditions.

Impacts. Potential impacts of this Alternative are discussed in the following section.

Impacts. Potential impacts of this Alternative are discussed in the following section.

- ❒ ***Aesthetics:*** Under this alternative, there would be a 10-foot reduction in maximum building heights in both Additional Height Zone A and B. Potential development along Front Street adjacent to the San Lorenzo River and along Pacific Avenue would be taller than existing development along Pacific Avenue and Front Street south of Cathcart (except for the existing building at 1010 Pacific) and may be considered out of character with some existing buildings. However, potential future development would be consistent with the Additional Height Zone permitted north of Cathcart, and thus, would not result in a significant degradation of the visual character of the surrounding area. Thus, the Alternative 2 would slightly reduce less-than-significant impacts on aesthetics.
- ❒ ***Air Quality and Greenhouse Gas Emissions:*** This alternative would result in potentially less future development than the proposed project with an accompanying reduction in

vehicle trips, energy use and water use. Thus, this alternative would result in a reduced level of air emissions than the less-than-significant impact identified for the project.

- ***Biological Resources:*** Under this alternative, additional maximum building heights along the San Lorenzo River would be reduced by 10 feet. While any new development would be taller than existing development in the study area, impacts related to shading would be slightly reduced with minor shading effects during winter, which were not found to result in significant impacts to aquatic habitat or species. Potential indirect impacts to birds in the area would be reduced with the lower heights, but not eliminated, as potential concerns regarding reflective glass and lighting would also be a concern under the No Project Alternative. Similarly, potential construction-related disturbance to nesting birds could also occur under this alternative. Mitigation for both these impacts would be required as with the proposed project.
- ***Cultural Resources:*** Under this alternative, the potential for increased building heights would be eliminated, but future development could occur within the same overall development area as the proposed project. Since the overall development footprint would not change, potential impacts to cultural resources (archaeological, tribal cultural, historical, or paleontological) would remain unchanged.
- ***Hydrology and Water Quality:*** Under this alternative, the potential for increased building heights would be eliminated, but future development could occur within the same overall development area as the proposed project. Potential impacts related to hydrology and water quality would remain unchanged.
- ***Public Services:*** Potential future development under this alternative would result in 66 fewer residential units than the proposed project with the same net increase in office space and a net decrease in commercial space as with the proposed project. As a result, residential population would be reduced with an accompanying reduction in demand for public services. Significant impacts related to schools and park and recreational facilities would be reduced but not eliminated. Other identified less-than-significant fire protection, police protection, and solid waste disposal impacts also would be reduced.
- ***Traffic and Transportation:*** Under this alternative, the potential for increased building heights adjacent to the San Lorenzo River would be eliminated, which would result in decreased potential development intensity. Thus, this alternative would result in reduced daily and peak hour trips as summarized on Table 5-4. Daily and peak hour trips would be slightly less than the proposed project. The less-than-significant impacts identified for the proposed project would be further reduced with the No Project alternative.
- ***Water Supply and Wastewater Utilities:*** Under this alternative, the potential for increased building heights would be eliminated, which would result in decreased potential development intensity. Potential future development under the No Project Alternative with existing General Plan and DRP provisions could lead to an increase in water demand of approximately 26 MGY based on water demand rates for multi-family

homes identified in the City's adopted 2015 Urban Water Management Plan and commercial and office demand rates in the General Plan 2030 EIR. This alternative would reduce estimated project water use by more than half of the proposed project demand. Wastewater generation would also be substantially reduced, although no significant impacts were identified for either of these utilities.

- ***Noise:*** This alternative would result in fewer residential units potentially constructed in the downtown area. However, given the location portions of the study area adjacent to streets with future predicted higher noise levels, there would still be exposure of future residential units to roadway noise. The mitigation requiring an acoustical study to determine building design and materials still would still be needed.
- ***Cumulative Traffic Impacts:*** This alternative would slightly reduce peak hour trips from those estimated with the proposed project. Significant cumulative impacts would remain with the project's contribution being cumulatively considerable.
- ***Other Impacts:*** No new impacts have been identified with this alternative.

Ability to Meet Project Objectives. Alternative 2 would meet three project objectives. With no proposed plan changes, the existing DRP would continue to support the First Principles of the plan (#1), and housing opportunities would continue to be encouraged, although with reduced opportunities (#2). Any development would need to meet existing DRP development standards for sensitive siting and design next to the river (#5). This alternative would include the incentives to create two new linkages to the San Lorenzo River and Riverwalk through extensions of Elm and Maple Streets and would meet the project objectives to increase public access, although incentives may be limited with a reduction of additional building heights. Thus, this alternative would partially meet the project objectives to increase public access (#3, 4, 6, 7).

Environmentally Superior Alternative

According to CEQA Guidelines section 15126.6(e), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Furthermore, Sections 21002 and 21081 of CEQA require lead agencies to adopt feasible mitigation measures or feasible alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. Where the environmentally superior alternative also is the no project alternative, CEQA Guidelines in Section 15126(d)(4) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

In the present case, none of the alternatives, including the No Project Alternative would eliminate significant project impacts and cumulative impacts related to traffic, although all alternatives would result reduce the level of impact. Table 5-5 presents a comparison of project impacts between the proposed project and the alternatives. Excluding the No Project Alternative, Alternative 1 – Reduced Height for Additional Height Zone A and Elimination of

Additional Height Zone B – is considered the environmentally superior alternative of the alternatives considered. Although it would not reduce significant impacts to less-than-significant levels, it could result in the greatest reduction of traffic and water demand impacts and reduce some of the other identified significant impacts. However, it would not fully meet project objectives.

Table 5-5 is on the next page.

Table 5-5: Comparison of Impacts of Project Alternatives

Environmental Issue	PP	NP	ALT 1	ALT 2
Aesthetics 4.1-1: Scenic Views	LS	LS -	LS -	LS -
Aesthetics 4.1-3: Degradation of Visual Character	LS	LS-	LS -	LS -
Aesthetics 4.1-4: Light and Glare	LS	LS -	LS -	LS -
Air Quality 4.2-1: Pollutant Emissions	LS	LS -	LS -	LS -
Air Quality 4.2-2: GHG Emissions	LS	LS -	LS -	LS -
Biological Resources 4.3-1: Aquatic Habitat/Species	LS	LS -	LS	LS
Biological Resources 4.3-2: Riparian Habitat-Birds	LSM	LSM -	LSM	LSM
Biological Resources 4.3-3: Nesting Birds	LSM	LSM	LSM	LSM
Cultural Resources 4.4-1: Archaeological Resources	LS	LS	LS	LS
Cultural Resources 4.4-2: Historical Resources	LS	LS	LS	LS
Cultural Resources 4.4-3: Paleontological Resources	LS	LS	LS	LS
Hydrology 4.5-1: Stormwater Drainage	LS	LS	LS	LS
Hydrology 4.5-2: Water Quality	LS	LS	LS	LS
Hydrology 4.5-3: Flood Hazards	LS	LS	LS	LS
Public Services 4.6-1a: Fire Protection	LS	LS -	LS -	LS -
Public Services 4.6-1b: Police Protection	LS	LS -	LS -	LS -
Public Services 4.6-1c: Schools	LSM	LSM -	LSM -	LSM -
Public Services 4.6-2: Parks and Recreation	LSM	LSM -	LSM -	LSM -
Public Services 4.6-3: Solid Waste	LS	LS -	LS -	LS -
Traffic 4.7-1: Circulation System Impacts	LS	LS -	LS -	LS -
Traffic 4.7-2: Highway Impacts	LS	LS -	LS -	LS -
Water & Wastewater 4.8-1: Water Supply	LS	LS -	LS -	LS -
Water & Wastewater 4.8-2: Wastewater	LS	LS -	LS -	LS -
Noise: Exposure to Noise	LSM	LSM -	LSM -	LSM -
Cumulative Traffic	SU	SU -	SU -	SU -
New Significant Impacts		None	None	None

Notes:

PP = Proposed Project
NP = No Project
ALT1 = Reduced Height for Expanded Additional Height Zone A and Elimination of Additional Height Zone B
ALT2 = Reduced Height for Additional Height Zone A to 75 feet along Pacific/Front and Reduced Height for Additional Height Zone B to 60 feet along the San Lorenzo River with Development Standard Modifications

Impact without Mitigation / Impact with Mitigation

NI = No Impact
LS = Less than significant impact
S = Significant
LSM = Less than significant with mitigation
SU = Significant unavoidable impact
+ = Greater adverse impact than proposed project
- = Lesser adverse impact than proposed project

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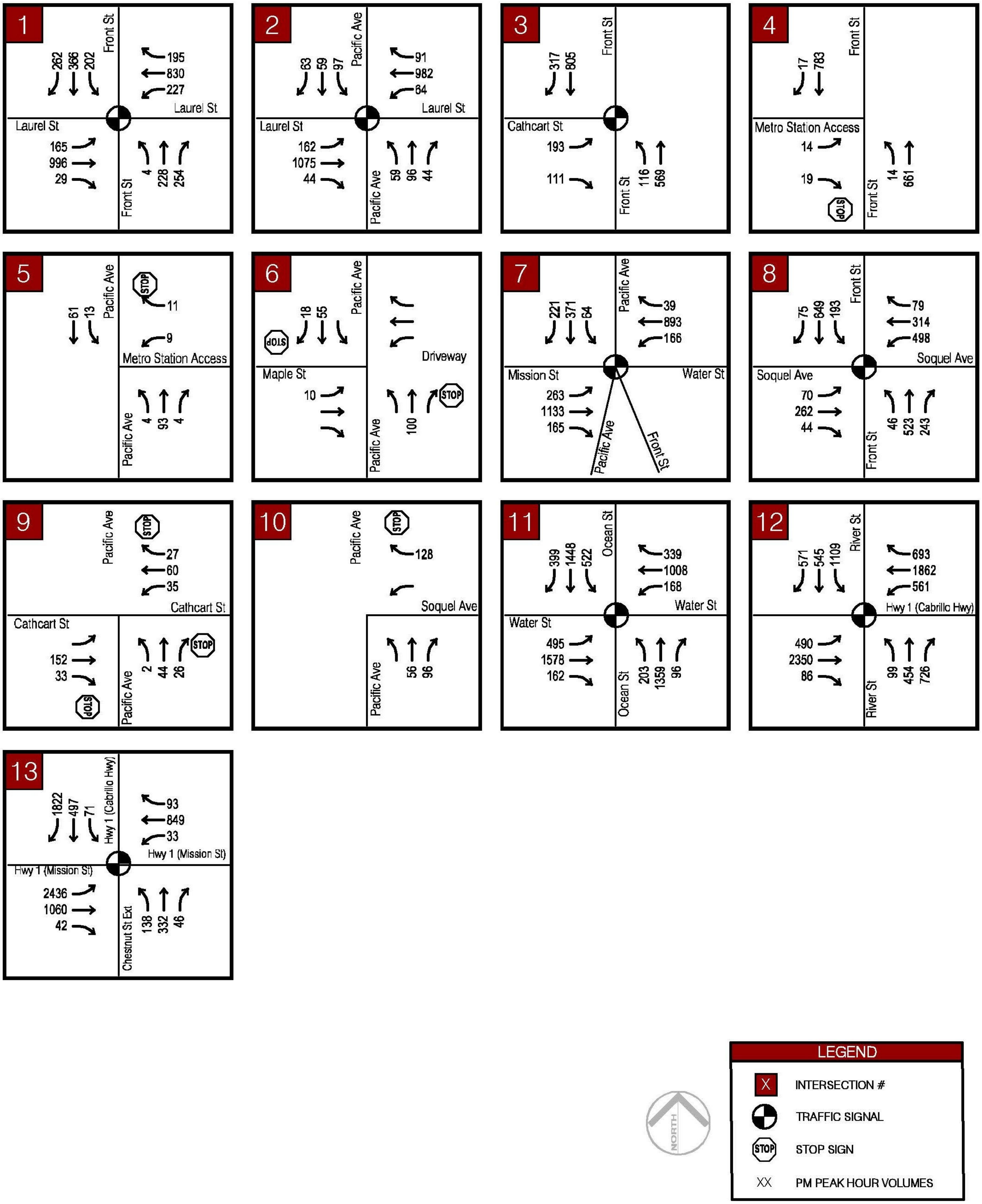

SOURCE: Kimley Horn

FIGURE 5.1
Cumulative Trips

DUDEK