CHAPTER 5
ALTERNATIVES ANALYSIS

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA), §15126.6(a), requires an Environmental Impact Report (EIR) to "describe a reasonable range of alternatives to a project, or to the location of a project, which could 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." This chapter discusses a range of alternatives to the proposed project, including alternative locations, alternative designs, and a No Project Alternative. The CEQA Guidelines provide direction for the discussion of alternatives to the proposed project. This section requires:

- Description of "...a range of reasonable alternatives to the project, or to the location of a 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." [§15126.6(a)]

- A setting forth of alternatives that "...shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." [§15126.6(f)]

- Discussion of the "No Project" alternative, and "...If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." [§15126.6(e)(2)]

- Discussion and analysis of alternative locations "…that would avoid or substantially lessen any of the significant effects of the project;" only these need to be considered for inclusion in the EIR. [§15126.6(f)(2)(A)]

- "Prior to approval of the proposed subsequent project, the lead agency shall incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the Master EIR and provide notice in the manner required by §15087. [§15177 (d)]

Given the CEQA mandates listed above, this section: (1) describes the range of reasonable alternatives to the project; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the proposed project; and (3) identifies the Environmentally Superior Alternative.

5.2 ALTERNATIVES SELECTION

In defining feasibility of alternatives, the CEQA Guidelines state: "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." Through the scoping process, if an alternative was found to

be infeasible, as defined above, then it was dropped from further consideration. In addition, CEQA states that alternatives should "…attain most of the basic objectives of the project..."

5.2.1 Project Objectives

The basic objectives of the proposed project that were used in the screening of project alternatives are taken from Chapter 2 and include the following:

The Dana Adobe Nipomo Amigos (DANA), the project applicant, has developed the following project statement of intentions, which were used in the initial screening of applicant prepared project alternatives:

> *"The intent of the project's master plan is to tell the stories of the people and the land over time using the Dana Adobe as the key component. Master plan components should complement the education being provided about the Dana Adobe, the Native American presence on the landscape, and the Rancho era. The arrangement and physical elements on the site must create a spatial sequence that enables the visitor experience to be programmed toward the larger educational purpose. As a result, individual master plan components should not dominate the site or detract from the site's intent by creating separate sites for uses not directly related to the project's overall educational purpose. The project provides:*
>
> - *A visitor's center that furnishes adequate area for visitors, exhibits and interpretive elements, fundraising, and daily and staffing needs;*
> - *Structures, buildings, and landscaped areas that help visitors understand the site's history and historic uses;*
> - *An area devoted to the understanding and appreciation of the Chumash culture as it relates to the Rancho era and aspects of Chumash life in earlier eras and today;*
> - *Educational opportunities that address the consequences of human interaction with the land over time, as well as modern day environmental and sustainability issues;*
> - *Facilities, indoors and outdoors, for education of school aged children, adults, and seniors; all income levels, varying physical capabilities; and for the Nipomo area and the County's tourist population;*
> - *On the 30-acre site, disabled access to all facilities and experiences consistent with ADA, connecting the site's educational components;*
> - *On the 100-acre site, public trails that also furnish education regarding the site's natural, historical, and agricultural resources;*
> - *Amenities (such as ~~a~~ra<u>m</u>adas, viewing areas, gardens, and picnic tables) to provide a pastoral and pleasurable visitor experience;*

- *Adequate support facilities (such as a caretaker's unit and emergency access) to safeguard resources onsite and provide security and visitor safety;*

- *Provide infrastructure consistent with the level of development proposed while maintaining the site's historical setting and balancing new development with resource protection and historic character;*

- *Restoration along portions of the project's creek corridors in order to provide resource protection and education regarding those resources;*

- *A building design for the visitor center and other project components that has sustainable construction techniques and does not confuse visitors regarding the interpretation of historical structures on the site;*

- *Master plan components in locations that complement the Dana Adobe and its setting while balancing protection of the site's various resources; and,*

- *Facilities and amenities that DANA, a nonprofit, can reasonably afford to maintain in the present and future."*

The primary goal of The Stories of the Rancho Project Master Plan is to establish the plan for protection/preservation of the historic Dana Adobe and development of surrounding areas for educational purposes. DANA and County of San Luis Obispo (County) have utilized the applicant's above-stated project intent to establish the following project objectives:

1. To facilitate development of the historic project site to tell the stories of the people and the land over time, including the Native American presence, Dana Adobe, and the Rancho era, using the Dana Adobe as the key component;

2. To guide development of the project site that helps visitors understand the site's pre-history, history and historic uses, and enables the visitor experience to be programmed toward the larger educational purpose;

3. To provide a range of passive and active facilities and use areas to provide cultural, historic, environmental, natural, and agricultural educational opportunities to the community;

4. To develop an area devoted to the understanding and appreciation of the Chumash culture as it relates to the Rancho era and aspects of Chumash life in earlier eras and today;

5. To provide amenities that are environmentally sensitive, sustainable, and aesthetically consistent with the regional and historic character of the area;

6. To provide amenities and facilities that are accessible to a wide range of individuals of varying ages, income levels, and physical capabilities.

7. To restore and protect natural resources associated with on-site creek corridors, and provide educational opportunities related to on-site natural resources;

8. To balance the level of new development with resource protection and maintenance of the site's historic character;

9. To provide necessary infrastructure consistent with the level of development proposed;

10. To furnish on-site opportunities for fundraising, and to provide facilities and amenities that DANA can reasonably afford to maintain; and

11. To establish a plan for development consistent with the Nature Education Facilities Grant.

5.2.2 Significant Impacts Resulting from the Proposed Project

Generally, the alternatives analysis considers alternatives that would avoid or reduce, to the maximum extent feasible, the identified unavoidable impacts. However it was determined that the proposed project would not result in any unavoidable impacts. Therefore the considered alternatives focused on avoiding or reducing the significant impacts which require the most intensive mitigation measures. They include:

1. **Air Quality.** Construction of the project would generate short-term emissions including reactive organic gases (ROG), nitrates of oxygen (NOx), fugitive dust (PM10), diesel particulate matter (DPM), and greenhouse gases (GHGs) and pollutants that contribute to climate change. Generation of emissions due to vehicle trips on a daily basis, and during special events, and generation of fugitive dust during use of unpaved overflow parking areas.

2. **Biological Resources.** Impacts to sensitive wildlife and potential for pollutant discharge into Nipomo Creek and its tributaries during construction.

3. **Cultural Resources.** Grading and construction within a known archaeological site, with varying effects depending on the location and depth of disturbance.

4. **Noise.** Generation of noise during special events, including the use of amplified sound, potentially affecting off-site sensitive receptors (residences).

5. **Transportation and Circulation.** Contribution of vehicle trips, potentially contributing to deficient level of service conditions at the U.S. Highway 101 (US 101) and West Tefft Street interchange during the PM peak hour.

6. **Water Resources.** Impact to surface waters, including accidental discharge of sediments and pollutants into Nipomo Creek and its tributaries during construction. The creation of additional impervious areas and stormwater runoff.

5.3 ALTERNATIVES ANALYSIS

Criteria used to develop potential alternatives included the potential of the project to avoid impacts to sensitive resources and the human environment, whether or not it could generally meet the project objectives, and costs. Specific consideration was given to potential alternatives that appeared to avoid or minimize impacts to natural resources and the human environment.

The applicant is requesting approval of both a Land Use Ordinance (LUO) Amendment and Conditional Use Permit (CUP); therefore, two No Project Alternatives are included in the

analysis. Identified alternatives include the No Project (No Action) Alternative – Land Use Ordinance Amendment, No Project Alternative – Conditional Use Permit, Design Alternative A – Initial Conceptual Site Plan, and Design Alternative B – Applicant's Alternative Plan.

5.4 ALTERNATIVES IMPACTS ANALYSIS

5.4.1 No Project Alternative – Land Use Ordinance Amendment

Under the No Project Alternative – Land Use Ordinance Amendment, no changes to the County LUO would occur. Proposed clarifications that would accurately represent current land ownership would not be approved. Language requiring construction of the Southland Street Interchange would remain, in addition to design standards identified in the current ordinance. The existing reference to the "Site Master Plan" on file would be outdated and inconsistent with current conditions. The proposed project, which includes the CUP request and a Master Plan, may be considered by the decision-makers regardless of approval of the LUO Amendments; however, the decision and associated findings would be complicated by the current inconsistencies in the existing ordinance language, primarily the requirement for the Southland Street Interchange (which is not proposed by the applicant or currently pursued by the County or the California Department of Transportation [Caltrans]) and implementation of the Master Plan would not occur.

Aesthetics

Under this No Project Alternative, existing language regarding the location of future development and the architectural motif would remain in place. Future development would be required to comply with these standards.

Air Quality and Climate Change

Under the existing Ordinance, development could occur that would result in air quality impacts including the generation of construction and operation-related emissions.

Biological Resources

Under the existing Ordinance, development could occur that may result in impacts to biological resources; identification of specific impacts is contingent on the type of development proposed, and would be considered through CUP review.

Cultural Resources

Under the existing Ordinance, development could occur that may result in impacts to cultural resources, including the Dana Adobe and identified archaeological site. Evaluation of specific impacts is contingent on the type of development proposed, and would be considered through CUP review.

Geology and Soils

Under the existing Ordinance, development could occur that may result in geology and soils impacts; identification of specific impacts is contingent on the type of development proposed, and would be considered through CUP review.

Hazards and Hazardous Materials

Under this alternative, the requirement for an emergency access road would not be included in the Ordinance. This may result in a potentially significant impact, as the emergency access road is meant to provide egress if needed for employees and visitors to the Dana Adobe. The requirement for the Southland Street Interchange would remain; however, the likelihood of construction is contingent on County and Caltrans plans to actually pursue development of the interchange.

Land Use

As noted above, the intent of the proposed Amendment is to clarify existing conditions, including land ownership and use of the site. The existing language, which would remain in place under this No Project Alternative, would allow future development of the site pursuant to CUP approval. As noted above, approval of the CUP would be complicated by inconsistencies with the requirement for the Southland Street Interchange.

Noise

Under the existing Ordinance, development could occur that may result in noise impacts; identification of specific impacts is contingent on the type of development proposed, and would be considered through CUP review.

Transportation and Circulation

Under the No Project Alternative, development could occur consistent with existing language. As noted, approval of any future project would be complicated by the current requirement for the Southland Street Interchange, which is not currently under consideration by the County or Caltrans.

Water and Hydrology

Under the existing Ordinance, development could occur that may result in impacts to water resources; identification of specific impacts is contingent on the type of development proposed, and would be considered through CUP review.

Consistency with Project Objectives

The No Project Alternative would be inconsistent with project objectives, in the event the decision makers require construction of the Southland Street Interchange. This requirement is unlikely to be achieved by the applicant.

5.4.2 No Project Alternative – Conditional Use Permit

The No Project Alternative – Conditional Use Permit would include none of the components of the proposed project. Continued restoration of the Dana Adobe would occur, in addition to qualifying non-profit events and educational tours. The No Project Alternative would not meet the primary goal of the project, which is to establish the plan for protection/preservation of the historic Dana Adobe and develop the surrounding area for educational purposes.

Aesthetics

Under the No Project Alternative, no physical improvements would occur. This alternative would not result in adverse impacts.

Air Quality and Climate Change

The No Project Alternative would not include any construction activities or long-term trip generation and, therefore, would not result in any adverse effects to air quality. This alternative would not result in GHG emissions or require the use of energy as nothing would be constructed.

Biological Resources

Biological resources would not be impacted by the No Project Alternative. The proposed informational and interpretive areas would not be developed, and the subsequent educational opportunities regarding the sensitive species, habitats, and landscape would not occur.

Cultural Resources

Restoration of the Dana Adobe would continue under this alternative. No additional facilities or amenities would be constructed, which would avoid identified significant impacts to archaeological resources related to grading and construction. Education and fundraising related to the Dana Adobe would be limited to currently occurring events. Potential impacts to surficial cultural resources may occur due to use of vehicles onsite.

Geology and Soils

This alternative would not result in the construction of additional facilities and no further ground disturbance would occur, which would avoid potential impacts related to erosion and sedimentation.

Hazards and Hazardous Materials

Under this alternative, the emergency access road would not be constructed. This may result in a potentially significant impact, as the emergency access road is meant to provide egress if needed for employees and visitors to the Dana Adobe.

Land Use

The No Project Alternative would not affect the existing land use and, therefore, would not conflict with any applicable policies.

Noise

Under the No Project Alternative, qualifying non-profit special events would continue, and may include the use of amplified sound. Future events would not be mitigated by measures identified in the EIR, including noise attenuation.

Transportation and Circulation

The No Project Alternative would not result in short- or long-term trip generation beyond existing conditions; however, if no project is approved, the applicant would not be required to implement mitigation including minimization of peak hour trips during qualifying non-profit special events.

Water and Hydrology

Water demand for the site, including use of water for the Dana Adobe and restoration actions on the 100-acre site, would remain the same as current conditions. No ground disturbance would

occur, avoiding the potential for sediment or pollutant discharge into Nipomo Creek and its tributaries.

Consistency with Project Objectives

The No Project Alternative would not be consistent with project objectives, because the primary goal and objective is to implement the proposed Master Plan. Adoption of the No Project Alternative would constitute denial of the project.

5.4.3 Design Alternative A – Initial Conceptual Site Plan

This alternative consists of a conceptual plan, which was developed ~~as part~~during preparation of the applicant's grant application submittal to the State Parks Nature Education Facilities Program. Please note that the final plan submitted in the grant application package included additional features not included in this reduced development alternative. The Conceptual Site Plan, shown in Figure 5-1, includes the following: Visitor's Center and curation room, indoor and outdoor spaces and native gardens; nature education classroom and outdoor patio; Native American (Chumash) interpretive features and living Chumash Village including a ceremonial circle, painted caves, sweat lodge, arbors, story boulders, garden, signage; nature trail system with Native American interpretive features; restrooms; parking areas; onsite wastewater system; maintenance building; native habitat interpretation, restoration, and preservation areas; environmental interpretation and preservation areas of on-site geological, paleontological, and archaeological features; perimeter landscaping; utilities; and, drainage and erosion control systems.

This alternative does not include the outdoor demonstration arena, replicated Rancho era buildings, or horse trailer parking (on South Thompson Avenue). This alternative also does not include the emergency access road and flat car bridge across Nipomo Creek; however, the California Department of Forestry and Fire Protection/County Fire (CAL FIRE) conditions regarding access would need to be considered in lieu of the Southland Street Interchange project, which is not planned for construction. This alternative does not include any additional special events beyond existing, qualifying, non-profit events.

Aesthetics

Under this alternative, impacts to aesthetics resources would be similar to the proposed project. Parking areas would be located along South Oakglen Avenue, and the Visitor's Center would be located approximately 100 feet from the roadway, roughly 200 feet northwest of the proposed location and closer to the Dana Adobe. The Visitor's Center may be more visible, as seen from the Adobe, due its closer location in this alternative. Structures would need to apply similar mitigation as the proposed project, including architectural and design features that complement the Dana Adobe historical setting, and minimization of exterior lighting.

Air Quality and Climate Change

As proposed, implementation of this alternative would result in less ground disturbance; however, construction of the emergency access road is anticipated to be a required condition of approval. Therefore, construction-related air quality impacts are expected to be less, but similar to the proposed project, including the generation of ROG and NOx (if construction occurs over a quarter, or 90 days), generation of fugitive dust (PM10), generation of DPM, potentially affecting nearby sensitive receptors (residences), and potential exposure to material-containing asbestos and naturally-occurring asbestos. Operational air quality impacts including generation of fugitive

dust may be avoided, because an arena would not be used for demonstrations or overflow special event parking.

Biological Resources

The conceptual plan includes a crossing over Nipomo Creek as part of the nature trail system. As noted above, emergency access would be required as a condition of approval, which would result in similar impacts to biological resources as the proposed project. Construction of the trail system would require oak tree protection measures similar to the proposed project. Grading and construction activities would require mitigation similar to the proposed project to prevent accidental discharge of pollutants into Nipomo Creek and its tributaries. Long-term impacts to sensitive species and their habitat would be similar, because use of the site by visitors and non-profit special events would occur.

Cultural Resources

Implementation of this alternative would include development within identified cultural resource Locus A (unimproved parking area, outdoor use area to the northwest of the Visitor's Center, and trails) and Locus B (Chumash Village, ceremonial circle, and trails). Mitigation identified for these areas would be applicable, including control units, data collection, and monitoring. Implementation of this alternative would reduce some potential impacts within Locus A, because the arena and Rancho era buildings would not be constructed. This alternative would locate the Visitor's Center outside of both Locus A and Locus B, similar to the proposed project, with the exception of the edge of an outdoor use area. Mitigation may include shifting the development to the southeast to completely avoid Locus A. Based on the delineation of the archaeological site, implementation of this alternative would not avoid impacts, but would reduce the affected area compared to the proposed project.

Geology and Soils

This alternative would require less ground disturbance than the proposed project; however, similar geology and soils impacts would occur. Grading and construction would be required to comply with the Uniform Building Code, LUO, and a Regional Water Quality Control Board (RWQCB) Stormwater Pollution Prevention Plan (SWPPP). No additional mitigation measures would be necessary.

Hazards and Hazardous Materials

Implementation of this alternative as proposed would result in a significant and unavoidable impact related to inadequate emergency access. This impact would be addressed by compliance with CAL FIRE requirements for construction of an emergency access road extending from South Oakglen Avenue, through the site, and connecting with South Thompson Avenue. All other potential hazards and hazardous materials impacts would be similar to the proposed project, and mitigation would apply.

Land Use

As noted above, implementation of this alternative does not include an emergency access road or other off-site road improvements, which would be inconsistent with both the current LUO and proposed LUO Amendment, and would result in a significant land use impact. This impact would be addressed by a condition of approval requiring construction of the emergency access road. All other aspects of this alternative appear to be consistent with applicable land use policies.

Noise

Under this alternative, non-profit special events would continue to occur, which would generate noise similar to the proposed project, although the events and associated noise would occur less often. The Visitor's Center would be located approximately 200 feet to the northwest of the location identified in the proposed project, which would help attenuate amplified sound affecting the residences to the southwest (if events occur northeast of the Visitor's Center).

Transportation and Circulation

This alternative does not include additional special events (beyond existing conditions); therefore; additional traffic trips related to special events would not occur. This alternative would generate additional traffic trips due to expected increased use of the Visitor's Center and Chumash Village, and would add trips to the US 101/West Tefft Street Interchange during the PM peak hour. Mitigation would be necessary, similar to the measures identified for the proposed project.

Water and Hydrology

Under this alternative, water demand would be similar to the proposed project, because the primary water demand is generated by the Visitor's Center. There would be some reduction in demand due to the avoidance of additional visitors during special events. Potentially significant impacts, including discharge into waters and increased surface water runoff would occur. These impacts would be addressed by compliance with existing regulations (i.e., LUO, SWPPP), and implementation of identified mitigation measures.

Consistency with Project Objectives

Implementation of this alternative may not be consistent with the project objectives, because it does not include an intended balance of pre-historic, archaeological, and historical features. While continued restoration of the Dana Adobe would occur, the alternative does not include the demonstration arena or Rancho era buildings. This alternative would be potentially inconsistent with the following project objectives:

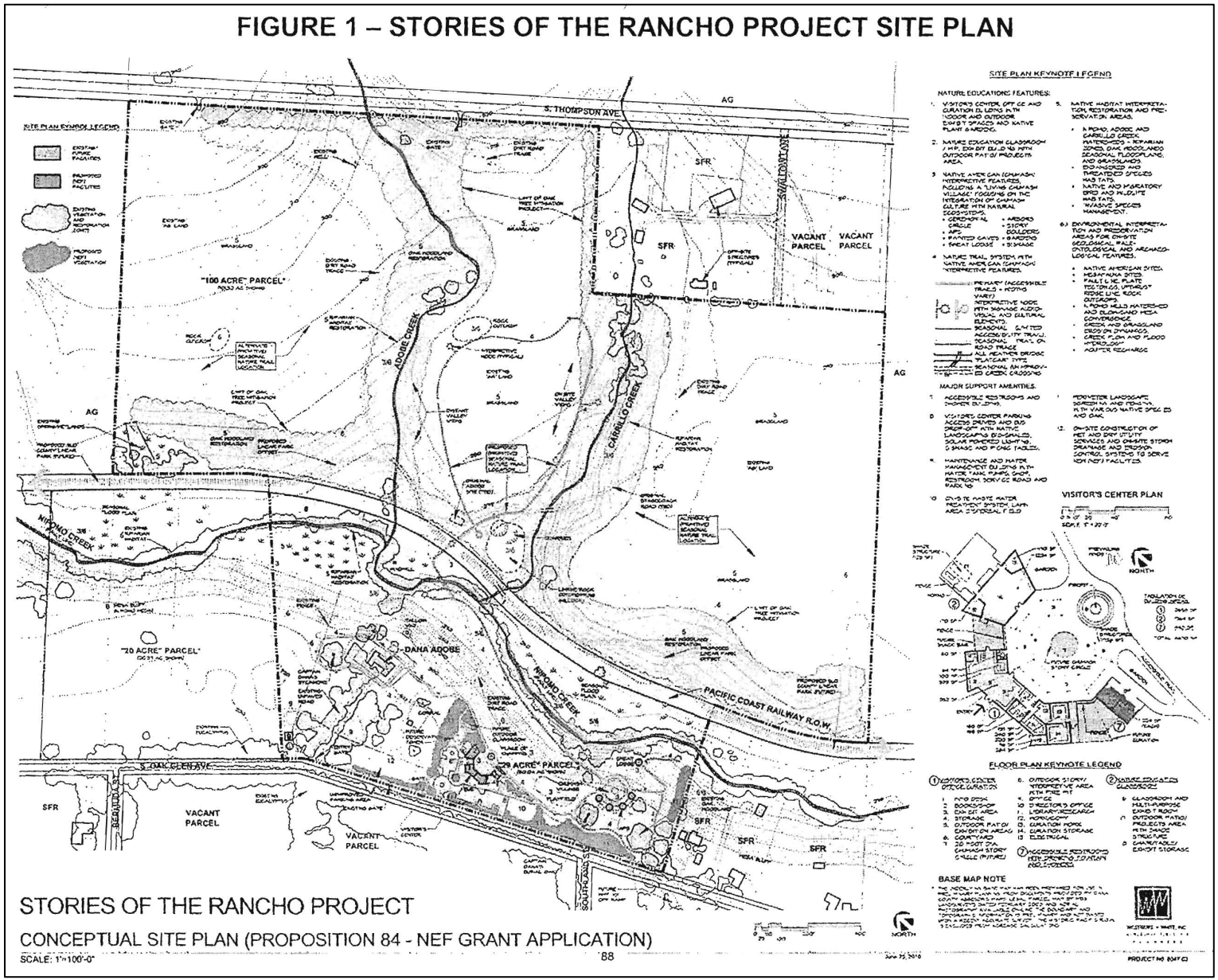
- To facilitate development of the historic project site to tell the stories of the people and the land over time, including the Native American presence, Dana Adobe, and the Rancho era, using the Dana Adobe as the key component;

- To guide development of the project site that helps visitors understand the site's pre-history, history and historic uses, and enables the visitor experience to be programmed toward the larger educational purpose; and,

- To provide a range of passive and active facilities and use areas to provide cultural, historic, environmental, natural, and agricultural educational opportunities to the community.

In addition, this alternative does not include additional special events and may not include facilities that are adequate to "furnish on-site opportunities for fundraising, and to provide facilities and amenities that DANA can reasonably afford to maintain." Lack of consistency with this objective is the burden of the applicant to demonstrate to the decision makers, because it relates to the financial intent and burden of this alternative.

Figure 5-1. Design Alternative A – Initial Conceptual Site Plan



5.4.4 Design Alternative B – Applicant's Alternative Project

This design alternative presented by the applicant includes features that are intended to avoid or minimize potentially significant impacts to archaeological resources. As shown in Figures 5-2 and 5-3, this alterative would include the following changes compared to the proposed project:

- Rancho era outbuildings would be located approximately 60 feet southwest of the proposed location;
- The tack/blacksmith building would be located near the arena, approximately 230 feet northwest of the proposed location;
- The caretaker's residence and shop/storage building would be located approximately 60 feet southwest of the proposed location, closer to South Oakglen Avenue and rotated 90 degrees;
- Elimination of on-site septic systems; and,
- Connection to the Nipomo Community Services District (NCSD) sewer system, requiring construction of onsite infrastructure and trenching and pipe installation along South Oakglen Avenue (approximately 1,800 linear feet, off-site to Bermuda Avenue).

Aesthetics

Under this alternative, similar impacts to aesthetics would occur, including the development of potentially visually incompatible structures and the creation of nighttime light and glare. Mitigation would be necessary, similar to the measures identified for the proposed project.

Air Quality and Climate Change

This alternative would generate similar construction and operational emissions as the proposed project, including ROG, NOx, fugitive dust (PM10), and GHGs. Mitigation would be necessary, similar to the measures identified for the proposed project.

Biological Resources

Implementation of this alternative would result in similar impacts to biological resources, including potential direct and indirect impacts to special-status species, nesting birds, wildlife, and wetland and riparian habitat. The proposed emergency access road would be constructed over Nipomo Creek, and identified restoration actions would occur similar to the proposed project. Mitigation would be necessary, similar to the measures identified for the proposed project.

Cultural Resources

Implementation of this alternative would include development within identified cultural resource Locus A and Locus B, similar to the proposed project, and similar mitigation would apply. This alternative would require a bore pit extending from the Rancho Era restroom southwest to South Oakglen Avenue, located within Locus A. The bored sewer line between the Visitor's Center and street would not be located within Locus A or B. Implementation of this alternative would reduce the area affected by waste treatment onsite, because it would be primarily limited to the bore pit and would not require onsite disposal. Offsite impacts may occur due to additional ground disturbance required for the sewer infrastructure connection to the NCSD system.

Geology and Soils

Implementation of this alternative would result in similar geology and soils impacts, and would be constructed in compliance with the Uniform Building Code, LUO, and a RWQCB SWPPP. No additional mitigation measures would be necessary.

Hazards and Hazardous Materials

Implementation of this alternative would result in similar hazards and hazardous materials impacts as the proposed project, and would be constructed in compliance with the Fire Code and LUO. The proposed emergency access road would be constructed and maintained pursuant to County and CAL FIRE requirements. Mitigation would be necessary, similar to the measures identified for the proposed project.

Land Use

This alternative includes similar uses as the proposed project, including special events. The Master Plan, emergency access road, and trail development appear to be consistent with all applicable plans and policies (final determination rests with the decision makers), and potential land use conflicts such as noise would be addressed by identified mitigation measures.

Noise

The proposed alternative includes special events, which would generate noise similar to the proposed project. Mitigation would be necessary, similar to the measures identified for the proposed project.

Transportation and Circulation

This alternative would generate additional traffic trips, similar to the proposed project, and would add trips to the US 101/West Tefft Street Interchange during the PM peak hour. Mitigation would be necessary, similar to the measures identified for the proposed project.

Wastewater

Implementation of this alternative would include connection to the NCSD sewer system. Based on the 2010-2012 Resource Summary Report (County of San Luis Obispo 2013), the NCSD's Southland Wastewater Treatment Facility currently operates at 67% of its capacity at peak flow, and would be able to serve the project. In the event this alternative, or the community sewer option is selected by the decision makers, the applicant would be required to obtain a will serve letter from the NCSD.

Water and Hydrology

Under this alternative, water demand would be similar to the proposed project. Potentially significant impacts, including discharge into waters and increased surface water runoff would occur. These impacts would be addressed by compliance with existing regulations (i.e., LUO, SWPPP), and implementation of identified mitigation measures.

Consistency with Project Objectives

This alternative is consistent with the applicant's and County's project objectives.

Figure 5-2. Design Alternative B – Applicant's Alternative Project, The Rancho Era

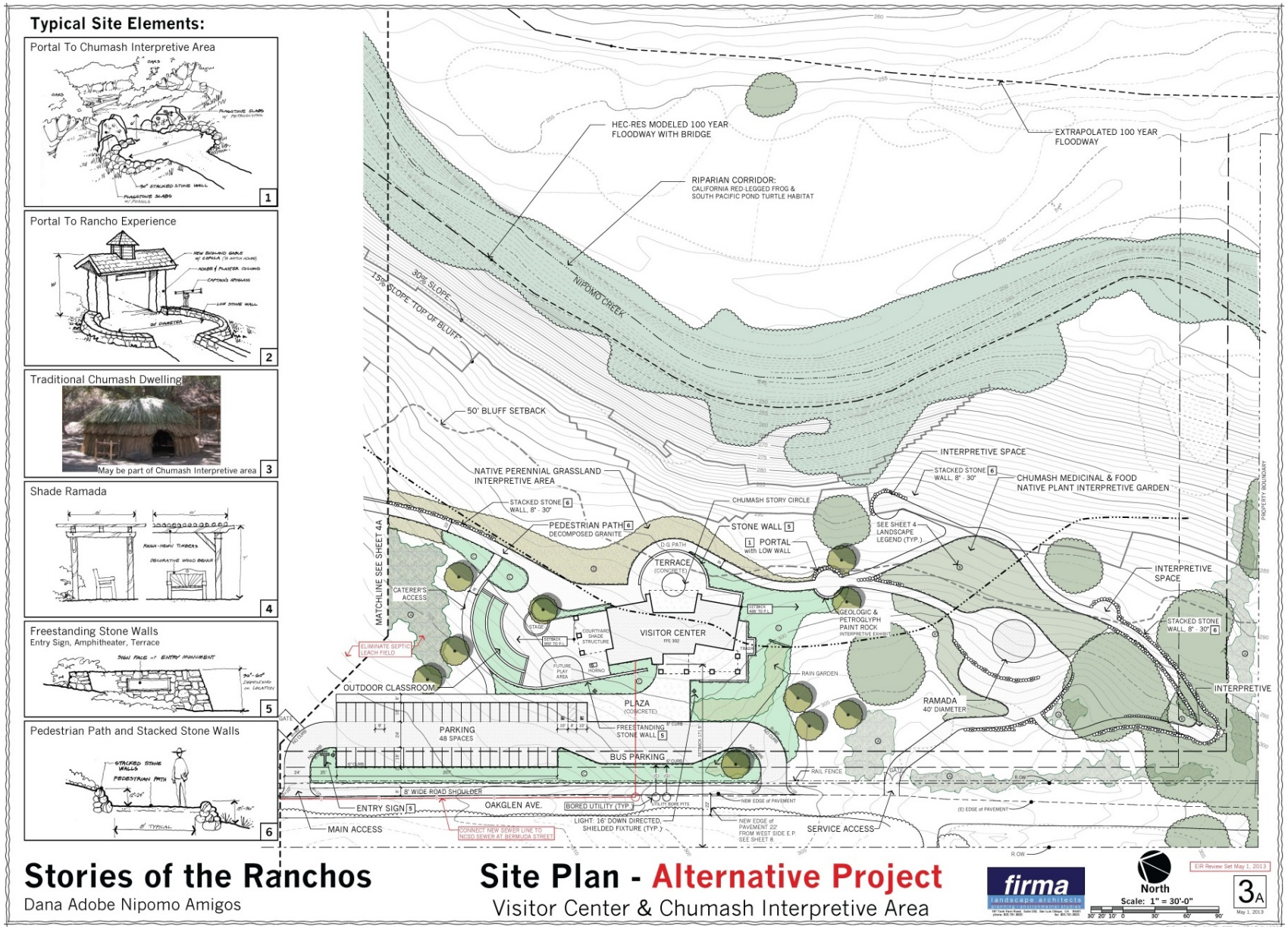
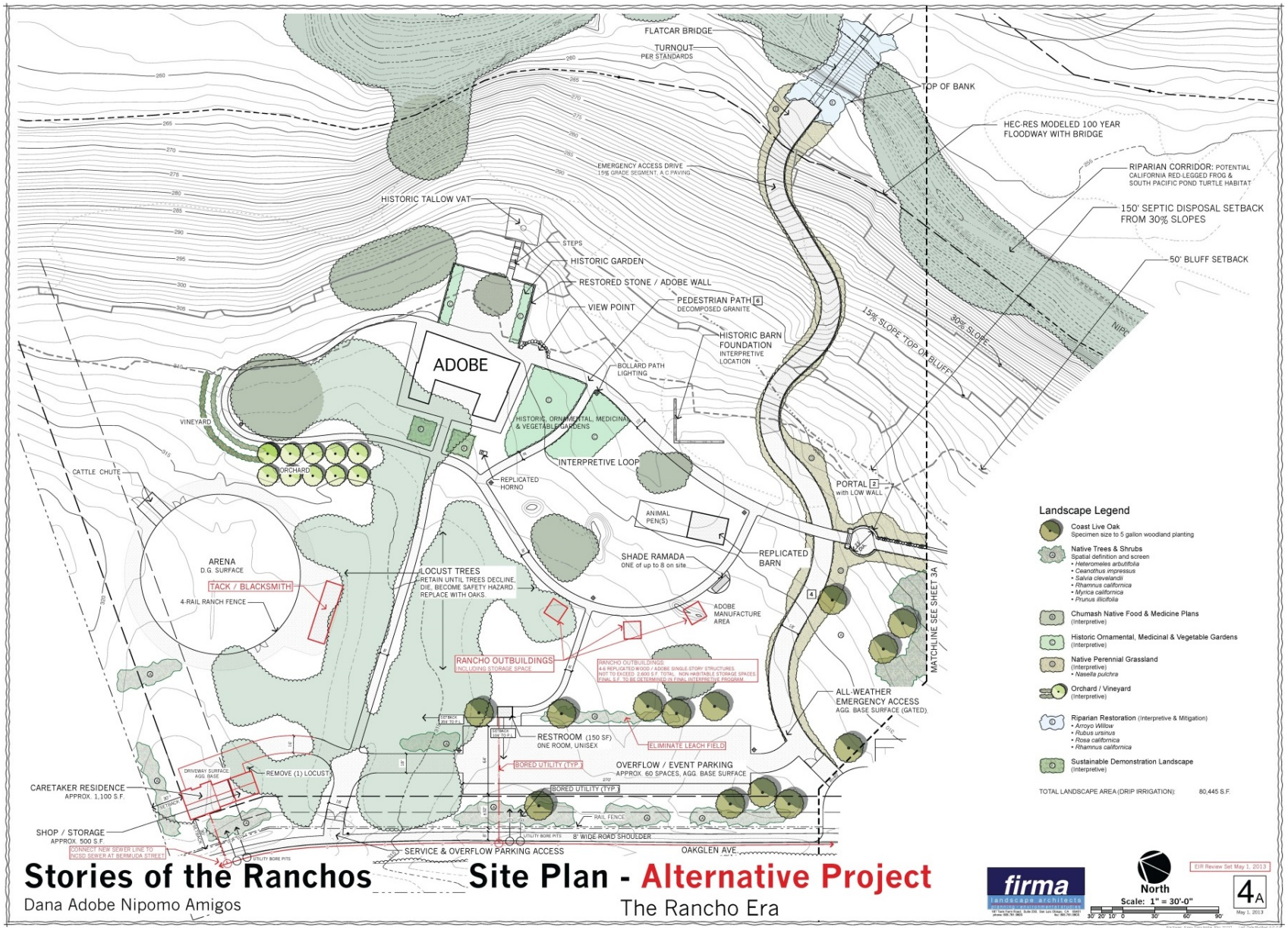


Figure 5-3. Design Alternative B – Applicant's Alternative Project, Visitors Center & Chumash Interpretive Area



5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the alternatives section of an EIR to describe a reasonable range of alternatives to the project that avoid or substantially lessen any of the significant effects identified in the EIR analysis while still attaining most of the basic project objectives. The alternative that most effectively reduces impacts while meeting project objectives should be considered the "environmentally superior alternative." In the event that the No Project Alternative is considered the environmentally superior alternative, the EIR should identify an environmentally superior alternative among the other alternatives.

In this EIR, the No Project Alternative (LUO Amendment) would result in the fewest impacts, because if the LUO Amendment is not adopted, the applicant cannot move forward with a Master Plan. The No Project Alternative (Conditional Use Permit) also results in the fewest environmental impacts. The No Project Alternatives do not meet any of the project objectives, including the primary objective to implement the proposed Master Plan.

As proposed, and with incorporation of recommended mitigation measures, the proposed project would not result in any significant, unavoidable environmental effects, and would meet project objectives. Proposed alternatives include modifications to the project, such as different features, shifted location of project elements, use of alternative means of wastewater treatment and disposal, and elimination of use permit-approved special events. Based on the delineation of the archaeological site and other site restrictions including LUO setbacks and the Nipomo Creek corridor, complete avoidance is not feasible. Grading and construction of the Visitor's Center would occur outside of identified significant cultural resource Locus A and B under all alternative scenarios. No alternative would result in any significant, adverse, and unavoidable (Class I) impacts upon implementation of mitigation measures similar to those identified for the proposed project.

Design Alternative A – Initial Conceptual Site Plan provides variation in the project features, and focuses primarily on the Visitor's Center and Chumash Village and interpretive features. This alternative also does not include permit-approved special events, which would further reduce periodic traffic trips and air quality impacts related to additional traffic and use of an additional unpaved overflow parking area. Implementation of this alternative may not be consistent with the project objectives, because it does not include an intended balance of pre-historic, archaeological, and historical features. While continued restoration of the Dana Adobe would occur, the alternative does not include the demonstration arena or Rancho era buildings. In addition, this alternative does not include additional special events and may not include facilities that are adequate to "furnish on-site opportunities for fundraising, and to provide facilities and amenities that DANA can reasonably afford to maintain." Lack of consistency with this objective is the burden of the applicant to demonstrate to the decision makers, because it relates to the financial intent of the proposed project.

The primary component of Design Alternative B is the elimination of onsite septic and connection to the NCSD sewer system. This option would reduce potential onsite impacts to archaeological resources within Locus A by reducing the affected area; however, overall, this option may not substantially minimize potential impacts to cultural resources due to the construction of a new sewer line within South Oakglen Avenue. While this alternative meets all project objectives, it would not significantly reduce identified impacts on the environment compared to the proposed project. All identified mitigation measures would be required, similar to the proposed project.

Based strictly on an analysis of the relative environmental impacts, the proposed project, with adoption and incorporation of recommended mitigation measures, is considered the Environmentally Superior Alternative. The decision-making body will consider the whole of the record when considering the approved project including, but not limited to, public comment and testimony. The decision-making body may select the project as proposed, an Alternative, or a specified combination of particular elements identified in the Alternatives, as the approved project. In all scenarios, the Mitigation and Monitoring Program would be applied to the approved project.

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