

5 ALTERNATIVES

5.1 INTRODUCTION

Section 15126.6(a) of the State CEQA Guidelines requires EIRs to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states that the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include information about each alternative sufficient to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (Section 15126.6[d]).

The State CEQA Guidelines further require that the “no project” alternative be considered (Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR “shall also identify an environmentally superior alternative among the other alternatives.” (Section 15126[e][2]).

In defining “feasibility” (e.g., “feasibly attain most of the basic objectives of the project”), Section 15126.6(f)(1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body, here the Board of Trustees. (See CEQA Sections 21081.5, 21081[a][3].)

5.1 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.1.1 Attainment of Project Objectives

In determining what alternatives should be considered in the EIR, the objectives of the project must be considered because attainment of most of the basic objectives forms one of the tests of whether an alternative is feasible (see discussion above). Cal Poly Humboldt identified the following project objectives, as previously described (see Chapter 2, "Project Description"):

1. provide additional housing near existing and planned mobility infrastructure (i.e., pedestrian and bicycle facilities and transit) to reduce vehicle trips, vehicle miles travelled, and parking demand;
2. provide student housing opportunities within Cal Poly Humboldt property to promote student enrollment and address current housing needs. In addition, provide housing opportunities and complementary services that may be offered to nontraditional students such as graduate students and veterans;
3. support and advance Cal Poly Humboldt's educational mission by guiding the physical development of housing proximate to campus to accommodate gradual student enrollment growth up to a future enrollment of 12,000 full-time-equivalent students per the 2004 Master Plan while preserving and enhancing the quality of campus life;
4. optimize an underutilized infill location within the City of Arcata and proximate to Cal Poly Humboldt;
5. provide housing density adjacent to Cal Poly Humboldt and the downtown area of the City of Arcata to reduce vehicle trips, vehicle miles traveled, and parking demand within campus and the downtown area;
6. minimize building footprints to preserve as much of the site as possible for the creation of open space and landscaped setbacks from surrounding roadways and residential uses;
7. contribute to the overall character and livability of the surrounding neighborhood and Cal Poly Humboldt by facilitating the reuse of property in a manner that enhances the visibility and aesthetic appeal of the city from US 101 and surrounding local roadways and that enhances circulation within the city and to Cal Poly Humboldt;
8. minimize impacts to on-site vegetation and potentially sensitive biological resources;
9. provide energy-efficient building design, low-water use indoor and outdoor design, and high-quality construction by incorporating national, state, and/or local sustainable design practices; and
10. advance campus-wide environmental sustainability and make progress toward goals of carbon neutrality and climate resilience.

5.1.2 Summary of Significant Impacts

The Executive Summary of this EIR presents a detailed summary of the potential environmental impacts of implementation of the Student Housing Project. Overall, the project would result in less-than-significant impacts with respect to air quality; archaeological, historical, and tribal cultural resources; biological resources; energy; greenhouse gas (GHG) emissions; land use and planning; noise; population and housing; public services; transportation; and utilities and service systems. However, the project would result in significant and unavoidable impacts with respect to aesthetics and noise (construction).

5.2 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(a) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project

purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* [2008] 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision maker(s) (See CEQA Section 21081[a][3].) At the time of action on the project, the decision maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint and may reject an alternative on that basis provided that the decision maker(s) adopts a finding, supported by substantial evidence, to that effect and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered by Cal Poly Humboldt but are not evaluated further in this ~~Draft~~ Final EIR.

5.2.1 Alternative Site Configuration

Cal Poly Humboldt initially considered a modified configuration (i.e., site layout) of the proposed student housing complex that would nonetheless include the same primary components (i.e., apartment-style units with up to 964 beds for undergraduate and graduate student and on-site amenities) as the project. More specifically, Cal Poly Humboldt explored providing four four-story housing buildings along the perimeter of the site, resulting in on-site buildings being located closer to single-family homes located along the southern and western edges of the site. In contrast, the project would consolidate two seven-story buildings in the center of the site that would increase in height as they trend to the east, and includes deep landscape setbacks from surrounding roadways (e.g., Maple Lane and Eye Street). Because of the existing single-family residential neighborhood to the south and west, as well as US 101 to the east, this alternative would potentially increase visual impacts on the nearby residential neighborhood and/or along US 101 if the reconfiguration necessitated increased building height or massing along the perimeter of the site. Additionally, this alternative could expose on-site residences to additional noise associated with vehicles along US 101 or the existing lumber mill (Mad River Lumber) to the north.

While this alternative would achieve the project objectives and would support Cal Poly Humboldt's desire to provide additional student housing proximate to campus, it would also alter the internal circulation of the site and could require more substantial relocation of existing City utility infrastructure in the area (including water, sewer, and stormwater facilities located within the project site). As currently proposed, the project would include development of a roundabout in the northeast corner and driveways and parking would occur along the perimeter of the site, which allows for consistent emergency vehicle access to and through the site. However, internal circulation under this alternative would provide limited access for fire protection personnel during potential emergency situations, as well as potential conflicts with pedestrian circulation. Furthermore, because this alternative would not alter the amount of development (in terms of acreage and square footage of on-site buildings), nature of the proposed uses, or number of on-site residents, this alternative would not reduce or eliminate environmental impacts resulting from the project. Therefore, this alternative is not considered in further detail.

5.2.2 Academic/Administrative Development

Cal Poly Humboldt considered the development of academic or administrative buildings/facilities instead of student housing. Because of its distance from the main campus, this alternative could create a greater number of vehicle trips, as a result of academic administrative or academic trips to other on-campus uses during the academic calendar year.

It would also not provide additional student housing proximate to campus that is intended to accommodate projected growth of Cal Poly Humboldt, consistent with campus master planning efforts. Additionally, this alternative would not be consistent with the City of Arcata's adopted planning documents or current planning efforts, which have identified the project site for redevelopment with higher density residential uses. Although, as noted throughout this EIR, the CSU is not subject to local regulations, development within the local context/community is considered where appropriate, and this alternative would not be consistent with the City's General Plan update designation and vision for the site. Because this alternative would not meet many of the project objectives and would not reduce or eliminate environmental impacts resulting from the project, this alternative is not considered in further detail.

5.2.3 Development Per Existing Zoning

The City has identified the project site for redevelopment with high-density, multifamily residential development (City of Arcata 2022); however, the current City zoning and land use designations for the project site are Limited Industrial, which could allow for development/redevelopment with a mix of light industrial and/or warehouse-related uses. Nonetheless, because the project site is currently owned by the Humboldt State University Foundation, would be transferred to Cal Poly Humboldt as part of the project, and Cal Poly Humboldt (as part of the CSU) is not subject to local plans, policies, and regulations, redevelopment of the site with industrial uses consistent with existing zoning is not considered feasible. It would also not provide additional student housing proximate to campus that is intended to accommodate existing demand and projected growth in student enrollment at Cal Poly Humboldt, consistent with campus master planning efforts. Because this alternative would not meet any of the project objectives and would not reduce or eliminate environmental impacts resulting from the project, this alternative is not considered in further detail.

5.3 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives are evaluated in this ~~Draft~~ Final EIR:

- ▶ **Alternative 1: No Project–No Development Alternative.** This alternative would involve no alteration of the project site. No development would occur, and the project site would remain in its current condition, providing leasable workspace and storage opportunities for the local community and businesses.
- ▶ **Alternative 2: Lower-Density Student Housing Development.** Under this alternative, the project site would be developed with a less intense housing development, consistent with the previously proposed development at the project site. Under this alternative, up to 800 student beds would be provided within four 4-story structures with internal courtyards located within the central portion of the site. This alternative was previously considered by the City as part of an application for a private development on the same site, but was never approved.
- ▶ **Alternative 3: On-Campus Student Housing.** Under this alternative, the upper playfield of the main campus, approximately 2.3 acres in size, would be developed with student housing. In terms of housing density, this alternative would be similar in size and scale (~500 student beds per acre within 2 multi-story buildings) to existing Redwood and Sunset Halls, which provide on-campus housing for first-year students. This alternative would require the removal of the university's upper playfield, which is used as a multipurpose field for softball and baseball, and conversion of other on-campus recreational areas (e.g., Redwood Bowl or College Creek Soccer Field) to multipurpose facilities to replace the loss of the upper playfield and its functions.
- ▶ **Alternative 4: Faculty and Staff Housing.** Under this alternative, the project site would be developed to include a series of townhomes and apartments for faculty and staff and their families. Assuming that 0.1 acre would be required per townhome/residence, including amenities (e.g., internal circulation and open space), and allowing for appropriate setbacks from the existing lumber mill and US 101, it is anticipated that approximately 150 units could be developed on-site. Assuming 2.12 persons per household (DOF 2021), this would equate to 318 on-site residents.

For purposes of comparison with the action alternatives, conclusions for each technical area are characterized as "impacts" that are comparatively greater than, similar to, or reduced compared to those of the proposed project. Further details on these alternatives and an evaluation of environmental effects relative to the project are provided below.

5.3.1 Alternative 1: No Project-No Development Alternative

CEQA Guidelines Section 15126.6(e)(1) requires that the “no project” alternative be described and analyzed “to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.” The no project analysis is required to discuss “the existing conditions at the time the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (Section 15126.6[e][2]). Further,

[i]f the project is...a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment. (Section 15126[e][3][B])

Under Alternative 1, the No Project–No Development Alternative, no actions would be taken by Cal Poly Humboldt and the project site would remain unchanged from current conditions and underutilized. The property would remain in operation as a light industrial use with rental space for small businesses in the area, and the existing single-family residences on the project site would remain.

AESTHETICS

Under the No Project–No Development Alternative, there would be no alteration of the visual character of the project site, and views of the area from surrounding vantage points would not change as a result of construction activities or project operation. In comparison, project would result in the development of new buildings on-site ranging from five to seven stories in height (up to approximately 75 feet above ground surface), as well as site improvements including roads, paths, parking, and landscaping. Because the project site is currently underutilized and characterized by primarily light industrial uses (including the Craftsman’s Mall main building), the local visual character after project development, as experienced by viewer groups in the area, would be altered by the project. The project would partially obstruct long-distance views of and through the site and would result in significant impacts related to scenic vistas, existing visual character, and scenic resources along a State scenic highway. Comparatively, the No Project–No Development Alternative would involve no change in existing conditions and, as a result, would avoid all significant impacts of the project.

Although the No Project–No Development Alternative would avoid both short-term and long-term visual changes, the proposed development of the project site may be considered an improvement to the visual quality of the area, as it would remove containers, debris, and materials stored outside with no visual screening and introduce new aesthetic elements through the construction of new buildings, green spaces, and landscaping. At the same time, the No Project–No Development Alternative would not introduce new lighting or development of the site, resulting in no alteration to the visual character or lighting at the site. Therefore, the No Project–No Development Alternative would result in reduced impacts with respect to aesthetics, compared to the project. *(Less impact; significant and unavoidable aesthetics impacts avoided)*

AIR QUALITY

Because the project site is currently underutilized and because the No Project–No Development Alternative would involve no construction disturbance and no new vehicular trip generation, this alternative would not generate construction- or operations-related air emissions. By comparison, with implementation of mitigation measures, the project would result in less-than-significant impacts pertaining to operational emissions, odors, and substantial pollutant concentrations. Further, with mitigation, the project’s air quality impacts during construction would be less

than significant. Implementation of the No Project–No Development Alternative would not result in these air quality impacts; therefore, this alternative would result in reduced impacts with respect to air quality, compared to the project. *(Less impact; significant but mitigable air quality impacts avoided)*

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

The No Project–No Development Alternative would not involve on-site construction activities, thereby avoiding impacts related to the disturbance, destruction, or alteration of any known or as-yet-undiscovered/unrecorded prehistoric or historic archaeological resources, tribal cultural resources, human remains, or historic architectural resources. In comparison, implementation of the project would result in ground-disturbing activities that could cause potentially significant impacts related to disturbance of undiscovered/unrecorded subsurface archaeological and tribal cultural resources. These impacts would be reduced to less-than-significant levels with implementation of mitigation measures. Because the No Project–No Development Alternative would not include any ground disturbance, it has a lesser potential to result in the disturbance of as-yet-undiscovered subsurface tribal cultural resources. Therefore, the cultural resource impacts under the No Project–No Development Alternative would result in reduced impacts, compared to the project. *(Less impact; significant but mitigable archaeological and tribal cultural resources impacts avoided)*

BIOLOGICAL RESOURCES

The No Project–No Development Alternative would not include any development activities and would not disturb any existing on-site biological resources. Construction of the project may result in some on-site tree removal and the potential disturbance of certain amphibians, nesting raptors, and/or other birds, which would be mitigated to avoid disturbance to these resources, resulting in less than significant impacts. The project site is located within a disturbed area of a generally densely developed environment, and the proposed project would entirely avoid the riparian wetlands and grasslands in the western portion of the project site and along its western and northwestern perimeters, and would not result in any significant biological resources impacts after mitigation. However, the No Project–No Development Alternative would avoid disturbance to the project site and would therefore result in reduced potential biological resource impacts, compared to the project. *(Less impact; significant but mitigable biological resources impacts avoided)*

ENERGY

Under the No Project–No Development Alternative, no development would occur. The project site would remain in its currently underutilized condition, has and would continue to have minimal energy needs limited to security lighting and operation of the on-site Craftsman’s Mall and three residences. Retention of the project site in its current condition would result in no change in energy use compared to existing conditions. While the project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction and would involve the operation of energy-efficient structures on-site, the No Project–No Development Alternative would avoid all energy use related to construction and operation of the project, thereby resulting in reduced energy use, compared to the project. *(Less impact)*

GREENHOUSE GAS EMISSIONS

Because the No Project–No Development Alternative would involve no construction disturbances and no new vehicular trip generation, this alternative would not generate new construction- or operations-related GHG emissions. By comparison, with implementation of mitigation measures, the project would result in less-than-significant impacts with respect to GHG emissions and would assist Cal Poly Humboldt in providing student housing proximate to campus, which would reduce regional GHG emissions. However, the No Project–No Development Alternative would not result any new construction-, transportation-, or operational-related GHG emissions and therefore would result in reduced impacts with regard to climate change, compared to the project. *(Less impact)*

LAND USE AND PLANNING

This alternative would not result in redevelopment of the site. As a result, this alternative would result in no additional changes to the existing site. However, its continued use as storage and light industrial and low-density residential uses would not implement the City's General Plan Update (pending approval by the City) and would conflict with the City's contemplated land use and zoning designations for the site. Under the currently adopted General Plan, Alternative 1 would not conflict with land use designation and zoning, and therefore would have no impact, which would be reduced compared to the project's less than significant impact associated with consistency with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, and physical division of an existing community. *(Less impact)*

NOISE

Under the No Project–No Development Alternative, no development activities would occur, and no additional traffic would be generated. Therefore, there would be no increase in potential noise conflicts under the No Project–No Development Alternative. By comparison, the project would result in less-than-significant construction-generated noise and vibration levels and a less-than-significant operation-related noise impact. Although the project would not have significant and unavoidable noise impacts, the No Project–No Development Alternative would not generate noise as a result of on-site construction or additional operation activities beyond existing conditions; therefore, noise impacts associated with this alternative would be reduced, in comparison to the impacts of the project. *(Less impact; significant and unavoidable construction noise impact avoided)*

POPULATION AND HOUSING

Under this alternative, no student housing would be provided at the site. As a result, the additional housing for existing and projected enrollment (under the 2004 Master Plan) within Cal Poly Humboldt property and proximate to the main campus would not be provided. As student enrollment at Cal Poly Humboldt increases, as anticipated in the 2004 Master Plan and associated EIR, the additional students may seek housing within the nearby community, which could induce the construction of additional housing within the City of Arcata and Humboldt County. However, this demand for housing would not be entirely directly attributable to this alternative, as demonstrated by the provision of additional alternatives to the project within this chapter (e.g., Alternative 3). As a result and for the purposes of this analysis, this alternative would not necessitate the provision of housing elsewhere because of increased activity at the site, nor would it displace substantial numbers of existing people or homes. Accordingly, this alternative would result in reduced population and housing impacts compared to the project. *(Less impact)*

PUBLIC SERVICES

Under this alternative, no development would occur at the project site, and existing uses would continue to operate as they do under existing conditions. As a result, this alternative would not result in an increase in demand for public services. With project implementation, impacts were determined to be less than significant because the proposed development would be adequately served by local public service providers. However, this alternative would result in no impact altogether because there would be no change in demand, and as a result, public services impacts would be reduced under this alternative. *(Less impact)*

TRANSPORTATION

Under the No Project–No Development Alternative, no vehicular trips would be generated as a result of on-site construction or operation of new facilities, and there would be no change to local vehicular trips because the project site would remain vacant and unused. In comparison, the project would add new trips to the local roadway network; however, vehicle miles traveled (VMT) as a result of project implementation would not exceed appropriate standards. Construction of the project may temporarily disrupt parking and pedestrian and bike access in the vicinity of the project

site, but these localized and temporary impacts would be minimized through implementation of a construction traffic management plan. However, the project would require implementation of mitigation to reduce impacts related to the provision of appropriate bicycle and pedestrian facilities to and from the project site because of the current lack sufficient bicycle and pedestrian facilities between the Cal Poly Humboldt main campus and the project site. The No Project–No Development Alternative would avoid the potential hazards related to bicycle and pedestrian facilities associated to the project. Additionally, under this alternative, no new vehicular or bicycle facilities would be introduced; therefore, no connectivity improvements would be implemented. Further, the No Project–No Development Alternative would result in no additional trips; no vehicular transportation impacts; and no transit, bicycle, or pedestrian impacts. Therefore, the No Project–No Development Alternative would result in reduced transportation and circulation impacts, compared to the project. *(Less impact; significant but mitigable transportation impacts avoided)*

UTILITIES AND SERVICE SYSTEMS

The No Project–No Development Alternative would not result in additional demand for water, wastewater treatment, stormwater conveyance, electricity, or natural gas; nor would it result in the need for new infrastructure. By comparison, the project would result in largely less-than-significant impacts on utility demand and infrastructure but would require potential improvement of an off-site sewer pipe (pending verification through mitigation implementation). Comparatively, the No Project–No Development Alternative would not result in any significant impacts because the site would remain in its current underutilized condition and would have no additional demand for potable water, stormwater/surface-runoff management, wastewater treatment, and stormwater and wastewater conveyance infrastructure. With respect to utilities and service systems, the No Project–No Development Alternative would have reduced utilities impacts, in comparison to the project. *(Less impact; significant but mitigable sewer line impacts avoided)*

ACHIEVEMENT OF PROJECT OBJECTIVES

The No Project–No Development Alternative would not support Cal Poly Humboldt’s academic mission by accommodating increases in student enrollment proximate to campus and within Cal Poly Humboldt property (Project Objectives 1, 2, and 3). In addition, it would not optimize an underutilized location or contribute to the overall livability of the area (Project Objective 4). In general, Alternative 1 would not meet any of the project objectives and would not achieve the underlying project purpose of the project.

5.3.2 Alternative 2: Lower-Density Student Housing Development

Under this alternative, the project site would be developed with a smaller housing development, consistent with the previously proposed development at the project site. Under this alternative, up to 800 student beds would be provided within four 4-story buildings surrounding internal courtyards located within the central portion of the site. This alternative was previously considered by the City as part of an application for a private development on the same site, but was never approved. As noted in Chapter 2, “Project Description,” the application was rescinded in 2019.

AESTHETICS

Both Alternative 2 and the project would redevelop the project site with new buildings, parking, open space and landscaping, and utility infrastructure. While this alternative would include less development at the project site, because the project site is within an urban/suburban area of the city, surrounded by developed uses, the local visual character as experienced by viewer groups in the area would be similarly altered under this alternative. Because of the reduced height of on-site buildings under this alternative, in comparison to the project, impacts would be less; however, views from Viewpoints 1, 3, and 4 (refer to Section 3.1, “Aesthetics”), which includes residents to the west and south, as well as motorists along an eligible State scenic highway segment, would experience a substantial adverse change in visual character. Similar mitigation to that of the project with respect to light and glare impacts would also be required under this alternative. *(Similar impact)*

AIR QUALITY

Similar to the project, Alternative 2 would include construction of new student housing, internal roadways, and landscaping that would generate less than significant construction-related air emissions with implementation of identified mitigation measures. However, implementation of this alternative would reduce ground disturbance, which would result in incrementally reduced construction-related emissions. In addition, the elimination of approximately 100 student beds would reduce site-generated operational and vehicular air emissions. The project would not result in significant and unavoidable air quality impacts; therefore, Alternative 2 would not avoid any significant impacts. However, this alternative would reduce construction-related air emissions and could reduce operational-related air emissions relative to the proposed project, resulting in reduced air quality impacts, in comparison to the project. *(Less impact)*

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Alternative 2 would still require excavation, removal of existing on-site structures, and disturbance of site soils during construction, which could result in the potential to disturb undiscovered/unrecorded subsurface archaeological and tribal cultural resources. Both Alternative 2 and the project would reduce significant impacts related to these resources to less-than-significant levels with mitigation. Therefore, Alternative 2 would result in similar impacts related to the potential to disturb as-yet-undiscovered subsurface archaeological and tribal cultural resources. *(Similar impact)*

BIOLOGICAL RESOURCES

With respect to biological resources, Alternative 2 would develop the same site as the project and with multiple housing structures. Although the massing and scale of development at the site would be less under this alternative, the disturbance area and potential for impacts to biological resources would be the same. Therefore, similar to the project, this alternative would require mitigation for potential impacts related to special status wildlife, which would then be mitigated to less than significant. Therefore, this alternative would have biological resource impacts similar to those of the project. *(Similar impact)*

ENERGY

Similar to the project, Alternative 2 would include development of the project site with student housing, which would increase electricity consumption compared to existing conditions. Also similar to the proposed project, Alternative 2 would be designed to meet current building standards and would implement energy efficiency measures to achieve Leadership in Energy and Environmental Design (LEED) v4 Silver certification (consistent with Executive Order B-18-12). Therefore, neither the project nor this alternative would result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. However, this alternative would result in less construction activities and operation of fewer student residences, which would further reduce fuel consumption and energy use. This alternative would result in reduced energy impact, compared to the project. *(Less impact)*

GREENHOUSE GAS EMISSIONS

Similar to the project, Alternative 2 would include construction of student residences at the project site. As with the project, Alternative 2 would provide EV-ready parking spaces equivalent to 10 percent of the total number of on-site parking spaces and other sustainability features consistent with current building efficiency standards. As under the project, the GHG emissions related to construction, vehicle trips, area sources, electricity and natural gas consumption, water use, and waste generation would not be considered significant, due in large part to the VMT efficiency that would be achieved by the provision of high-density housing on-site. However, implementation of this alternative would reduce construction-related emissions because of the reduced level of development. Because up to 800 student beds would be provided upon buildout of the project site, this alternative would also result in a reduction of site occupants on the site, which would reduce operational GHG emissions. The reduction in the number

of site occupants associated with buildout may also reduce vehicle trips and VMT. Overall, Alternative 2 would reduce GHG emissions, resulting in reduced GHG-related impacts in comparison to the project. (*Less impact*)

LAND USE AND PLANNING

Development of the project site under Alternative 2 would involve the provision of high-density student housing proximate to the Cal Poly Humboldt campus. Although the level of development under this alternative would be approximately 15 percent less than under the project, the type of development and land use would remain the same. As a result, potential land use impacts associated with division of an established community and conflicts with applicable plans and policies would be less than significant, as under the project. (*Similar impact*)

NOISE

Similar to the project, Alternative 2 would involve the construction of on-site residential structures, internal roadways, common areas, and site landscaping. This alternative would reduce construction activities and construction-related noise compared to the project because it would involve the construction of structures of lower height and with less square footage. Nonetheless, construction activities would occur within the same developable areas as the project; therefore, potential impacts on off-site receptors during construction would be similar to those under the project. With respect to operational noise, this alternative would generally reduce the level of activity at the site (i.e., reduced operational uses, fewer occupants, less parking, and less mechanical equipment compared to the proposed project). Therefore, while the overall construction and operational noise impacts of this alternative would be reduced in comparison to the noise impacts of the project, impacts would be expected to remain significant with implementation of this alternative. (*Less impact*)

POPULATION AND HOUSING

Under Alternative 2, a reduced number of student beds (i.e., housing capacity) would be provided at the site. As a result, the additional housing for existing/projected enrollment (under the 2004 Master Plan) within the Cal Poly Humboldt property and proximate to the main campus would not be provided to the extent that it would be provided under the project. Nonetheless, this alternative would provide some additional student housing which would reduce competition for the limited amount of available housing elsewhere in the community by both students and local residents. As this alternative would result in a net increase in the number of student housing opportunities in the area, the removal of the three residences on-site would not be considered substantial or necessitate replacement housing elsewhere. As a result, this alternative would result in a population and housing impact similar to that of the project. (*Similar impact*)

PUBLIC SERVICES AND RECREATION

Alternative 2 would result in an increase in demand for public services similar to that of the project. Under the project, impacts were determined to be less than significant because development of the project site would be adequately served by local public service providers and project-related demand for service would not require new or modified facilities, the development of which could result in significant environmental impacts. Alternative 2 would also result in less-than-significant public service impacts because this alternative would also not require new or modified public service facilities, the development of which could result in significant environmental effects. (*Similar Impact*)

TRANSPORTATION

Because Alternative 2 would involve less overall development of the project site (in terms of structural square footage), it would reduce the construction effort and would generate less short-term construction traffic. The localized and temporary impacts would continue to be minimized through implementation of a construction traffic management plan. Because Alternative 2 would accommodate fewer site occupants than the project, overall VMT

associated with on-site uses would also be reduced. However, as noted in Section 3.11, "Transportation," no significant and unavoidable transportation impacts are anticipated. Because residential uses would be developed on-site, the need for mitigation related to the provision/consideration of pedestrian/bicycle facilities on- and off-site would remain under this alternative. Although Alternative 2 would not avoid the need for the aforementioned mitigation, the transportation-related impacts under this alternative would be reduced when compared to those of the project because of the reduced level of development at the project site. (*Less impact*)

UTILITIES AND SERVICE SYSTEMS

Alternative 2 would reduce the intensity of on-site land uses (i.e., fewer site occupants and reduced building square footage) at the project site. Therefore, this alternative could result in an incrementally lower demand for water, wastewater collection and treatment, and electricity. The project would not result in significant utilities impacts; therefore, this alternative would not avoid any significant impacts. Similar mitigation related to sewer lines in the area would also be required as part of this alternative. However, Alternative 2 would reduce utility demands. Therefore, this alternative would result in reduced utilities impacts compared to the project. (*Less impact*)

ACHIEVEMENT OF PROJECT OBJECTIVES

Alternative 2 would achieve most of the stated project objectives, similar to the proposed project. However, Alternative 2 would provide less opportunity for students to reside in Cal Poly Humboldt housing and reduce off-campus housing demands (Project Objectives 1 and 2). This alternative would also not achieve the level of optimization of the project site (Project Objective 4) that the project would achieve, nor would it (in doing so) eliminate the significant and unavoidable impacts associated with the project. Thus, Alternative 2 would not provide the same level of achievement of the project objectives and would be less effective in supporting the underlying purpose of Cal Poly Humboldt.

5.3.3 Alternative 3: On-Campus Student Housing

Under this alternative, development of the project site would not occur. Instead, the upper playfield of the Cal Poly Humboldt main campus, approximately 2.3 acres in size (in contrast to the 12.8-acre project site), would be developed with student housing. In terms of housing density, this alternative would be similar in size and scale (approximately 500 student beds per acre within 2 multistory buildings) to Redwood and Sunset Halls, which provide on-campus housing for first-year students. In order to be consistent with other typical campus housing, this alternative would not provide apartment-style housing and would more closely resemble traditional residence halls (i.e., without kitchens and other amenities such as dining). Based on similarly sized on-campus housing, under this alternative, the buildings would likely be 5-7 stories in height with reduced communal meeting and study space compared to the project.

As part of ongoing campus planning efforts, other developable areas of campus are also being preliminarily considered for additional student housing or essential academic/administrative programming space in the future. This alternative would require the removal of the university's upper playfield, which currently supports softball and other track and field activities. It is also the only multipurpose, natural grass field on campus. Consequently, this alternative would also require the conversion of other on-campus recreational areas (e.g., Redwood Bowl or College Creek Soccer Field) to multipurpose facilities to supplant the loss of the upper playfield and its functions. It would also result in an overall reduction in recreational opportunities on campus.

AESTHETICS

Under this alternative, the changes in visual character as a result of student housing development would be similar to those under the project; however, the degree of visual change in the area as a result of development of the on-campus location would be less than under the project. Compared to the project site, the on-campus location has limited visibility from publicly accessible vantagepoints and none from US 101. While the size (up to seven stories) and design of the

student housing under Alternative 3 would be similar to those under the project, the change in visual character would be less under Alternative 3. For example, whereas the project site is visible from US 101, the existing residential neighborhoods to the west and south, the L.K. Wood Boulevard/US 101 overpass, and certain nearby parks/open space, the upper playfield site has limited visibility from off-site locations because of intervening topography and vegetation. Some visibility of the student housing identified in this alternative would occur from locations like the 14th Street overcrossing of US 101 because of the potential structures' height; however, existing campus development (e.g., the Behavioral and Social Science Building) is already visible from such locations. At the project site, this alternative would involve no change from existing conditions. Therefore, the potential impacts of this alternative with respect to affecting long-distance views, resulting in a substantial adverse effect on existing visual character, and affecting scenic resources along a State scenic highway would be reduced in comparison to the project. (*Less impact*)

AIR QUALITY

Alternative 3 would include the same type and amount of development, albeit at a different location and within the Cal Poly Humboldt main campus, as the project. As a result, and similar to the project, this alternative would be consistent with applicable air quality plans by locating more students and faculty/staff on campus, proximate to their likely destinations, and in a manner consistent with existing regional air quality planning efforts. Because of the similar level of projected development, Alternative 3 would emit the same overall air emissions (associated with on-site structures) during construction and operation. During operations, Alternative 3 would provide the same number of on-campus housing opportunities for students as the project. However, because of the location of this alternative within the main campus, the amount of operation-related emissions of criteria air pollutants from sources such as vehicle trips to and from the main campus would be incrementally less than under the project. Generally, air quality impacts under Alternative 3 would be less than significant with mitigation (as a result of construction-related emissions), and the operation-related air quality impact would be reduced in comparison to the project. (*Less impact*)

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Earth-moving activities have the potential to disturb archaeological resources or result in accidental discovery of human remains. Under the project, there would be ground-disturbing activities (e.g., grading, excavation) that could result in the accidental discovery of archaeological and tribal cultural resources; however, feasible mitigation measures would reduce these impacts to a less-than-significant level. The potential to encounter these types of cultural resources would be similar under Alternative 3 because ground-disturbing activities would occur during construction. (*Similar impact*)

BIOLOGICAL RESOURCES

The upper playfield is a turf playfield located against the wooded eastern edge of the Cal Poly Humboldt main campus. Compared to the project site, the upper playfield has a greater potential for sensitive biological resource, along its northern and eastern edges. Due to the small size of the upper playfield, this alternative would likely require the removal of existing trees and vegetation along the northern and eastern boundaries of the site, whereas the project would avoid sensitive biological resources located in the northern and western portions of the site (e.g., Janes Creek and a small wetland) because of the larger size of the site. As a result, Alternative 3 could result in adverse effects on additional special-status species, associated with the habitat type (i.e., redwood forest) and potential wildlife corridors located adjacent to this alternative site. Depending on the species that may occur at or be near this alternative's site, these potential impacts could be mitigated through implementation of mitigation measures discussed in Section 3.4, "Biological Resources," or additional mitigation may be necessary. Because the size of this alternative location is relatively small compared to that of the project, avoidance of sensitive biological resources may not be feasible. As a result, impacts related to disturbance of biological resources would be greater under this alternative. (*Greater impact*)

ENERGY

Under Alternative 3, the same amount of development would occur as under the project, which would result in the same amount of construction activities and thus the same energy impacts during construction. Although development proposed under Alternative 3 and the project would be similar in terms of efficiency and structural energy consumption during operations, the number of vehicle trips to and from the rest of the main campus could be incrementally less under this alternative. Therefore, the impact would be less than significant under this alternative and reduced in comparison to the impacts of the project. (*Less impact*)

GREENHOUSE GAS EMISSIONS

Because the level of on-campus development under Alternative 3 would be similar to that under the project, including the need for the development of new connections to existing utilities, there would be similar construction- and operation-related GHG emissions compared to the 2035 Master Plan. However, because of the location of this alternative within the main campus, the corresponding amount of operational GHG emissions from sources such as vehicle trips to and from the main campus would be incrementally less than under the project. Generally, GHG impacts under Alternative 3 would be less than significant and, during operation, reduced in comparison to those of the project. (*Less impact*)

LAND USE AND PLANNING

Alternative 3 would not result in development of the project site, which would remain in its current underutilized condition. However, with respect to the threshold regarding physical division of an established community, this alternative would also not develop the project site in a manner consistent with current planning efforts by the City.

While development of the upper playfield would not result in the division of an established community, this alternative would result in the removal of an existing essential recreational facility at the main campus. The removal of the upper playfield could necessitate the construction of new facilities which may be inconsistent with ongoing planning efforts by the university. Construction at this location would conflict with the designated use of the alternative site under the current Master Plan for Cal Poly Humboldt. Impacts would be incrementally greater than under the project because of the inconsistency with the mix of land uses per the City's General Plan Update (pending City approval), inconsistency with the current 2004 Master Plan and ongoing planning efforts by the campus, and the further urbanization of the campus's eastern edge. (*Greater impact*)

NOISE

Because Alternative 3 and the project would result in the same level of development, earth-moving activities (e.g., grading, excavation) and noise and vibration impacts associated with development would be similar. However, receptors subject to those impacts would be different. Because no new development would occur within 500 feet of on-campus or off-campus residences under Alternative 3, impacts on receptors would be reduced. During operation, this alternative would likely result in fewer vehicle trips to, from, and within the campus, resulting in less roadway noise. As under the project, this impact would be less than significant. Because of the lack of receptors at the Alternative 3 site and fewer vehicle trips during operation, noise impacts associated with this alternative would be reduced in comparison to the impacts of the project. (*Less impact; significant and unavoidable noise impact avoided*)

POPULATION AND HOUSING

Alternative 3 would allow development of the same number of student beds as the project, but would not allow for the development of apartment-style housing and amenities. Alternative 3 would not induce unplanned population growth or displace existing residents. Because the number of student beds to be provided under this alternative would be the same under the project and would likewise accommodate the campus's existing and planned student

population, impacts related to unplanned population growth and displacement of substantial numbers of existing people or homes would be similar and remain less than significant. *(Similar impact)*

PUBLIC SERVICES AND RECREATION

Compared to the project, Alternative 3 would result in the same level of development at an on-campus location (i.e., the upper playfield). For this reason, the increase in demand for public services by the student housing development would be the same as under the project. Under the project, impacts on fire service, police service, schools, and libraries, and recreation were determined to be less than significant. Based on the size (964 student beds), location (on university property), and type (student housing), public services impacts to fire and police services, schools, and libraries under Alternative 3 would be similar in type and magnitude to those associated with the project. However, this alternative would require the removal of the existing upper playfield, which is the only turf field within the Cal Poly Humboldt main campus and is considered a unique recreational feature of the campus. The upper playfield also provides program space for certain classes and camps provided by Cal Poly Humboldt. As a result of its removal, the use of other on-campus field/recreational space would increase, and the development of additional field space within the main campus or off-campus may be required, which could result in environmental impacts. As a result, impacts on public services and recreation under Alternative 3 would be potentially significant and greater than under the project. *(Greater impact; potentially significant impact related to recreation)*

TRANSPORTATION

Under Alternative 3, VMT associated with on-campus student housing would be less than under the project because students would be on the campus and therefore that much closer to on-campus destinations. Because of the proximity of the Alternative 3 site to campus academic and other uses, development under this alternative would reduce overall VMT and be considered more consistent with bicycle and pedestrian policies because it would locate students closer to their destination and further promote alternative transportation. For this reason, the transportation impacts under Alternative 3 would be reduced in comparison to the impacts of the project. *(Less impact)*

UTILITIES AND SERVICE SYSTEMS

Under Alternative 3, development of the upper playfield with student housing would place greater demand on utilities and service system than under existing conditions. The overall demand for utilities would be the same as under the project because the same amount of development and number of student residents would occur under this alternative. As with the project, development under this alternative would connect to the same municipal utility infrastructure systems, which would be generally sufficient to meet the additional demands associated with this alternative. The potential need to modify nearby utility lines would be similar to that under the project, and mitigation similar to that identified for the project in Section 3.12, "Utilities and Service Systems," may be required. Further, similar stormwater management features and procedures would be required. As a result, impacts would be similar to those under the project. *(Similar Impact)*

ACHIEVEMENT OF PROJECT OBJECTIVES

Alternative 3 would achieve most of the stated project objectives, similar to the proposed project. However, Alternative 3 would not involve the optimization of an underutilized site (Project Objective 4), because the upper playfield is considered an essential recreational amenity to the Cal Poly Humboldt main campus and the students, faculty, and staff. As part of that, it would also detract from overall campus life/experience (Project Objective 3) by removing an essential recreational amenity of the existing campus. Additionally, this alternative would have secondary effects such as the net permanent loss of a unique recreational facility and the need to redevelop or intensify the use of other campus recreational facilities. As noted above, this alternative may result in greater impacts on biological resources, which would be less consistent with Project Objective 8, as stated above. Thus, Alternative 3 would not achieve the project objectives to the same extent as the project and would be less effective in supporting

the overall educational mission of Cal Poly Humboldt, which includes consideration, maintenance, and provision of a certain level of recreational amenities for its students.

5.3.4 Alternative 4: Faculty and Staff Housing

Under Alternative 4, the project site would be developed with a series of townhomes and apartments for faculty and staff and their families. Assuming that 0.1 acre would be required per townhome/residence, including amenities (e.g., internal circulation and open space), and allowing for appropriate setbacks from the existing lumber mill to the northeast and US 101, it is anticipated that approximately 150 units could be developed on-site. On-site structures would be up to two stories in height and would resemble the Janes Creek Meadows residential community. Assuming 2.12 persons per household (DOF 2021), this would equate to 318 on-site residents.

AESTHETICS

Both Alternative 4 and the project would redevelop the project site with new buildings, parking, open space and landscaping, and utility infrastructure. While this alternative would include less development at the project site, because the project site is within a densely developed area of the city, surrounded by developed uses, the local visual character as experienced by viewer groups in the area would be altered under this alternative, albeit to a lesser degree. Because of the lesser height of on-site structures under this alternative, impacts would be reduced; however, residents to the west and south, as well as motorists along an eligible State scenic highway segment, would potentially experience a substantial adverse change in visual character. This could likely be mitigated through the provision of on-site landscaping (including trees similar in height and scale to those in the adjacent hillsides), and this alternative could eliminate a significant and unavoidable impact of the project. Mitigation to address light and glare impacts would be required and would be similar to that identified for the project. *(Less impact; significant and unavoidable impacts avoided with mitigation)*

AIR QUALITY

Similar to the project, Alternative 4 would include construction of new housing, internal roadways, and landscaping, which would generate less-than-significant construction-related air emissions with implementation of identified mitigation measures. However, implementation of this alternative would reduce overall construction as a result of lesser anticipated square footage (i.e., 150 units with an average square footage of 1,500 square feet), which would result in incrementally reduced construction-related emissions. In addition, the reduction in overall site population would reduce site-generated operational and vehicular air emissions. As noted in Section 3.2, "Air Quality," the project would not result in significant and unavoidable air quality impacts; therefore, Alternative 4 would not avoid any significant impacts. However, this alternative would reduce construction-related air emissions and could reduce operational-related air emissions relative to the proposed project, resulting in reduced air quality impacts in comparison to those of the project. *(Less impact)*

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Alternative 4 would still require excavation, removal of existing on-site structures, and disturbance of site soils during construction, which could result in the potential to disturb undiscovered/unrecorded subsurface archaeological and tribal cultural resources. Both Alternative 4 and the project would reduce significant impacts related to these resources to less-than-significant levels with mitigation. Therefore, Alternative 4 would result in similar impacts related to the potential to disturb as-yet-undiscovered subsurface archaeological and tribal cultural resources. *(Similar impact)*

BIOLOGICAL RESOURCES

With respect to biological resources, Alternative 4 would develop the same site as the project and with multiple housing structures. Although the massing and scale of development at the site would be less under this alternative,

the disturbance area and potential for impacts on biological resources would be the same. Therefore, similar to the project, this alternative would require mitigation for potential impacts related to special-status wildlife, which would then be mitigated to less than significant. Therefore, this alternative would have biological resource impacts similar to those of the project. *(Similar impact)*

ENERGY

Similar to the project, Alternative 4 would include development of the project site with housing (albeit faculty/staff housing versus student housing), which would result in an increase in electricity consumption relative to existing conditions. Also similar to the project, Alternative 4 would be designed to meet current building standards and would implement energy efficiency measures to achieve LEED v4 Silver certification (consistent with Executive Order B-18-12). Therefore, neither the project nor this alternative would result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. However, Alternative 4 would result in less construction activity and operation of fewer student residences, which would further reduce fuel consumption and energy use. Therefore, this alternative would result in reduced impacts related to energy use and efficiency compared to the project. *(Less impact)*

GREENHOUSE GAS EMISSIONS

Alternative 4 would include construction of faculty/staff residences at the project site. As with the project, Alternative 4 would involve the incorporation of site sustainability features consistent with current building efficiency standards and the CSU Sustainability Policy. As under the project, the GHG emissions of this alternative related to construction, vehicle trips, area sources, electricity and natural gas consumption, water use, and waste generation, would not be considered significant. However, implementation of this alternative would reduce construction-related emissions because of the reduced level of development. Because up to 318 people would reside at the project site upon buildout, compared to the 964 for the project, this alternative would also result in a reduction of operational GHG emissions. The reduction in site occupants associated with buildout may also reduce vehicle trips and VMT. Overall, Alternative 4 would reduce GHG emissions, resulting in reduced impacts compared to the project. *(Less impact)*

LAND USE AND PLANNING

Development of the project site under Alternative 4 would involve the provision of faculty/staff housing proximate to the Cal Poly Humboldt campus. Although the level of development under this alternative would be approximately one-third that of the project, the type of development and land use (i.e., high-density residential) would remain the same. As a result, potential land use impacts associated with division of an established community and conflicts with applicable plans and policies would be less than significant, as under the project. *(Similar impact)*

NOISE

Similar to the project, Alternative 4 would involve the construction of on-site residential structures, internal roadways, common areas, and site landscaping. This alternative would reduce construction activities and construction-related noise compared to the project because it would involve the construction of structures of lower height and with less square footage. Nonetheless, construction activities would occur within the same developable areas as the project; therefore, potential impacts on off-site receptors during construction would be similar to those under the project. With respect to operational noise, this alternative would generally reduce the level of activity at the site (i.e., reduced operational uses, fewer occupants, less parking, and less mechanical equipment compared to the proposed project). Therefore, while the overall construction and operational noise impacts of this alternative would be reduced in comparison to the project, impacts would be expected to remain significant with implementation of this alternative. *(Less impact)*

POPULATION AND HOUSING

Under Alternative 4, faculty/staff housing would be provided at the site rather than student housing. As a result, the additional housing for existing/projected student enrollment (under the 2004 Master Plan) within Cal Poly Humboldt property and proximate to the main campus would not be provided. Nonetheless, because this alternative would provide additional Cal Poly Humboldt-related housing proximate to the main campus, it would likely reduce the level of Cal Poly Humboldt faculty/staff living in the local community. This alternative would not necessitate the provision of housing elsewhere, nor would it displace existing people or homes beyond the three residential structures on-site that would be removed under both this alternative and the project. As a result, this alternative would result in a population and housing impact similar to that of the project. *(Similar impact)*

PUBLIC SERVICES AND RECREATION

Alternative 4 would result in an increase in demand for public services similar to that of the project. Under the project, impacts were determined to be less than significant because development of the project site would be adequately served by local public service providers and project-related demand for service would not require new or modified facilities, the development of which could result in significant environmental impacts. Under Alternative 4, the project would potentially result in greater public services impacts, primarily related to potential new, school-age children who would seek enrollment in the Arcata School District and Northern Humboldt Union High School District. For the most part, this alternative, like the project, would result in less-than-significant public service impacts; however, potential impacts on local schools would be greater under this alternative. *(Greater Impact)*

TRANSPORTATION

Because Alternative 4 would involve less overall development of the project site (in terms of structural square footage), it would reduce the construction effort and would generate less short-term construction traffic. The localized and temporary impacts would continue to be minimized through implementation of a construction traffic management plan. Because Alternative 4 would accommodate fewer site occupants than the project (318 rather than 964), overall VMT associated with on-site uses would also be reduced. However, as noted in Section 3.11, "Transportation," no significant and unavoidable transportation impacts are anticipated. Because residential uses would be developed on-site, the need for mitigation related to the provision/consideration of pedestrian/bicycle facilities on- and off-site would remain under this alternative. Although Alternative 4 would not avoid the need for the aforementioned mitigation, the transportation-related impacts under this alternative would be reduced in comparison to the transportation impacts of the project because of the reduced level of development at the project site. *(Less impact)*

UTILITIES AND SERVICE SYSTEMS

Alternative 4 would reduce the intensity of on-site land uses (i.e., fewer site occupants and reduced building square footage) at the project site. Therefore, this alternative could result in an incrementally lower demand for water, wastewater collection and treatment, and electricity. The project would not result in significant utilities impacts; therefore, this alternative would not avoid any significant and unavoidable impacts. Similar mitigation related to sewer lines in the area would also be required as part of this alternative. However, Alternative 4 would reduce utility demands. Therefore, this alternative would result in reduced impacts compared to the project. *(Less impact)*

ACHIEVEMENT OF PROJECT OBJECTIVES

Alternative 4 would achieve most of the stated project objectives, similar to the proposed project. However, Alternative 4 would not provide opportunities for students to reside in Cal Poly Humboldt housing and reduce off-campus housing demand (Project Objective 2). Alternative 4 would result in fewer housing options and resources available to students compared to faculty and staff, thereby not achieving Project Objectives 1 and 5 to the extent of the project. The lack of available on-campus student housing has deterred prospective students from accepting enrollment, which has caused the university to suffer from reduced yield. This alternative would also not achieve the level of optimization of the project site (Project Objective 4) that the project would achieve, and would not minimize building footprints on-site (Project Objective 5) to the extent of the project. Thus, Alternative 4 would not provide the same level of achievement of the project objectives and would be less effective in supporting the underlying purpose of Cal Poly Humboldt.

5.4 COMPARISON OF ALTERNATIVES

Table 5-1 summarizes the environmental analysis provided above for the Student Housing Project alternatives.

Table 5-1 Summary of Environmental Effects of the Alternatives Relative to the Student Housing Project

Environmental Topic	Project	Alternative 1: No Project– No Development Alternative	Alternative 2: Lower Density Student Housing Development	Alternative 3: On- Campus Student Housing	Alternative 4: Faculty and Staff Housing
Aesthetics	SU	-	-	-	-
Air Quality	LTS/M	-	=	-	=
Archaeological, Historical, and Tribal Cultural Resources	LTS/M	-	=	=	=
Biological Resources	LTS/M	-	=	+	=
Energy	LTS	-	-	-	-
Greenhouse Gas Emissions	LTS	-	-	-	-
Land Use and Planning	LTS	-	=	+	=
Noise	SU	-	-	-	-
Population and Housing	LTS	-	=	=	=
Public Services and Recreation	LTS	-	=	+	+
Transportation	LTS/M	-	-	-	-
Utilities and Service Systems	LTS/M	-	-	=	-

Notes:

Impact Status:

LTS = less-than-significant impact.

LTS/M = LTS with mitigation.

SU = Significant and unavoidable.

= - Impacts would be similar to those of the project.

- - Impacts would be less than those of the project.

+ - Impacts would be greater than those of the project.

Source: Data compiled by Ascent Environmental in 2022.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines Section 15126.6 states that an EIR should identify the “environmentally superior” alternative. It further states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As shown in the Executive Summary of this EIR, there would be significant and unavoidable impacts associated with the project. These impacts are related to aesthetics. Additionally, significant but mitigable impacts would occur with respect to air quality; archaeological, historical, and tribal cultural resources; biological resources; noise; transportation; and utilities and service systems.

Because Alternative 1 (No Project–No Development), which would represent the least amount of development compared to existing conditions, would have the fewest and least substantial potential physical environmental impacts. Because the No Project–No Development Alternative (described above in Section 5.4.1) and would avoid the significant adverse impacts resulting from the construction and operation of the project, it is the environmentally superior alternative. As required by State CEQA Guidelines Section 15126.6(e)(2), because the No Project–No Development Alternative was identified as the environmentally superior alternative, another environmentally superior alternative must be identified among the other alternatives considered.

When considering objectives, the project would best meet the purpose and need. In contrast, Alternative 1 would not provide additional housing to accommodate projected student enrollment growth under the current 2004 Master Plan. Alternative 2 would generally result in impacts that are less than or equal to those of the project but would not provide the extent of student housing afforded by the project to meet existing and projected housing demand, as anticipated in the 2004 Master Plan and as a result of Cal Poly Humboldt’s designation as a polytechnic university within the CSU system. It would also not eliminate the significant and unavoidable impacts of the project, although it would lessen them. Alternative 3 would reduce some impacts as a result of development of student housing on-campus but would result in some greater impacts because it would replace existing campus uses. While Alternative 4 would generally meet the objectives of the project, it would provide a different housing type than is considered necessary and would be less consistent with the overall educational mission of Cal Poly Humboldt. Further, it would have additional impacts on local schools that would not occur with the project.

Alternatives 2, 3, and 4 would result in various environmental effects, some of which would be greater than with implementation of the project, some less than, and some the same. Nonetheless, each of the alternatives considered would result in significant and unavoidable environmental impacts for a variety of issue areas depending on the alternative, ranging from aesthetics and noise (similar to the project) to biological resources and public services/recreation, as illustrated in Table 5-1. However, on balance, the environmentally superior alternative would be Alternative 2: Lower Density Student Housing Development, considering the reduced size of development compared to the project, as it would reduce the degree of impact but not the overall significance conclusions for aesthetics and noise impacts. However, Alternative 2 would not meet the existing and projected housing demand needed to accommodate projected growth in student enrollment, nor would it support the underlying purpose of the project to provide additional student housing and reduce the student housing burden on the local community to the extent of the project.

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