

## **Chapter 9. Alternatives Analysis**

This chapter provides a comparative evaluation of the potential environmental effects of the Proposed Project and alternatives. The alternatives analyzed in detail in this EIR include variations of MPA network components identified as Alternatives 1, 2, and 3. Descriptions of these alternatives can be found in Chapter 2. This chapter also describes and considers the No Project Alternative and describes the alternatives screening process used in this planning effort.

### **9.1. Alternatives Screening Process**

This discussion provides an overview of the alternatives screening process, including a discussion of alternatives considered in the previous stages of project development and stakeholder outreach. Because the MLPA contemplates the redesign or development of MPAs, alternatives consideration is limited to project alternatives that would meet this primary project objective. Therefore, alternative fishery management regulations (e.g., changes in fishing quotas, seasonal species take restrictions, no-trawl zones) would not meet the specific requirements of the MLPA and were not considered in this EIR.

In accordance with State CEQA Guidelines Section 15126.6, EIRs must evaluate a “range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project.” The discussion of alternatives should focus on “alternatives capable of eliminating any significant adverse impacts or reducing them to below a level of significance, even if these alternatives could impede to some degree the attainment of the project objectives or would be more costly.” CEQA further directs that “the significant effects of an alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” The factors relevant to the Proposed Project that should be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, consistency with existing plans or planning documents, regulatory limitations, and jurisdictional boundaries.

State CEQA Guidelines Section 21061.1 defines feasible as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The final decision regarding the feasibility of alternatives lies with the decision-maker for a given project who must make the necessary findings addressing the potential feasibility of reducing the severity of significant environmental effects (PRC 21081, State CEQA Guidelines Section 15091).

#### **9.1.1. Alternatives Development**

Alternatives analyzed in this EIR were developed considering project goals, significant environmental impacts of the Proposed Project, and information generated through the alternatives screening process that preceded the writing of this EIR.

### 9.1.1.1. Project Goals

As stated in Chapter 2, the goals of the project are as follows:

- **Goal 1:** To protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems.
- **Goal 2:** To help sustain, conserve, and protect marine life populations, including those of economic value, and rebuild those that are depleted.
- **Goal 3:** To improve recreational, educational, and study opportunities provided by marine ecosystems that are subject to minimal human disturbances, and to manage these uses in a manner consistent with protecting biodiversity.
- **Goal 4:** To protect marine natural heritage, including protection of representative and unique marine life habitats in north central California waters, for their intrinsic value.
- **Goal 5:** To ensure that north central California's MPAs have clearly defined objectives, effective management measures, and adequate enforcement, and are based on sound scientific guidelines.
- **Goal 6:** To ensure that the north central coast's MPAs are designed and managed, to the extent possible, as a component of a statewide network.

### 9.1.1.2. Alternatives Selection

CDFG developed a range of alternatives through a comprehensive stakeholder process. Multiple meetings and discussions with stakeholders enabled CDFG personnel to narrow down options for potential MPAs, reduce potential impacts on existing uses and activity patterns (where possible), as voiced by the various experts and concerned parties.

Using the Commission-adopted master plan framework as a guide, the comprehensive stakeholder and public process was initiated in October 2007 to identify a range of alternative MPA network component proposals for the north central coast study region. These alternatives were to be submitted to the CDFG for consideration in development of a Commission preferred alternative. Over an approximate 2-year period, a substantial number of design and planning meetings took place, including 14 public workshops, 12 meetings of the NCCRSG, 4 meetings of the Statewide Interests Group, and 9 meetings of the Blue Ribbon Task Force (BRTF).

In March 2008, the MLPA NCCRSR transmitted three alternative MPA packages (1-3, 2-XA, and 4) to the CDFG for its consideration. The three NCCRSR MPA proposals were refined based on input from the MLPA Master Plan SAT evaluations, MLPA Initiative staff evaluations, CDFG feedback and analyses, and extensive public comment. The proposals were finally forwarded to the BRTF, which selected and modified the three MPA proposals and created a single preferred alternative. The CDFG presented the BRTF recommendation to the Commission for consideration as the Commission-preferred alternative.

The Commission-preferred alternative became the Proposed Project for the purposes of CEQA review. The Commission also determined that Packages 1-3, 2-XA, and 4 should be carried forward for consideration as alternatives in the EIR. These packages are identified as Alternatives 1, 2, and 3, respectively, in this document.

## 9.2. Alternatives Considered but Dismissed from Further Consideration in this EIR

The following alternatives were dismissed from more detailed impact analysis in this EIR because they were considered infeasible, would not meet MLPA goals, would have unacceptably high potential impacts on fisheries, or were substantially similar to the project alternatives under consideration. Each dismissed alternative is described below, along with the reason it was dismissed from further analysis.

- **Alternative fishery management techniques:** Additional species quotas, seasonal restrictions, or gear restrictions would not meet the primary MLPA objective of improving the State's existing array of MPAs and ensuring they are based in sound science and function, to the extent possible, as a network.
- **Alternative and fewer MPA locations that have lower potential to displace existing fishing effort:** Such an alternative would provide little of the habitat and species protections identified in the MLPA objectives, would not meet scientific design guidelines, and could lead to continued declines in certain populations and a less resilient ecosystem; likely to the point of creating a significant biological impact comparable to the No Project Alternative.

The State CEQA Guidelines also suggest that an EIR examine any reasonable offsite alternatives to a project. Offsite alternatives to the Proposed Project are precluded by its geographic scope, which limits areas on the California coast from Point Arena to Pigeon Point. Therefore, offsite alternatives are not possible. It is the CDFG's intent to establish MPAs along the remainder of the California coast and some offshore islands at a later date, but the Proposed Project deals only with the north central coast.

### 9.3. Alternatives Analyzed in the Draft EIR

CEQA suggests that impact discussions for alternatives do not need to be presented to the depth of the discussion of the Proposed Project's impacts. However, the CDFG decided to review each alternative MPA network component design at an equal level in the draft EIR. This analysis can be found in Chapters 5 to 7. Table 9-1 briefly summarizes the impacts associated with each alternative compared to the Proposed Project. Alternatives 1, 2, and 3 would consist of the same project characteristics as the Proposed Project; the differences would be limited to number, size, shape, and location of the MPAs and the restrictions on fishing proposed within various MPAs. Alternative 1 would place 21.6% of state waters in MPAs, consisting of 12 SMRs (87.2 square miles [mi<sup>2</sup>]), one SMCA<sup>1</sup> (0.1 mi<sup>2</sup>), 10 SMCAs (77.3 mi<sup>2</sup>), and no SMRMAs. Alternative 2 would place 18.0% of state waters in MPAs, including 12 SMRs (67.41 mi<sup>2</sup>), one SMCA<sup>1</sup> (0.7 mi<sup>2</sup>), 8 SMCAs (68.9 mi<sup>2</sup>), and 3 SMRMAs (0.59 mi<sup>2</sup>). Alternative 3 would place 26.9% of state waters in MPAs, including 15 SMRs (105 mi<sup>2</sup>), one SMCA<sup>1</sup> (2.9 mi<sup>2</sup>), 12 SMCAs (97.1 mi<sup>2</sup>), and no SMRMAs.

Overall, impacts resulting from Alternatives 1, 2, and 3 were found to be the same as impacts resulting from the Proposed Project (Table 9-1).

#### 9.3.1. No Project Alternative

The No Project Alternative is described in Chapter 2, Section 2.5.4. Under the No Project Alternative, there would not be potential for added impacts resulting from the displacement of fishing activity, such as increased air pollutant emissions and redirected fishing-related impacts on biological resources. However, there is insufficient habitat within existing MPAs to meet the goals of the MLPA and satisfy the recommended scientific guidelines for establishing MPAs in the master plan. The MLPA was passed specifically noting the lack in real ecosystem benefit or protection provided by existing MPAs. The No Project Alternative could lead to continued declines in certain populations and a less resilient ecosystem, as noted in the MLPA. This would be considered a potentially significant biological resources impact.

**Table 9-1. Comparison of Impact Significance under Proposed Project and Alternatives**

<b>Environmental Issue Area</b>	<b>Proposed Project</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>No Project</b>
Aesthetics	NI	NI	NI	NI	NI
Agriculture	NI	NI	NI	NI	NI
Air Quality	LTS	LTS	LTS	LTS	NI
Biological Resources	LTS to B	LTS to B	LTS to B	LTS to B	PSU
Cultural Resources	NI	NI	NI	NI	NI
Geology and Soils	NI	NI	NI	NI	NI
Hazards and Hazardous Materials	NI	NI	NI	NI	NI
Land Use	NI	NI	NI	NI	NI
Mineral Resources	NI	NI	NI	NI	NI
Noise	NI	NI	NI	NI	NI
Oceanography	NI	NI	NI	NI	NI
Population and Housing	LTS	LTS	LTS	LTS	NI
Public Services and Utilities	LTS	LTS	LTS	LTS	NI
Recreation	LTS	LTS	LTS	LTS	NI
Research and Education	NI/B	NI/B	NI/B	NI/B	NI
Vessel Traffic	LTS	LTS	LTS	LTS	NI
Water Quality	LTS to B	LTS to B	LTS to B	LTS to B	NI

Notes: NI = no impact; B = beneficial; LTS = less than significant; PSU = potentially significant unavoidable.

#### 9.4. Environmentally Superior Alternative

Because none of the alternatives considered would result in significant impacts, the identification of the environmentally superior alternative focuses on the relative degree of significant and less-than-significant impacts, as well as the relative degree of potential environmental benefit associated with each alternative. In the short term, Alternative 2 potentially would result in the least amount of fishing displacement, and less extensive potential impacts such as increased air pollutant emissions resulting from increased vessel transit, water quality impacts resulting from vessel abandonment, and increased demand for law enforcement. However, in the long term, Alternative 3 provides greater habitat representation, thereby providing a greater potential benefit to populations of marine species that depend on these habitat types for some part of their life history. This greater net benefit to biological resources ultimately would likely offset initial fishing displacement–related impacts, particularly as species presently designated in an overfished status begin to recover as a result of increased fishing restrictions. The combination of increased fish stocks due to fishery restrictions and the added benefit provided from new MPAs ultimately should result in healthier sustainable fishery populations, reducing the need for fishermen to transit beyond the periphery of the MPAs in search of available resources. Alternative 3 is therefore considered the environmentally superior alternative under CEQA.

#### 9.5. Preferred Alternative

The Proposed Project (Commission Preferred Alternative) was developed to address biological and fisheries considerations as well as management concerns. In particular, ease of recognition by the public, enforcement of boundaries, ability to implement, and regulatory simplicity were considered. As noted in the MLPA, existing MPAs "lack clearly defined purposes, effective management measures and enforcement," creating "the illusion of protection."

The SAT assigned levels of protection (LOP) based on allowed uses or activities within MPAs. Alternative 3 covers the most area in MPAs at or above the very high and high LOP (as well as at the moderate and low LOP); Alternative 2 covers the least area; and Alternative 1, similar to the Proposed Project cover an intermediate amount of area. All of the Alternatives cover at least 16.5% of the north central coast study region in MPAs that are at or above the moderate-high LOP.

The abundance of each habitat type varies throughout the north central coast study region and affects how much habitat each Alternative is able to include across the north central coast study region. For instance, there is more rocky shoreline and shallow rocky reef habitat in the northern part of the north central coast study region than the southern area. All three Alternatives generally include a similar percentage of habitat in the north central coast study region within SMRs especially in shoreline habitats, and shallow and deep soft bottom habitats. For shallow and deep rocky habitats, Alternative 3 tends to include the most habitat and Alternative 2 tends to include the least. In sandy beach and shallow sand habitats, Alternative 2 tends to have less coverage than Alternative 1 and 3. All habitats, with the exception of shallow sand, have at least 10% representation at or above the moderate-high LOP in all three Alternatives. All three alternatives include rocky habitats mostly within SMRs, though Alternatives 1 and 2, similar to the Proposed Project, include a portion of deep rocky habitat within moderate-high LOP MPAs in order to allow take of salmon and crab. Alternative 3 protects the greatest portion of kelp, and shallow and deep rocky habitats within SMRs. All three alternatives have areas of deep sand included in high and moderate-high level of protection MPAs due to allowances for salmon and crab take. All alternatives are similar in the location and size of estuarine MPAs (although only Alternative 3 has an MPA in Tomales Bay), and include a similar proportion of available estuarine habitats within very high LOP MPAs.

Size and spacing analyses consider “clusters” of MPAs at various levels of protection. Comparing all of the alternatives, most MPA clusters meet the minimum size guidelines. At the very high level of protection, Alternatives 3 and the Proposed Project have larger MPAs. On average, across all levels of protection, Alternative 3 and the Proposed Project tend to have larger MPAs and the most within the preferred size range.

All of the alternatives generally meet the science guidelines of the master plan for MPAs and include similar percentages of habitat. However, the Proposed Project was identified by selecting and slightly modifying the MPAs from each of the three alternatives to better meet the scientific guidelines and goals of the MLPA. Because the Proposed Project is the most likely to achieve the full range of MLPA goals and objectives, it has therefore been identified as the Commission preferred alternative.

