

5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 OVERVIEW

The California Environmental Quality Act (CEQA) requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. This section sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the *CEQA Guidelines*¹ pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that 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 No Project alternative shall be evaluated along with its impact. The no project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss 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.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.²

5.2 PROJECT OBJECTIVES

The following objectives for the East Area 1 Specific Plan are based on the City’s General Plan and the existing physical, environmental, demographic and market conditions:

- Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, California Environmental Quality Act (CEQA) Guidelines, §15126.6.

² Ibid, §15126.6(f)(1).

- Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas.
- Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area.
- Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails.
- Establish new residential neighborhoods and districts with supporting commercial and institutional uses.
- Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions.
- Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.
- Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.
- Provide sites for a wide range of educational facilities including primary, secondary and post - secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.

5.3 ALTERNATIVES CONSIDERED

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and therefore merit in-depth consideration, and which are infeasible. Alternatives considered include a range of potential projects to meet the project's objectives while eliminating or reducing significant environmental impacts identified in Section 4.0 of this EIR.

Alternatives considered include the following:

- Alternative 1: No Project
- Alternative 2: City of Santa Paula General Plan – 900 Dwelling Units
- Alternative 3: East Area 1 Specific Plan - 1,000 Dwelling Units
- Alternative 4: East Area 1 Specific Plan - 1,250 Dwelling Units
- Alternative 5: East Area 1 Specific Plan- State Route 150 ByPass

The alternatives identified below, with the exception of the mandatory No Project Alternative, were selected for their potential to attain basic project objectives and lessen or avoid significant environmental effects resulting from implementation of the proposed project.

5.4 ALTERNATIVE 1 - NO PROJECT ALTERNATIVE

5.4.1 DESCRIPTION OF ALTERNATIVE 1

As shown in Table 5-1, the East Area 1 project site would continue to be actively farmed, and Ventura County General Plan and Non-Coastal Zoning Ordinance land use and zoning designations, respectively would apply. The project site would not be annexed by the City of Santa Paula and would remain under Ventura County jurisdiction.

**TABLE 5-1
LAND USES PROPOSED FOR ALTERNATIVE 1: NO PROJECT**

| Lands Use | Unit Counts/Size |
|-----------------------------------|-------------------------|
| Residential Dwelling Units | 0 units |
| Workplace Buildings | 0 sf |
| Retail/Office | 0 sf |
| Assisted Living | 0 sf |
| Elementary School | 0 ac |
| High School/Post Secondary School | 0 ac |
| Shared Athletic Fields | 0 ac |
| Parks and Greenways | 0 ac |
| Agriculture | 501 ac |

Source: P&D Consultants, 2007

5.4.2 IMPACTS OF ALTERNATIVE 1

5.4.2.1 Land Use and Planning

Under Alternative 1, there would be no change resulting from development at the site. No new development would occur and the proposed specific plan would not be implemented. The East Area 1 expansion area in the General Plan would not be annexed into the City and would remain outside the existing City Urban Restriction Boundary and Sphere of Influence lines. Under this alternative, the City would continue to terminate at Santa Paula Creek (on the western border of the site). The site would remain as unincorporated land under Ventura County's jurisdiction. Because there is no development east of the project site, there would not be any division of established communities. As the no project alternative does not provide for the implementation of the goals and policies of the City's General Plan, the General Plan would not be implemented and the goals and objectives of the City would not be achieved. There are no applicable habitat conservation or natural community conservation plans that apply to the site. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to land use and planning.

5.4.2.2 Agricultural Resources

Under Alternative 1, there would be no change resulting from development at the project site. Existing agricultural operations would continue on-site for the foreseeable future. There would be no conversion of farmland designated as Prime and Unique, as identified on the State's Important Farmland Maps. There are no Williamson Act contracts in effect. The use of the site for continued agriculture would be at the decision of the land owner and operator and would continue in response to market trends. Agricultural operation on adjacent lands would not be impacted. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to agricultural resources.

5.4.2.3 Mineral Resources

Under Alternative 1, there would be no change resulting from development at the site. There are no known mineral resources on-site. Similar to the proposed project, no significant impacts related to mineral resources would result with implementation of this alternative.

5.4.2.4 Transportation and Circulation

Under Alternative 1, no changes in traffic or circulation would occur on-site. No new trips would be generated beyond existing levels. As such, there would be no increase in traffic in relation to the existing traffic load and capacity of the street system. Existing levels of services (LOS) at intersection around the project site and throughout the City would remain at existing levels and no additional trips beyond those currently generated would result. In addition, no changes in roadway design would result. There would be no changes in emergency access or requirements for parking. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to transportation and circulation.

5.4.2.5 Air Quality

Under Alternative 1, there would be no change in air quality resulting from development of the project site. No new sources of air emissions would exist. Ongoing agricultural operations would continue which could result in the use of spraying, which in turn could continue to degrade local air quality and expose residents near the site to airborne chemicals. As regulations continue to be developed and implemented on such operations, these impacts could decline over time.

The existing agricultural operations have been accounted for and comply with local air quality plans. There could be some violations to air quality standards depending upon what agricultural operations continue and are implemented (such as open burns, excessive spraying, etc.).

There would be no cumulative net increase in any criteria pollutants which are currently non-attainment in the region. Sensitive receptors near the site would not be exposed to new emissions from on-site sources, but could be exposed, as noted previously, to continued use of chemicals on-site for agricultural related uses.

Odors on the site would be similar to existing conditions.

Emissions of greenhouse gases that contribute to climate change are also expected to remain the same with no increase due to changes in land-use.

Unlike the proposed project, implementation of this alternative would result in less than significant impacts related to air quality.

5.4.2.6 Noise

Under Alternative 1, farming activities would continue and therefore the noise exposure would be representative of existing conditions on the project site. Specific Community Noise Equivalent Level readings range between 54.3 dB(A) and 68.5 dB(A) depending on proximity to Telegraph Road and SR-126. There would be very little change over time and no substantive changes in off-site noise generation. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to noise.

5.4.2.7 Biological Resources

Under Alternative 1, there would be no change to existing conditions on-site related to biological resources. This would include both native and non-native plant communities. There would be no substantial adverse effects on any candidate, sensitive, or special status species identified in local or

regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. There would be no impact to riparian habitat or other sensitive natural communities. There would be no change in the movement of native resident or migratory fish or wildlife species; there would be change to established native resident or wildlife migratory wildlife corridors. In addition, this alternative does not conflict with any local policies or ordinances protecting biological resources. There would be no trees removed. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved conservation plans that apply to the site. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to biological resources.

5.4.2.8 Geology and Soils

Under Alternative 1, there would be no changes to existing conditions at the site. No grading or earth removal would occur. The existing geological conditions would remain the same. Given that there would be no new development, no additional persons (beyond those currently working and/or living on-site) or new structures would be potentially subject to ground rupture, strong seismic shaking, seismic-induced land failure, including liquefaction, or landslides. The site could continue to experience the loss of top soil and soil erosion due to farming activities and erosion from rain events and watering. Haun Creek at SR-126 would continue to flood during storm events.

Since no grading or new development on-site is proposed, no new structures would be located on geologic units that are unstable or would become unstable. Existing conditions related to on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse would persist (in the event they are currently present). No structure would be located on expansive soil that would create new risks. There would be no new use of septic systems and any existing systems on-site would remain. The existing residents and employees on-site would experience the same exposure to seismic risk that exists today. Unlike the proposed project, implementation of this alternative would result in less than significant impacts related to geology and soils.

5.4.2.9 Hydrology and Water Quality

Under Alternative 1, there would be no change resulting from development at the site. The existing on-site drainages would continue to exist with no improvements beyond those made for agricultural purposes. Under this alternative, no water quality standards or waste discharge requirements would be violated. However, because there would be no improvement, any accidental release of chemicals used in agricultural operations could occur and result in water quality degradation.

The existing water supply wells would continue to be operated and there would be no reduction in water supply or reduction in groundwater recharge. Existing drainage patterns along both Haun Creek and Santa Paula Creek would continue. No improvements or alterations to drainage patterns would occur. Existing flow volumes and velocities from both upper Haun Creek and Santa Paula Creek would continue.

Improvements proposed to retain storm water from intense (100-year) rainfall events to contain flows in Haun Creek would not occur. Flooding along the north portions of SR-126 during these events would continue. The existing bridge on Haun Creek at SR-126 does not meet capacity requirements for the 100-year storm and retention basins proposed on-site to reduce flows during these events would not be constructed.

There would not be any new housing built on-site, therefore, no new structures would be placed within the 100-year flood hazard area as currently mapped. However, existing structures on-site are located within portions of the 100-year flood zone, as are off-site structures north of SR-126; these structures would continue to be susceptible to flooding.

The risk of flooding from failure of up stream dams would be the same as for the proposed project. The project is not susceptible to seiche, tsunami or mudflow.

Implementation of this alternative would result in greater impacts than those of the proposed project in that the existing flood hazards on-site would remain. Impacts would be considered significant.

5.4.2.10 Hazards and Hazardous Materials

Under Alternative 1, there would be no change to existing conditions on-site. The existing hazardous materials (herbicides, insecticides, fertilizers, etc.) used as part of ongoing agricultural operations would continue to be used and stored on-site. There would not be any new significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials currently used on-site, since applicable local, state and federal laws pertaining to the use, storage and transport of these substances would continue to be adhered to. The potential for a future hazard or release of hazardous materials would remain as it is today. There are no schools within 0.25 miles of the site.

The known site that contains underground storage tanks (UST) would not be excavated and there would be no remediation or removal of any contaminated soils that may exist at these sites. The site would remain on the current list of hazardous materials sites specified by Section 65962.5 of the California Government Code. The facility status is listed as inactive. The project site is at the east end of the Santa Paula Airport and outside of the airport's land use plan area. Continued use of the site in active agriculture would not interfere with any adopted emergency response or evacuation plans. The site is adjacent to undeveloped lands to the north at the base of Sulphur Mountain, and is considered a high wildfire potential area. Residences and employees would continue to be exposed to these risks. Implementation of this alternative has the potential to result in significant adverse impacts related to hazards/hazardous materials.

5.4.2.11 Aesthetics

Under Alternative 1, there would be no change resulting from development at the project site. The existing views of the site would remain unchanged, primarily comprised of avocado and citrus orchards, windrows and the on-site hillsides. There would be no change to the scenic vista, no grading would occur, therefore there would not be any removal of trees on-site, alternation or removal of bluffs and rock outcropping, or removal of historic buildings. The visual character of the site and eastern Santa Paula at the base of Sulphur Mountain and the upper Santa Clara River Valley would remain unchanged. No new sources of light and glare would be introduced. No impacts to SR-126 (designated as an eligible scenic highway) would occur and no impacts to this facility would result. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to aesthetic.

5.4.2.12 Cultural and Historic Resources

Under Alternative 1, there would be no changes to the project site. The existing structures that have been identified as historic on-site would remain in their current location. This includes the pump house, packing plant, residences, and barn. The existing archaeological sites would remain undisturbed. There would be no ground disturbance; therefore, buried historic, archaeological or paleontological resources

remain undisturbed. No unique paleontological or geological resources are known to exist on-site; as such there would be no impacts. Similarly, there are no known burial sites on-site and since no grading is proposed, no undiscovered site would be exposed. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to cultural and historic resources.

5.4.2.13 Public Services

Under Alternative 1, there would be no changes to existing conditions on-site concerning the provisions and/or need for public services and no additional facilities would need to be constructed to serve the site. Implementation of this alternative would result in no significant impacts related to public services.

5.4.2.14 Recreation

Under Alternative 1, no new park sites or facilities would be required and there would be no increase in use of existing recreational sites. Implementation of this alternative would result in no significant impacts related to recreation.

5.4.2.15 Utilities and Service Systems

Under Alternative 1, there would be no change in utilities or service systems resulting from development at the site. No new water supply or sewer infrastructure would be constructed to serve the site. Likewise, there would be no improvements to support existing City services such as increased water supply or use of recycled water. There would no need to construct additional facilities to support waste water treatment or require approval of the Regional Water Quality Control Board as a result of continuing existing activities on-site. There would be no increase in solid waste generated by the site or changes in solid waste flow to landfills. Unlike the proposed project, implementation of this alternative would result in no significant impacts related to utilities and service systems.

5.4.2.16 Population and Housing

Under Alternative 1, there would be no change in population resulting from development at the site. The existing population on-site would remain and not be displaced. Under this alternative, no new housing would be constructed. Similar to the proposed project, implementation of this alternative would result in no significant impacts related to population and housing. It should be noted that this alternative will not result in a beneficial impact related to the increase in permanent employment as the proposed project.

5.4.3 SUMMARY OF ALTERNATIVE 1

The No Project Alternative would preclude the construction of land uses identified for the proposed project. As previously noted, the existing agricultural operations would continue on-site and conditions would remain unchanged. However, under this alternative Haun Creek at SR-126 would continue to experience flooding during normal storm events. In addition, this alternative does not meet any of the projected objectives, as noted in Table 5-2.

**TABLE 5-2
ABILITY OF ALTERNATIVE 1 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|---|---|
| Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula. | No |
| Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas | No |
| Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area. | No |
| Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails. | No |
| Establish new residential neighborhoods and districts with supporting commercial and institutional uses. | No |
| Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions. | No |
| Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas. | No |
| Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings. | No |
| Provide sites for a wide range of educational facilities including primary, secondary and post –secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community. | No |

Source: P&D Consultants, 2007.

5.5 ALTERNATIVE 2 – SANTA PAULA GENERAL PLAN - 900 DWELLING UNITS

5.5.1 DESCRIPTION OF ALTERNATIVE 2

This alternative is based on the City of Santa Paula's General Plan (1998) description for East Area 1, which would allow for the construction of 900 dwelling units, up to 76,230 square feet of neighborhood commercial, a school, parks, and a hotel and golf course. Table 5-3 summarizes the proposed land uses for this alternative.

**TABLE 5-3
LAND USES PROPOSED FOR ALTERNATIVE 2: SANTA
PAULA GENERAL PLAN – 900 DWELLING UNITS**

| LANDS USE | UNIT COUNTS/SIZE |
|-----------------------------------|------------------------|
| Residential Dwelling Units | 900 units ¹ |
| Workplace Buildings | 0 sf |
| Retail/Office | 76,230 sf |
| Assisted Living | 0 sf |
| Elementary School | 10 ac |
| High School/Post Secondary School | 0 ac |
| Shared Athletic Fields | 0 ac |
| Parks and Greenways | 13.5 ac ² |
| Agriculture | 0 ac |
| Golf Course and Hotel | 150 ac |

Source: City of Santa Paula General Plan. Pgs. LU-25 and 34.

Notes:

¹ Includes 742 single-family dwelling units and 158 multi-family dwelling units.

² Total is for parks only. The General Plan does not identify the acres of greenways.

5.5.2 IMPACTS OF ALTERNATIVE 2

5.5.2.1 Land Use and Planning

Under Alternative 2, the site would be developed as outlined in the City's General Plan. New development would occur; given that this alternative implements the intent of the General Plan, it would be consistent (and no Amendment would be required). The East Area 1 expansion area would still be required to be annexed into the City and amendments made to the existing City Urban Restriction Boundary (CURB) line and Sphere of Influence. Under this alternative, the City would expand its border to the area identified in the General Plan. The site would be removed from unincorporated land under Ventura County's jurisdiction. However, as noted in Section 4.1 (Land Use & Planning) of this EIR, unincorporated "islands" would be created and would need to be addressed since their creation would be contrary to Ventura Local Agency Formation Commission (LAFCO) policy.

Because there is no development east of the project site, there would not be any division of established communities.

This alternative provides for the implementation of the goals and policies of the City's general Plan.

There are no applicable habitat conservation or natural community conservation plans that apply to the site.

Unlike the proposed project, this alternative would reduce all significant impacts associated with land uses and planning to less than significant levels, provided mitigation measures contained within Section 4.1 of this EIR are implemented.

5.5.2.2 Agricultural Resources

Under Alternative 2, the existing on-site agriculture would be eliminated. All farmland designated as Prime and Unique as contained on the State Important Farmland Maps would be converted. Currently, there are 154 acres of land designated as Prime and 282 acres designated as Unique on the project site. There are no Williamson Act contracts in effect. Agricultural operation on adjacent lands would not be impacted. Agricultural buffers, as described for the proposed project, could be implemented to separate ongoing agricultural activities on adjacent lands from residents and uses on the project site. Since this alternative would result in the elimination of agricultural operations and associated crops, soils and other related resources, its impacts would be similar to those described for the proposed project. As such, implementation of this alternative would result in significant adverse and unavoidable impacts related to agricultural resources.

5.5.2.3 Mineral Resources

Under Alternative 2, there would be no change resulting from development at the site, since there are no known mineral resources on-site. Similar to the proposed project, no impacts related to mineral resources would result with implementation of this alternative.

5.5.2.4 Transportation and Circulation

As shown in Table 5-4, Alternative 2 would generate approximately 13,177 daily trips, 833 trips during the A.M. peak hour and 1,217 trips during the P.M. peak hour. Alternative 2 would generate approximately 51 percent (= 13,177 / 25,848) of the total daily trips for the proposed project. Therefore, implementation of this alternative would create the same amount or fewer significant adverse traffic impacts than the proposed project. As shown previously in Section 4.4 (Transportation and Circulation), all significant adverse traffic impacts were mitigated to below a level of significance. Therefore, traffic related impacts under Alternative 2 would also be mitigated to below a level of significance.

**TABLE 5-4
PROJECT TRIP GENERATION ESTIMATES FOR ALTERNATIVE 2**

| LAND USE | ITE CODE | SIZE | UNITS | DAILY TRIPS | WEEKDAY | | | | | |
|-----------------------------|----------|--------|-------|---------------|----------------|------------|------------|----------------|------------|--------------|
| | | | | | A.M. Peak Hour | | | P.M. Peak Hour | | |
| | | | | | In | Out | Total | In | Out | Total |
| Residential - Single Family | 210 | 495 | DU | 4,737 | 93 | 278 | 371 | 315 | 185 | 500 |
| Residential - Condominium | 230 | 117 | DU | 686 | 9 | 42 | 51 | 41 | 20 | 61 |
| Residential - Apartment | 220 | 288 | DU | 1,935 | 29 | 118 | 147 | 116 | 63 | 179 |
| Open Space [a] | 412 | 56.0 | Acre | 128 | 1 | 0 | 1 | 1 | 2 | 3 |
| Elementary School | 520 | 35,400 | SF | 513 | 90 | 76 | 166 | 48 | 63 | 111 |
| (65% internal capture) | | | | (333) | (59) | (49) | (108) | (31) | (41) | (72) |
| Shopping Center | 820 | 76,230 | SF | 3,277 | 48 | 31 | 79 | 137 | 149 | 286 |
| Golf Course | 430 | 200 | Acre | 1,008 | 31 | 11 | 42 | 20 | 40 | 60 |
| Hotel | 310 | 150 | Room | 1,226 | 51 | 33 | 84 | 47 | 42 | 89 |
| TOTAL EXTERNAL TRIPS | | | | 13,177 | 293 | 540 | 833 | 694 | 523 | 1,217 |

Source: Fehr & Peers/Kaku Associates and P&D Consultants, 2007.
 Trip generation estimates based on Trip Generation, 7th Edition.

Notes:
 DU = dwelling unit
 SF = square foot
 [a] includes park and preserve land

5.5.2.5 Air Quality

Under Alternative 2, there would be substantial change in air quality resulting from development at the site. New sources of air emissions would result from both mobile sources (traffic associated with the development) and from some stationary emissions. Compared to the proposed project, Alternative 2 emissions from mobile sources would be less than the proposed project.

This alternative would comply with local air quality plans. There could be some violations to air quality standards depending upon what golf course maintenance operations are implemented (such as fairway spraying and fertilizing, etc.). There would be temporary emissions during construction from construction equipment on-site.

There would be a cumulative net increase in criteria pollutants (ozone) which are currently non-attainment in the region. This would be primarily due to emissions associated with vehicle trips from the project. Sensitive receptors near the site could be exposed to new emissions from on-site sources and increased emissions from mobile sources.

Odors on the site would be primarily from residential uses and possibly from restaurants associated with the hotel and golf course club house.

Emissions of greenhouse gases that contribute to climate change would increase for the area due to construction and operations. Although it cannot be determined if this project would be an incrementally significant impact to climate change due to a lack of a significance threshold, this alternative would contribute to an already existing significant impact.

Similar to the proposed project, Alternative 2 would result in significant impacts related to ROC and NO_x which would exceed Ventura County Air Pollution Control District thresholds and therefore would be considered significant and unavoidable.

5.5.2.6 Noise

Under Alternative 2, 900 dwelling units would generate similar noise levels for both construction and operational noise as the proposed project. The number of dwelling units is less than the proposed project and the mix of land uses as shown in Table 5-3 are different golf course and hotel. However, to conduct the site preparation, similar construction equipment would be utilized on the project site resulting in noise exposure levels consistent with the proposed project.

For longer term operational noise exposure, the traffic loading and distribution along the network would be less due to fewer dwelling units and less total trip generation. Trip generation is anticipated to be approximately 13,177 daily trips. The differences between the trip generation and the expected distribution on the network are primarily associated with the total trips as the vehicles would be distributed similar to the proposed project. Since the total trips generated for Alternative 2 are an estimated 51 percent of the total trips of the proposed project the CNEL values would be expected to be an estimated 3 dB(A) less than the proposed project. The standard rule of doubling the traffic on a street segment or highway generally results in 3 dB(A) increase. Although a 3 dB(A) increase is discernible, this would not likely require a substantive difference in mitigation requirements beyond that for the proposed project.

5.5.2.7 Biological Resources

Under Alternative 2, there would be substantial change to the existing biological resources found on-site as the proposed project. Although a site plan is not available, it is anticipated that the existing biological communities on-site would be largely removed to provide for the golf course, hotel and residential development. This would include the removal of both native and non-native vegetation. There could be substantial adverse effects, depending upon the final design, on candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. There could also be impacts to riparian habitat or other sensitive natural communities on-site. Movement of native resident or migratory fish or wildlife species could be impacted as wildlife migratory wildlife corridors across the site would be modified or changed with the development. Depending upon the needs to implement infrastructure improvements, temporary or permanent intrusions into Santa Paula Creek and/or Haun Creek could occur. This alternative could conflict with local policies or ordinances protecting biological resources. Protected trees, such as oaks, could be removed, relocated or encroached upon. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved conservation plans that apply to the site. With the implementation of mitigation measures similar to those identified in Section 4.7 (Biological Resources) of this EIR, impacts to biological resources would be anticipated to be reduced to less than significant levels for this alternative.

5.5.2.8 Geology and Soils

Under Alternative 2, no persons or buildings would be subject to impacts associated with fault rupture. As noted in Section 4.8 (Geology & Soils) of this EIR, the geotechnical analysis determined that no such faults were located on-site. There are a number of active faults located within close proximity of the project site and which could result in strong seismic ground shaking. The EIR also determined that the site has a low potential for liquefaction, expansive soils, seismically induced settlement. Areas of potential slope instability were identified within the northern portion of the project site and were determined to be unsuitable for habitable structures. Erosion on-site was determined to be minor on-site. Under this alternative, it is anticipated that all land uses would be sewered and no septic systems would be utilized. Similar to the proposed project, implementation of mitigation measures contained within Section 4.8 (Geology and Soils) of this EIR, would reduce impacts to less than significant for this alternative.

5.5.2.9 Hydrology and Water Quality

Under Alternative 2, the existing landforms on-site would be altered to construct urban uses and associated stormwater conveyance facilities. All on-site land uses would be subject to compliance with existing stormwater runoff and water quality requirements. The implementation of standard Best Management Practices and adherence to the County-wide NPDES Permit No. CAS004002 (which the City is a co-permittee) identified under the proposed project would reduce impacts associated with erosion and water quality under Alternative 2.

Implementation of this alternative would require improvements (e.g., drainage basins, etc.) to address increases in surface runoff from on-site development. Similar to the proposed project, the drainage plan would be required to demonstrate that surface flows would not exceed the capacity of local facilities or these facilities would need to be sized to address flow increases. Although a site plan has not been developed, Section 4.9 (Hydrology & Water Quality) of this EIR indicates that areas adjacent to Haun Creek are subject to flooding during storm events. As such, drainage improvement likely similar to those identified for the proposed project would be required in order to reduce flows at SR-126/Haun Creek

which currently floods during storm events. The construction of these drainage improvements would also be required to address the site's location within a 100-year flood plain. As noted in Section 4.9 of this EIR, the risk of flooding from failure of up stream dams, seiche, tsunami or mudflows would be negligible.

Similar to the proposed project, implementation of mitigation measures contained in Section 4.9 of this EIR would reduce impacts under Alternative 2 to below a level of significance.

5.5.2.10 Hazards and Hazardous Materials

Under Alternative 2, existing hazardous materials (herbicides, insecticides, fertilizers, etc.) used as part of agricultural operations would be replaced by those needed for golf course maintenance. These materials would be used and stored on-site. No materials considered acutely hazardous by the United States Environmental Protection Agency would be utilized on-site. It is anticipated that small amounts of household and garden hazardous materials could be used and stored by future occupants of the commercial and residential uses.

The previous site of underground storage tanks (UST) would most likely be excavated and any contamination remediated or removed.

There could be hazards to the public or the environment through the routine transport, use or disposal of hazardous materials used on-site.

There are no schools within 0.25 miles of the site. However, a new elementary school site would be proposed by the project. As such, restriction on the use and application of chemicals would be subject to state regulations for school sites and adjoining properties.

The project site is at the east end of the Santa Paula Airport and outside of the airport's land use plan area.

Implementation of this alternative would not interfere with any adopted emergency response or evacuation plans.

The site would be adjacent to undeveloped lands to the north at the base of Sulphur Mountain and are considered a high wildfire potential area.

Similar to the proposed project, implementation of mitigation measures contained in Section 4.10 (Hazard & Hazardous Materials) of this EIR would reduce impacts under Alternative 2 to below a level of significance.

5.5.2.11 Aesthetics

Under Alternative 2, the project site would be substantially altered resulting in the removal of agricultural uses which would be replaced by roads and buildings. A 150 acres golf course and associated hotel would also be constructed. The existing views of the site would change substantially from primarily avocado and citrus orchards to urban. The scenic vista would change as a result of development from both on- and off-site areas. Grading would occur, therefore trees on-site, including the orchards, would be removed. It is possible that some of the existing trees (cottonwoods and palms) could be retained and incorporated into the design of the project. Trees that would be protected by ordinance, such as oaks trees, may be impacted, depending on final site design.

The visual character of the site and eastern Santa Paula at the base of Sulphur Mountain and the upper Santa Clara River Valley would change markedly. The lower portions of the site close to SR-126 would be developed, while the foothills to Sulphur Mountain along the northern portion of the site would either be incorporated into the golf course design or be left in open space.³ In addition, new sources of light and glare would be introduced to the site beyond what exists today by virtue of new development. Views of the site from SR-126 (an eligible, but not currently designated scenic highway) could also be affected, although this would largely be dependent on the amount of visual screening implemented for this alternative. Implementation of this alternative would result in less than significant impacts related to light and glare with the implementation of similar mitigation measures identified for the proposed project. However, similar to the proposed project, Alternative 2 impacts related to views, scenic vistas and visual quality would not be able to be reduced to less than significant despite the provision of mitigation measures.

5.5.2.12 Cultural and Historic Resources

Under Alternative 2, cultural and historic resources on-site could be impacted from development at the site. The existing structures that are identified as historic on-site could be subject to removal or relocation to accommodate the site design and layout. This includes the pump house, packing plant, residences, and barn. The existing archaeological site would likely remain undisturbed as they are located in an area of topographic relief that could be avoided. However, disturbance during grading and earthwork could reveal the presence of buried historic, archaeological or paleontological resources. No unique paleontological or geological resources are known to exist on-site. Similarly, there are no known burial sites on-site although it is possible that undiscovered sites could be exposed and/or discovered. Similar to the proposed project, implementation of mitigation measures contained in Section 4.12 (Cultural and Historic Resources) of this EIR would reduce paleontological and archaeological resources impacts under Alternative 2 to below a level of significance. However, similar to the proposed project, impacts to historic resources would be considered significant and unavoidable.

5.5.2.13 Public Services

Under Alternative 2, there would be an increased need for public services resulting from development at the site. As previously noted, the 900 residential units would generate an on-site residential population of 3,198 persons. The construction of 76,230 square feet of retail/office uses and golf course and hotel would generate approximately 303 employees. The presence of these new residents, employees and golf course and hotel guests would substantially increase the existing on-site population at the project site. Consequentially, the number of service calls for fire and emergency and police would be increased. As noted in Section 4.13 (Public Services) of this EIR, the distance to the project site from Stations 81 and 82 coupled with the age of the existing equipment and anticipated increases in service calls would exceed the capacity of the Santa Paula Fire Department's ability to serve the project site. In order to remedy this, an on-site fire station and additional equipment, fire personnel and civilian staff would be needed. Similarly, the on-site population increase would also require additional police personnel, including the provision of a police substation.

³ Note: The General Plan does not provide a site plan. However, due to the considerable topographic relief of the northern portion of the site which would require substantial grading, it is assumed for the purposes of this analysis to remain untouched under this alternative.

Utilizing student generation factors contained within Table 4.13-3 (see Section 4.13 of this EIR), this alternative is anticipated to generate a total of 608 students (i.e., 462 K-8th grade students and 146 9th – 12th grade students).⁴ The General Plan noted that 10 acres of the project site would be dedicated for construction of an elementary school. The construction of this facility would accommodate the 462 K-8th grade students. However, Santa Paula Union High School District (SPUHSD) is currently over capacity and therefore, would not be able to accommodate the additional 146 9th - 12th grade students.

Library facilities within the City are also over capacity and would not be able to support the increased demand associated with implementation of this alternative. This alternative does not include the provision of civic uses to off-set impacts to library facilities.

Similar to the proposed project, implementation of mitigation measures contained in Section 4.13 of this EIR would reduce police and fire impacts under Alternative 2 to below a level of significance. However, impacts to schools (i.e., SPUHSD) and library facilities would be considered significant under this alternative.

5.5.2.14 Recreation

Under Alternative 2, there would be additional parks and greenways (13.5 acres) constructed as part of the development at the site. In addition, a 150 acres golf course and hotel would be constructed and would be accessible to City and County residents. As noted in Section 4.14 (Recreation) of this EIR, the City is currently severely deficient in its parkland acreage. At present, a total of 35.9 acres of parkland are available to City residents, resulting in a net deficit of 109.8 acres. Utilizing the City's parkland standards (i.e., five acres per 1,000 persons), a total of approximately 16 acres of parkland would be required for this alternative. The combined golf course and park acreage (i.e., 163.5 acres) would offset the City's shortfall.

Similar to the proposed project, with the implementation mitigation measures identified in Section 4.14 of this EIR would reduce recreational impacts under Alternative 2 to below a level of significance.

5.5.2.15 Utilities and Service Systems

Under Alternative 2, there would be an increase in utilities or service systems resulting from development at the site. Additional water supply or sewer infrastructure would be constructed to serve the site. Similarly, there would be improvements to support existing City services such as increased water supply or use of recycled water.

As noted in Table 5-5, this alternative is anticipated to result in a water supply demand of 883.6 acre feet per year (AFY). The combined on-site water supplies available are 1,612 AFY. Therefore, sufficient water supplies would be available on-site to supply the project site for this alternative.

⁴ Note: The student generation rates only reflect proposed residential units and do not include student generation which could be realized due to office and retail employees.

**TABLE 5-5
WATER SUPPLY DEMAND FOR ALTERNATIVE 2**

| LAND USE | UNITS/SIZE | PERSON | GPD/AFY | DAYS | AF | AFY |
|-----------------------------------|-------------------|---------------|----------------|-------------|-----------|--------------|
| Residential Dwelling Units | 900 | 3.75 | 132 | 365 | 325851 | 499.0 |
| Workplace Buildings | 0 sf | | | | 325851 | |
| Retail/Office | 76,230 sf | | 15.1 | | 325851 | 3.5 |
| Assisted Living | 0 sf | | | | 325851 | |
| Elementary School | 10 acres | | 1.81 | | | 18.1 |
| High School/Post Secondary School | 0 acres | | | | | |
| Shared Athletic Fields | 0 acres | | | | | |
| Parks and Greenways | 13.5 acres | | 2.22 | | | 30.0 |
| Agriculture | 0 acres | | | | | |
| Golf Course and Hotel | 150 acres | | 2.22 | | | 333.0 |
| Total water Demand | | | | | | 883.6 |

Source: Impact Sciences, 2007.

Sewer flow for this alternative would be approximately half (0.255 million gallons per day (MGD)) compared to the proposed project (i.e., 0.435 MGD). As noted in Section 4.15 (Utilities & Services) of this EIR, the City's planned construction of a new Water Recycling Facility by 2010 would be able to accommodate the wastewater treatment requirements of this alternative.

Utilizing solid waste generation factors contained within Table 4.15-4 (Section 4.15) of this EIR, the proposed residential uses would generate 1,697 tons of solid waster per year. The on-site office/retail uses would be anticipated to generate approximately 823 tons of solid waste per year.

Similar to the proposed project, implementation of mitigation measures contained within Section 4.15 of this EIR would reduce utilities and services impacts under Alternative 2 to below a level of significance. It should be noted that Alternative 2 would result in less impacts than the proposed project related to sewer flow.

5.5.2.16 Population and Housing

Under Alternative 2, there would be an increase in population resulting from development at the site. The 900 residential units could generate an on-site population of approximately 3,168 people.⁵ The population would fluctuate during the daytime since employees associated with the retail commercial uses would be present on-site. The anticipated daytime population from these employees would be approximately 303 persons.⁶ Therefore, the total daytime population is estimated for this alternative to be 3,471 persons. In addition, some transient population use would be experienced from the golf course and hotel. Overall, the increase in population would not exceed either City or Southern California Association of Governments' (SCAG) estimates for Santa Paula for the General Plan

⁵ Note: Population totals are based upon the following assumption: 900 residential dwelling units times 3.52 persons per unit.

⁶ Note: The General Plan does not identify the breakout of office or retail comprising the 76,230 square feet proposed. For the purposes of this analysis, 38,115 square feet of the overall total were assigned to office, while the remainder was assigned to retail. Utilizing these totals, the office is estimated to generate 152 employees (i.e., 38,115 square feet divided by 250 square feet per employee) while the retail would generate 76 employees (i.e., 38,115 square feet divided by 500 square feet per employee). It is anticipated that the golf course and hotel would generate an additional 75 employees. Source: Employee generation estimates derived from Stanley R. Hoffman Associates, Inc., East Area One Fiscal Analysis of Annexation, City of Santa Paula, August 20, 2007, Table 2-2.

framework (e.g., 2020).

Existing on-site housing (totaling nine units utilized by ranch employees) would likely be eliminated with implementation of this alternative. However, as noted in Section 4.16 (Population & Housing) of this EIR, the loss of these units would represent a fraction of the City and County housing stock. In addition, their removal would be off-set by the 900 units proposed for this alternative. Moreover, the construction of on-site housing would be consistent with SCAG’s 2020 housing estimates for the City and County.

Similar to the proposed projects, Alternative 2 would result in no significant impacts related to population and housing. It should be noted that Alternative 2 would result in beneficial impacts related to permanent employment, but not as much as the proposed project.

5.5.3 SUMMARY OF ALTERNATIVE 2

Similar to the proposed project, Alternative 2 would convert the project site from agriculture to urban land uses, consistent with the Santa Paula General Plan’s vision of this area. In addition, it would also result in similar impacts as the proposed project, provided mitigation measures contained within this EIR are implemented. This alternative would result in fewer impacts related to land use and planning since it reflects the planned use of this area, as envisioned in the General Plan. However, impacts associated with public services related to schools (high school) and libraries would be significant since the provision of these services is not planned for under this alternative. Overall, as noted in Table 5-6, implementation of this alternative would not be consistent with the objectives of the proposed project.

**TABLE 5-6
ABILITY OF ALTERNATIVE 2 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|---|---|
| Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula. | Yes |
| Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas | Yes |
| Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area. | Yes |
| Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails. | Yes |
| Establish new residential neighborhoods and districts with supporting commercial and institutional uses. | Yes |
| Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions. | Yes |
| Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas. | No |
| Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community’s identity and connection to its natural and agricultural surroundings. | No |

**TABLE 5-6
ABILITY OF ALTERNATIVE 2 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|--|--|
| Provide sites for a wide range of educational facilities including primary, secondary and post –secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community. | No |

Source: P&D Consultants, 2007.

5.6 ALTERNATIVE 3 – EAST AREA 1 SPECIFIC PLAN - 1,000 DWELLING UNITS

5.6.1 DESCRIPTION OF ALTERNATIVE 3

The Regulating Plan for Alternative 3 is the same as the Specific Plan base case but contains 500 fewer dwelling units. It contains a total of 1,000 dwellings units, as well as mix of various educational, commercial and open space uses. Table 5-7 summarizes the proposed land uses for this alternative.

**TABLE 5-7
LAND USES PROPOSED FOR ALTERNATIVE 3: EAST AREA 1
SPECIFIC PLAN – 1,000 DWELLING UNITS**

| Lands Use | Unit Counts/Size |
|-----------------------------------|------------------|
| Residential Dwelling Units | 1,000 units |
| Workplace Buildings | 150,000 sf |
| Retail/Office | 210,000 sf |
| Assisted Living | 75,000 sf |
| Elementary School | 10.8 ac |
| High School/Post Secondary School | 25.6 ac |
| Shared Athletic Fields | 23.2 ac |
| Parks and Greenways | 65.8 ac |
| Agriculture | 134.4 ac |

Source: HDR Town Planning, 2007.

The lower number of units is achieved by changing the allowed building types and minimum lot widths in each zone. Alternative 3 contains a limited range of unit types and sizes. Multi-family units are limited to the Neighborhood Center, while the remainders of the units are predominantly detached single family buildings with some attached single family buildings mixed in. The percentage of unit types would be distributed approximately as follows:

- 564 units (56%) - single-family detached
- 188 units (19%) - single-family attached
- 248 units (25%) - multi-family

The level of development would likely not be sufficient to support the proposed commercial uses and thus might require off-site vehicle trips for daily needs.

5.6.2 IMPACTS OF ALTERNATIVE 3

5.6.2.1 Land Use and Planning

Under Alternative 3, impacts to land uses would be similar to those described for the proposed project. As summarized in Section 4.1 (Land Use & Planning) of this EIR, despite the application of mitigation measures, this alternative (similar to the proposed project) would continue to result in impacts related to land use and which would include:

- Exceed land use density standards
- Urban development would not be directed away from the most productive agricultural areas
- Development would be proposed outside of the City's existing Sphere of Influence
- The Specific Plan would include a Growth Management Ordinance which is not entirely consistent with that contained within the SPMC
- The proposed Specific Plan differs from the original land uses proposed for the East Area 1 Expansion Area, as defined in the General Plan
- The visual appearance along the existing rail corridor (located immediately south of the proposed project) would be negatively affected by the introduction of urban uses in lieu of the existing agricultural uses which are considered scenic.

Therefore, similar to the proposed project, implementation of Alternative 3 would result in significant and unavoidable impacts related to land use and planning.

5.6.2.2 Agricultural Resources

Under Alternative 3, impacts to agricultural resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, the provision of fewer on-site urban uses would increase the amount of land remaining in active agricultural production (i.e., Agricultural Preserve). Never the less, similar to the proposed project, despite the implementation of mitigation measures contained within Section 4.2 (Agricultural Resources) of this EIR, impacts to agricultural resources would remain significant and unavoidable for this alternative.

5.6.2.3 Mineral Resources

Under Alternative 3, impacts to mineral resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, no significant impacts to mineral resources would result from implementation of this alternative.

5.6.2.4 Transportation and Circulation

As shown in Table 5-8, Alternative 3 would generate approximately 16,441 daily trips, 1,501 trips during the A.M. peak hour and 1,648 trips during the P.M. peak hour. Alternative 3 would generate approximately 64 percent (= 16,441 / 25,848) of the total daily trips for the proposed project. Therefore, implementation of this alternative would create the same amount or fewer significant adverse traffic impacts than the proposed project. As shown previously in Section 4.4 (Transportation and Circulation), all significant adverse traffic impacts were mitigated to below a level of significance. Therefore, traffic related impacts under Alternative 3 would also be mitigated to below a level of significance.

**TABLE 5-8
PROJECT TRIP GENERATION ESTIMATES FOR ALTERNATIVE 3**

| LAND USE | ITE CODE | SIZE | UNITS | DAILY TRIPS | WEEKDAY | | | | | |
|---|----------|---------|-------|---------------|----------------|------------|--------------|----------------|------------|--------------|
| | | | | | A.M. Peak Hour | | | P.M. Peak Hour | | |
| | | | | | In | Out | Total | In | Out | Total |
| Residential - Single Family | 210 | 564 | DU | 5,397 | 106 | 317 | 423 | 359 | 211 | 570 |
| Residential - Condominium | 230 | 188 | DU | 1,102 | 14 | 69 | 83 | 66 | 32 | 98 |
| Residential - Apartment | 220 | 248 | DU | 1,667 | 25 | 101 | 126 | 100 | 54 | 154 |
| Assisted Living (Assume 1 bed per 500 sf) | 254 | 150 | Bed | 399 | 14 | 7 | 21 | 15 | 18 | 33 |
| Open Space [a] | 412 | 89.0 | Acre | 203 | 1 | 0 | 1 | 2 | 3 | 5 |
| Light Industrial | 110 | 150,000 | SF | 1,046 | 121 | 17 | 138 | 18 | 129 | 147 |
| High School | 530 | 110,400 | SF | 1,423 | 240 | 98 | 338 | 58 | 49 | 107 |
| (75% internal capture) | | | | (1,067) | (180) | (74) | (254) | (44) | (37) | (81) |
| Community College | 540 | 165,000 | SF | 4,536 | 365 | 128 | 493 | 243 | 176 | 419 |
| (5% internal capture) | | | | (227) | (18) | (6) | (24) | (12) | (9) | (21) |
| Shopping Center | 820 | 87,000 | SF | 3,736 | 55 | 35 | 90 | 156 | 170 | 326 |
| (65% internal capture) | | | | (2,428) | (36) | (23) | (59) | (101) | (111) | (212) |
| Office | 710 | 123,000 | SF | 1,354 | 168 | 23 | 191 | 31 | 152 | 183 |
| (65% internal capture) | | | | (880) | (109) | (15) | (124) | (20) | (99) | (119) |
| Elementary School | 520 | 35,400 | SF | 513 | 90 | 76 | 166 | 48 | 63 | 111 |
| (65% internal capture) | | | | (333) | (59) | (49) | (108) | (31) | (41) | (72) |
| TOTAL EXTERNAL TRIPS | | | | 16,441 | 797 | 704 | 1,501 | 888 | 760 | 1,648 |

Source: Fehr & Peers/Kaku Associates and P&D Consultants, 2007.

Trip generation estimates based on Trip Generation, 7th Edition.

Notes:

DU = dwelling unit

SF = square foot

[a] includes park and preserve land

5.6.2.5 Air Quality

Under Alternative 3, impacts to air quality would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, compared to the proposed project, Alternative 3 emissions from mobile sources would be less than the proposed project. In addition, emissions of greenhouse gases that contribute to climate change would increase for the area due to construction and operations. Although it cannot be determined if this project would be an incrementally significant impact to climate change due to a lack of a significance threshold, this alternative would contribute to an already existing significant impact.

Similar to the proposed project, Alternative 3 would result in significant impacts related to ROC and NO_x, which would exceed Ventura County Air Pollution Control District thresholds and therefore would be considered significant and unavoidable.

5.6.2.6 Noise

Alternative 3 would generate very similar noise levels for both construction and operational noise as the proposed project. The number of dwelling units is less than the proposed project and the mix of land uses as shown in Table 5-7 are slightly different. However, to conduct the site preparation, very similar construction equipment would be utilized on the project site resulting in noise exposure levels consistent with the proposed project.

Under Alternative 3 (longer term operational noise exposure), the traffic loading and distribution along the network would be less due fewer dwelling units and less total trip generation. Trip generation is anticipated to be approximately 16,441 daily trips. The differences between the trip generation and the expected distribution on the network are primarily associated with the total trips as the vehicles would be distributed similar to the proposed project. Since the total trips generated for Alternative 3 are an estimated 64 percent of the total trips of the proposed project the CNEL values would be expected to be an estimated 2 dB(A) less than the proposed project. The standard rule of doubling the traffic on a street segment or highway generally results in 3 dB(A) increase. Although a 2 dB(A) increase is just barely if at all discernible, this would not likely require a substantive difference in mitigation requirements beyond that for the proposed project.

5.6.2.7 Biological Resources

Under Alternative 3, impacts to biological resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, the provision of fewer on-site urban uses would increase the amount of natural areas and land remaining in active agricultural production (i.e., Agricultural Preserve) which could be used by on-site biological resources. Similar to the proposed project, implementation of mitigation measures contained within Section 4.7 (Biological Resources) of this EIR would reduce biological resources impacts under Alternative 3 to below a level of significance.

5.6.2.8 Geology and Soils

Under Alternative 3, impacts to geology and soils would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.8 (Geology & Soils) of this EIR would reduce geology and soils impacts under Alternative 3 to below a level of significance.

5.6.2.9 Hydrology and Water Quality

Under Alternative 3, impacts to hydrology and water quality would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.9 (Hydrology & Water Quality) of this EIR would reduce hydrology and water quality impacts under Alternative 3 to below a level of significance.

5.6.2.10 Hazards and Hazardous Materials

Under Alternative 3, impacts to hazards and hazardous materials would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.10 (Hazard & Hazardous Materials) of this EIR would reduce hazards and hazardous materials impacts under Alternative 3 to below a level of significance.

5.6.2.11 Aesthetics

Under Alternative 3, impacts to aesthetics would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, despite the implementation of mitigation measures contained within Section 4.11 (Aesthetics) of this EIR, impacts to aesthetics (views, scenic vistas, visual quality) would remain significant and unavoidable under Alternative 3.

5.6.2.12 Cultural and Historic Resources

Under Alternative 3, impacts to cultural and historic resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.12 (Cultural and Historic Resources) of this EIR would reduce archaeological and paleontological resources impacts under Alternative 3 to below a level of significance. However, similar to the proposed project, impacts to historic resources would be considered significant and unavoidable.

5.6.2.13 Public Services

Under Alternative 3, impacts to public services would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, as previously noted, this alternative would generate an on-site residential population of 3,520 persons, while the construction of 360,000 square feet of retail/office and workplace buildings would generate approximately 1,230 employees. Therefore, the combined daytime population would be 4,750 persons.

Utilizing student generation factors contained within Table 4.13-3 (see Section 4.13 (Public Services) of this EIR), this alternative is anticipated to generate a total of 900 students (i.e., 629 K-8th grade students and 271 9th – 12th grade students).⁷ As noted above, this alternative provides for the provision of a 10.8 acre elementary school and 25.6 acres high school/post secondary school.

Similar to the proposed project, implementation of mitigation measures contained within Section 4.13 of this EIR would reduce public services impacts under Alternative 3 to below a level of significance.

5.6.2.14 Recreation

Under Alternative 3, impacts to recreation would be similar to those described for the proposed project. However, under this alternative, there would be additional parks and greenways (65.8 acres) constructed as part of the development at the site. In addition, shared athletic fields would also be provided (23.2 acres) and would be accessible to City and County residents. As noted in Section 4.14 (Recreation) of this EIR, the City is currently severely deficient in its parkland acreage. At present, a total of 35.9 acres of parkland are available to City residents, resulting in a net deficit of 109.8 acres. Utilizing the City's parkland standards (i.e., five acres per 1,000 persons), a total of 17.6 acres of parkland would be required for this alternative. The combined parks and greenways and shared athletic fields would total 89 acres and would offset the City's shortfall.

⁷ Note: The student generation rates only reflect proposed residential units and do not include student generation which could be realized due to office and retail employees.

Similar to the proposed project, implementation mitigation measures identified in Section 4.14 of this EIR would reduce recreational impacts under Alternative 3 to below a level of significance.

5.6.2.15 Utilities and Service Systems

Under Alternative 3, impacts to utilities and service systems would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, as noted in Table 5-9 this alternative is anticipated to result in a water supply demand of 971.0 acre feet per year (AFY). The combined on-site water supplies available are 1,612 AFY. Therefore, sufficient water supplies would be available on-site to supply the project site for this alternative.

**TABLE 5-9
WATER SUPPLY DEMAND FOR ALTERNATIVE 3**

| LAND USE | UNITS/SIZE | PERSON | GPD/AFY | DAYS | AF | AFY |
|-----------------------------------|------------|--------|---------|------|--------|-------|
| Residential Dwelling Units | 1,000 | 3.75 | 132 | 365 | 325851 | 554.5 |
| Workplace Buildings | 150,000 sf | | 15.1 | | 325851 | 7.0 |
| Retail/Office | 210,000 sf | | 15.1 | | 325851 | 9.7 |
| Assisted Living | 75,000 sf | | 15.1 | | 325851 | 3.5 |
| Elementary School | 10.8 acres | | 1.81 | | | 19.5 |
| High School/Post Secondary School | 25.6 acres | | 1.81 | | | 46.3 |
| Shared Athletic Fields | 23.2 acres | | 2.22 | | | 51.5 |
| Parks and Greenways | 65.8 acres | | 2.22 | | | 146.1 |
| Agriculture | 65.8 acres | | 2.02 | | | 132.9 |
| Total water Demand | | | | | | |

Source: Impact Sciences, 2007.

Sewer flow for this alternative would be approximately half (0.283 million gallons per day (MGD) compared to the proposed project (i.e., 0.435 MGD). As noted in Section 4.15 (Utilities & Services) of this EIR, the City's planned construction of a new Water Recycling Facility by 2010 would be able to accommodate the wastewater treatment requirements of this alternative.

Utilizing solid waste generation factors contained within Table 4.15-4 (Section 4.15) of this EIR, the proposed residential uses would generate 2,202 tons of solid waster per year. The on-site office/retail uses would be anticipated to generate approximately 3,888 tons of solid waste per year.

Similar to the proposed project, implementation of mitigation measures contained within Section 4.15 of this EIR would reduce utilities and service impacts under Alternative 3 to below a level of significance. It should be noted that Alternative 3 would result in less impacts than the proposed project related to sewer flow.

5.6.2.16 Population and Housing

Under Alternative 3, impacts to population and housing would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, the 1,000 residential units would generate an on-site residential population of 3,520 persons. The construction of 360,000 square

feet of retail/office and workplace buildings would generate approximately 1,230 employees.⁸

Similar to the proposed project, Alternative 3 would result in no significant impacts related to population and housing. It should be noted that Alternative 3 would result in beneficial impacts related to permanent employment, but not as much as the proposed project.

5.6.3 SUMMARY OF ALTERNATIVE 3

Similar to the proposed project, Alternative 3 would convert the site from agriculture to urban land uses. However, the proposed land uses and intensities noted for this alternative would not be consistent with the Santa Paula General Plan’s vision of this area. Among other things, this alternative would exceed General Plan land use density standards and would include a Growth Management Ordinance which is not entirely consistent with that contained within the Santa Paula Municipal Code. Overall however, impacts from this alternative would not be markedly different from the proposed project. As noted in Table 5-10, implementation of this alternative would not be consistent with the objectives of the proposed project.

**TABLE 5-10
ABILITY OF ALTERNATIVE 3 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|---|--|
| Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula. | Yes |
| Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas | Yes |
| Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area. | Yes |
| Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails. | Yes |
| Establish new residential neighborhoods and districts with supporting commercial and institutional uses. | Yes |
| Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions. | Yes |
| Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas. | No |
| Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community’s identity and connection to its natural and agricultural surroundings. | Yes |

⁸ Note: For the purposes of this analysis, 255,000 square feet of the overall total were assigned to office, while the remainder was assigned to retail (105,000 square feet). Utilizing these totals, the office is estimated to generate 1,020 employees (i.e., 255,000 square feet divided by 250 square feet per employee) while the retail would generate 210 employees (i.e., 105,000 square feet divided by 500 square feet per employee). Source: Employee generation estimates derived from Stanley R. Hoffman Associates, Inc., East Area One Fiscal Analysis of Annexation, City of Santa Paula, August 20, 2007, Table 2-2.

**TABLE 5-10
ABILITY OF ALTERNATIVE 3 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|--|--|
| Provide sites for a wide range of educational facilities including primary, secondary and post –secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community. | Yes |

Source: P&D Consultants, 2007.

5.7 ALTERNATIVE 4 – EAST AREA 1 SPECIFIC PLAN - 1,250 DWELLING UNITS

5.7.1 DESCRIPTION OF ALTERNATIVE 4

The Regulating Plan for Alternative 4 is the same as the Specific Plan base case, but contains 250 fewer dwelling units. It contains a total of 1,250 dwellings units, as well as mix of various educational, commercial and open space uses. Table 5-11 summarizes the proposed land uses for this alternative.

The lower number of units is achieved by changing the allowed building types and minimum lot widths in each zone. The full range of unit types from the Specific Plan would be utilized, but Alternative 4 has more detached single family homes than the base case. Each neighborhood has a range of lot sizes and types. However, there would be fewer mid-range attached units. The percentage of unit types would be distributed approximately as follows:

- 627 units (50%) - single-family detached
- 223 units (18%) - single-family attached
- 400 units (32%) - multi-family

A range of services, commercial uses and work place facilities would be provided on-site and could be accessed by walking and/or a short drive away. Essential, daily needs would require limited off-site vehicular trips.

**TABLE 5-11
LAND USES PROPOSED FOR ALTERNATIVE 4: EAST AREA 1
SPECIFIC PLAN – 1,250 DWELLING UNITS**

| LANDS USE | UNIT COUNTS/SIZE |
|-----------------------------------|------------------|
| Residential Dwelling Units | 1,250 units |
| Workplace Buildings | 150,000 sf |
| Retail/Office | 210,000 sf |
| Assisted Living | 75,000 sf |
| Elementary School | 10.8 ac |
| High School/Post Secondary School | 25.6 ac |
| Shared Athletic Fields | 23.2 ac |
| Parks and Greenways | 65.8 ac |
| Agriculture | 134.4 ac |

Source: HDR Town Planning, 2007.

5.7.2 IMPACTS OF ALTERNATIVE 4

5.7.2.1 Land Use and Planning

Under Alternative 4, impacts to land uses would be similar to those described for the proposed project. As summarized in Section 4.1 (Land Use & Planning) of this EIR, despite the application of mitigation measures, this alternative (similar to the proposed project) would continue to result in impacts related to land use and which would include:

- Exceed land use density standards
- Urban development would not be directed away from the most productive agricultural areas
- Development would be proposed outside of the City's existing Sphere of Influence
- The Specific Plan would include a Growth Management Ordinance which is not entirely consistent with that contained within the SPMC
- The proposed Specific Plan differs from the original land uses proposed for the East Area 1 Expansion Area, as defined in the General Plan
- The visual appearance along the existing rail corridor (located immediately south of the proposed project) would be negatively affected by the introduction of urban uses in lieu of the existing agricultural uses which are considered scenic.

Therefore, similar to the proposed project, implementation of Alternative 4 would result in significant unavoidable impacts related to land use and planning.

5.7.2.2 Agricultural Resources

Under Alternative 4, impacts to agricultural resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, the provision of fewer on-site urban uses would increase the amount of land remaining in active agricultural production (i.e., Agricultural Preserve). Never the less, similar to the proposed project, despite the implementation of mitigation measures contained within Section 4.2 (Agricultural Resources) of this EIR, impacts to agricultural resources would remain significant and unavoidable for this alternative.

5.7.2.3 Mineral Resources

Under Alternative 4, impacts to mineral resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, no significant impacts to mineral resources would result from implementation of this alternative.

5.7.2.4 Transportation and Circulation

As shown in Table 5-12, Alternative 4 would generate approximately 18,270 daily trips, 1,641 trips during the A.M. peak hour and 1,823 trips during the P.M. peak hour. Alternative 4 would generate approximately 71 percent ($= 18,270 / 25,848$) of the total daily trips for the proposed project. Therefore, implementation of this alternative would create the same amount or fewer significant adverse traffic impacts than the proposed project. As shown previously in Section 4.4 (Transportation and Circulation), all significant adverse traffic impacts were mitigated to below a level of significance. Therefore, traffic related impacts under Alternative 4 would also be mitigated to below a level of significance.

**TABLE 5-12
PROJECT TRIP GENERATION ESTIMATES FOR ALTERNATIVE 4**

| LAND USE | ITE CODE | SIZE | UNITS | DAILY TRIPS | WEEKDAY | | | | | |
|---|----------|---------|-------|---------------|----------------|------------|--------------|----------------|------------|--------------|
| | | | | | A.M. Peak Hour | | | P.M. Peak Hour | | |
| | | | | | In | Out | Total | In | Out | Total |
| Residential - Single Family | 210 | 627 | DU | 6,000 | 118 | 352 | 470 | 399 | 234 | 633 |
| Residential - Condominium | 230 | 223 | DU | 1,307 | 17 | 81 | 98 | 78 | 38 | 116 |
| Residential - Apartment | 220 | 400 | DU | 2,688 | 41 | 163 | 204 | 161 | 87 | 248 |
| Assisted Living (Assume 1 bed per 500 sf) | 254 | 150 | Bed | 399 | 14 | 7 | 21 | 15 | 18 | 33 |
| Open Space [a] | 412 | 89.0 | Acre | 203 | 1 | 0 | 1 | 2 | 3 | 5 |
| Light Industrial | 110 | 150,000 | SF | 1,046 | 121 | 17 | 138 | 18 | 129 | 147 |
| High School | 530 | 110,400 | SF | 1,423 | 240 | 98 | 338 | 58 | 49 | 107 |
| (75% internal capture) | | | | (1,067) | (180) | (74) | (254) | (44) | (37) | (81) |
| Community College | 540 | 165,000 | SF | 4,536 | 365 | 128 | 493 | 243 | 176 | 419 |
| (5% internal capture) | | | | (227) | (18) | (6) | (24) | (12) | (9) | (21) |
| Shopping Center | 820 | 87,000 | SF | 3,736 | 55 | 35 | 90 | 156 | 170 | 326 |
| (65% internal capture) | | | | (2,428) | (36) | (23) | (59) | (101) | (111) | (212) |
| Office | 710 | 123,000 | SF | 1,354 | 168 | 23 | 191 | 31 | 152 | 183 |
| (65% internal capture) | | | | (880) | (109) | (15) | (124) | (20) | (99) | (119) |
| Elementary School | 520 | 35,400 | SF | 513 | 90 | 76 | 166 | 48 | 63 | 111 |
| (65% internal capture) | | | | (333) | (59) | (49) | (108) | (31) | (41) | (72) |
| TOTAL EXTERNAL TRIPS | | | | 18,270 | 828 | 813 | 1,641 | 1,001 | 822 | 1,823 |

Source: Fehr & Peers/Kaku Associates and P&D Consultants, 2007.

Trip generation estimates based on Trip Generation, 7th Edition.

Notes:

DU = dwelling unit

SF = square foot

[a] includes park and preserve land

5.7.2.5 Air Quality

Under Alternative 4, impacts to air quality would be similar to those described for the proposed project and Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units). However, compared to the proposed project, Alternative 4 emissions from mobile sources would be less than the proposed project. In addition, emissions of greenhouse gases that contribute to climate change would increase for the area due to construction and operations. Although it cannot be determined if this project would be an incrementally significant impact to climate change due to a lack of a significance threshold, this alternative would contribute to an already existing significant impact.

Similar to the proposed project, Alternative 4 would result in significant impacts related to ROC and NO_x which would exceed Ventura County Air Pollution Control District thresholds and therefore would be significant and unavoidable.

5.7.2.6 Noise

Alternative 4 would generate very similar noise levels for both construction and operational noise as the proposed project. The number of dwelling units is less than the proposed project and the mix of land uses as shown in Table 5-11 are slightly different. However, to conduct the site preparation, very similar construction equipment would be utilized on the project site resulting in noise exposure levels consistent with the proposed project.

Under to Alternatives 4 (longer term operational noise exposure), the traffic loading and distribution along the network would be less due fewer dwelling units and less total trip generation. Trip generation is anticipated to be approximately 18,720 daily trips. The differences between the trip generation and the expected distribution on the network are primarily associated with the total trips as the vehicles would be distributed similar to the proposed project. Since the total trips generated for Alternative 4 are an estimated 71 percent of the total trips of the proposed project the CNEL values would be expected to be an estimated 1 to 2 dB(A) less than the proposed project. The standard rule of doubling the traffic on a street segment or highway generally results in 3 dB(A) increase. A 1 -2 dB(A) increase is not discernible and would not likely require a substantive difference in mitigation requirements beyond that for the proposed project.

5.7.2.7 Biological Resources

Under Alternative 4, impacts to biological resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, the provision of fewer on-site urban uses would increase the amount of natural areas and land remaining in active agricultural production (i.e., Agricultural Preserve) which could be used by on-site biological resources. Similar to the proposed project, implementation of mitigation measures contained within Section 4.7 (Biological Resources) of this EIR would reduce biological resources impacts under Alternative 4 to below a level of significance.

5.7.2.8 Geology and Soils

Under Alternative 4, impacts to geology and soils would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.8 (Geology & Soils) of this EIR would reduce geology and soils impacts under Alternative 4 to below a level of significance.

5.7.2.9 Hydrology and Water Quality

Under Alternative 4, impacts to hydrology and water quality would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.9 (Hydrology & Water Quality) of this EIR would reduce hydrology and water quality impacts under Alternative 4 to below a level of significance.

5.7.2.10 Hazards and Hazardous Materials

Under Alternative 4, impacts to hazards and hazardous materials would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.10 (Hazard & Hazardous Materials) of this EIR would reduce hazards and hazardous materials impacts under Alternative 4 to below a level of significance.

5.7.2.11 Aesthetics

Under Alternative 4, impacts to aesthetics would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, despite the implementation of mitigation measures contained within Section 4.11 (Aesthetics) of this EIR, impacts to aesthetics (views, scenic vistas, visual quality) would remain significant and unavoidable under Alternative 4.

5.7.2.12 Cultural and Historic Resources

Under Alternative 4, impacts to cultural and historic resources would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. Similar to the proposed project, implementation of mitigation measures contained within Section 4.12 (Cultural and Historic Resources) of this EIR would reduce archaeological and paleontological resources impacts under Alternative 4 to below a level of significance. However, similar to the proposed project, impacts to historic resources would be considered significant and unavoidable.

5.7.2.13 Public Services

Under Alternative 4, impacts to public services would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, as previously noted, this alternative would generate an on-site residential population of 4,400 persons, while the construction of 360,000 square feet of retail/office and workplace buildings would generate approximately 1,230 employees. Therefore, the combined daytime population would be 5,630 persons.

Utilizing student generation factors contained within Table 4.13-3 (see Section 4.13 (Public Services) of this EIR), this alternative is anticipated to generate a total of 1,127 students (i.e., 793 K-8th grade students and 334 9th – 12th grade students).⁹ As noted above, this alternative provides for the provision of a 10.8 acre elementary school and 25.6 acres high school/post secondary school.

Similar to the proposed project, implementation of mitigation measures contained within Section 4.13 of this EIR would reduce public service impacts under Alternative 4 to below a level of significance.

⁹ Note: The student generation rates only reflect proposed residential units and do not include student generation which could be realized due to office and retail employees.

5.7.2.14 Recreation

Under Alternative 4, impacts to recreation would be similar to those described for the proposed project. However, under this alternative, there would be additional parks and greenways (65.8 acres) constructed as part of the development at the site. In addition, shared athletic fields would also be provided (23.2 acres) and would be accessible to City and County residents. As noted in Section 4.14 (Recreation) of this EIR, the City is currently severely deficient in its parkland acreage. At present, a total of 35.9 acres of parkland are available to City residents, resulting in a net deficit of 109.8 acres. Utilizing the City's parkland standards (i.e., five acres per 1,000 persons), a total of 22.0 acres of parkland would be required for this alternative. The combined parks and greenways and shared athletic fields would total 89 acres and would offset the City's shortfall.

Similar to the proposed project, implementation mitigation measures identified in Section 4.14 of this EIR would reduce recreational impacts under Alternative 4 to below a level of significance.

5.7.2.15 Utilities and Service Systems

Under Alternative 4, impacts to utilities and service systems would be similar to those described for the proposed project. The discussion of impacts described for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, as noted in Table 5-13, this alternative is anticipated to result in a water supply demand of 1,109.6 acre feet per year (AFY). The combined on-site water supplies available are 1,612 AFY. Therefore, sufficient water supplies would be available on-site to supply the project site for this alternative.

**TABLE 5-13
WATER SUPPLY DEMAND FOR ALTERNATIVE 4**

| LAND USE | UNITS/SIZE | PERSON | GPD/AFY | DAYS | AF | AFY |
|-----------------------------------|------------|--------|---------|------|--------|---------------|
| Residential Dwelling Units | 1,250 | 3.75 | 132 | 365 | 325851 | 693.1 |
| Workplace Buildings | 150,000 sf | | 15.1 | | 325851 | 7.0 |
| Retail/Office | 210,000 sf | | 15.1 | | 325851 | 9.7 |
| Assisted Living | 75,000 sf | | 15.1 | | 325851 | 3.5 |
| Elementary School | 10.8 | | 1.81 | | | 19.5 |
| High School/Post Secondary School | 25.6 acres | | 1.81 | | | 46.3 |
| Shared Athletic Fields | 23.2 acres | | 2.22 | | | 51.5 |
| Parks and Greenways | 65.8 acres | | 2.22 | | | 146.1 |
| Agriculture | 65.8 acres | | 2.02 | | | 132.9 |
| Total water Demand | | | | | | 1109.6 |

Source: Impact Sciences, 2007.

Sewer flow for this alternative would be similar (0.354 million gallons per day (MGD) compared to the proposed project (i.e., 0.435 MGD). As noted in Section 4.15 (Utilities & Services) of this EIR, the City's planned construction of a new Water Recycling Facility by 2010 would be able to accommodate the wastewater treatment requirements of this alternative.

Utilizing solid waste generation factors contained within Table 4.15-4 (Section 4.15) of this EIR, the proposed residential uses would generate 2,550 tons of solid waste per year. The on-site office/retail uses would be anticipated to generate approximately 3,888 tons of solid waste per year.

Similar to the proposed project, implementation of mitigation measures contained within Section 4.15 of this EIR would reduce utilities and service impacts under Alternative 4 to below a level of significance.

5.7.2.16 Population and Housing

Under Alternative 4, impacts to population and housing would be similar to those described for the proposed project. The discussion of impacts for Alternative 2 (City of Santa Paula General Plan - 900 Dwelling Units) would also apply to this alternative. However, the 1,250 residential units would generate an on-site residential population of 4,400 persons.¹⁰ The construction of 360,000 square feet of retail/office and workplace buildings would generate approximately 1,230 employees.

Similar to the proposed project, Alternative 4 would result in no significant impacts related to population and housing. It should be noted that Alternative 4 would result in beneficial impacts related to permanent employment, but not as much as the proposed project.

5.7.3 Summary of Alternative 4

Similar to the proposed project, Alternative 4 would convert the site from agriculture to urban land uses. However, the proposed land uses and intensities noted for this alternative would not be consistent with the Santa Paula General Plan’s vision of this area. Among other things, this alternative would exceed General Plan land use density standards and would include a Growth Management Ordinance which is not entirely consistent with that contained within the Santa Paula Municipal Code. Overall however, impacts from this alternative would not be markedly different from the proposed project. As noted in Table 5-14, implementation of this alternative would be consistent with the objectives of the proposed project.

**TABLE 5-14
ABILITY OF ALTERNATIVE 4 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|---|--|
| Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula. | Yes |
| Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas | Yes |
| Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area. | Yes |
| Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails. | Yes |
| Establish new residential neighborhoods and districts with supporting commercial and institutional uses. | Yes |
| Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions. | Yes |

¹⁰ Note: Population totals are based upon the following assumption: 1,250 residential dwelling units times 3.52 persons per unit.

**TABLE 5-14
ABILITY OF ALTERNATIVE 4 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|---|---|
| Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas. | Yes |
| Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings. | Yes |
| Provide sites for a wide range of educational facilities including primary, secondary and post-secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community. | Yes |

Source: P&D Consultants, 2007.

5.8 ALTERNATIVE 5 – EAST AREA 1 SPECIFIC PLAN – STATE ROUTE 150 BYPASS

5.8.1 DESCRIPTION OF ALTERNATIVE 5

Under Alternative 5, the proposed project as currently described in Section 3.0 (Project Description) of the EIR would be constructed. However, a ByPass to State Route 150 (Ojai Road) would be constructed. The ByPass would follow Hallock Road beginning at Telegraph Road and extend northwest through the project site before eventually heading west across Santa Paula Creek. The exact location of the crossing would need to be evaluated within a future study. As currently considered in the traffic report, the roadway would end at Santa Paula Creek.

5.8.2 IMPACTS OF ALTERNATIVE 5

5.8.2.1 Land Use and Planning

Land use and planning impacts under the proposed project were considered significant and unavoidable. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to land use and planning, refer to Section 4.1 (Land Use & Planning). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.2 Agricultural Resources

Agricultural resources impacts under the proposed project were significant and unavoidable. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to agricultural resources, refer to Section 4.2 (Agricultural Resources). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.3 Mineral Resources

Mineral resources impacts under the proposed project were considered less than significant. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to mineral resources, refer to Section 4.3 (Mineral Resources). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.4 Transportation and Circulation

Alternative 5 would generate the same amount traffic as the proposed project as shown previously in Table 4.4-9 (Section 4.4). However, the SR-150 bypass would be constructed through East Area 1 connecting to SR-150 to the north and to SR-126 to the south. SR-150 would redirect traffic from Downtown Santa Paula to travel through East Area 1. As shown in the Traffic Study in Appendix D, implementation of this alternative would create a significant adverse impact to ten intersections and one freeway segment. However, as shown in the Traffic Study in Appendix D, all significant adverse traffic impacts were mitigated to below a level of significance.

5.8.2.5 Air Quality

Under Alternative 5, there would be substantial change in air quality resulting from development at the site. New sources of air emissions would result from both mobile sources (traffic associated with the development) and from some stationary emissions. Compared to the proposed project, Alternative 5 emissions from mobile sources would be approximately the same and therefore would comply with local air quality plans. There would be temporary emissions during construction from construction equipment on-site. There would be a cumulative net increase in criteria pollutants (ozone) which are currently non-attainment in the region. This would be primarily due to emissions associated with vehicle trips from the project. Sensitive receptors near the site could be exposed to new emissions from on-site sources and increased emissions from mobile sources. Odors on the site would be primarily from residential uses and possibly from commercial uses. Emissions of greenhouse gases that contribute to climate change would increase for the area due to construction and operations. Although it cannot be determined if this project would be an incrementally significant impact to climate change due to a lack of a significance threshold, this alternative would contribute to an already existing significant impact.

Similar to the proposed project, Alternative 5 would result in significant impacts related to ROC and NO_x which would exceed Ventura County Air Pollution Control District thresholds and therefore would be significant and unavoidable.

5.8.2.6 Noise

Alternative 5 would result in somewhat different construction scenario to accommodate the bypass, however, the resultant noise impacts would not be substantively different since the construction equipment mix would likely be similar. The site preparation, grading and the construction activities would use very similar construction equipment resulting in noise exposure levels consistent with the proposed project. It is anticipated that specific phasing sequencing of the road would be accommodated during the construction of the Specific Plan.

Alternative 5 would generate the same traffic as the proposed project which contributes to the longer term operational noise. Some of the roadway segments would result in an increase in noise due to the proposed project with the State Route 150 ByPass. These increases are between 0.1 to 3.7 dB(A) CNEL.

Twelve roadway segments would generate less roadway noise. Based on the location of the noise sensitive land uses and the roadway noise increases there are no significant impacts except along Santa Paula Street between 12th Street and 10th Street where a 3.0dB(A) increase occurs and a 60.9 CNEL has been identified.

5.8.2.7 Biological Resources

Biological resources impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to biological resources, refer to Section 4.7 (Biological Resources). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.8 Geology and Soils

Geology and soils impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to geology and soils, refer to Section 4.8 (Geology & Soils). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.9 Hydrology and Water Quality

Hydrology and water quality impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to hydrology and water quality, refer to Section 4.9 (Hydrology & Water Quality). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.10 Hazards and Hazardous Materials

Hazards and hazardous materials impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to hazards and hazardous materials, refer to Section 4.10 (Hazards and Hazardous Materials). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.11 Aesthetics

Aesthetic impacts under the proposed project were considered significant and unavoidable. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to aesthetics, refer to Section 4.11 (Aesthetics). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.12 Cultural and Historic Resources

Cultural resources impacts under the proposed project were considered less than significant for archaeological and paleontological resources with implementation of mitigation measures. However, impacts to historic resources were determined to be significant and unavoidable. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the

proposed project impacts related to cultural and historic resources, refer to Section 4.12 (Cultural and Historic Resources). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.13 Public Services

Public services impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to public services, refer to Section 4.13 (Public Services). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.14 Recreation

Recreation impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to recreation, refer to Section 4.14 (Recreation). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.15 Utilities and Service Systems

Utilities and services impacts under the proposed project were considered less than significant with implementation of mitigation measures. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to utilities and services, refer to Section 4.15 (Utilities and Services). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.2.16 Population and Housing

No significant population and housing impacts were considered under the proposed project. Under Alternative 5, impacts associated with the proposed project would apply. For a discussion of the proposed project impacts related to population and housing, refer to Section 4.16 (Population and Housing). Therefore, impacts associated with Alternative 5 would be similar to the impacts under the proposed project.

5.8.3 SUMMARY OF ALTERNATIVE 5

Similar to the proposed project, Alternative 5 would convert the site from agriculture to urban land uses. However, the proposed land uses and intensities noted for this alternative would not be consistent with the Santa Paula General Plan's vision of this area. Among other things, this alternative would exceed General Plan land use density standards and would include a Growth Management Ordinance which is not entirely consistent with that contained within the Santa Paula Municipal Code. Overall however, impacts from this alternative would be similar to the proposed project. As noted in Table 5-15, implementation of this alternative would be consistent with the objectives of the proposed project.

**TABLE 5-15
ABILITY OF ALTERNATIVE 5 TO MEET THE PROJECT OBJECTIVES**

| PROJECT OBJECTIVE | DOES THE ALTERNATIVE MEET THE PROJECT OBJECTIVE? |
|---|--|
| Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in East Area 1 that reflects and complements the existing pattern and scale of development in Santa Paula. | Yes |
| Cluster development to preserve the hillside portions of the site most visible from the City and surrounding areas | Yes |
| Enhance Haun Creek to provide drainage facilities that are natural in appearance, provide additional natural habitat, and create a buffer between development and agricultural uses to the east that is consistent with the visual character of the area. | Yes |
| Create a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected to each other and the existing downtown by a coherent network of interconnected streets, walkways and trails. | Yes |
| Establish new residential neighborhoods and districts with supporting commercial and institutional uses. | Yes |
| Provide a wide variety of housing types and lifestyle choices which are consistent with and embody Santa Paula traditions. | Yes |
| Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas. | Yes |
| Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings. | Yes |
| Provide sites for a wide range of educational facilities including primary, secondary and post –secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community. | Yes |

Source: P&D Consultants, 2007.

5.9 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Alternatives that are remote or speculative, or have effects that cannot be reasonably predicted, need not be considered.¹¹ Several alternatives were considered by the City of Santa Paula, but rejected as infeasible, and the following provides a brief explanation of the reasons for their exclusion.

In selecting potential sites for the proposed project, a number of factors were considered including the City's General Plan goals and objectives, and control of the majority of the land in which the project was proposed to be built.

Other sites were deemed infeasible and rejected for further consideration as described below:

- No contiguous infill properties are available within the City to accommodate either the proposed project or the alternatives noted above.
- Other sites identified for expansion (East Area 2 and West Areas) do not provide adequate acreage for development;

¹¹ California Code of Regulations, Title 14, Division 6, Chapter 3, California Environmental Quality Act (CEQA) Guidelines, §15126.6(f)(3).

- Development proposals and/or limitations are already in place for expansion areas such as Adams Canyon or Fagan Canyon and no development is planned for South Mountain;
- Other sites would remove agricultural lands from cultivation not already planned for urbanization.

5.10 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 5-16 shows a comparison of the environmental effects of the proposed project, the project alternatives and the No Project Alternative. Each of the build alternatives would result in environmental impacts greater than would occur under the No Project Alternative. Therefore, the No Project Alternative is the environmentally superior alternative, although it would not meet project objectives, as discussed earlier. Section 15126.6(e) of the CEQA Guidelines states that if the No Project Alternative is selected as the environmentally superior alternative, then the EIR shall also identify an environmental superior alternative among the other alternatives. Of the remaining alternatives, the proposed project and Alternatives 2, 3, 4 and 5 would result in similar levels of impacts. However, there are a number of variations amongst and between the proposed project and these alternatives which would result in slightly differing levels of impacts for some environmental parameters.

**TABLE 5-16
COMPARISON OF THE ENVIRONMENTAL IMPACTS OF ALL PROJECT ALTERNATIVES**

| Environmental Parameter | Proposed Project | No Project Alternative | Alternative 2 | Alternative 3 | Alternative 4 | Alternative 5 |
|---------------------------------|-------------------------|-------------------------------|----------------------|----------------------|----------------------|----------------------|
| Land Use and Planning | 3 | 1 | 3 | 3 | 3 | 3 |
| Agriculture Resources | 3 | 1 | 3 | 3 | 3 | 3 |
| Mineral Resources | 1 | 1 | 1 | 1 | 1 | 1 |
| Transportation and Circulation | 2 | 1 | 2 | 2 | 2 | 2 |
| Air Quality | 3 | 1 | 3 | 3 | 3 | 3 |
| Noise | 2 | 1 | 2 | 2 | 2 | 2 |
| Biological Resources | 2 | 1 | 2 | 2 | 2 | 2 |
| Geology and Soils | 2 | 1 | 2 | 2 | 2 | 2 |
| Hydrology and Water Quality | 2 | 1 | 2 | 2 | 2 | 2 |
| Hazards and Hazardous Materials | 2 | 2 | 2 | 2 | 2 | 2 |
| Aesthetics | 3 | 1 | 3 | 3 | 3 | 3 |
| Cultural and Historic Resources | 3 | 1 | 3 | 3 | 3 | 3 |
| Public Services | 2 | 1 | 2 | 2 | 2 | 2 |
| Recreation | 2 | 1 | 2 | 2 | 2 | 2 |
| Utilities and Service Systems | 2 | 1 | 2 | 2 | 2 | 2 |
| Population and Housing | 1 | 1 | 1 | 1 | 1 | 1 |

Source: P&D Consultants, Inc. (2007).

Legend

1. Insignificant or no impact.
2. Impact that can be mitigated to a level of insignificance.
3. Impact that can not be mitigated to a level of insignificance.

Alternatives 2, 3 and 5 would generate additional traffic, noise and air quality impacts when compared to the proposed project and Alternative 4. Alternatives 2 and 3 would include the construction of 900 and 1,000 residential units, respectively. This level of development would likely not be able to support the range of commercial/office uses proposed for these alternatives. This would require most residents to travel off-site to other areas within the City or adjacent areas to the west (City of San Buenaventura) and east (Cities of Fillmore and Santa Clarita). Alternative 5 would include the construction of the proposed State Route 150 (Ojai Road) ByPass. The construction of the ByPass would result in a greater number of vehicle trips along Hallock Road connecting to SR-150 as people seek to avoid existing congestion along 10th Street and Ojai Road. Therefore, the environmentally superior alternatives are the proposed project and Alternative 4.

5.11 SUMMARY OF THE ALTERNATIVES ABILITY TO MEET THE PROJECT OBJECTIVES

The proposed project and Alternatives 2, 3, 4 and 5 would generally meet most project objectives when broadly considered. However, components of Alternatives 2 and 3 when viewed as a whole would not meet some of the project objectives.

Alternatives 2 and 3 would not entirely be able to meet the following objective:

- Allow for development of a sufficient number of homes to support viable neighborhood-serving commercial uses within close proximity to residential areas.

Alternatives 2 and 3 would include the construction 900 and 1,000 residential units, respectively. This level of development would likely not be able to support the range of commercial/office uses proposed for these alternatives. This would require most residents to travel off-site to other areas within the City or adjacent areas to the west (City of San Buenaventura) and east (Cities of Fillmore and Santa Clarita).

Moreover, Alternative 2 would not be able to entirely meet the following objectives:

- Provide a wide range of open space, park and recreational facilities serving residents of the City of Santa Paula and surrounding areas and reinforcing the community's identity and connection to its natural and agricultural surroundings.
- Provide sites for a wide range of educational facilities including primary, secondary and post - secondary facilities, to meet the needs of residents of the City of Santa Paula and the surrounding community.

Alternative 2 as currently described in the City's General Plan does not propose the conservation of agricultural resources contained within the project site (unlike the proposed project, Alternatives 3, 4 and 5 which include the provision of an agricultural preserve). As such, Alternative 2 would not meet the overall intent of this objective which includes reinforcing the community's identify and connection to its agricultural surrounding.

Similarly, while Alternative 2 includes the provision of an elementary school, it does not provide for a wide range of educational facilities. The elementary school would only serve the needs of the residences and commercial/office uses located on-site for this alternative. As noted above, under this alternative, high school age students would be required to travel off-site to Santa Paula Union High School, a facility which is currently over capacity. The proposed project and Alternatives 3, 4 and 5 would include the provision of elementary, secondary and post-secondary facilities. City and project residents would be

able to access the proposed elementary and secondary schools. Both City and County residents would be able to access and utilize the post-secondary facility.