

6.0 ALTERNATIVES

6.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant environmental impacts of the project. An EIR is required to include sufficient information about each alternative to meaningful evaluation, analysis, and comparison with the proposed project. This section identifies and describes alternatives to the proposed project, evaluates the environmental impacts that would result from each of these alternatives and compares these to the proposed project, 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.
- If the project is a development project on an identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. Discussion of this alternative shall compare the environmental effects of the property remaining in its existing state to the environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. In certain instances, the No Project Alternative means “no build,” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify

¹ Title 14 California Code of Regulations § 15126.6.

the practical results of not approving the project rather than create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.²

- 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.³

The range of feasible alternatives to a proposed project is to be selected and discussed in a manner that fosters meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.⁴

6.2 PROJECT OBJECTIVES

The East Gateway Project has the following objectives, 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 the East Gateway Project Area that reflects and complements the existing pattern and scale of development in Santa Paula;
- Eliminate unincorporated island areas within the City to improve the efficiency of providing public services to existing and future development;
- Provide for retail and other commercial uses that complement the residential, public facility, and small amount of commercial uses in the approved East Area 1 community;
- Provide suitable sites for large commercial centers meeting the needs of the community not presently available in the City of Santa Paula; and

2 Ibid.

3 Title 14 California Code of Regulations § 15126.6(f)(3).

4 CEQA Guidelines § 15126.6(f)(1).

- Provide a suitable site for a major new retail commercial center providing goods and services not presently available in the City of Santa Paula to reduce the length of trips by residents of Santa Paula to more distant commercial areas.

6.3 ALTERNATIVES CONSIDERED AND ELIMINATED FROM DETAILED CONSIDERATION

The following alternatives was identified and initially considered by the City and eliminated from further consideration in this EIR because these alternatives would not feasibly attain the basic objectives of the East Gateway Project.

6.3.1 Not Annexing the Unincorporated Island Areas

The proposed East Gateway Project includes the proposed annexation of one existing island of unincorporated property located south of SR 126 within the existing Lemonwood Industrial Park located within the City's jurisdiction and additional unincorporated territory site located north of SR 126 and west of S. Hallock Drive. The latter area will become an unincorporated island when the Ventura LAFCo approved annexation of the East Area 1 Specific Plan Area to the north is recorded. Recordation of the East Area 1 Specific Plan area is conditioned upon an application to annex these island areas being filed with LAFCo.

Eliminating these unincorporated islands is one of the basic objectives of the East Gateway Project and, for this reason, this alternative was eliminated from detailed evaluation in this EIR.

6.3.2 Alternative Site for East Gateway Specific Plan

The proposed East Gateway Project also includes the proposed annexation of additional unincorporated territory located east of the current City jurisdictional boundaries and south of the East Area 1 Specific Plan Area. The proposed East Gateway Specific Plan Area would include this additional unincorporated territory and adjacent vacant land located within the City of Santa Paula. Annexation of this additional territory is proposed at this time as the property owners have indicated the property included in the East Gateway Specific Plan Area will be developed in the next five years as a retail commercial center and business park.

As discussed in **Section 5.10, Land Use**, the Santa Paula General Plan identifies expansion areas and planning areas to allow for the growth of the City due to the small amount of vacant land within the City. The East Gateway Specific Plan Area is located within the East Area 2 Planning Area as identified in the Santa Paula General Plan. The General Plan Land Use Element notes the only site for a major new

commercial center in the City is located in East Area 2 since the other expansion areas identified in the General Plan only include land for neighborhood-serving commercial uses.⁵

The portion of the proposed East Gateway Specific Plan Area located south of SR 126 and outside of the City's boundaries is active agricultural land designated as Prime Farmland on the State Important Farmland Map. As discussed in **Section 5.2, Agricultural Resources**, the annexation and conversion of this agricultural land to urban development would be a significant and unavoidable impact of the proposed project. This impact could be avoided by identifying an alternative location for the uses planned for the East Gateway Specific Plan Area.

The East Gateway Specific Plan would provide a master-planned 32.5-acre site south for development of a retail center containing the type of large retail commercial stores not available in Santa Paula. This type of regional retail ranges in size from approximately 300,000 to 1,000,000 square feet center in other communities in Ventura County. The majority of such centers are 330,000 to 480,000 square feet (sf) in size.⁶ Gross leasable store space for large retail commercial tenants range from 100,000 to 160,000 sf and generally require parking for 1,000 vehicles or more.⁷ Parking can require as much as one to three times the total net area (a 1:1 or 3:1 ratio).⁸ For a 300,000 sf retail area, parking could require from 300,000 to 900,000 sf. Combining the total gross leasable store area and parking requirements, a single retail store 150,000 sf in size with supporting retail stores would require a site 15 to 30 acres in size.

The City prepared an inventory of vacant and underutilized sites in the City for the City's April 2012 Housing Element. As shown in **Figure 6.0-1, City of Santa Paula Vacant Land Sites** and **Figure 6.0-2, City of Santa Paula Underutilized Sites**, and in **Table 6.0-1, Vacant Commercial/Mixed-Use Sites in the City of Santa Paula**, and **Table 6.0-2, Underutilized Commercial Sites in the City of Santa Paula**, there are no available vacant or underutilized sites that would accommodate a large commercial center or a single large tenant. The City currently has less than 10 acres of vacant or underutilized commercial sites available within the City limits.

5 City of Santa Paula. General Plan Land Use Element (as amended through September 2010), page LU-47.

6 The Natelson Dale Group, Retail Market Analysis for Santa Paula East Area Two Annexation, October 27, 2011, Appendix D.

7 Buxton Real Estate, Community ID, Real Estate Requirements, available in Appendix 6.0.

8 American Planning association, Planning Advisory Service, Site Design, Parking and Zoning for Shopping Centers, available at <http://www.planning.org/pas/at60/report59.htm> accessed July 3, 2012.

**Table 6.0-1
Vacant Commercial/Mixed-Use Sites in the City of Santa Paula**

Address	APN	Zone	Size (ac)
145 10th St	101-0-212-145	C-O	0.14
SB/Ojai	101-0-211-165	C-G	0.17
143 Ojai	101-0-211-155	C-G	0.17
113 Ojai	101-0-2-11-125	C-G	0.17
120 N. 11th St	101-0-211-055	C-G	0.15
129 S.10th St	101-0-214-105	C-G	0.10
125 S.10th St	101-0-214-115	C-G	0.07
123 S.10th St	101-0-214-125	C-G	0.07
937 Harvard	103-0-241-615	C-G	0.19
326 Palm	105-0-103-155	C-G PD	0.12
Harvard	102-0-221-015	C-G	0.64
Harvard	102-0-221-025	C-G	0.64
Harvard	102-0-221-035	C-G	0.64
124 Seventh St.	103-0-082-155	C-O	0.17
116 N. Seventh St.	103-0-082-165	C-O	0.22
Faulkner/Peck	098-0-030-465	C-G PD	0.47
Total			4.13

While large vacant and underutilized parcels are available in the City, the largest parcels are designated for residential use and would require a General Plan Amendment to change the land use designation to permit commercial use (see sites 43, 44, 46, 47, 48, 66 and 67 on **Figure 6.0-1** and sites 23 and 30 on **Figure 6.0-2**). Further, these sites located in existing developed residential neighborhoods do not have the location or access characteristics required for large retail commercial tenants or centers.

As there are no suitable sites available that could accommodate a large retail commercial center of the type that would be permitted by the East Gateway Specific Plan within the City's current boundaries, the East Gateway project includes a request to annex additional land within the City's Sphere of Influence to create the East Gateway Specific Plan area.

Other expansion areas identified in the Santa Paula General Plan, as shown in **Figure 3.0-2, Santa Paula General Plan Land Use Map and Expansion Areas**, which consist of Fagan Canyon, Adams Canyon and West Area 2, are not suitable in terms of location and other site characteristics, to accommodate a large community retail commercial center.

Because no suitable alternative sites for a large community retail commercial center within the City of Santa Paula or the City's Sphere of Influence, detailed evaluation of this alternative is not provided.

6.4 ALTERNATIVES CONSIDERED

As discussed above in the introduction to this section, an EIR is required to briefly describe the rationale for selection and rejection of alternatives and only evaluate in detail those alternatives that can feasibly meet the basic objectives of the project and avoid or substantially lessen the significant effects of the project:

The alternatives evaluated include the following:

Alternative 1: No Project Alternative – No Development

Alternative 2: No Project – Existing Plans & Policies

Alternative 3: Alternative Use – High Density Residential and East Gateway Specific Plan

Alternative 4: Alternative Use – M-2 Zoning and East Gateway Specific Plan

Evaluation of the No Project alternative is required by the CEQA Guidelines.⁹ Specifically the CEQA Guidelines state the when the project consists of a development project, the No Project alternative should consider the circumstance where the project does not proceed, including whether it is predictable that some other development project will be proposed on the site. When the project consists of a revision to a land use plan, the No Project alternative should consider the continuation of existing land use plan. As the East Gateway Project includes revisions to a land use plan and a proposed development project on the East Gateway Specific Plan site, Alternative 1 evaluates the No Project – No Development alternative and Alternative 2 evaluates what is likely to be built under the existing land use and zoning designations that apply to the project area.

As discussed above in **Section 6.3**, annexation of less land would not feasibly meet the basis objectives of the project and annexation of less land is not being evaluated in detail for this reason. The other land use option available for consideration is to evaluate different uses for the areas proposed for annexation that are not included in the East Gateway Specific Plan Area. Alternative 3 considers high density residential uses in these areas and Alternative 4 considers zoning these areas for heavier industrial uses than would be allowed by the City's Highway Commercial zoning, which would be applied to these areas to conform to the existing City General Plan land use designation for these areas.

⁹ CEQA Guidelines § 15126.6(e).

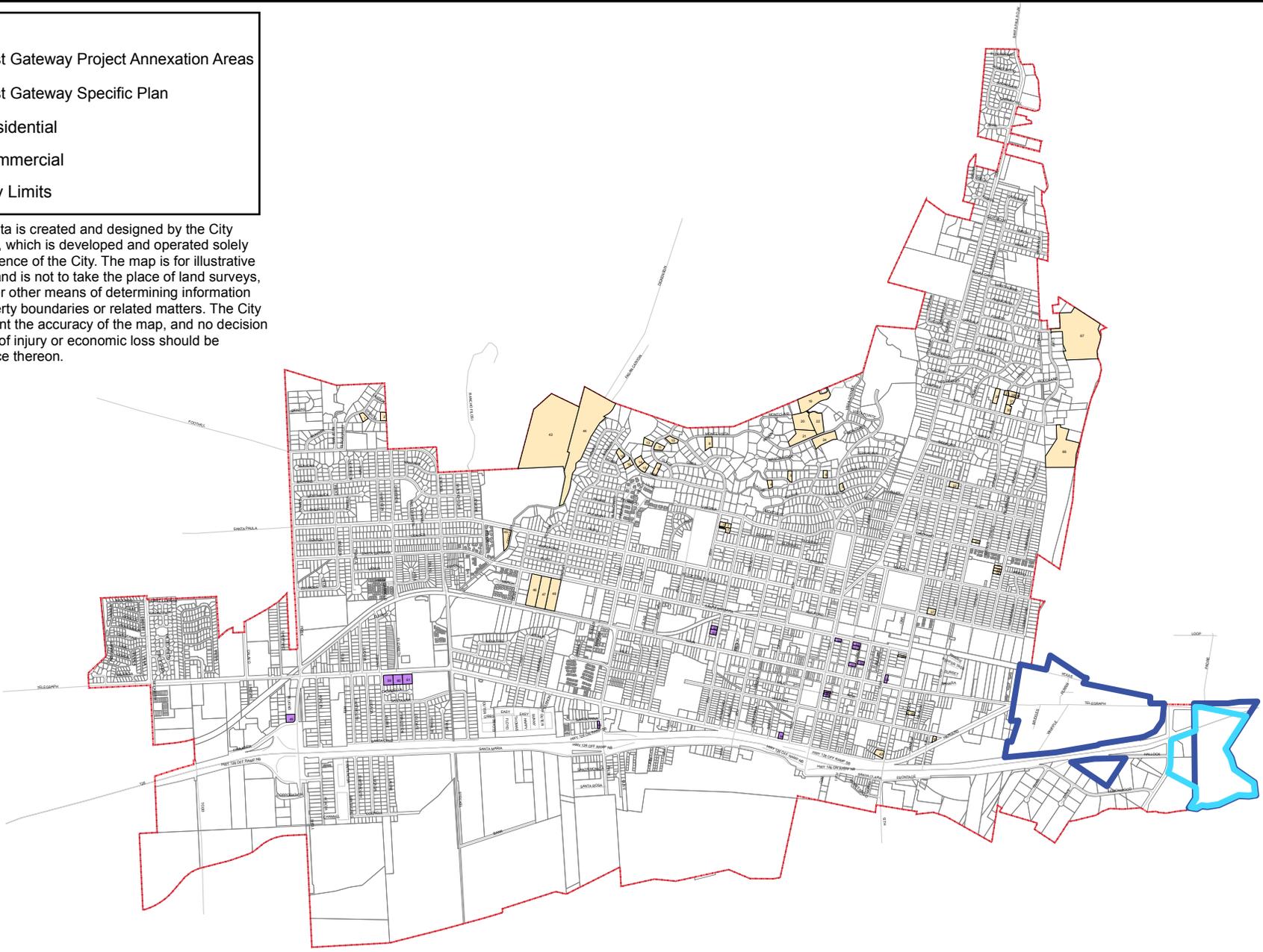
**Table 6.0-2
Underutilized Commercial Sites in the City of Santa Paula**

Address	APN	Zone	Size (ac)	Year Built	Existing Use & Redevelopment Potential
142 N. 11TH ST	1010211015	C-G	0.31	1927	Auto painting shop / existing corrugated metal building occupies approximately 30% of site. Remaining area is parking lot. Good consolidation potential with adjacent vacant site to west and 11 th Street sites to south. Residential development is located across street. Within walking distance to Main Street commercial.
134 N. 11TH ST	1010211175	C-G	0.31	1950	Outdoor furnishings distributor / existing stucco building occupies approximately 20% of lot. Remaining area is used for outdoor storage. Good consolidation potential with 11 th Street lots to north and south. Residential development is located across street. Within walking distance to Main Street commercial.
122 N. 11TH ST	1010211045	C-G	0.15	1900	Single-family residence w/ office / existing stucco building occupies approximately 25% of site. Remaining site is vacant and paved. Good consolidation potential with 11 th Street sites to north and vacant site to south. Residential development is located across street. Within walking distance to Main Street commercial.
933 YALE ST	1030102365	C-G	0.16	1952	Warehouse/distribution building / existing cinder block building occupies approximately 50% of lot. Remaining area is parking lot. Good consolidation potential with adjacent Yale Street site to west. Residential development is located across street. Within walking distance to Main Street commercial.
917 YALE ST	1030102075	C-G	0.31	1947	Plumbing contractor & supplies / existing cinder block building occupies approximately 33% of site. Remaining area is parking lot. Good consolidation potential with adjacent Yale Street site to east. Residential development is located across street. Within walking distance to Main Street commercial.
512 E. HARVARD BLVD	1030235075	C-G	0.21	1946	Single-family residence / existing stucco building occupies approx. 15% of site. Good consolidation potential with adjacent Harvard Blvd. sites to east and west. New mixed-use residential development located across Harvard.
516 E. HARVARD BLVD	1030235085	C-G	0.34	1948	Single-family residence / existing stucco building occupies approx. 15% of site. Good consolidation potential with adjacent Harvard Blvd. sites to east and west. New mixed-use residential development located across Harvard.
600 E. HARVARD BLVD	1030235135	C-G	0.13	1930	Single-family residence / existing stucco building occupies approx. 25% of site. Good consolidation potential with adjacent Harvard Blvd. sites to east. New mixed-use residential development located across Harvard.
614 E. HARVARD BLVD	1030235145	C-G	0.08	na	Part of equipment rental yard.
614 E. HARVARD BLVD	1030235105	C-G	0.08	1959	Equipment rental yard / equipment rental storage yard / no buildings on site. Good consolidation potential with adjacent Harvard Blvd. sites to east and west. New mixed-use residential development located across Harvard.
614 E. HARVARD BLVD	1030235115	C-G	0.22	na	Equipment rental office / existing stucco rental office building occupies approximately 50% of site. Good consolidation potential with adjacent Harvard Blvd. sites to east and west. New mixed-use residential development located across Harvard.
704 E. HARVARD BLVD	1030235125	C-G	0.08	1956	Equipment rental storage yard / no buildings on site. Good consolidation potential with adjacent Harvard Blvd. sites to east and west. New mixed-use residential development located across Harvard.
338 E. HARVARD BLVD	1030332445	C-G	1.22	1970	Retail water purification accessories / existing stucco building occupies approximately 50% of small triangular shaped lot. Remaining lot is used for parking. Good consolidation potential with adjacent Harvard Blvd. sites to west. New mixed-use residential development located across Harvard.
146 SANTA ANNA	1050103145	C-G	0.39	1952	Single-family residences / 3 or 4 small cottages and outbuildings occupy approximately 15% of site. Remaining area is open driveway and yard. Near Isbell Middle School.
Total	3.99				

Legend

-  East Gateway Project Annexation Areas
-  East Gateway Specific Plan
-  Residential
-  Commercial
-  City Limits

The mapped data is created and designed by the City of Santa Paula, which is developed and operated solely for the convenience of the City. The map is for illustrative purposes only and is not to take the place of land surveys, title searches or other means of determining information regarding property boundaries or related matters. The City does not warrant the accuracy of the map, and no decision involving a risk of injury or economic loss should be made in reliance thereon.

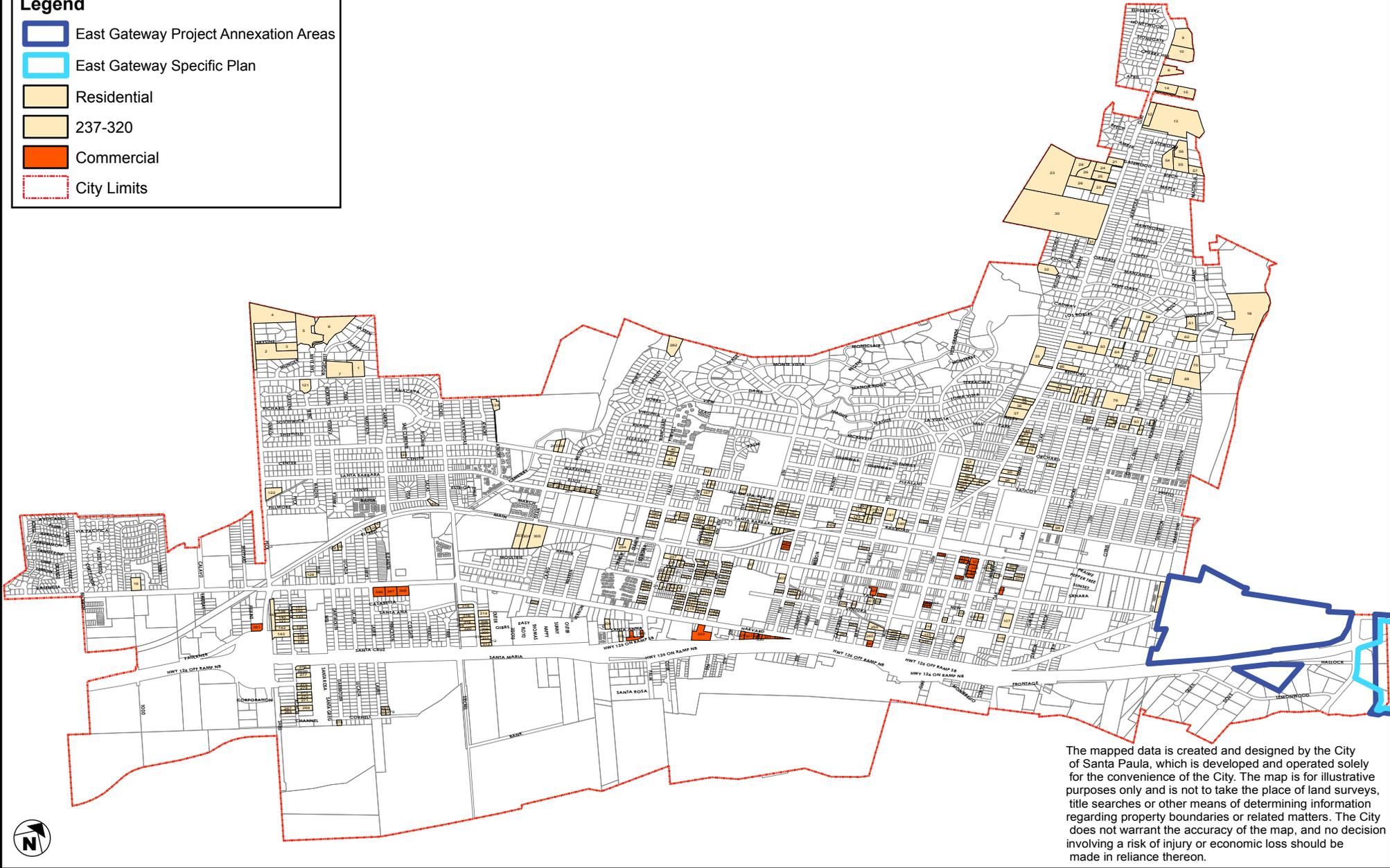


SOURCE: California Department of Conservation Farmland Mapping and Monitoring Program, Ventura County, 2010

FIGURE 6.0-1

Legend

- East Gateway Project Annexation Areas
- East Gateway Specific Plan
- Residential
- 237-320
- Commercial
- City Limits



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SOURCE: City of Santa Paula - 2008

FIGURE 6.0-2

City of Santa Paula Underutilized Sites

6.5 ALTERNATIVES ANALYSIS

This subsection provides a comparison of the impacts of the alternatives and the proposed East Gateway project for the environmental topics addressed in this EIR. In all cases, the comparison of impacts assumes that all feasible mitigation measures identified in this EIR would be implemented for the impacts resulting from the alternatives. Similarly, in all cases where it can be safely assumed that there are feasible mitigation measures for impacts caused by the alternative, it is assumed that those mitigation measures would be implemented. In accordance with the *CEQA Guidelines*, the discussion of the environmental effects of the alternatives may be less detailed than that provided for the proposed project but should be sufficiently detailed to allow meaningful evaluation, analysis, and comparison with the proposed project.¹⁰

6.5.1 Alternative 1: No Project Alternative – No Development

Description of Alternative

Under the No Project Alternative, the proposed East Gateway Project, including the East Gateway Specific Plan and applications for LAFCo jurisdictional reorganization, would not be approved by the City of Santa Paula. There would be no change to any of the existing land uses or jurisdictional boundaries under this alternative.

Analysis of Alternative

Aesthetics

The existing visual characteristics within the project area would not be altered and there would be no aesthetic impacts in or near the project area. In comparison, if approved, the proposed project would result in the near term development of the East Gateway Specific Plan area with a regional commercial center or some mixture of commercial and business park uses that would substantially change the visual character and quality of that part of the project site. Over the long term, without the East Gateway project, there would likely be an incremental change in the visual character of the rest of the project area, as currently undeveloped and underutilize parcels are developed with commercial and light industrial uses in accordance with applicable zoning standards at the time they are developed. This scenario is considered further as part of Alternative 2 below. As discussed in **Section 5.1** of this Draft EIR, the East Gateway Project as proposed would not result in any significant aesthetic or visual impacts. Consequently, the No

¹⁰ CEQA Guidelines § 15126.6(d).

Project Alternative would not lessen or avoid aesthetic impacts that would result from the proposed project.

Agricultural Resources

Under the No Project Alternative, the unincorporated areas of the County would remain zoned as Agricultural Exclusive, Limited Industrial, Rural Exclusive, and Open Space. All existing uses would remain under the current conditions. The agricultural land designated as Prime and Unique Farmland within the project area would remain unchanged and would not convert to non-agricultural uses. Existing agricultural use of the portion of the proposed East Gateway Specific Plan Area located south of SR 126 and outside of the City would continue. This alternative would avoid the significant impact of converting agricultural land to urban uses that would result from the proposed project.

Air Quality

Under the No Project Alternative, air pollutant emissions would continue to be generated by the small amount of light industrial and residential uses within the annexation area. No new emissions would be generated. The significant air quality impacts identified for the proposed project would be avoided by this alternative. The potentially significant air quality impacts identified for the proposed project can be mitigated to a less than significant level.

Biological Resources

With the No Project - No Development Alternative, the existing conditions of the East Gateway Project Area would remain unchanged, and no impacts to biological resources would occur.

Cultural Resources

Under the No Project Alternative, there would be no construction or ground disturbing activities that could impact historical resources, or unearth any archeological or paleontological resources or human remains that may be present within the project area. All potential impacts to cultural resources would be avoided with this alternative.

Geology/Soils

With the No Project Alternative, no new development would occur within the project area and all potential impacts associated with new development in the project area would be avoided.

Greenhouse Gas

Under the No Project Alternative, greenhouse gas (GHG) emissions would continue to be generated by the small amount of light industrial and residential uses within the annexation area. No new GHG emissions would be generated.

Hazards/Hazardous Materials

Under Alternative 1, no development would occur on the project site. Accordingly, there would be no increase in the use, transportation, and disposal of hazardous materials and the potential risk of exposure to these hazards would not increase. Implementation of this alternative would not allow for the potential elimination of existing hazardous material sites that may be present in the project area. With the implementation of the East Gateway Project or any of the other alternatives, any new development occurring on any documented hazardous materials sites would have to be preceded by remediation and cleanup of any existing hazardous materials conditions subject to required oversight by public agencies with jurisdiction over hazardous materials remediation.

Hydrology/Water Quality

The project area would remain unchanged under the No Project Alternative. Runoff from existing developed areas is conveyed to existing drainage facilities within the project area. Both developed and undeveloped parcels currently drain to either Santa Paula Creek to the west of the area or Haun Creek to the east, and then into the Santa Clara River. Storm runoff patterns would not change under the No Project Alternative. No construction would occur which could potentially impact water quality of Haun Creek or Santa Paula Creek. Existing residential and commercial uses located in the 100-year floodplain would continue to be subject to potential flooding. Hydrology and water quality impacts under the No Project Alternative would result in similar impacts to the proposed project.

Land Use/Planning

With the No Project Alternative, there would be no changes in existing land use conditions or in the local or regional land use planning and regulatory frameworks that currently govern the affected land area. Accordingly, there would be no land use impacts. None of the objectives and community benefits of the proposed project would occur. There would be no development in the East Gateway Project area that might improve the City's economic base and complement the existing pattern and scale of development in Santa Paula. Existing unincorporated islands would remain, and municipal services and infrastructure would not be provided to the unincorporated areas proposed for annexation to the City. New retail and other commercial uses that could complement the mixture of uses in the new East Area 1 community

would not be developed. An opportunity to secure a suitable site for development of a large commercial center to meet the shopping needs of existing and future residents would not be realized. The No Project/No Development Alternative would not implement a key General Plan land use policy to expand the City's urban limits into the East Area 2 Planning Area to provide a suitable site for a large commercial center providing good and services not presently available within the City. Consequently, this alternative would have negative impacts with respect to land use and planning, while the proposed project would have both positive and less than significant impacts.

This alternative, like the proposed project, would not divide an established community and would have no effect on any habitat conservation plans.

Noise

As the No Project Alternative would not result in new development, there would be no increase in traffic. Consequently, the significant noise impacts to the five roadway segments of Hallock Drive south of SR 126, Hallock Drive between SR 126, Telegraph Road north of SR 126, Main Street between 12th Street and Telegraph Road and Harvard Boulevard between 12th Street and Telegraph Road identified for the proposed project would be avoided. In addition, Alternative 1 would not include the introduction of stationary noise sources such as mechanical equipment, loading docks, or parking lots. No construction activities occur with this alternative, and potential temporary vibration and noise impacts from construction would be avoided. Measures have been identified to mitigate all potential noise impacts identified for the proposed project.

Public Services

With no changes in existing conditions, there would be no impact on any public services and no need to extend any of the City's municipal services to serve new development or existing uses in the unincorporated areas proposed for annexation. As discussed in **Section 5.10**, extension of the full range of municipal services to the East Gateway Project area would not result in any significant impacts. There would be a negligible, if any, effect on local public schools, parks and recreation and library facilities and a less than significant effect on police and fire protection services, as well as general local government services. This alternative would not, therefore, avoid any significant impacts that would result from the proposed project.

Transportation/Traffic

With the No Project Alternative, there would be no new development as a result of the East Gateway Project. Of the 14 signalized intersections analyzed in the project area, the intersection level of service

(LOS) for these intersections operate at LOS C or better during both the AM and PM peak hours. Of the 21 stop-controlled intersections, all currently operate at LOS C or better during the AM peak hour. The freeway segments currently operate at LOS C or better in both directions during both peak periods. On the multilane highway segment, the current operating conditions are LOS B or better in both directions during both peak periods. Each ramp junction currently operates at LOS D or better during both peak periods.

Three stop-sign controlled SR 126 ramp intersections (10th Street/SR 126; Palm Avenue/SR 126; and Peck Road/SR 126) located west of the East Gateway Project Area currently operate at LOS D or worse during the PM peak period. Under the No Project Alternative there would be no improvements, or mitigation, applied to these three intersections to improve the level of service. Therefore, the No Project Alternative would result in greater level of impact than the proposed project.

Utilities/Service Systems

Existing water use would continue. Existing developed uses consume approximately 39 acre-feet of water per year while 608 acre-feet per year of water are currently used for agricultural operations. As discussed in **Section 5.9, Hydrology/Water Quality**, the Santa Paula Groundwater Basin is the primary source of water for the City and the adjoining County parcels. The Basin is an adjudicated basin and the existing extractions from the Basin would remain within each water user's allocated amount. As such, water demand impacts would be similar within both the City's and the County's jurisdiction when compared to the proposed project.

The amount of wastewater generated by existing uses would also remain unchanged. The increase in wastewater projected from development in the East Gateway Project Area, is identified and addressed in the City's Wastewater Master Plan. Wastewater flows to the City's water recycling facility (WRF) would be reduced if no new development occurs within the East Gateway Project Area, but since the WRF has the capacity to accommodate wastewater generated by the proposed project; neither this alternative nor the proposed project would result in significant impacts.

Solid waste would continue to be generated by existing uses within the project area and there would be no change in the amount of solid waste generated by these uses

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the project alternatives is provided in **Table 6.0-4, Comparison of Alternatives to the Proposed Project** at the end of this section. The potential impacts

of the proposed project would be avoided or lessened if no new development occurs within the East Gateway Project Area.

The measures identified to mitigate the traffic impacts of the proposed project would improve the operation of some intersections currently operating below the City's level of service standard. While the No Project – No Development Alternative would not generate any additional traffic, these intersection improvements would not be made and in this regard, the traffic impact of this alternative could be considered greater than the proposed project.

The No Project – No Development Alternative would not meet any of the basic objectives defined by the City of Santa Paula for the propose East Gateway Project.

6.5.2 Alternative 2: No Project - Existing Plans & Policies

Description of Alternative

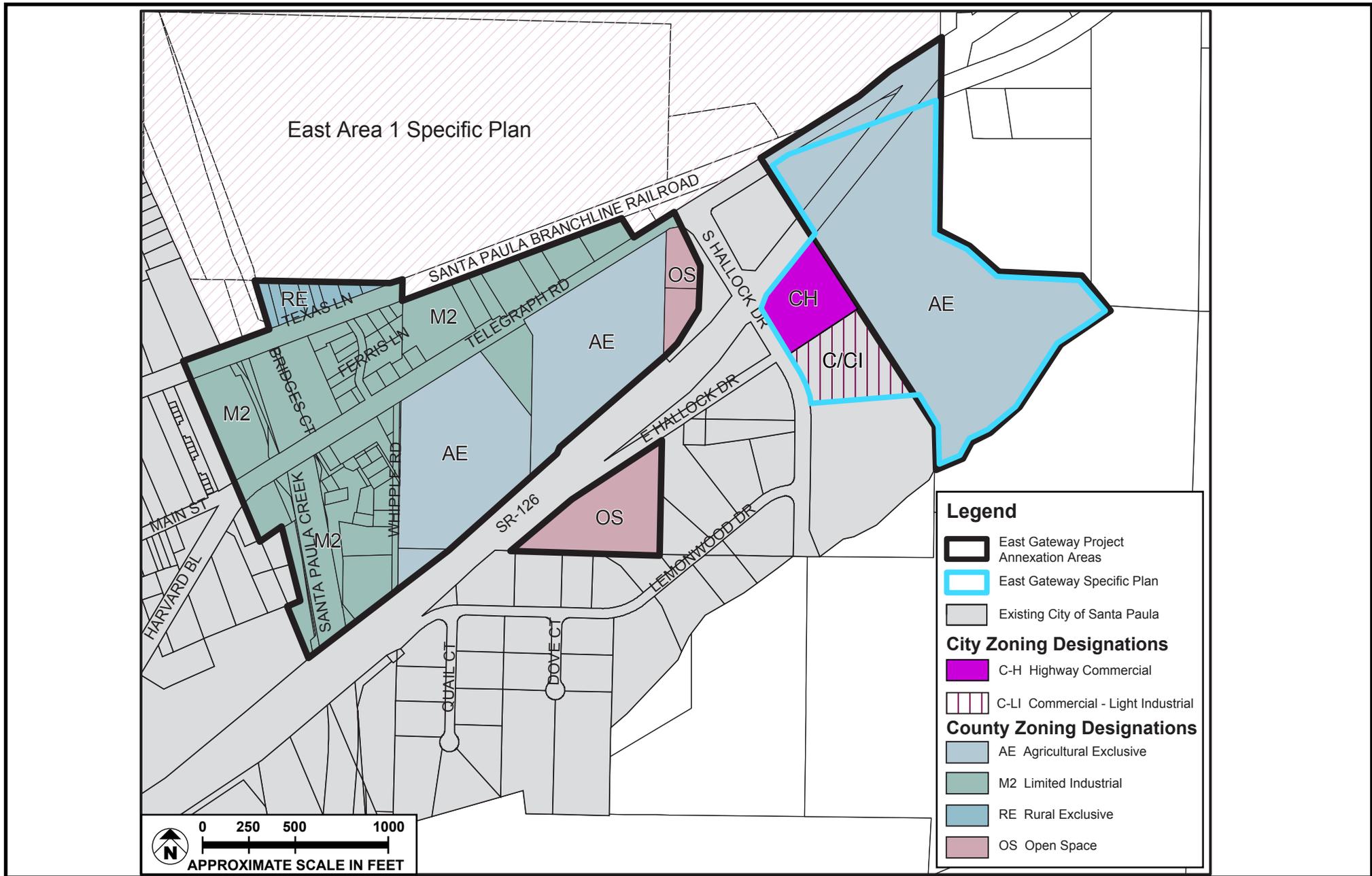
When a proposed project involves the revision of existing land use plans and policies, the No Project Alternative discussion in an EIR is also required to consider conditions that would result from the continuation of existing plans and policies into the future. As the proposed East Gateway Project involved the proposed annexation of unincorporated territory into the City of Santa Paula, which would result in changes to the existing land use plans and policies applicable to these areas, this alternative considers these areas continuing to remain under the jurisdiction of the County of Ventura with land use subject to the County's General Plan and zoning. With this alternative, the proposed project would not be constructed and the proposed annexation would not occur.

Future use of the land proposed for annexation would continue to be regulated by the current Ventura County Non-Coastal Ordinance Zoning¹¹ designations for the project area (see **Figure 6.0-3, Alternative 2 - Existing Zoning Designations**). The three parcels located at the west end of the proposed East Gateway Specific Plan Area are within the City's jurisdiction and are zoned as Highway Commercial (C-H) for the northern half and Commercial – Light Industrial (C-LI) on the southern half. Future use of these parcels would be regulated by the Santa Paula Municipal Code.

Under the Santa Paula Municipal Code,¹² the following definitions apply to the C-H and C-LI zones;

11 Ventura County, Ventura County Ordinance Code, Division 8, Chapter 1, Non-Coast Zoning Ordinance, last amended June 28, 2011.

12 Santa Paula Municipal Code §§ 16.15.010(E) and 16.21.010(A).



SOURCE: City of Santa Paula - 2008

FIGURE 6.0-3

Highway Commercial (C-H) - minimum lot size 5 acres.¹³ The Highway Commercial (C-H) zone accommodates large-scale regional commercial uses and light industrial uses. Examples of uses include automotive sales, large retail or discount stores, and other commercial uses oriented toward automobile traffic. Industrial uses include research and development facilities, light manufacturing, and work/sale uses that support the agricultural industry. The maximum FAR for the C-H zone is 0.35.

Commercial/Light Industrial Zone (C/LI) – minimum lot size 20,000 sf.¹⁴ The C/LI zone allows heavy commercial uses that may involve outdoor storage activity and low-intensity industrial businesses, including small-scale manufacturing, warehousing and storage. This zone is intended to provide a district for a mix of commercial and industrial operations that do not produce emissions of odor, dust, gas, fumes, smoke, glare, liquids, waste, noise, vibrations, disturbances or other similar impacts to surrounding properties. All operations are to be conducted entirely within enclosed buildings. The maximum FAR for the C/LI zone is 0.35.

Under this alternative, use of the unincorporated land currently under the County's jurisdiction would be subject to the following zoning designations:

Agricultural Exclusive (AE)¹⁵ – minimum lot: 40 acres.¹⁶ The purpose of this zone is to preserve and protect commercial agricultural lands as a limited and irreplaceable resource, to preserve and maintain agriculture as a major industry in Ventura County and to protect these areas from the encroachment of nonrelated uses that, by their nature, would have detrimental effects upon the agriculture industry.

Limited Industrial (M2)¹⁷ – minimum lot: 10,000 sf¹⁸ The purpose of this zone is to provide suitable areas for the development of a broad range of industrial and quasi-industrial activities of a light manufacturing, processing or fabrication nature, while providing appropriate safeguards for adjoining industrial sites, nearby nonindustrial properties and the surrounding community.

Rural Exclusive (RE)¹⁹ – minimum lot: 10,000 sf²⁰ The purpose of this zone is to provide for and maintain rural residential areas in conjunction with horticultural activities, and to provide for a limited

13 SPMC § 16.21.030, Table 21-2.

14 SPMC § 16.15.020, Table 15-1.

15 Ventura County, Ventura County Ordinance Code, Division 8, Chapter 1, Non-Coast Zoning Ordinance, last amended June 28, 2011, Section 8104-1.2 – Agricultural Exclusive (AE) Zone.

16 Ibid, Section 8103-0 – Purpose and Establishment of Zones and Minimum Lot Areas.

17 Ibid, Section 8104-5.2 – Limited Industrial (M2) Zone.

18 Ibid, Section 8103-0 – Purpose and Establishment of Zones and Minimum Lot Areas.

19 Ibid, Section 8104-2.2 – Rural Exclusive (RE) Zone.

20 Ibid, Section 8103-0 – Purpose and Establishment of Zones and Minimum Lot Areas.

range of service and institutional uses which are compatible with and complementary to rural residential communities.

Open Space (OS)²¹ – minimum lot: 10 acres.²² The purpose of this zone is to provide for any of the following on parcels or areas of land or water that are essentially unimproved:

- a. The preservation of natural resources including, but not limited to: areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays and estuaries; and, coastal beaches, banks of rivers and streams, and watershed lands.
- b. The managed production of resources, including but not limited to: forest lands, rangeland, agricultural lands and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers and streams which are important for the management of commercial fisheries; and, areas containing major mineral deposits, including those in short supply.
- c. Outdoor recreation, including but not limited to: areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and, areas that serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.
- d. The public health and safety, including, but not limited to areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs and areas required for the protection and enhancement of air quality.
- e. The formation and continuation of cohesive communities by defining the boundaries and by helping to prevent urban sprawl.
- f. The promotion of efficient municipal services and facilities by confining urban development to defined development areas.
- g. Support of the mission of military installations that comprises areas adjacent to military installations,

21 Ibid, Section-1-1 – Open Space (OS) Zone.

22 Ibid, Section 8103-0 – Purpose and Establishment of Zones and Minimum Lot Areas.

military training routes, and underlying restricted airspace that can provide additional buffer zones to military activities and complement the resource values of the military lands.

- h. The protection of places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

The maximum percent of building coverage is determined by the General Plan for each of these zones.

Based on the above zoning, the type and amount of additional development allowed is shown in **Table 6.0-3, Existing Zoning Development**. As shown, the project area would accommodate up to 1,191,138 sf of commercial and manufacturing development.

Analysis of Alternative

Aesthetics

On the land located between SR 126 and Telegraph Road, currently zoned by the County as AE-Agricultural Exclusive, there is highly limited development potential. Development is restricted to buildings that support activities compatible with agricultural uses such as some single-family homes, barns, shops and storage buildings, perhaps some outdoor storage areas for farm equipment and supplies. The proposed project would apply the City's Agriculture zone district standards to these same parcels, with a similar intent to create and maintain viable agricultural land uses with low-intensity development restrictions, until such time as development in accordance with the overlying General Plan land use designation of Mixed Use Commercial/Light Industrial is proposed. Potential visual characteristics of low-intensity, agriculture-compatible development would be similar between this alternative of retaining the County's AE zoning and the proposed project. In both cases, less than significant aesthetic impacts would occur.

At the eastern edge of the project area, along both sides of SR 126, the unincorporated parcels are currently zoned by the County as AE Agricultural Exclusive. As noted above, there is highly limited development potential in the AE Zone, restricted to structures that are compatible with agricultural uses such as single-family homes, barns, shops and storage buildings, and perhaps some outdoor storage areas for farm equipment and supplies. At the present time, these parcels are undeveloped. The flat land on the south side of SR 126 is currently used as irrigated row cropland, while the small triangular-shaped site on the north side of SR 126 is flat, compacted bare ground surface, devoid of visual features. The visual features and character of the farmed land on the south side of the highway could remain unchanged if this land is not annexed. Alternatively, it could potentially be altered with one or more low-scale buildings that are permitted by the County's AE zone standards or possibly changed partially or fully

**Table 6.0-3
Existing Zoning Development**

Zoning	City Zoning		County Zoning			Total Acres
	CH	C/LI	AE	OS	M2	
	3.3					3.3
		3.9				3.9
			29.3			29.3
			1.9			1.9
				23.9		23.9
acres					1.4	1.4
					5.7	5.7
					6.9	6.9
					2.6	2.6
					0.9	0.9
				5.2		5.2
					2.0	2.0
Total	3.3	3.9	31.2	29.1	19.5	108.2
Alternative 2 Development Potential						
FAR	0.35	0.35	0.05	0.05	0.50	
Development Potential (sq. ft.)	50,312	59,459	67,954	63,380	424,710	989,030
Potential Employment	112	66	76	70	472	796

Notes: Assumes Development of full FAR potential.

Building coverage from City of Santa Paula Development Code, Tables 15-1 and 21-2, and Ventura County General Plan, Land Use Appendix, Figures 3.3.6-6.

to an animal-keeping activity. An open, agricultural visual character is likely to remain in any event. Because of the limited size and triangular shape of the AE-zoned site on the north side of the freeway, the property is more difficult to develop than a larger, rectangular shaped site. It is possible that some small-scale building such as a single family home or other agricultural-support structures could be built on that site. While some modifications to the existing undeveloped open space character of these parcels could occur under the County's existing AE zoning, significant changes are considered unlikely. Aesthetic impacts would be less than significant.

Changes in the visual character of these eastern edge parcels would be much more substantial if the land is annexed and developed in accordance with the East Gateway Specific Plan (EGSP). As discussed in Section 5.1 of this Draft EIR, however, the vision and form of physical development defined by the Specific Plan, together with the design principles and corresponding development standards set forth in the EGSP would result in a high quality and pleasant visual character with a unified design theme that

would respect the existing small town character of Santa Paula. The aesthetic impacts of the project were determined to be less than significant for this reason.

On the triangular island site on the south side of SR 126, currently zoned by the County as OS Open Space, no changes in aesthetic characteristics is anticipated since this site is already being used as a light industrial/outdoor storage area. Two parcels to be annexed located just west of S. Hallock Drive, at the eastern terminus of Telegraph Road, are currently zoned by the County as OS Open Space. If these are not annexed, there would be highly limited development potential. Total building area is restricted to a Floor Area Ratio (FAR) not to exceed 0.05, and thus minor visual impacts potential associated with building construction. A substantial variation in the types of land use activities and associated visual qualities is possible, however, since the range of allowable land uses in the Open Space Zones is extensive. A partial list of uses that could occur here includes: animal husbandry; contractors yards; crops and orchard production; agricultural sales facilities; board and care homes; single family homes and mobile homes; renewable energy production; outdoor events and festivals; filming activities; public works facilities; police and fire stations; above-ground pipelines and transmission facilities; recreation and sports facilities; temporary building materials storage; solid waste handling; recycling and disposal operations; wastewater treatment facilities; and water storage and treatment facilities. The City's CH zone standards allow development at a FAR of up to 0.35, which could result in substantially more intensive building massing, more extensive vehicle parking areas and a fully urbanized character, compared to the County's OS zone standards. These changes would result in less than significant aesthetic impacts, as discussed in Section 5.1 of this Draft EIR. Potential changes in the visual character of these two parcels under the Existing County Zoning Alternative would be less extensive than changes that could result from the proposed City zoning of CH. Significant adverse aesthetic impacts would not occur in either scenario.

All of the land currently zoned by the County as M-2 Light Industrial would be rezoned to the City's CH Highway Commercial zone. These parcels are already developed with a variety of residential, heavy commercial and light industrial uses and are not expected to be redeveloped for many years. It is unlikely they would be affected by the proposed rezoning under the East Gateway project as the uses allowed by the County's M-2 and the City's CH zone are similar. Visual characteristics on these existing developed parcels, therefore, are not likely to change in the Existing County Zoning Alternative or under the proposed City CH zoning. On the undeveloped parcels, however, there could be substantial variations in the visual form and character of future development between the existing County zoning and the proposed City zoning. In the County's M-2 zone district, building intensities of up to FAR 0.50 are allowed, while in the City's CH zone, building intensity is limited to an FAR of 0.35. It is possible; therefore, that development under the County zoning would be more visually intensive as larger buildings could be built. Parking requirements for light industrial uses tend to be lower than for commercial uses, so there could

be more building area versus parking area with the existing M-2 zoning, compared to potential development under the City's CH zoning. The visual characteristics of future development that could occur under the existing county zoning and future development under the City's zoning would be similar because similar uses would be permitted by the City's proposed zoning.

Agricultural Resources

The majority of the agricultural land currently identified as Prime and Unique Farmland on the State Important Farmland Maps within the project area would remain unchanged and would not convert to non-agricultural uses. However, according to the Agricultural Exclusive zone/Agricultural Land Use designation, Alternative 2 could result in the development of approximately 68,000 square feet, or approximately 1.56 acres, of agricultural land. According to the Ventura County Initial Study Guidelines, a significant impact would result if more than 5 acres of land designated under the General Plan for Agriculture is lost either directly or indirectly. Under Alternative 2, the maximum amount of development that could occur would result in the loss of approximately 1.56 acres of agricultural land.

Air Quality

As discussed in **Section 5.13, Transportation/Traffic**, the proposed project would generate a net increase of approximately 20,981 average daily vehicle trips (ADT). Under Alternative 2, approximately 7,461 daily trips would be generated. As with the proposed project, emissions would be generated by area sources, energy sources, and mobile sources, with mobile sources generating the majority of the overall emissions. The overall development under Alternative 2 would generate emissions that exceed the Ventura County Air Pollution Control District's (VCAPCD's) thresholds of significance, but would be less than half the amount generated by the proposed project. Mitigation measures similar to those recommended for the proposed project would be necessary to reduce the impact to a less than significant level.

Impacts associated with Air Quality Management Plan (AQMP) consistency, exposure of sensitive receptors to substantial pollutant concentrations, and objectionable odors under Alternative 2 would be less than significant.

Biological Resources

As portions of the project area would remain in agricultural use with Alternative 2, potential impacts to biological resources would be reduced in comparison to the proposed project, even though the project area consists of disturbed and agricultural areas with limited amounts of semi-natural habitat area.

The drainage located south of SR 126 in the agricultural field in the proposed East Gateway Specific Plan Area would not be impacted by development of this area and indirect impacts to natural habitat areas in Haun Creek and the Santa Clara River located adjacent to the East Gateway Specific Plan Area would also be avoided.

Cultural Resources

Future use of land within the project area, including properties in the annexation area that contain historic resources, could occur as allowed by the current County zoning. The future development of these parcels may result in the demolition, destruction, relocation, or alteration of historic resources. Any potential impacts would have to be evaluated for significance and mitigated if feasible. As such, Alternative 2 would result in similar impacts to historical resources as the proposed project.

The potential to uncover undiscovered archaeological and paleontological resources, as well as human remains, exists during grading and subsurface excavations. Therefore, impacts under Alternative 2 would be similar to the proposed project.

Geology/Soils

Any future development within the project area occurring as permitted by the existing County zoning would have to comply with the California Building Code (CBC) requirements for seismicity, liquefaction, subsidence and expansive soils, similar to the proposed project, which would mitigate potential significant impacts associated with the existing soils and geology conditions of the site. Future construction and grading required for this alternative would also have to comply with NPDES requirements, including preparing and submitting a Storm Water Pollution Prevention Plan (SWPPP) including best management plans (BMPs) for erosion control on- and off-site. For this reason, the geology and soils impacts of this alternative would be similar to the proposed project.

Greenhouse Gas

The proposed project would generate a net increase of approximately 20,981 ADT while 7,461 ADT could be generated under Alternative 2. As with the proposed project, GHG emissions would be generated by area, energy, and mobile sources, waste disposal, and water and wastewater treatment and conveyance, with mobile sources generating the majority of the overall GHG emissions. The overall GHG emissions would be less than half of those associated with the proposed project.

As with the proposed project, development under Alternative 2 is expected to be consistent with all feasible and applicable strategies of the 2006 CAT Report and the recommended measures of ARB

Scoping Plan to reduce greenhouse gas emissions in California. Neither this alternative nor the proposed East Gateway Project would result in significant greenhouse gas impacts.

Hazards/Hazardous Materials

The industrial uses allowed by the County M-2 zoning would likely involve the transportation and use of hazardous materials such as fuels, oils, solvents, and other materials. Existing federal and state laws address risks associated with the transport, storage and use of hazardous materials. A variety of state and federal laws govern the generation, treatment, and/or disposal of hazardous wastes. Santa Paula's Fire Department and Ventura County Environmental Health Division have the authority to inspect on-site uses and to enforce state and federal laws governing the storage, use, transport, and disposal of hazardous materials and wastes. In addition, City and County requires an annual inventory of hazardous materials in use on site, as well as the submission of a business emergency plan for annual review. Consequently, potential impacts associated with Alternative 2, like the East Gateway Project, are considered to be less than significant through the implementation of standard state and federal requirements.

Alternative 2, like the East Gateway Project, may involve the renovation or demolition or refurbishment of existing buildings. Based on the age of most of the existing buildings, there is a potential for these buildings to contain asbestos-containing building materials, and lead based paints. If these materials are not removed before demolition of these buildings, the presence of these materials could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the East Gateway Project, Alternative 2 impacts would be similar to those of the East Gateway Project and would be reduced to a less than significant.

The project area could be contaminated with pesticides associated with past and present agricultural uses. In addition, based on a search of available federal, state, and County agency hazardous material database listings, there are sites within the project area that may contain hazardous materials. These include a range of sites with a variety of potential sources of contamination, including various forms of chemical waste, oil and gas, auto-repair facilities, and gas stations. Alternative 2, as with the East Gateway Project, may require the disturbance of soil contaminated with hazardous materials for new development. With the incorporation of mitigation measures recommended for the East Gateway Project, this potential impact would be reduced to a less than significant level.

Hydrology/Water Quality

Any future development within the project area would be subject to applicable federal, state, and local water quality regulations during and after construction. Federal and state regulations require projects to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction Activity to prevent or reduce potential water quality impacts generate during construction activities as would the proposed project. Local water quality regulations include compliance with Los Angeles Regional Water Quality Control Board, Order R4-2010-0108, NPDES Permit No. CA-CAS004002, Water Discharge Requirements for Storm Water (Wet Weather) and Non-storm Water (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems (MS4) within Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein, July 8, 2010. As both the proposed project and Alternative 2 would be subject to the requirements of this permit, impacts with this alternative would be similar to the proposed project.

Parcels located within the 100-year floodplain adjacent to Santa Paula Creek would still be subject to flooding. Measures similar to the proposed project would be implemented to minimize potential flooding impacts. As such, Alternative 2 would result in similar hydrology and water quality impacts as the proposed project.

Land Use/Planning

If all of the land in the East Gateway Project Area were to remain in the County under the present zoning, there would likely be no near-term changes in existing land use conditions and there would be no changes in land use policies or development regulations governing the affected land area. Potential new land uses on undeveloped parcels could vary widely in accordance with the County's existing OS-Open Space, M2-Limited Industrial, AE-Agricultural Exclusive, and RE-Rural Exclusive zone district regulations, and would result in a different and possibly less cohesive land use composition than the mostly mixed commercial and light industrial land use character that would result from the proposed project. Urbanization of this area would likely occur over a much longer period of time, if at all, due to the absence of municipal services and infrastructure, and would likely occur in a more incremental and piecemeal fashion. There would be no need to address issues of consistency with existing land use plans and programs, at the local or regional level. This alternative, like the proposed project, would not divide an established community and would have no effect on any habitat conservation plans.

None of the land use objectives or community benefits of the proposed project would result from this alternative. Existing unincorporated islands would remain, and municipal services and infrastructure would not be provided to these areas. New retail and other commercial uses that could complement the

mixture of uses in the new East Area 1 Community would not be developed. An opportunity to secure a suitable site for development of a large commercial center would not be realized. This alternative would not implement the City's land use policy to expand the City's urban limits into the East Area 2 Planning Area with a large commercial center. In addition, the unincorporated islands within the project area would not be eliminated and would remain, which would be inconsistent with LAFCO policies. For these reasons, the land use impacts of this alternative are considered greater than the impacts of the proposed project.

Noise

The East Gateway Project would result in the approximately 26,603 daily vehicle trips, while Alternative 2 would result in approximately 7,461 daily vehicle trips, without any reduction considered for potential pass-by trips or use of other travel modes, such as bicycles. Assuming the same distribution of daily trips for Alternative 2 as the East Gateway Project, the potential noise level increase would be less than 3 dB(A) along Hallock Drive south of SR 126, Hallock Drive between SR 126, Telegraph Road north of SR 126, Main Street between 12th Street and Telegraph Road and Harvard Boulevard between 12th Street and Telegraph Road. This increase would not be audible over existing conditions. For this reason this alternative would avoid the significant increase in roadway noise that would occur with the proposed project.

New industrial uses developed as permitted by the existing County zoning, would add new stationary noise sources to the area. These would include rooftop-mounted equipment, loading docks, and parking lots. Due to the high level of traffic noise along SR 126 in the project area, normal stationary equipment, loading docks and parking lot noise levels would not likely be audible due to the masking of noise by traffic on nearby roadways. However, single noise events could be an annoyance to onsite and surrounding residents and may exceed a 3 dB(A) increase over ambient conditions at receptor locations resulting in significant impacts. With the implementation of mitigation measures proposed for the East Gateway Project, impacts as a result of these noise sources under Alternative 2 would be reduced to a less than significant level.

Public Services

Without annexation to the City of Santa Paula, the City's municipal services would not be extended to the project area and there would be no increase in demand for the City's police, fire, parks or general government services. The Santa Paula Unified Elementary and Unified High School Districts and the local library district also currently serve existing residential uses in the project area. The County would continue to administer and provide local government services throughout this area and be the primary provider of

public safety services. There could be some minor impacts on local schools, parks and the library under this alternative, since additional residential development could occur within the areas zoned by the County as Open Space, which permits some low-density residential land uses. The proposed project, on the other hand, would not enable any new residential development and would have not result in any impacts on schools, libraries or parks and recreation facilities and services. As the unincorporated islands within the project area would not be eliminated and would remain, impacts to public services could be considered to be greater as it is less efficient for the County to provide services to these areas than it would be for the City of Santa Paula.

Transportation/Traffic

The amount of additional development that would be permitted by the current County zoning would generate approximately 7,461 average daily trips. The proposed project would generate 26,603 average daily trips. As such, Alternative 2 would generate 19,142 fewer trips per day. The traffic impacts identified for the proposed project would be less than significant with implementation of the mitigation measures identified. Therefore, while Alternative 2 would generate substantially less traffic than the proposed project, this alternative would not avoid any significant impacts that would result from the proposed project.

Utilities/Service Systems

As described above, water for use within County jurisdiction would be extracted from the Santa Paula Basin. The Santa Paula Basin is an adjudicated basin. Accordingly, water extractions from the basin have been determined and set to a maximum allotment. Currently, the Santa Paula Basin is not being overdrafted. Based on the maximum allowed development within each zone, the projected water demand for Alternative 2 would be 19.4 acre-feet per year, 19.1 less acre-feet per year than the proposed project. As described in the City's 2010 Urban Water Management Plan (UWMP), sufficient water supplies are identified to meet projected future needs, including the water needed for the proposed project, during normal, dry year, and multiple dry year water scenarios. This alternative would require less water than the proposed project. However, as sufficient water supplies are available to meet the needs of the project, neither this alternative nor the proposed project would have a significant impact on available water supplies.

The average dry weather wastewater flow generated by Alternative 2 would be approximately 0.017 million gallons per day (MGD), which would be approximately 0.017 MGD less than the project. This alternative would result in a substantial reduction in wastewater generation. However, there is available wastewater capacity at the City's WRF and wastewater generated by the project would result in

less than significant impacts. As such, wastewater impacts under this alternative would be similar to the proposed project.

Alternative 2 would generate of 7,211 tons per year of solid waste, 3,064 tons less than the proposed project. As Alternative 2 would generate substantially less solid waste, this alternative would reduce solid waste impacts services when compared to the proposed project. However neither the proposed project nor this alternative would result in significant solid waste impacts. As such, utilities and service systems would be similar under this alternative when compared to the proposed project.

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the project alternatives is provided in **Table 6.0-4, Comparison of Alternatives to the Proposed Project** at the end of this section.

The No Project – Existing Plans & Policies Alternative would result in reduced impacts where compared to the proposed project and avoid the significant and unavoidable impact of the proposed project on agricultural resources. Land use and public service impacts are considered to be greater as the unincorporated islands in the project area would not be eliminated.

The No Project – Existing Plans & Policies Alternative would not meet any of the basic objectives defined by the City of Santa Paula for the proposed East Gateway Project.

6.5.3 Alternative 3: Alternative Use – High Density Residential and East Gateway Specific Plan

Description of Alternative

Alternative 3 considers the annexation of all the areas included in the proposed project with adoption of the East Gateway Specific Plan. The remainder of the annexation area would be designated for High Density Residential uses instead of the commercial and light industrial use.

As defined in the City's General Plan Land Use Element,²³ the High Density Residential category was created to provide for the development of high-density residential housing in the downtown and other appropriate areas within the City adjacent to arterial or collector streets with convenient access to the downtown shopping area and other City services. The density range for this category is 22 to 29 dwellings per gross acre. This designation is currently applied to properties in the central and west side of town, mostly located north of the Santa Paula Branch Line Rail.

23 Santa Paula General Plan, Land Use Element,

This alternative would include the East Gateway Specific Plan as proposed, which would permit development of up to 310,000 sf of retail commercial uses, or 350,000 sf of business park uses and 10,000 sf of retail commercial uses. This alternative also considers designating 56.9 acres of the area proposed for annexation High Density Residential (HDR). Assuming development occurs at a density of 25 units per acre, 1,422 units of multi-family housing would be developed with an estimated associated population of 4,979 people.²⁴

Analysis of Alternative

Aesthetics

The visual character of the East Gateway Specific Plan Area would be the same with this alternative as it would be with the proposed project. A different visual character would result from development of high-density residential land uses in the rest of the project area. The differences would involve building locations, height and bulk, architectural styles and building finish materials, placement and design of parking areas, use of walls and other screening materials, public and private spaces, landscaping, outdoor lighting, and layout of internal streets and access points to existing public streets. It is likely that there would be less variety in building forms and architectural styles within a single land use type of high density, multi-family housing, compared to the mix of building forms, architectural styles that could occur in the proposed CH Highway Commercial zoned areas. Implementation of this alternative could potentially result in significant aesthetic impacts due to a more intensive level of development that could be substantially out of character and scale with neighboring land uses, and the small town character that exists in Santa Paula today. The aesthetic and visual impacts of the proposed project were determined in Section 5.1 to be less than significant

Agricultural Resources

Both Alternative 3 and the proposed project would result in the annexation and conversion of agricultural land to urban uses. This loss of agricultural land cannot be mitigated and this significant impact would be unavoidable for this reason. Therefore, impacts under this alternative would be similar to the proposed project.

24 Population estimate is based on the California Department of Finance, January 2012, Estimated Person per Household for the City of Santa Paula, Table 2: E-5.
<http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>, accessed July 6, 2012.

Air Quality

The proposed project would generate a net increase of approximately 20,981 average daily trips and approximately 27,369 average daily trips would be generated by Alternative 3. As with the proposed project, emissions would be generated by area sources, energy sources, and mobile sources, with mobile sources generating the majority of the overall emissions. The emissions associated with the East Gateway Specific Plan would not change with this alternative, but the emissions associated with the uses within the remaining annexation areas would be greater than those of the proposed project. Mitigation measures similar to those recommended for the proposed project would be necessary to reduce the impact to a less than significant level.

As with the proposed project, impacts associated with Air Quality Management Plan (AQMP) consistency, exposure of sensitive receptors to substantial pollutant concentrations, and objectionable odors under Alternative 3 would be less than significant.

Biological Resources

Alternative 3 would involve the annexation of the same areas included in the proposed project, and zoning of these areas to permit future development. Accordingly, impacts to biological resources would be the same with this alternative and the proposed project. The East Gateway Project Area consists of disturbed and agricultural areas with limited amounts of semi-natural habitat area remain along the edges of the project area and within the drainage located south of SR 126 in the agricultural field in the proposed East Gateway Specific Plan Area. The project area is located next to a channelized portion of Santa Paula Creek on the west and a portion of Haun Creek on the east. While limited by the disturbed nature of the project area, there is some potential for sensitive plant and wildlife species to be present in limited locations that could be impacted by future development, measures have been identified to mitigate potential impacts to any sensitive species that may be present and impacted by future development to a less than significant level. As no physical modifications to Santa Paula Creek or Haun Creek would occur with the proposed project or this alternative, no impacts to sensitive fish species that may be present in these creeks would occur.

Since the East Gateway Project Area is located adjacent to natural habitat areas in the Santa Clara River and in Santa Paula and Haun Creeks, there is also a potential for indirect impacts to these areas to result from increased human presence, and from increases in night lighting and non-native plants in the project area. Measures have also been identified to mitigate these potential indirect impacts to a less than significant level for the proposed project that would also apply to this alternative.

Cultural Resources

Alternative 3 would permit the development and redevelopment of the same areas included in the proposed project, with the difference being the type of use allowed in a portion of the area proposed for annexation. There are currently no plans for development for the areas proposed for annexation located outside of the East Gateway Specific Plan area.

Once these areas are annexed to the City, future development may result in the demolition, destruction, relocation, or alteration of existing historic resources located in these areas. Any such potential impacts would be subject to further evaluation to identify appropriate mitigation measures. Alternative 3 would result in similar impacts to historical resources as the proposed project.

The potential to uncover undiscovered archaeological and paleontological resources, as well as human remains, exists during grading and subsurface excavations. Therefore, impacts under Alternative 3 would be similar to the proposed project.

Geology/Soils

Alternative 3 would include the adoption of the East Gateway Specific Plan as proposed and annexation of the other areas proposed with these areas designated for development of high-density residential uses. All future development within the project area would have to comply with the California Building Code (CBC) residential and non-residential requirements for seismicity, liquefaction, subsidence and expansive soils, similar to the proposed project, which would mitigate potential significant impacts associated with the existing soils and geology conditions. Future construction and grading required for this alternative would also have to comply with NPDES requirements, including preparing and submitting a SWPPP including BMPs for erosion control on- and off-site. For these reasons, the geology and soils impacts of this alternative would be similar to the proposed project.

Greenhouse Gas

The proposed project would generate a net increase of approximately 20,981 average daily trips while 27,369 average daily trips would be generated by the uses included in Alternative 3. As with the proposed project, GHG emissions would be generated by area, energy, and mobile sources, waste disposal, and water and wastewater treatment and conveyance, with mobile sources generating the majority of the overall GHG emissions. The GHG emissions associated with the East Gateway Specific Plan would not change with this alternative, but the emissions associated with the uses within the remaining annexation areas would be greater than those of the proposed project.

As with the proposed project, development under Alternative 3 is expected to be consistent with all feasible and applicable strategies of the 2006 CAT Report and the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California. Both this alternative and the proposed project would result in less than significant Greenhouse Gas impacts.

Hazards/Hazardous Materials

During and after construction, Alternative 3, like the East Gateway Project, would allow commercial and light industrial uses that may involve the delivery, storage, and use of hazardous materials such as fuels, oils, solvents, and other materials.

A variety of state and federal laws govern the generation, treatment, and/or disposal of hazardous materials. Santa Paula's Fire Department and Ventura County Environmental Health Division have the authority to inspect on-site uses and to enforce state and federal laws governing the storage, use, transport, and disposal of hazardous materials and wastes. In addition, the City and County requires an annual inventory of hazardous materials in use on site, as well as the submission of a business emergency plan for annual review. Consequently, potential impacts associated with Alternative 3, like the East Gateway Project, are considered to be less than significant through the implementation of standard state and federal requirements.

Alternative 3, like the East Gateway Project, may involve the demolition or renovation of existing buildings within the project area. Many of the existing buildings are old enough to have the potential to contain asbestos-containing building materials, and lead based paints. If these materials are not removed before demolition of these buildings, the presence of these materials could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the East Gateway Project, the impacts associated with Alternative 3 would be similar to those of the East Gateway Project, and would be reduced to a less than significant level by compliance with existing regulations.

The project area could be contaminated with pesticides associated with past and present agricultural uses. In addition, based on a search of available federal, state, and County agency hazardous material database listings, there are sites identified within the project area that may potentially contain hazardous materials. These include a range of sites with a variety of potential sources of contamination, including various forms of chemical waste, oil and gas, auto-repair facilities, and gas stations. Alternative 3, like the East Gateway Project, may involve the potential disturbance of sites contaminated with hazardous

materials as these sites are developed or redeveloped. As the level of remediation of contaminated areas is generally higher when the planned use is residential as opposed to commercial or industrial, this could pose a constraint to development of some sites for residential uses. With the incorporation of mitigation measures recommended for the East Gateway Project, the potential impacts associated with Alternative 3 would be similar to the East Gateway Project and would be reduced to a less than significant level.

Hydrology/Water Quality

Future development of the project area would be subject to federal, State, and local water quality regulations during and after construction with either the proposed project or this alternative. Federal and State regulations require projects to comply with the NPDES General Permit for Stormwater Discharges Associated with Construction Activity to prevent or reduce potential water quality impacts generate during construction activities as would the proposed project. Local water quality regulations include compliance with Los Angeles Regional Water Quality Control Board, Order R4-2010-0108, NPDES Permit No. CA-CAS004002, Water Discharge Requirements for Storm Water (Wet Weather) and Non-storm Water (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems (MS4) within Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein, July 8, 2010. As both the proposed project and Alternative 4 would be subject to these stormwater requirements, impacts with this alternative would be similar to the proposed project.

Alternative 3 would zone the annexation areas for residential use, which could place future housing within the existing 100-year floodplain adjacent to Santa Paula Creek. Measures similar to the proposed mitigation for the proposed project would be required to mitigate potential flooding impacts.

Land Use/Planning

The creation and development of nearly 57 acres of high-density residential land uses on this eastern edge of the City's planning area would not be consistent with the intent of the High Density Residential land use category established in the City's General Plan Land Use Element. The General Plan states that high-density residential development is considered to be appropriate on infill sites in the central and western expansion parts of the existing town. The Expansion Areas and East Area 2 Planning Area as defined in the General Plan are not identified as suitable locations for high-density residential land uses. A general plan amendment would be required to establish a high-density residential district in the East Gateway Project area. This would constitute a major amendment to the City's adopted land use policies.

The High Density Residential and East Gateway Specific Plan Alternative, like the proposed project, would not divide an established community and would have no effect on any habitat conservation plans.

Noise

The East Gateway Project would generate approximately 26,603 daily vehicle trips, while Alternative 3 would generate approximately 27,372 daily vehicle trips, without any reduction considered for potential pass-by trips or use of other travel modes, such as bicycles. The trips generated by this alternative would use the existing roadway network, like the East Gateway Project, resulting in increases in traffic volumes on Hallock Drive, Main Street, and Telegraph Road. While Alternative 3 would result in more vehicle trips, the amount of trips would not be substantially greater than those projected for the East Gateway Project. Under either the East Gateway Project or Alternative 3, significant noise increases would be likely along five roadway segments, including Hallock Drive south of SR 126, Hallock Drive between SR 126, Telegraph Road north of SR 126, Main Street between 12th Street and Telegraph Road and Harvard Boulevard between 12th Street and Telegraph Road. With the implementation of mitigation measures identified for the East Gateway Project, noise impacts along these roadways could be reduced to a less than significant level.

With the high level of traffic noise from SR 126 and the noise generated by rail activity on the Santa Paula Branch Rail line, there are sites within the project area that would not be as suitable for development of residential uses instead of the commercial and light industrial uses that would be permitted by the proposed zoning for these areas. Noise studies would be required to determine appropriate mitigation, such as design requirements for residential buildings to reduce interior noise levels to meet applicable standards.

Implementation of Alternative 3, like the East Gateway Project, would add new stationary noise sources to the site as new development occurs over time. These sources would include rooftop-mounted equipment, loading docks, and parking lots. Due to the high level of traffic noise along SR 126 in the project area, normal stationary equipment, loading docks and parking lot noise levels would not likely be audible due to the masking of noise by traffic on nearby roadways. However, single noise events could be an annoyance to onsite and surrounding residents and may exceed a 3 dB(A) increase over ambient conditions, resulting in significant impacts. With the implementation of mitigation measures proposed for the East Gateway Project, impacts as a result of these noise sources under Alternative 3 could be reduced to a less than significant level.

Development activities associated with the East Gateway Project and Alternative 3, such as demolition, earthmoving, and construction of on-site and off-site infrastructure would involve the use of heavy equipment. Under either the East Gateway Project or Alternative 3, these construction equipment sources would result in temporary and intermittent vibration and noise impacts. These impacts are potentially

significant and would be mitigated by complying with the standards for construction activity in the City of Santa Paula's noise ordinance.

Public Services

With development of up to 1,422 multi-family housing units, with a potential residential population of approximately 4,979, this alternative would result in impacts to local public schools, the Blanchard Community Library and the City's parks and recreation facilities that would not occur with the proposed project. Such impacts could be significant, depending on the available capacity in local schools to accommodate new students, and the capacity of the library and local parks to serve these additional residents at the time of development of future high-density residential projects. Payment of mitigation fees to the school district would adequately offset impacts from new residential development, and satisfaction of demand for local parks could potentially be met through allocation of land for public and private parks within the high-density residential area or through payment of fees to the City for expansion of parks elsewhere. The increase in the demand for library space and resources might result in a significant decline in library level of service, unless additional library resources are developed to meet the demands of this currently unplanned residential growth.

With high-density residential development, the need for police and fire department services would be different than the needs of the commercial and light industrial uses that would be permitted by the East Gateway Project as proposed. High-density residential uses would generate a higher number of calls for service and have a greater impact on service levels.

Transportation/Traffic

Implementation of Alternative 3 would result in approximately 27,372 average daily trips, 769 more trips on a daily basis than the proposed project, which would generate approximately 26,603 average daily trips. The number of trips generated during the morning and evening peak traffic periods would be different for residential uses, with a greater number of trips generated in the morning peak hour than would be generated by commercial and light industrial uses. The incremental increase in traffic associated with this alternative would not be likely to result in substantially different levels of service at intersections in the area. As such, Alternative 3 would result in similar transportation and traffic impacts as those identified for the proposed project.

Utilities/Service Systems

Based on the maximum amount of development that would be permitted with Alternative 3, the projected water demand would be approximately 753 acre-feet per year. This is a substantial increase of 714-acre

feet per year over the amount of water needed for the maximum amount of commercial and light industrial uses that would be permitted by the land use zoning designations proposed. As discussed in **Section 5.14, Utilities and Service Systems**, the projected water demand for the East Area 2 Planning Area would be 74.6 acre-feet per year. The City's 2010 UWMP identifies sufficient water supplies to meet projected demand during normal, dry year, and multiple dry year water scenarios with a minimum of 1,567 acre-feet per year of surplus water available. The City would, therefore, have sufficient water supplies available to meet the increased demand for water needed by the residential uses included in this alternative. The impact on the City's water supplies would be substantially greater with this alternative.

The average dry weather wastewater flow from the uses that would be permitted by Alternative 3 would be approximately 0.67 million gallons per day (MGD), which is 0.64 MGD greater than the proposed project. According to the City's Wastewater Master Plan, the average dry weather flow projected for the City with projected development of the uses allowed by the General Plan would be 3.61 MGD. With implementation of Alternative 3, the average dry weather flow would be approximately 4.3 MGD, slightly above the planned 4.2 MGD capacity of the City's WRF. Therefore, this alternative would result in greater wastewater impacts when compared to the proposed project.

Alternative 3 would result in the generation of 6,789 tons per year of solid waste, which is 3,496 fewer tons per year than the amount of solid waste projected for the proposed project. As Alternative 3 would generate substantially less solid waste, this alternative would reduce impacts to solid waste services when compared to the proposed project. However neither the proposed project nor this alternative would result in significant solid waste impacts. As such, solid waste impacts would be similar under this alternative when compared to the proposed project.

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the project alternatives is provided in **Table 6.0-4, Comparison of Alternatives to the Proposed Project** at the end of this section.

Alternative 3 would result in greater aesthetic, air quality, greenhouse gas, land use, noise, public services and wastewater impacts and similar impacts for all other topics. This alternative would not avoid the significant and unavoidable impacts identified for the proposed project.

This alternative would meet the basic objectives defined by the City of Santa Paula for the proposed project.

6.4.4 Alternative 4: Alternative Use – M-2 Zoning and East Gateway Specific Plan

Description of Alternative

With Alternative 4, the East Gateway Project areas would be annexed to the City of Santa Paula as proposed. The East Gateway Specific Plan would be adopted as proposed. This alternative considers zoning the areas not included in the Gateway Specific Plan Area with the City's Light Industrial (M-2) instead of the Highway Commercial (CH) zoning proposed.

As defined in the City's General Plan Land Use Element,²⁵ the purpose of the Light Industrial category is to provide for a wide range of industrial uses. Development and performance standards are required to mitigate objectionable characteristics. Light manufacturing activities include manufacturing typically having few if any nuisance characteristics, including manufacture, compounding, assembling or treatment of articles or merchandise from previously prepared materials, manufacturing of food, clothing, cosmetics, electrical instruments, furniture, tools, and other related types of activities.

General manufacturing includes any kind of manufacture, processing or treatment of products other than those that produce, cause or omit any fumes, odor, dust, smoke, gas, noise or vibrations that are or may be detrimental to properties in the neighborhood.

Commercial uses of a supporting nature to light and general manufacturing activities may be permitted. These uses should serve the area's businesses and employees (food establishments, office supplies, tool sales, and storage). Examples of typical light industrial uses include recreation vehicle storage, moderate scale enterprises where goods and commodities are both manufactured and sold on the same or separate premises.

The Light Industrial land use category also provides for locations where mixed manufacturing and administrative office uses can be sited. Any light industrial activity that could successfully mitigate objectionable characteristics would be acceptable within this category. This land use category contains above average site development standards for landscaping, screening, and site design, through a planned development review process.

Industrial parcels ranging from less than one acre to forty acres or more would be allowed. This would encourage both small industrial and compatible commercial uses along with areas for major industrial development

²⁵ Santa Paula General Plan, Land Use Element.

This alternative would include the East Gateway Specific Plan as proposed, which would permit development of up to 310,000 sf of retail commercial uses, or 350,000 sf of business park uses and 10,000 sf of retail commercial uses. This alternative also considers designating 56.9 acres of the area proposed for annexation Light Industrial (M-2). At the maximum allowed FAR of 0.5, up to 1,239,282 sf of industrial space, with an estimated employment of 1,377 workers, could be developed.

Analysis of Alternative

Aesthetics

The aesthetic and visual characteristics within the East Gateway Specific Plan Area would be same with this alternative and the proposed project. As discussed in **Section 5.1**, these impacts would be less than significant.

In the remaining project area outside of the East Gateway Specific Plan Area, the character of development that would be permitted under the City's Light Industrial zoning standards could be similar to that permitted by the Highway Commercial zoning that would be applied to the majority of the annexation area with the proposed project. This is because the development standards for the City's Light Industrial zones are similar to those in the CH Zone, in terms of FAR restrictions, building height limits and lot coverage, the primary factors affecting the building intensity of new development. Differences in the built character would likely involve differences in the design of industrial versus commercial buildings, which are typically more utilitarian in design character with less variation in architectural style and less articulation in building finishes and rooflines. Since parking standards are higher for commercial uses than industrial uses, it is likely that development within a predominantly commercial zoned area, as proposed, would contain greater amounts of parking areas, while light industrial areas would have larger buildings and outdoor storage areas for materials. Changes in the visual character and quality of the East Gateway Project Area would be different in terms of specific design features; however, the overall aesthetic impact would be similar to the proposed project in terms of a change to a fully urbanized condition. As discussed in **Section 5.1**, that change would not result in significant adverse aesthetic impacts.

Since no significant scenic resources exist within the East Gateway Project Area, adverse impacts to scenic resources would not occur with this alternative or the proposed project.

Agricultural Resources

With either this alternative or the proposed project, agricultural land would be annexed and converted to urban uses. This loss of agricultural land cannot be mitigated and this significant impact would be

unavoidable for this reason. Therefore, impacts under this alternative would be similar to the proposed project.

Air Quality

The proposed project would generate a net increase of approximately 20,981 average daily trips, while this alternative would generate 26,637 average daily trips. As with the proposed project, emissions would be generated by area sources, energy sources, and mobile sources, with mobile sources generating the majority of the overall emissions. The emissions associated with the East Gateway Specific Plan would not change with this alternative, but the emissions associated with the uses within the remaining annexation areas would be greater than those of the proposed project. Mitigation measures similar to those recommended for the proposed project would be necessary to reduce the impact to a less than significant level.

As with the proposed project, impacts associated with Air Quality Management Plan (AQMP) consistency, exposure of sensitive receptors to substantial pollutant concentrations, and objectionable odors under Alternative 4 would be less than significant.

Biological Resources

Alternative 4 would involve the annexation of the same areas included in the proposed project, and zoning of these areas to permit future development. Accordingly, impacts to biological resources would be the same with this alternative and the proposed project. The East Gateway Project Area consists of disturbed and agricultural areas with limited amounts of semi-natural habitat area remain along the edges of the project area and within the drainage located south of SR 126 in the agricultural field in the proposed East Gateway Specific Plan Area. The project area is located next to a channelized portion of Santa Paula Creek on the west and a portion of Haun Creek on the east. While limited by the disturbed nature of the project area, there is some potential for sensitive plant and wildlife species to be present in limited locations that could be impacted by future development, measures have been identified to mitigate potential impacts to any sensitive species that may be present and impacted by future development to a less than significant level. As no physical modifications to Santa Paula Creek or Haun Creek would occur with the proposed project or this alternative, no impacts to sensitive fish species that may be present in these creeks would occur.

Since the East Gateway Project Area is located adjacent to natural habitat areas in the Santa Clara River and in Santa Paula and Haun Creeks, there is also a potential for indirect impacts to these areas to result from increased human presence, and from increases in night lighting and non-native plants in the project

area. Measures have also been identified to mitigate these potential indirect impacts to a less than significant level for the proposed project that would also apply to this alternative.

Cultural Resources

This alternative would allow the development and redevelopment of the same areas included in the proposed project, with the difference being the type of use allowed in a portion of the area proposed for annexation. There are currently no plans for development for the areas proposed for annexation located outside of the East Gateway Specific Plan Area.

Future development of these areas may result in the demolition, destruction, relocation, or alteration of existing historic resources located in these areas. Any such potential impacts would be subject to further evaluation to identify appropriate mitigation measures. Alternative 3 would result in similar impacts to historical resources as the proposed project.

Geology/Soils

Alternative 4 would develop the East Gateway Specific Plan as proposed and allow light industrial uses in the remainder of the area being annexed. All future development within the project area would have to comply with the California Building Code (CBC) residential and non-residential requirements for seismicity, liquefaction, subsidence and expansive soils, similar to the proposed project, which would mitigate potential significant impacts associated with the existing soils and geology conditions. Future construction and grading required for this alternative would also have to comply with NPDES requirements, including preparing and submitting a SWPPP including BMPs for erosion control on- and off-site. For these reasons, the geology and soils impacts of this alternative would be similar to the proposed project.

Greenhouse Gas

This alternative would generate a greater amount of traffic than the proposed project. As with the proposed project, GHG emissions would be generated by area, energy, and mobile sources, waste disposal, and water and wastewater treatment and conveyance, with mobile sources generating the majority of the overall GHG emissions. The GHG emissions associated with the East Gateway Specific Plan would not change with this alternative, but the emissions associated with the uses within the remaining annexation areas would be greater than those generated by the uses that would be permitted by the project as proposed.

As with the proposed project, development under Alternative 4 is expected to be consistent with all feasible and applicable strategies of the 2006 CAT Report and the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California. Both this alternative and the proposed project would result in less than significant greenhouse gas impacts.

Hazards/Hazardous Materials

Both this alternative and the proposed project would allow commercial and light industrial uses that may involve the delivery, storage, and use of hazardous materials such as fuels, oils, solvents, and other materials.

A variety of state and federal laws govern the generation, treatment, and/or disposal of hazardous materials. Santa Paula's Fire Department and Ventura County Environmental Health Division have the authority to inspect on-site uses and to enforce state and federal laws governing the storage, use, transport, and disposal of hazardous materials and wastes. In addition, the City and County requires an annual inventory of hazardous materials in use on site, as well as the submission of a business emergency plan for annual review. Consequently, potential impacts associated with this alternative and the proposed project would be less than significant.

This alternative and the proposed project may involve the demolition or renovation of existing buildings within the project area. Many of the existing buildings are old enough to have the potential to contain asbestos-containing building materials, and lead based paints. If these materials are not removed before demolition of these buildings, the presence of these materials could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of mitigation measures recommended for the East Gateway Project, the impacts associated with this alternative would be similar and reduced to a less than significant level.

The project area could be contaminated with pesticides associated with past and present agricultural uses. In addition, based on a search of available federal, state, and County agency hazardous material database listings, there are sites identified within the project area that may potentially contain hazardous materials. These include a range of sites with a variety of potential sources of contamination, including various forms of chemical waste, oil and gas, auto-repair facilities, and gas stations. Contaminated areas may be disturbed by development. The mitigation measures recommended for the East Gateway Project would be applicable to this alternative and would reduce potential impacts to a less than significant level.

Hydrology/Water Quality

With Alternative 4, the same areas would be annexed and could develop or redevelop as permitted by the East Gateway Specific Plan and the City's M2 zoning for the remainder of the annexation area. All future development within the project area would be subject to federal, State, and local water quality regulations during construction and post construction. Federal and State regulations require projects to comply with the NPDES General Permit for Stormwater Discharges Associated with Construction Activity to prevent or reduce potential water quality impacts generate during construction activities as would the proposed project. Local water quality regulations include compliance with Los Angeles Regional Water Quality Control Board, Order R4-2010-0108, NPDES Permit No. CA-CAS004002, Water Discharge Requirements for Storm Water (Wet Weather) and Non-storm Water (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems (MS4) within Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein, July 8, 2010. As a result impacts would be similar.

Like the project, this alternative could result in future development within the 100-year floodplain adjacent to Santa Paula Creek and be subject to flooding. Measures similar to the proposed mitigation for the project could be implemented to minimize potential flooding impacts. As such, Alternative 4 would result in similar hydrology and water quality impacts as the proposed project.

Land Use/Planning

There would be no difference in the land use character to be developed within the East Gateway Specific Plan Area, as the Specific Plan would be adopted with this alternative. Establishment of Light Industrial zoning for the rest of the project area or the Highway Commercial zoning included in the proposed project would expand the City's economic base in the East Area 2 Planning Area, as envisioned in the City's General Plan. Neither this alternative nor the proposed project would result in dividing the physical structure of an established community. Neither would have any impact on a habitat conservation plan. Less than significant land use/planning impacts would occur under this alternative or the proposed project.

Noise

The East Gateway Project would generate approximately 26,603 daily vehicle trips, while Alternative 4 would result in approximately 26,637 daily vehicle trips, without any reduction considered for potential pass-by trips or use of other travel modes, such as bicycles. As the amount of traffic generated would be similar, significant increases in noise levels would result along Hallock Drive south of SR 126, Hallock Drive between SR 126, Telegraph Road north of SR 126, Main Street between 12th Street and Telegraph Road and Harvard Boulevard between 12th Street and Telegraph Road with both this alternative and the

proposed project. With the implementation of mitigation measures proposed for the East Gateway Project, impacts as a result of these noise sources under Alternative 4 would be reduced to a less than significant level.

Implementation of Alternative 4, like the East Gateway Project, would add new stationary noise sources to the area such as rooftop-mounted equipment, loading docks, and parking lots. Due to the high level of traffic noise along SR 126 in the project area, normal stationary equipment, loading dock, and parking lot noise levels would not likely be audible due to the masking of this noise by traffic noise on nearby roadways. However, single noise events could be an annoyance to onsite and surrounding residents and may exceed a 3 dB(A) increase over ambient conditions, resulting in significant impacts. With the implementation of mitigation measures proposed for the East Gateway Project, impacts as a result of these noise sources under Alternative 4 could also be reduced to a less than significant level.

Development activities associated with the East Gateway Project and Alternative 4, such as demolition, earthmoving, and construction of on-site and off-site infrastructure would involve the use of heavy equipment. These impacts are potentially significant and would be mitigated by complying with the standards for construction activity in the City of Santa Paula's noise ordinance.

Public Services

Impacts associated with extending the City's municipal services to the East Gateway Specific Plan Area would be the same for this alternative or the proposed project, since the same specific plan standards would govern the development of this area in either case.

Impacts on local public schools, the library, and local parks would be minor for this alternative or the proposed project, since neither would allow for any new residential development that would have a regular demand for such public services, unlike commercial and industrial land uses that do not. Impacts involving the allocation of City staffing resources and administrative facilities for providing local government services to this area would be similar and less than significant. No new or expanded governmental facilities would be required to provide an adequate level of service.

Transportation/Traffic

Alternative 4 would result in approximately 26,637 average daily trips, an amount of traffic similar to the 26,603 average daily trips that would be generated by the project as proposed. The incremental increase would not result in substantially different levels of service at the area intersections. Transportation and traffic impacts would be similar under this alternative when compared to the proposed project.

Utilities/Service Systems

Based on the amount and type of development that would be permitted with Alternative 4, the projected water demand would be approximately 26.2 acre-feet per year, which is 12.3 acre-feet per year less than the proposed project. As described in the City's 2010 UWMP there are sufficient water supplies available to meet the projected future water demand. While Alternative 4 would require less water than the proposed project, water supply impacts would not be significant with either the project as proposed or this alternative.

The average dry weather wastewater flow generated by Alternative 4 would be approximately 0.023 million gallons per day (MGD), 0.011 MGD less than the project. As there would be available wastewater capacity at the WRF to accommodate the amount wastewater generated by the proposed project, neither this alternative nor the project would result in less than significant impacts.

Alternative 4 would generate 17,272 tons of solid waste annually, an additional 6,998 tons when compared to the proposed project. As Alternative 4 would generate substantially more solid waste, this alternative would result in greater impacts to solid waste facilities when compared to the proposed project.

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the project alternatives is provided in **Table 6.0-4, Comparison of Alternatives to the Proposed Project** at the end of this section.

Alternative 4 would result in greater air quality and greenhouse gas impacts than the proposed project, and less impacts to utilities and service systems. All other impacts would be similar in magnitude. This alternative would not avoid the significant and unavoidable impacts identified for the proposed project.

This alternative would meet the basic objectives defined by the City of Santa Paula for the proposed project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The findings of the alternatives analysis discussed above are summarized in **Table 6.0-4, Comparison of Alternatives to the Proposed Project**.

The *CEQA Guidelines* require that an environmentally superior alternative be identified among the selected alternatives.²⁶ If the No Project Alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives.

The No Project Alternative (Alternative 1) would have the fewest impacts and would not result in any significant impacts and is the environmentally superior alternative. However, the No Project Alternative would not meet the objectives of the proposed project. As noted above, if the No Project Alternative is determined to be environmentally superior, the *CEQA Guidelines* require an environmentally superior alternative must also be identified among the remaining alternatives.

The environmentally superior alternative among the remaining alternatives would be No Project – Existing Plans and Policies Alternative. This alternative would avoid the significant and unavoidable environmental impacts identified for the proposed project because the existing agricultural parcels in the project area would remain zoned for agricultural use and the amount of development and the traffic and other impacts resulting from development would be reduced.

However, this alternative would not eliminate the unincorporated islands in the project area and would not be consistent with applicable land use policies and would not achieve the basic objectives of the project as defined by the City of Santa Paula.

26 14 CCR § 15126.6(e)(2).

**Table 6.0-4
Comparison of Alternatives to the Proposed Project**

Environmental Topic	Proposed Project Impacts with Mitigation-	Alternative 1 – No Project Alternative	Alternative 2 - No Project Existing Plans & Policies	Alternative 3 – East Gateway Specific Plan and High Density Residential	Alternative 4 - East Gateway Specific Plan and Light Industrial (M-2)
Aesthetics	Less than Significant	Similar	Less	Greater	Similar
Agricultural Resources	Significant & Unavoidable	Less	Less	Similar	Similar
Air Quality	Less than Significant	Less	Less	Greater	Greater
Biological Resources	Less than Significant	Less	Less	Similar	Similar
Cultural Resources	Less than Significant	Less	Similar	Similar	Similar
Geology/Soils	Less than Significant	Less	Similar	Similar	Similar
Greenhouse Gas	Less than Significant	Less	Less	Greater	Greater
Hazards/Hazardous Waste	Less than Significant	Less	Similar	Similar	Similar
Hydrology/Water Quality	Less than Significant	Less	Similar	Similar	Similar
Land Use/Planning	Less than Significant	Less	Greater	Greater	Similar
Noise	Less than Significant	Less	Similar	Greater	Similar
Public Services	Less than Significant	Less	Greater	Greater	Similar
Transportation/Traffic	Project Impacts – Less than Significant Cumulative Impacts - Significant & Unavoidable at one intersection	Greater	Less	Similar	Similar
Utilities/Services Systems					
Water	Less than Significant	Similar	Less	Similar	Less
Wastewater	Less than Significant	Similar	Less	Greater	Less
Solid Waste	Less than Significant	Similar	Less	Similar	Less