

7.0 ALTERNATIVES

7.1 INTRODUCTION AND SUMMARY

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

Key provisions of the State CEQA Guidelines¹ pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*
- The No Project Alternative shall be evaluated along with its impact. The no-project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.*
- The range of alternatives required in an EIR is governed by a "rule of reason;" therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.*
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.*
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.*

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts; site suitability; economic viability; availability of infrastructure; General

¹ State CEQA Guidelines Section 15126.6

*Plan consistency; regulatory limitations; jurisdictional boundaries; and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.*²

7.2 PROJECT OBJECTIVES

The applicant has identified the following proposed project objectives:

- Provide a planned development that furthers the community objectives for hillside development including a variety of building forms and types and sensible neighborhood planning techniques;
- Meet the community’s need for senior citizen housing development with a rural character and a low-medium density consistent the City’s planning objectives;
- Respect the property’s significant cultural and historical context by developing neighborhoods with an architecture compatible with the adjacent St. John’s Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City’s housing and land use mix within the City’s urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John’s Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

7.3 ALTERNATIVES CONSIDERED

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible—and therefore merit in-depth consideration—and which are infeasible. The alternatives considered include a range of potential projects to meet the applicant’s objectives while eliminating or reducing significant environmental impacts identified in **Section 6.0, Considerations and Discussions of Environmental Analysis**.

Alternatives considered include the following:

- No Project/No Development
- Reduced Project Alternative

² *State CEQA Guidelines* Section 15126.6(f)(1).

7.4 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination.

The alternatives considered and rejected as infeasible were:

- Alternative uses – At the request of the Archdiocese of Los Angeles, several preliminary studies were conducted to evaluate the adaptive re-use of the St. John's Seminary College campus buildings. These alternative uses included a charter school and an eldercare facility. Due to the age and configuration of the existing buildings, which would require extensive remodeling and retrofitting, these alternatives were deemed infeasible for economic reasons.
- Development of the Proposed Project Site Under Current General Plan and Zoning - The current zoning of the property is RE-5 AC. The RE-5 AC zone allows for one residential unit for every five acres. If the total site acreage is divided by the number of allowable units in the RE 5-AC zone, a total number of 17 residential units would be allowed. This land use would not generate the necessary financial return from the development needed to provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary and was deemed infeasible for economic reasons.
- Alternate site – This alternative was not considered because the proposed project is reuse of the St. John's Seminary college site intended to provide a source of revenue to ensure ongoing operation of the St. John's Seminary Graduate Seminary. The proposed project and alternatives considered are specific to the project site, and it is not reasonable to consider an alternate site.

7.5 SUMMARY OF ALTERNATIVES CONSIDERED

Alternative 1 - No Project/No Development

The *State CEQA Guidelines* require the analysis of a No Project Alternative.³ This no-project analysis must discuss existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not to be approved based on current plans, site zoning, and consistency 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 would compare the

³ *State CEQA Guidelines* Section 15126.6(e).

environmental effects of the property remaining in its existing state to the environmental effects that would result 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 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.⁴

Under the No Project Alternative, the proposed project would not be constructed. The site buildings would remain in their present vacant condition for the near future. There are currently no plans for reuse of the campus at this time. If left vacant and unmaintained, there is a possibility for the existing buildings to experience deterioration in the future.

Alternative 2 - Reduced Project Alternative

The Alternative is intended to reduce the potential project impacts to agricultural resources. Under the Reduced Project Alternative 140 residential units, recreation/open space areas, and a two surface parking lots with approximately 38 guest spaces would be constructed. This reduction in units would represent an over 53.3 percent reduction in the number of new housing units.

The main difference in the Reduced Project Alternative from the Proposed Project would be the retention of a larger area of agricultural land. All applicable Project Design Features, Regulatory Compliance Measures, and Mitigation Measures would be implemented under this Alternative.

The potential environmental impacts associated with this Alternative are described below and are compared to the environmental impacts associated with the Proposed Project.

7.6 ALTERNATIVE IMPACT ANALYSIS

This subsection presents an analysis of the project alternatives and provides a comparison of the impacts of these alternatives to those of the proposed project for the environmental issues addressed in this document. In all cases, the comparison of impacts assumes that all feasible mitigation measures as identified in this document would be implemented the proposed project’s resulting impacts. 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

⁴ *Id.* at Section 15126.6(f)(1)

the *State CEQA Guidelines*, the discussion of the environmental effects of the alternatives may be less detailed than that provided for the proposed project.⁵

7.6.1 Alternative 1: No Project/No Development Alternative

Description and Analysis

Under the No Project Alternative, the proposed project would not be constructed. The current site would remain in its present vacant condition for the near future. There are currently no plans for reuse of the campus at this time.

Aesthetics

Under the No Project Alternative, existing structures on the proposed project site would be preserved. No new development would occur. Views into and from the proposed project site would be unchanged. It should be noted that since there is the potential for the deterioration of the existing structures, the site will become aesthetically degraded over time.

Agricultural Resources

Under the No Project Alternative, no conversion or alteration of the existing agricultural land uses would occur on the proposed project site. The 56.82 acres of Important Farmland (12.1 acres of Prime Farmland, and 44.72 acres of Unique Farmland) would remain in their present condition, and would be available for agricultural use, for the foreseeable future. Existing agricultural operations are likely to continue.

Air Quality

Under the No Project Alternative, there would be no change in air quality resulting from development at the proposed project site. No new stationary or mobile emission sources would be introduced into the area of the proposed project, and no new sensitive receptors (residential units) would be introduced onto the proposed project site. The current site would remain in its present vacant condition for the near future, and air quality would remain the same as is under the proposed project site's current conditions.

Biology

Under the No Project Alternative, no changes would be made to existing uses on the proposed project site. Existing biological resources, including the four coast live oak trees recorded within the site, would

⁵ California Public Resources Code, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6(d).

remain undisturbed. As no development would occur, migratory birds would not be affected by construction activities, and any monarch butterflies overwintering in eucalyptus windrows on the site would be undisturbed.

Cultural Resources

Under the No Project Alternative, there would be no change in cultural resources. The St. John's Seminary campus would remain vacant. As the campus is vacant and there are no plans for reuse, the preservation of the campus without any future reuse would most likely result in further deterioration of the campus. Buildings that are not used would not be maintained, structures requiring repair would not be repaired, and, ultimately, the deterioration would result in a loss of the individual design components. As some of these buildings are designated as historically significant resources, their deterioration may pose a potential significant impact if no regular maintenance is available.

Potential archeological resources that occur on site would remain undisturbed and potential significant impacts to archaeological and paleontological resources would be less than under the proposed project.

Geology and Soils

Under the No Project Alternative, the proposed project site would remain in its current state. The site is partially located in an Alquist-Priolo Earthquake Fault Zone and partially located in a City-designated Fault Hazard Zone. As no new development is proposed, mitigation measures to correct any existing hazards to the current structures would not occur. Therefore, the existing structures, which were built prior to requirements for seismic safety and the implementation of current building codes, would be subject to severe seismic shaking and potential collapse. However, as noted previously, there are no plans for reuse of the campus at this time.

Impacts related to liquefaction would be less than significant in that the project site is not located within designated liquefaction zones and groundwater levels are greater than 70 feet. Subsidence and ground collapse are not issues with the project site.

Greenhouse Gases

Under the No Project Alternative, there would be no change in greenhouse gas (GHG) emissions resulting from development at the proposed project site. No new stationary or mobile emission sources would be introduced into the area of the proposed project, and no new sensitive receptors (residential units) would be introduced onto the proposed project site. The current site would remain in its present

vacant condition for the near future, and GHG impacts would remain the same as is under the proposed project site's current conditions.

Hazards and Hazardous Materials

Under the No Project Alternative, no new uses would occur on the proposed project site; therefore, no hazardous materials would be removed from, or introduced to the site. Furthermore, no new sensitive receptors would be introduced to the site and exposed to potential hazards under the No Project Alternative. Existing potential hazards related to asbestos-containing materials, lead-based paint and agricultural chemicals would continue to exist at the site. Should the site be considered for reuse in the future, these hazards would then require remediation/mitigation. However, if the campus is left vacant, the potential for asbestos-containing materials to be released into the environment would be low. Likewise, hazards from existing asbestos-containing materials, and lead-based paint would be low, as no demolition would occur. The potential for any existing soil contamination to further contaminate groundwater would be low in that groundwater is greater than 70 feet below ground surface.

Furthermore, under the No Project Alternative, existing buildings on site may experience deterioration and there could be an accidental release of hazardous materials from this process. Should this event ever occur, the campus would follow all applicable regulations governing the disposal and transport of hazardous material during the demolition of existing structures.

Hydrology and Water Quality

Under the No Project Alternative, existing drainage, erosion, and sedimentation patterns on the site would remain unaltered. Surface water flows that currently traverse the project site would continue as flow would not increase in velocity or volume. No new impact would occur and this scenario would not worsen the existing hydrological conditions of the site.

No water quality violations or depletion of groundwater supplies would occur. However, as the site has substantial agricultural lands, any future application of pesticides or herbicides for crops on these lands could introduce chemicals into the environment that could degrade surface water on site and potential runoff into Calleguas Creek. Without the introduction of on-site surface water improvements to control and remediate degraded surface waters, impacts could be greater than those of the proposed project.

Land Use and Planning

Under this alternative, the site would continue to be zoned RE (Rural Exclusive). No changes in land use or zoning would occur, therefore, no land use impacts would occur.

Noise

Under the No Project Alternative, no new stationary or mobile noise sources would occur. The proposed project site would remain a vacant campus with agricultural production. The project site would continue to experience noise levels (noise from agricultural equipment and surrounding roadway traffic from Upland Road) equivalent to what is presently experienced on this portion of the project site. Existing noise levels on site range from approximately 61.9 and 64.6 dB(A) Leq. Therefore, no impacts would occur.

Population and Housing

Under this alternative, no new development would occur and the existing campus would remain vacant. As no new housing would be added to the site, no population increase would occur. Therefore, no population or housing impacts would result under this alternative. However, as no new housing would be introduced, the General Plan Housing Elements that address the need for additional housing stock in the City.

Public Services – Fire Protection

Under the No Project Alternative, the existing campus would remain vacant and the site would continue in agricultural production; no new land uses would be introduced. As the site is located adjacent to a high fire hazard area, there would be no reduction of this fire hazard through new landscaping on site. Additionally, as the existing campus does not meet current fire code, the existing buildings would be at risk for fire hazard, and given the vacant status of the campus, the ability to identify a fire early and notify first responders would be reduced. While demand for public services for fire protection would not increase above existing demand, the site would remain as a risk for wildfire and structure fire. However, no additional staff or equipment would be required to serve the site. There would also be no new or physically altered facilities required conforming to a new development. Therefore, no new impacts would result under this alternative.

Public Services – Law Enforcement

Under the No Project Alternative, the existing campus would remain vacant and the site would continue to be used for agricultural production; no new land uses would be introduced. As the campus is currently secured behind a fence/wall and gates and not open to the public, the potential for unlawful activities caused by outside sources to occur on site would remain low. Activities on site would be subject to continued security from St. John's Major Seminary and would likely not require additional law enforcement services. There would also be no new or physically altered facilities required conforming to

a new development. Therefore, demand for law enforcement services would not increase above existing demand; therefore, no new impacts would result under this alternative.

Public Services – Education

Under the No Project Alternative, the existing campus would remain vacant and the site would continue to be used for agricultural production; no new land uses would be introduced. Therefore, there would not be any new demand for schools; therefore no new impacts would result under this alternative.

Public Services – Parks and Recreation Services

Under the No Project Alternative, the existing campus would remain vacant and the site would continue to be used for agricultural production; no new land uses would be introduced. The existing recreation fields would serve the St. John’s Graduate Seminary on site and there would be no need for additional fields. Also, as the project site would remain within the secured St. John’s campus compound, no outside recreation activities could occur on site without the permission of the existing St. John’s administration. Therefore, demand for recreational services would not increase above existing demand.

Traffic and Transportation

Under this alternative, no new traffic would be generated on site. As the site is a vacant campus, it does not generate traffic. Ongoing agricultural activities on the site generate minimal seasonal traffic. As such, the No Project Alternative would have fewer impacts than the proposed project.

Utilities – Water

Under the No Project Alternative, the existing campus would remain vacant and the site would continue as an agricultural use. The vacant campus would not increase in water service requirements. Currently, there are no plans for reopening or reusing the campus. The campus has historically been served with water and could be served in the future should it be reopened. Current agricultural operations on the site require water for irrigation and utilize well water from an on-site well. Continuation of the on-site agriculture would utilize this well, and no additional water service would be required. Under the No Project Alternative, no new impacts would occur.

Utilities – Wastewater

The project site is currently not served by sewer and utilizes septic tanks. Under the No Project Alternative, the site would remain dependent on the existing septic systems. As the campus is vacant, it is likely this system would be adequate to service the site. As there are no plans for reopening the campus

or other future use, there would be no need to connect to outside sewer services. However, any use of the aging on-site septic systems could result in potential failure of the system and contamination of soils and groundwater resources. Under the No Project Alternative, no new impacts would occur.

Utilities – Solid Waste

Under the No Project Alternative, the site would remain as a vacant campus with portions in agricultural use. No new solid-waste streams would occur at the site, and existing solid waste would continue to be transported to current disposal sites. Little, if any, waste is generated at the site at present. As the campus is vacant, it does not generate waste. Green waste from the agricultural operations is either recycled on site or transported off site for disposal and use as daily cover. Under the No Project Alternative, no new impacts associated with solid waste service would occur.

Tribal Cultural Resources

Under the No Project Alternative, there would be no change in any potential Tribal Cultural Resources. The St. John's Seminary campus would remain vacant, and potential resources that occur on site would remain undisturbed. Under the No Project Alternative, no new impacts would occur.

Conclusion and Relationship to Project Objectives

The No Project Alternative would result in fewer impacts for most issues than the proposed project. However, actions associated with geology/soils, hazards, hydrology, and sewage would result in impacts that are marginally greater than those of the proposed project. Under this alternative, the existing buildings on the project site may experience deterioration over time and thus cause significant aesthetic and cultural resource impacts.

Additionally, the No Project Alternative would not fulfill any of the project objectives:

- Provide a planned development that furthers the community objectives for hillside development including a variety of building forms and types and sensible neighborhood planning techniques;
- Meet the community's need for senior citizen housing development with a rural character and a low-medium density consistent the City's planning objectives;
- Respect the property's significant cultural and historical context by developing neighborhoods with an architecture compatible with the adjacent St. John's Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;

- Permit development only at an appropriate scale which will increase the City's housing and land use mix within the City's urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

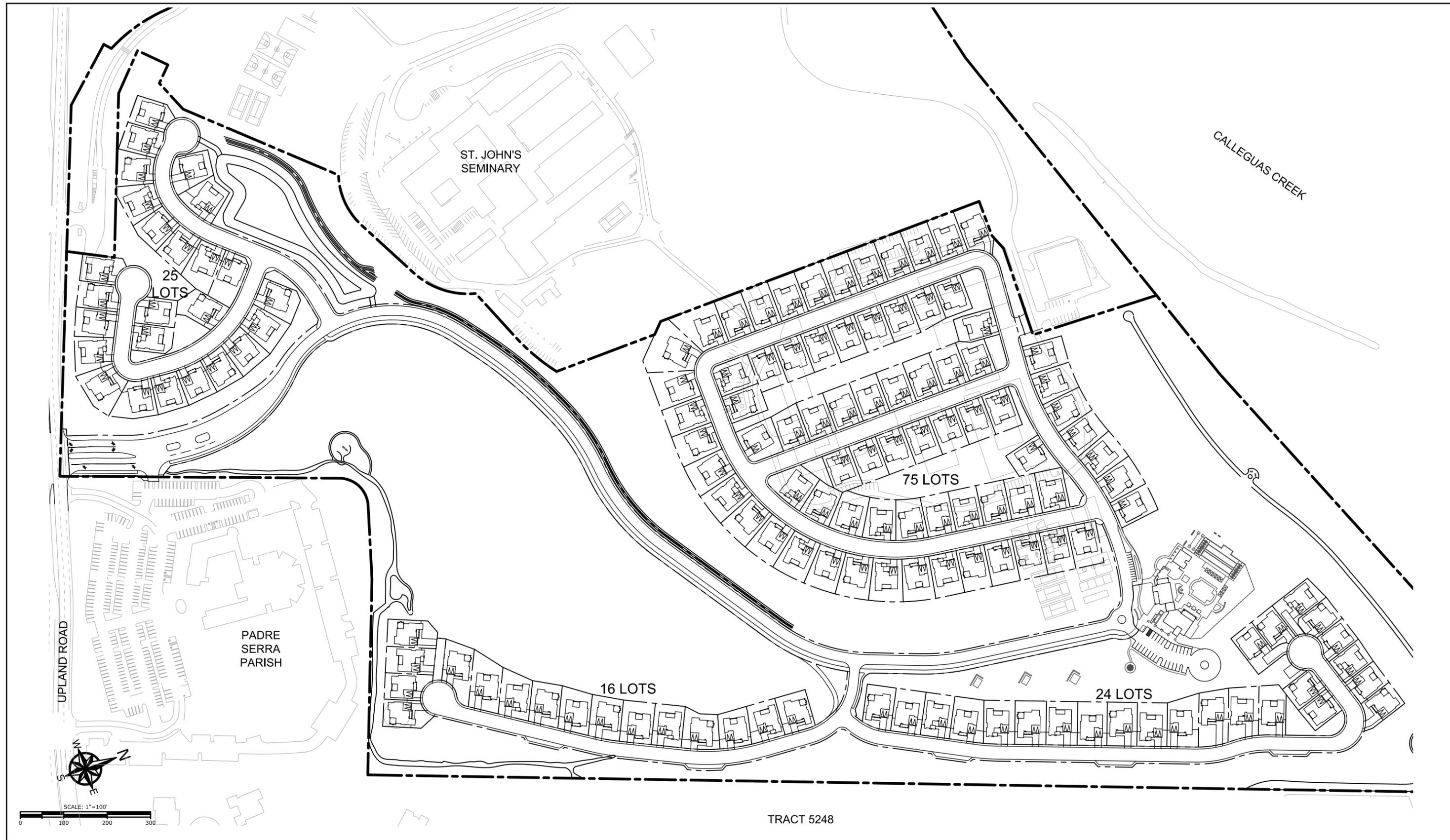
7.6.2 Alternative 2: Reduced Project

Description and Analysis

Under the Reduced Project Alternative 140 senior citizen residential housing units, recreation/open space areas, and a two surface parking lots with approximately 38 guest spaces would be constructed. This reduction in units would represent an over 53 percent reduction in the number of new housing units. The main difference in the Reduced Project Alternative from the Proposed Project would be the retention of a larger area of agricultural land. All applicable Project Design Features, Regulatory Compliance Measures, and Mitigation Measures would be implemented under this Alternative. Refer to **Figure 7.0-1, Reduced Project Alternative Conceptual Site Plan**.

Aesthetics

Development of the proposed project site under this alternative would require the removal of the existing structures and portions of the agricultural uses on site. This alternative would result in the development of 140 new single-family homes. Development would change the nature of the site by removing the vacant campus and some of the existing agriculture. As such, this alternative would affect views into the proposed project site from adjacent uses; however, these views would be more likely to include landscaping and open space. The development of the site would be less dense under this alternative providing for greater separation between units than the proposed project. As such, this alternative would preserve larger areas of open space and provide more opportunity to retain views through the site. The residential structures to be built on site would be both single story and two story with roof heights up to 35 feet. Such structures would be similar to those of the proposed project, and they could be visible off site, including from Lewis Road and Somis Road, which are City designated scenic corridors. However, given the varied topography of the site, the majority of the site is not visible from these roadways and impacts would not be considered significant. The changes in the views of the project site would be less than/similar to, which is less than significant, those of the proposed project.



SOURCE: Encompass Consultant Group, December 2016

FIGURE 7.0-1

Agricultural Resources

Similar to the proposed project, this alternative would convert existing agricultural uses on the project site by developing up to 140 residential units. Although the building density would be less compared to the land use concepts under the proposed project, this alternative would convert Important Farmland (Prime Farmland and Unique Farmland) that exists on the proposed site to residential uses. However, some agricultural uses would be retained, and the amount of land converted from Prime or Unique Farmland could be reduced by approximately 12 acres, compared to 56.82 acres under the proposed project. However, due to the need to address potential geotechnical conditions on site, the orchards on site may need to be removed during remedial grading. The potential loss of designated agricultural lands would be less than that of the proposed project while the loss of current crops under cultivation would be the similar. While this alternative would result in the loss of a reduced amount of Prime and Unique Farmlands on the proposed project site, such a loss would remain significant and unavoidable.

Air Quality

Construction Impacts

Under the Reduced Project Alternative, overall construction activity would be less than the proposed project because of the decreased activity that would be required to construct fewer housing units. However, daily construction emissions for rough grading under the Alternative would be similar to the proposed project because the same equipment and similar levels of daily construction activity would occur under the Alternative. As such, as discussed **Section 6.3, Air Quality**, and similar to the proposed project, the mass daily construction-related emissions generated during the project construction phase would exceed the thresholds of significance recommended by the Ventura County Air Pollution Control District (VCAPCD). As shown in **Table 6.3-9**, implementation of **Mitigation Measures 6.3-1** and **6.3-2**, combined with **Regulatory Compliance Measure 6.3-1**, would reduce on-site ROC, NO_x, PM₁₀, and PM_{2.5} emissions during the construction process. Pursuant to VCAPCD guidance, implementation of all feasible mitigation measures during the construction process is required for projects that exceed the thresholds of significance for ozone precursor emissions (i.e., ROC and NO_x emissions). As in **Section 6.3**, the VCAPCD states that construction-related emissions are not evaluated against any numeric threshold for significance, since such emissions are temporary. Instead, application of feasible mitigation measures is required. Since the analysis identifies all such feasible measures, construction of the proposed project would result in temporary impacts to ozone levels that are considered less than significant after mitigation. Therefore, impacts of the Reduced Project Alternative with respect to construction emissions would be similar/less than to the proposed project and less than significant.

Operational Impacts

Under the Reduced Project Alternative, 53 percent fewer residential units would be constructed as compared with the proposed project. Therefore, under the Reduced Project Alternative, traffic generation would be less than the proposed project. The Reduced Project Alternative would result in the lower levels of regional operational emissions, local pollutant concentrations, and CO concentrations at nearby intersections as compared to the proposed project. Therefore, impacts under the Reduced Project Alternative would be less than the proposed project and less than significant.

Biology

Development of the proposed project site under this alternative would involve the removal of on-site trees, including eucalyptus trees, and the transplant of existing coast live oak and other identified mature trees. Potential impacts to nesting birds could still result from construction activity. Overall, impacts would be less than those of the proposed project.

Cultural Resources

Development of the site under this alternative would result in the removal of the St. John's Seminary campus, which would also occur under the proposed project. Although the lower density of this alternative could provide for the retention of some of the campus or structures, unless the entire campus was retained the impact would be significant. Additionally, as the existing campus would require remediation prior to any reuse of the asbestos and lead-based paint hazards, it is not conducive to reuse. Impacts would be significant and unavoidable with regards to historical resources under this alternative, similar to those of the proposed project.

This alternative could provide for avoidance of the existing archaeology resources that remain on site. As such, impacts would be similar to those of the proposed project.

Geology and Soils

The site is partially located in an Alquist-Priolo Earthquake Fault Zone and partially located in a City-designated Fault Hazard Zone. New development would be required to mitigate potential geotechnical hazards associated with potential ground shaking through remedial grading to correct any existing hazards to the proposed structures. Additionally, as with the proposed project, structures would be required to avoid certain areas on the site that are subject to fault rupture.

Although this alternative would introduce fewer residents to the project site as a result of fewer residential units being constructed, it would still expose residents to potential adverse effects. Therefore,

overall, impacts regarding the exposure of people or structures to potential hazards such as fault rupture, seismic ground shaking, expansive soils, and liquefaction are considered similar to those of the proposed project. However, since the development area would be the slightly less under this alternative, the impact associated with the loss of topsoil and soil erosion would be reduced from the already less than significant impacts from the proposed project.

Greenhouse Gases

Under the Reduced Project Alternative, 53 percent fewer housing units would be developed. Therefore, under the Reduced Project Alternative, greenhouse gas emissions allocated to the project would be less than the proposed project. Because of decreased total levels of construction activity compared to the project, greenhouse gas emissions would be less than the project over the entire construction period. The Reduced Project would have lower traffic generation than the proposed project, which is the principal source of operational greenhouse gas emissions. Accordingly, impacts under the Reduced Project Alternative would be less than the proposed project during both the construction the operational phases; and similar to the proposed project, both would be less than significant.

Hazards and Hazardous Materials

As with the proposed project, development of the project site under this alternative would require the removal of the existing St. John's Seminary structures. Asbestos-containing materials and lead-based paint have been identified within these structures and would need to be removed prior to demolition. The residential uses would involve, albeit to a lesser extent, the use of common household chemicals such as cleaning agents. Impacts would be similar to those of the proposed project, and less than significant.

Hydrology and Water Quality

Under this alternative, there would be less impervious surfaces developed on site than under the proposed project, which would allow for more water infiltration into site soil. The alternative would also require infrastructure to be developed to address surface water drainage and reduce site flows from development to be in accordance with regulations of the VCWPD. The potential impacts to the watershed stormwater-runoff peak flow rates and volumes for a range of storm events would most likely be less than those of the proposed project.

Land Use and Planning

Development of the Reduced Project Alternative would need a similar zone change/land use amendment of the proposed project. These include the change of the existing General Plan designation of Natural

Open Space/Agriculture to the proposed Low-Medium Residential use. Similarly, a zone change from RE to Residential Planned Development (RPD) would be needed. Therefore, impacts would be similar to the proposed project. Furthermore, similar to the proposed project, this alternative would not physically divide an established community and, since there are currently no applicable habitat or natural community conservation plans, this alternative would not result in a conflict with such a plan. Impacts would be similar to the proposed project, which are less than significant.

Noise

Construction Impacts

Similar to the proposed project, the construction phase of this alternative would result in temporary noise and vibration increases. This site would require some level of grading to install infrastructure and remediate geotechnical conditions. Demolition of the existing campus would still be required. However, while the number of new units would be less than for the proposed project, actual time of construction would be less. Further, the City of Camarillo Municipal Code is interpreted to provide an exemption from established noise limits for construction activities that occur between the hours of 7:00 A.M. and 7:00 P.M. on Monday through Saturday; construction activities exceeding established noise standards would be prohibited on Sundays and federal holidays. Therefore, similar to the proposed project, construction noise impacts would be less than significant.

Operational Impacts

As compared to the proposed project, this alternative would generate fewer average daily trips (ADT) due to the lower amount of proposed residential units. Since this alternative would generate fewer vehicle trips compared to the proposed project, it would result in fewer mobile source noise impacts and a smaller permanent increase in ambient noise levels along Upland Road and Lewis Road. Therefore, similar to the proposed project, operational noise impacts would be less than significant.

Population and Housing

Under this alternative, the proposed project site would contain a total of 140 senior citizen residential housing units. As discussed in **Section 6.12, Population and Housing**, these units would support an estimated population of 280; this would be within growth projections for the City. Furthermore, development of the site under this alternative would not displace significant numbers of either housing or people. Impacts would be less than significant, similar to the proposed project.

Public Services – Fire Protection

Similar to the proposed project, the development under this alternative would place residential units adjacent to areas designated by the City of Camarillo to be of high fire hazard potential. As with the proposed project, landscaping on site would be planned to limit highly flammable materials. Additionally, this alternative would likely result in an increased number of calls for service to the Ventura County Fire Protection District (VCFPD) than are currently made for the vacant campus. However, due to a substantially lower population on site, demand on fire protection services would be less than that of the proposed project.

Public Services – Law Enforcement

Development of the proposed project site under this alternative would likely result in an increased number of calls for service to the Camarillo Police Department than are currently made for the vacant campus. However, due to a substantially lower population on site, demand on law enforcement services would be less than that of the proposed project.

Public Services – Education

Similar to the proposed project, this alternative would develop a senior citizen housing development which would not be expected to generate any substantial student population. Impacts related to education would be less than significant, similar to the proposed project.

Public Services – Parks and Recreation Services

Development of this alternative would result in an estimated population of 280. Approximately 1.40 acres of parkland would be required to meet the standard of 5 acres per thousand residents. Similar to the proposed project, this alternative would provide a community recreation center with a pool and spa, fire and bar-b-que pits, open seating and gathering areas, bocce courts, and an event lawn. Further, similar to the proposed project the alternative would provide trails that will connect pocket parks and view parks to various residential clusters within the site, allowing residents to walk, bike, or jog to parks within the project boundaries, instead of use their vehicles to travel to the parks from their residence. In addition, the alternative would provide greenbelts and other open space areas landscaped in compliance with the City of Camarillo's landscaping design standards which would be maintained by the Homeowners' Association (HOA). Impacts related to parks and recreation services would be less than significant, similar to the proposed project.

Traffic and Transportation

Under this alternative, new traffic would be generated on site. This alternative would generate 910 daily trips; the proposed project would generate 1,950 daily trips. As this is a substantial reduction from the proposed project, impacts would be reduced from the already less than significant impacts from the proposed project.

Utilities – Water

As with the proposed project, the Camrosa Water District (CWD) would provide water service to the project site. The CWD's most recent urban water management plan indicates that water supplies are adequate to supply current and projected demand for the district, as the additional population (140 new dwelling units and 280 new residents) that would be generated falls within projected growth for the City of Camarillo... Overall water use impacts would be reduced from the already less than significant impacts from the proposed project.

Utilities – Wastewater

Under this alternative and the proposed project, the current septic system on the site would be abandoned and CWD would provide wastewater disposal services to the proposed site. As with the proposed project, development of this alternative would require the construction of sewer service connections to existing CWD mains. Demand for wastewater treatment generated by this alternative would be met by existing CWD facilities. The associated impacts would be similar to the proposed project's, which are less than significant.

Utilities - Solid Waste

Solid waste generated by this alternative would be disposed at existing landfills, primarily at the Toland Road Landfill. As with the proposed project, recyclable materials would be removed from the waste stream prior to disposal at the Gold Coast Recycling and Transfer Station. These facilities have adequate available capacity to accept solid waste generated by this alternative and the proposed project. The associated impacts would be similar to the proposed project's, which are less than significant.

Tribal Cultural Resources

Similar to the proposed project, under the Reduced Project Alternative, local Tribal representatives would be invited to consult with the City of Camarillo regarding the potential for the project to impact Tribal Cultural Resources. One request was made by Ms. Tumamait-Stenslie, Chairperson of the Barbareno / Ventureneno Band of Mission Indians. No other requests were received as of the publication of this Draft

EIR. Ms. Tumamait-Stenslie requested that a Phase I Archaeological Survey be conducted for the project site. Two such surveys have been conducted for the project site (included in **Appendix 6.5**), no artifacts of note were reported in either survey.

The proposed project is not expected to result in a substantial adverse change in the significance of any TCRs. Similar to the proposed project, impacts related to TCRs under this Alternative would be less than significant.

Conclusion and Relationship to Project Objectives

The Reduced Project Alternative would meet all of the Project Objectives as listed in **Section 3.0, Project Description**, of this EIR, by providing a senior citizen housing development project to replace the vacant campus buildings on the project site. Specifically, this Alternative would meet the following proposed project objectives to a similar, or in some cases a somewhat lesser (with respect to the provision of a source of revenue), extent as the Proposed Project:

- Provide a planned development that furthers the community objectives for hillside development including a variety of building forms and types and sensible neighborhood planning techniques;
- Meet the community's need for senior citizen housing development with a rural character and a low-medium density consistent the City's planning objectives;
- Respect the property's significant cultural and historical context by developing neighborhoods with an architecture compatible with the adjacent St. John's Major Seminary campus;
- Respect the natural hillside topography and preserve views into and out of the site wherever feasible given existing geologic constraints;
- Permit development only at an appropriate scale which will increase the City's housing and land use mix within the City's urban restriction boundary (CURB) limits while not adversely impacting surrounding infrastructure or existing neighborhoods;
- Provide a source of revenue to ensure ongoing operation of the St. John's Major Seminary;
- Utilize design techniques and guidelines to minimize environmental impacts, such as Low Impact Development (LID) stormwater management, contour (or landform) hillside.

However, this alternative would not eliminate the two significant and unavoidable impacts of the proposed project; the conversion of agricultural land to nonagricultural use (although it would reduce this impact), and the demolition of the St. John's Seminary College buildings, a significant historic resource.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project Alternative would be environmentally superior to the proposed project, as it would avoid all of the significant and unavoidable impacts of the proposed project. The No Project Alternative would not, however, meet any of the objectives of the proposed project.

In accordance with CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the “no project” Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the alternatives analysis provided above and in **Table 7.0-1, Comparison of Alternatives to the Proposed Project**, the Reduced Project Alternative is considered the environmentally superior alternative as it would lessen one of the significant and unavoidable impacts related to the proposed project. However, the Reduced Project Alternative would still result in the conversion of prime agricultural lands to residential purposes. This impact would still remain significant and unavoidable.

**Table 7.0-1
Comparison of Alternatives to the Proposed Project**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	Alt. 1 – No Project	Alt. 2 – Reduced Project
Aesthetics	Less than Significant	Less	Similar
Agricultural Resources	Significant and Unavoidable	Less	Less
Air Quality	Less than Significant	Less	Less
Biological Resources	Less than Significant	Less	Similar
Cultural Resources	Significant and Unavoidable	Less	Similar
Geology and Soils	Less than significant	Less	Similar
Greenhouse Gas Emissions	Less than Significant	Less	Less
Hazards and Hazardous Materials	Less than Significant	Greater	Similar
Hydrology and Water Quality	Less than Significant	Less	Similar
Land Use	Less than Significant	Less	Less
Noise	Less than Significant	Less	Similar
Population and Housing	Less than Significant	Less	Less
Public Services - Fire Protection	Less than Significant	Greater	Similar
Public Services - Law Enforcement	Less than Significant	Less	Similar
Public Services - Education	Less than Significant	Less	Less
Public Services - Parks and Recreation	Less than Significant	Less	Less
Transportation and Traffic	Less than Significant	Less	Less
Utilities - Water	Less than Significant	Less	Less
Utilities - Wastewater	Less than Significant	Less	Similar
Utilities - Solid Waste	Less than Significant	Less	Similar
Tribal Cultural Resources	Less than Significant	Less	Similar