

ALTERNATIVES TO THE PROPOSED PROJECT

INTRODUCTION TO THE ALTERNATIVES ANALYSIS

As stipulated in Section 21002.1(a) of the CEQA Statutes (Public Resources Code):

The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to a project, and to indicate the manner in which those significant effects can be mitigated or avoided.

More specifically, the CEQA Guidelines (Section 15126.6) require an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are deemed “infeasible.”

Section 15126.6(a) of the CEQA Guidelines states:

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

Purpose

Section 15126.6(b) of the CEQA Guidelines states:

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

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also 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. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Level of Detail

The CEQA Guidelines do not require the same level of detail in the alternatives analysis as in the analysis of the proposed project. Section 15126.6(d) of the CEQA Guidelines states:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

ALTERNATIVES TO THE PROPOSED PROJECT

Development of the proposed project would result in the urban infill of a site that has been planned for commercial uses for several decades. The current General Plan land use designation for the site is General Commercial and the underlying zoning is CPD (Commercial Planned Development). The proposed uses are consistent with the land use and zoning designations for the site.

As discussed in the Environmental Impact Analysis section of this EIR, all potential environmental impacts of the proposed project would be reduced to less than significant levels through the mitigation measures recommended in this EIR. The proposed project would not result in any unavoidable significant impacts. As such, alternatives to the proposed project are not necessary to reduce or eliminate any unavoidable significant impacts.

Nevertheless, the alternatives to the proposed project that were considered for this EIR are described and evaluated in the following discussions.

No Project Alternative

As required by CEQA, a no project/no new development alternative is analyzed in this EIR section. Section 15126.6(e)(2) of the CEQA Guidelines states that the no project alternative "...analysis shall discuss the existing conditions at the time the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Furthermore, Section 15126.6(e)(3)(B) of the CEQA Guidelines states:

If approval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build/ wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

As discussed previously in this Final EIR, the current land use designation for the project site is General Commercial and the underlying zoning is CPD. The proposed uses are consistent with these designations for the site.

Under the No Project Alternative, the proposed project would not be constructed and the site would temporarily remain as an undeveloped site. However, it is reasonably foreseeable that another application would be submitted to the City of Camarillo in the near future requesting approval to develop the site with commercial uses to the extent permitted by the CPD zone. Therefore, the No Project Alternative would not preclude development of the project site; it would instead temporarily delay to a later date the development of the site with uses similar to the proposed project.

The environmental impacts associated with this alternative would be the same as those caused by the proposed project. Therefore, the No Project Alternative would delay, but not eliminate or reduce, the less

than significant environmental impact associated with the proposed project. This alternative would also not meet the following objectives for the proposed project:

- Provide conference and meeting facilities to serve the community that are currently not available in Camarillo at a site that has easy access and regional visibility.
- Improve blighted conditions at the project site by developing a hotel and conference center as envisioned in the City of Camarillo Successor Agency's *Long Range Property Management Plan*.
- Provide hotel rooms within the community so that visitors to Camarillo can find lodging within the community instead of needing to find hotel rooms in surrounding cities.

This alternative may also not meet the City's objective to provide the approved improvements to the Camarillo Hills Drain flood control channel that bisects the project site while accommodating a commercial development that accommodates the required flood control easements and is consistent with the existing General Plan and zoning designations for the site.

Reduced Density Air Quality Alternative

As discussed in the Air Quality section of the Initial Study prepared for the project, the operational emissions proposed project would generate average daily operational emissions that exceed the thresholds of significance recommended by the Ventura County Air Pollution Control District (VCAPCD). This would be a potentially significant impact. This impact would also occur simply as a result of the size of the project and the number of motor vehicle trips that it would generate. Although this impact can be reduced to a less than significant level by the mitigation measures recommended in this EIR, the Reduced Density Air Quality Alternative has been devised to identify the size of a hotel and commercial project that could be constructed at the site before the emissions would exceed the VCAPCD's recommended thresholds. Based on the emissions shown in Table 1 of the Initial Study, the project development would need to be reduced in size by approximately 32 percent to reach this level. Therefore, the Reduced Density Air Quality Alternative is assumed to involve the development of only 68 percent of the building space at a similar ratio to the proposed project. This would eliminate one of the potentially significant impacts of the proposed project.

This alternative also assumes that the entire site would be utilized rather than leaving any area undeveloped and available for additional future development. As such, the potential impacts associated with site disturbance and alteration would be the same as those of the proposed project. Mitigation measures AQ-1 and AQ-2 would still apply to this alternative.

The Reduced Density Air Quality Alternative would also result in a substantial underutilization of the project site compared to the City's adopted plans and expectations for the site. By building less building space than permitted under the existing land use designations for the site, this alternative could induce faster growth on other properties in the vicinity.

Alternative Site

The evaluation of an alternative site is generally practical for new infrastructure projects or other projects that do not need to be developed at a site that is owned by a particular project developer. It is generally less applicable to new infill general development projects such as the proposed project. In the case of this proposed project, the project applicant could, in theory, purchase another property within Camarillo that is designated for commercial uses. However, development at an alternative site would not meet the following objectives for the project:

- Improve blighted conditions at the project site by developing a hotel and conference center as envisioned in the City of Camarillo Successor Agency’s *Long Range Property Management Plan*.
- Provide the approved improvements to the Camarillo Hills Drain flood control channel that bisects the project site while accommodating a commercial development that accommodates the required flood control easements and is consistent with the existing General Plan and zoning designations for the site.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, No Project Alternative would result in the least impacts on the existing environment. However, this alternative would also simply delay, but not eliminate or reduce, the less than significant environmental impact associated with the proposed project. This alternative may also not meet any of the objectives for the proposed project.

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