

6.0 ALTERNATIVES

As required by Section 15126.6 of the *CEQA Guidelines*, this section of the EIR examines a range of reasonable alternatives to the proposed specific plan. However, it should be emphasized that the proposed specific plan would not result in any unavoidably significant impacts. The proposed specific plan would require annexation of land that is currently within the County and would involve culverting a 725 linear foot section of Brown Barranca, both of which are actions subject to outside approvals. Therefore, because there were no alternatives that would result in a reduction of unavoidably significant impacts, this alternatives analysis explores the No Project Alternative, an Existing General Plan/Zoning Alternative, and a Barranca Avoidance Alternative.

The following alternatives are evaluated in this EIR:

- *Alternative 1: No Project (no development - no change to existing land uses)*
- *Alternative 2: Existing General Plan/Zoning Alternative*
- *Alternative 3: Barranca Avoidance. This alternative would leave the barranca in its current state.*

Table 6-1 provides a summary comparison of the development characteristics of the proposed specific plan and the alternatives. A more detailed description of the alternatives is included in the impact analysis for each alternative.

**Table 6-1
 Comparison of Project Alternatives' Buildout Characteristics**

Characteristic	Proposed Specific Plan	Alternatives		
		1	2	3
		No Project – No Build	Existing General Plan/Zoning	Barranca Avoidance
Residential Density	~7.48 units/acre (499 units)	AE -40 AC - one caretaker mobile home	R-1-7 ~7 units/acre (91 Units)	~7.19 units/acre (480 Units)
Commercial Square Footage	Up to 25,000 square feet	None	None	Up to 25,000 square feet
Barranca Modifications	725 Linear Feet Culverted	None	None	None
Remaining Agricultural Production	None	67 acres	54 acres	None



6.1 ALTERNATIVE 1: NO PROJECT - NO BUILD

This alternative assumes that the proposed improvements are not implemented and that the existing agricultural operations continue. It should be noted that implementation of the No Project alternative would not preclude future development within the specific plan area.

The No Project alternative would avoid the proposed specific plan's environmental impacts in every issue area studied in the EIR except for treatment of contaminated soils and groundwater demand. Under this alternative, pesticide use and drawing of groundwater would continue. These impacts would be reduced with implementation of the proposed specific plan. The proposed specific plan would require treatment of contaminated soils and asbestos containing materials, and would cease to involve application of agricultural pesticides.

The No Project Alternative would also not achieve two objectives of the specific plan: 1) alleviation of existing flooding at the Blackburn Road undercrossing where the existing double box culvert is deficient by 304 cubic feet/second under a 100-year storm condition; and 2) development of the Carlos Street extension as a collector street through the plan area that would eventually link Wells Road and Saticoy Avenue (as illustrated on the Roadway Classification Plan of the 2005 General Plan).

Despite avoiding most of the environmental impacts of the proposed specific plan, the No Project Alternative would not provide new housing opportunities in the City of Ventura. Moreover it is noted that the proposed specific plan does not have any project-specific impacts that cannot be mitigated to a less than significant level.

6.2 ALTERNATIVE 2: EXISTING GENERAL PLAN/ ZONING

This alternative would involve development under the existing County of Ventura General Plan and Zoning Designations. About 54 acres of the plan area are currently within the County. The County lands are currently zoned AE-40 and have a General Plan designation of Agricultural Urban Reserve - 40 Acre minimum. This alternative assumes that these 54 acres would remain in agricultural production as they are today. About 13 acres are currently within the City of Ventura and are zoned R-1-7 with a General Plan designation of Neighborhood Low 0-8 du/acre. This alternative assumes that buildout of these 13 acres would have a maximum density of 7 units/acre as allowed under the zoning ordinance, and would result in development of 91 units. This alternative would not involve modifications to the Barranca and would not involve development of commercial uses.

It is noted that the 54-acres that are currently within the County have an Urban Reserve General Plan overlay designation, which specifies that the property is intended for eventual annexation. This alternative would not preclude some eventual future development pursuant to the City's Neighborhood Low 0-8 du designation, should annexation be sought. Maximum allowable residential density for these 54 acres would be an additional 432 dwelling units.



6.2.1 Aesthetics

Under this alternative, views of the plan area from SR 126 and Wells Road would be altered, similar to what would occur under the proposed specific plan, since the 13 acres that would be developed with residential uses are situated along the southern and eastern boundaries of the plan area adjacent to SR 126/Blackburn Road and Wells Road. It is likely the same 7-8 foot tall garden wall would need to be constructed along the southern boundary of the plan area to attenuate noise within exterior usable spaces, as with the proposed specific plan.

From the SR 126 and Wells Road vantages, the viewer would see 1-2 story residential development, similar to what would occur under the proposed specific plan. However, views of the mountains in the background would remain visible, the same as with the proposed specific plan. The impacts with respect to views from visually sensitive corridors would be less than significant.

Under this alternative, views of agricultural land would remain from Telegraph Road, but not from SR 126 or Wells Road. Views from Wells Road and SR 126 would still involve alteration of the visual character of the plan area; however the change would not be visually offensive, and the impact would be less than significant. Overall, the change in visual character would be lower under this alternative as 54 of the 67 plan area acres would remain in agricultural production.

6.2.2 Air Quality

Temporary impacts to air quality resulting from construction of this alternative would be lower than with the proposed specific plan. Since this alternative would develop roughly 20% of the units proposed under the specific plan, construction emissions would be reduced by about 80%. The same standard dust control mitigation would apply, and, as with the proposed specific plan, the impact would be less than significant.

Operational emissions would not exceed Ventura County APCD thresholds and no mitigation measures would be necessary. This alternative would result in about 20% of the emissions that would result from buildout of the proposed specific plan or about 15 lbs of ROG per day as compared with the 66 lbs of ROG per day that would be produced at full buildout of the specific plan. Emissions of NO_x would be similarly reduced to 9 lbs per day from the 50 lbs per day that would be associated with full buildout of the specific plan.

This alternative would be anticipated to result in continued farming practices on the 54 acres that would remain in agricultural production. The area produces row crop flowers that involves tilling and would be anticipated to continue to involve application of pesticides and herbicides. These agricultural practices would continue to expose existing nearby receptors and future residential receptors to particulate matter and pesticides or herbicides, some of which could have adverse health effects. This is a potentially adverse effect that could be mitigated through implementation of appropriate buffers between residences and agricultural operations.

6.2.3 Biological Resources

Because this alternative would not include modifications to Brown Barranca, the potential for adverse effects to biological resources would be reduced. This alternative would result in no impacts to riparian vegetation, wildlife or wetlands and biological resource impacts would be less than significant. The biological resource impacts associated with development under the proposed specific plan would be significant, but mitigable. It should be noted that this alternative would not include the barranca restoration that would occur under the proposed specific plan.

6.2.4 Cultural Resources

Grading would be reduced under this alternative, as development would be limited to 13 acres instead of the 67 acres that would be developed under the proposed specific plan. Nevertheless, potential impacts to unrecorded archaeological resources would be the same as for the proposed specific plan, and mitigation measures recommended for the proposed specific plan for unexpected discovery of such resources would apply. This alternative would have significant, but mitigable impacts similar to those of the proposed specific plan.

6.2.5 Hazards

The plan area has several different hazards due to the presence of an underground storage tank, soils contaminated with pesticides, and asbestos cement. This alternative would maintain agricultural production in the northwest corner of the plan area, where soils are contaminated with pesticides. The ongoing agricultural operations would not require removal of these soils; therefore mitigation measure HAZ-1 would not apply though these soils could still be dispersed by wind and water, which is adverse due to the presence of residential receptors surrounding the plan area.

Mitigation measures for removal of the underground storage tank and asbestos cement would apply as these hazards are present within areas where development of the 91 residences would occur. This alternative would have significant, but mitigable impacts with respect to hazards, the same as with the proposed specific plan.

6.2.6 Drainage and Flood Hazards

This alternative would not construct the barranca improvements at the Blackburn Road undercrossing to alleviate the existing flooding impact at Blackburn Road. It is noted that this alternative could include such an improvement, but that biological resource impacts would also result. If no improvements were constructed, portions of the developable area would be within the 100-year flood zone (see updated 100-year flood zone delineation on Figure 4.6-1) and residential units would need to be constructed outside of the flood hazard area. The impacts with respect to Flood Hazards would be less than significant if structures were sited outside of the 100-year flood zone. The impact would be significant, but mitigable if barranca improvements were incorporated to reduce the flood hazard within the developable area, the same as for the proposed specific plan. This alternative would include similar drainage features to comply with City requirements and the impacts would be similar to those of the proposed specific plan.



6.2.7 Land Use and Planning

This alternative would not achieve extension of Carlos Street through the plan area, as that extension would bisect agricultural operations. Thus, this alternative would not achieve the City's objective of creating that Carlos Street roadway extension to connect Wells Road and Saticoy Avenue as indicated on the Roadway Classification Plan of the 2005 General Plan. Additionally, the 54 County acres would not be annexed to the City as part of the infill strategy that was chosen above expanding the City's boundaries on the periphery of the City.

This alternative would not result in extension of the linear park system and would not create mixed uses at the southeast corner of Telegraph Road and Wells Road. This alternative could be found to be consistent with applicable policies of the 2005 General Plan, but would not implement the goals and policies of the 2005 General Plan to the degree that the proposed specific plan would through provision of a walkable, higher density mixed use neighborhood with parks, trails and peripheral pedestrian, bicycle and vehicular circulation improvements to Telegraph Road and Wells Road that would benefit the community as a whole.

6.2.8 Noise

Construction noise would be lower than under the proposed specific plan, but compliance with the City's noise ordinance would reduce impacts to a less than significant level. This alternative would produce less traffic than the proposed specific plan, and would thus produce less traffic-generated noise, though traffic generated noise from the proposed specific plan would be less than significant. Like the proposed specific plan, residences along the southern boundary of the plan area would require a 7-8 foot garden wall along the north side of Blackburn Road, with interior noise attenuation for those residences closest to Blackburn Road/SR 126 due to freeway generated noise in excess of the residential standards. Residences closest to Wells Road and Telegraph Road would likewise require orientation such that exterior usable spaces are either shielded by the proposed structures, with noise attenuating construction or would require construction of a sound wall to ensure that exterior spaces do not exceed the allowable noise levels of 65 dBA. The same mitigation measures applied to the proposed specific plan would apply to this project. This alternative would expose residences to noise associated with agricultural operations, which could mean the use of tractors for tilling, planting, harvesting and spraying, which would not occur with the proposed specific plan.

6.2.9 Traffic and Circulation

This alternative would generate fewer trips than the proposed specific plan. Assuming 91 single family residences, this alternative would generate 871 average daily trips (ADT), which is 4,687 fewer trips (84% reduction) as compared to the proposed specific plan. As with the proposed specific plan, this alternative's impact to the local circulation system would be less than significant.

6.3 ALTERNATIVE 3: BARRANCA AVOIDANCE

This alternative would involve avoidance of the barranca as this was a recommendation made by the Department of Fish and Game in response to the Mitigated Negative Declaration that was previously issued for the proposed specific plan. This alternative would reduce impacts to



biological resources, primarily riparian and wetland habitat that would be affected by the culverting of 725 linear feet of the barranca. The Barranca Avoidance Alternative assumes a slight reduction in units (19 fewer) as those residential units that would be situated within the updated 100-year flood zone as shown on Figure 4.6-1 would not be constructed. This alternative assumes that the specific plan would still involve development of up to 25,000 square feet of commercial use, but that the Carlos Street extension would not be constructed as it is dependent on culverting of the barranca.

6.3.1 Aesthetics

Under this alternative, because the overall layout of development would be roughly the same as under the proposed specific plan, aesthetic impacts would be similar to those of the proposed specific plan. Impacts relating to the freeway sound wall could be reduced to below a level of significance with the mitigation measure recommended to the proposed specific plan.

6.3.2 Air Quality

Under this alternative, impacts would be about similar to, but slightly lower than, those of the proposed specific plan because the level of development would be slightly lower. Both construction and operational impacts would be reduced slightly; however, the same mitigation measures relative to payment of Transportation Demand Management fees would apply.

6.3.3 Biological Resources

Because this alternative would not include modifications to Brown Barranca, the potential for adverse effects to biological resources would be reduced. This alternative would result in no direct impacts to riparian vegetation, wildlife or wetlands and biological resource impacts would be less than significant. The biological resource impacts associated with development under the proposed specific plan are classified as significant, but mitigable. It should be noted that this alternative would not be expected to include the barranca restoration program that is part of the proposed specific plan.

6.3.4 Cultural Resources

The development footprint would be about the same as that of the proposed specific plan, but would involve about 19 fewer residential units. Potential impacts to unrecorded archaeological resources would be the same as for the proposed specific plan, and mitigation measures recommended for the proposed specific plan for unexpected discovery of such resources would apply. This alternative would have the same significant, but mitigable impacts as the proposed specific plan.

6.3.5 Hazards

The plan area has several different hazards due to the presence of an underground storage tank, soils contaminated with pesticides, and asbestos cement. Because the level of development with this alternative would be about the same as with the proposed specific plan and all of the same areas would be disturbed, this alternative would have impacts and mitigation measures similar to those of the proposed specific plan.

6.3.6 Drainage and Flood Hazards

This alternative would not include the barranca improvements at the Blackburn Road undercrossing to alleviate the existing flooding impact at Blackburn Road. The impacts with respect to Flood Hazards would be less than significant providing that structures would be sited outside of the 100-year flood zone. This alternative would include similar drainage features to comply with City requirements and the impacts would be the same as for the proposed specific plan and would be less than significant.

It should be noted that under this alternative, flooding along Blackburn Road would continue to occur, whereas under the proposed specific plan, that impact would be reduced as compared with what currently occurs (see Figure 4.6-1, Updated and Proposed 100-Year Flood Plains).

6.3.7 Land Use and Planning

This alternative would not achieve extension of Carlos Street through the plan area, as that improvement is dependent on culverting the 725 linear foot section of Brown Barranca. Therefore, this alternative would not achieve the City's objective of creating the Carlos Street roadway extension to connect Wells Road and Satcoy Avenue as indicated on the Roadway Classification Plan of the 2005 General Plan. This alternative would, however, be consistent with other goals and policies pertaining to infill development, creation of mixed use walkable neighborhoods in close proximity to transit and with pedestrian and bicycle amenities. This alternative would have similar less than significant land use and planning impacts.

6.3.8 Noise

This alternative would have the same noise impacts as the proposed specific plan due to the similar development intensity and layout. Noise impacts would be less than significant for construction and due to project generated traffic. Impacts relating to exposure of future residents to noise would be the same as under the proposed specific plan and mitigation measures regarding interior construction materials as well as garden wall construction would apply.

6.3.9 Traffic and Circulation

This alternative would generate slightly fewer trips than the proposed specific plan (about 4% fewer trips). This alternative's impacts to the local circulation system would be similar to those of the proposed specific plan and would be less than significant. This alternative would not involve the extension of Carlos Street through the plan area as would occur with the proposed specific plan; therefore, some of the traffic shown to utilize this intersection would be re-distributed to other intersections on the periphery of the plan area such as Citrus Drive. However, since all project-generated traffic impacts were determined to be less than significant, the redistribution is not likely to cause a significant impact. This alternative's effects would be about the same as those of the proposed specific plan.

6.4 ALTERNATIVE SITES

The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors* (1990), indicated that a discussion of alternative sites is needed if the project “may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved” at another site. As suggested in *Goleta*, several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. *Could the size and other characteristics of another site physically accommodate the project?*
2. *Is another site reasonably available for acquisition?*
3. *Is the timing of carrying out development on an alternative site reasonable for the applicant?*
4. *Is the project economically feasible on another site?*
5. *What are the land use designation(s) of alternative sites?*
6. *Does the lead agency have jurisdiction over alternative sites? and*
7. *Are there any social, technological, or other factors that may make the consideration of alternative sites infeasible?*

Other sites that could physically accommodate the proposed specific plan may be present in Ventura, and some sites have land use designations that would accommodate the general scale of the proposed specific plan. However, one of the fundamental objectives of the proposed specific plan is to design the project around Brown Barranca with the barranca as a focal point of the project. Moreover, the project is sited to develop this southwest corner of Telegraph Road at Wells Road with mixed uses thereby expanding the Wells Corridor westward towards the edge of the barranca. The specific plan at this location would be a key to shaping the future development pattern of the area to create walkable, bikeable neighborhoods with ample recreational, residential and commercial opportunities. Relocating the project to another site would not achieve this objective. Moreover, the applicant does not have access to other sites and has already made a substantial investment in the current project site. Therefore, relocating the project to another site would not be feasible from either an economic or timing standpoint. Consequently, because relocation of the project to an alternative site is not feasible, discussion of the impacts of alternative sites is not warranted.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-2 shows a comparison of the environmental effects of each alternative in the issue areas that were covered in the EIR. The No Project Alternative would avoid most of the proposed specific plan’s adverse impacts. However, the No Project Alternative would not remediate all of the existing hazards, including soil that has been contaminated with pesticides, would not improve the existing flooding hazard at Blackburn Road/Wells Road, and would not construct the Carlos Street Extension from Wells Road through the plan area. Moreover, the No Project Alternative would not eliminate the potential for future development proposals within the plan area.

Among the other alternatives, the Existing General Plan and Zoning Alternative would have reduced air quality, hazards, noise and traffic effects due to the reduction in units (82% reduction). It would also avoid impacts to biological resources within Brown Barranca, though



it also would not include the proposed restoration of the barranca. This alternative could have secondary adverse effects because of other air quality impacts from tilling (suspended particulate matter) and pesticide/herbicide use, in addition to not remediating the existing soil contamination hazard in the northwestern corner of the plan area. This alternative also would not facilitate the Carlos Street extension, nor would it repair existing deficiencies at the Brown Barranca undercrossing. Moreover, this alternative would not prevent future annexation and development of the County portions of the plan area as both the City’s land use designation and the County’s land use designation acknowledge that the area is intended for eventual annexation to the City. Later annexation of these 54 acres could result in development of up to 432 additional residences.

**Table 6-2
 Comparison of Environmental Impacts of Alternatives**

Issue	Proposed specific plan	No Project No Build	Existing General Plan/Zoning	Barranca Avoidance
Aesthetics	=	+	=	=
Air Quality	=	+	+ / -	=
Biological	=	+ / -	+ / -	+ / -
Cultural Resources	=	+	=	=
Hazards	=	-	+ / -	=
Drainage and Flood Hazard	=	- / =	- / =	- / =
Land Use	=	-	-	- / =
Noise	=	+	= / +	=
Transportation/Traffic	=	+	+	=

+ Superior to the proposed specific plan
 - Inferior to the proposed specific plan
 = Similar impact to the proposed specific plan

The Barranca Avoidance Alternative could be considered superior to the proposed specific plan with respect to reducing impacts to biological resources, though it also would not include the proposed barranca restoration. This alternative would be inferior with respect to drainage/flooding and land use because the barranca modifications are necessary to alleviate an existing flood hazard along Blackburn Road at Wells Road and to facilitate extension of Carlos Street through the plan area.



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