

## 5.0 ALTERNATIVES

### Introduction & Methodology

The CEQA Guidelines require that an Environmental Impact Report (EIR) identify and evaluate a reasonable range of alternatives that are designed to avoid or substantially lessen one or more of the significant environmental impacts of the proposed project while meeting most of the basic project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

### *Alternatives to the Project*

Section 15126.6(a) of the State 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 comparative 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.”

### *Project Objectives & Significant Effects*

Section 15126.6(a) of the CEQA Guidelines specifies that the purpose of alternatives discussion is to evaluate alternatives to the project that would feasibly attain *most of the basic project objectives* but would *avoid or substantially lessen any of the project’s significant effects*. Thus, the selection of alternatives should center around the objectives and the significant effects, which are specified in Chapter 2.0, Project Description, and Chapter 4.0, Impact Analysis, of this EIR, and repeated and summarized here as follows:

#### Objectives

##### *North Canyon Ranch*

The project objectives for the North Canyon Ranch component of the project are as follows:

- Construct a variety of housing types to expand the City of Simi Valley’s housing stock (i.e., both single family and multi-family housing) and help to meet the City Regional Housing Needs Assessment (RHNA) projections.
- Provide new housing designed and built to modern energy-efficient standards.
- Establish open space areas within the subdivision to provide for aesthetic and health benefits of the future project and surrounding area residents.
- Construct the extension of Falcon Street, from Erringer Road on the east to the northerly terminus of First Street on the west, fulfilling a City General Plan component that promotes mobility within the City for use by automobiles, busses, and bicycles.

##### *Required Island Annexations*

The objectives for the Required Island Annexations component of the project are as follows:

- Incorporate County Island areas, which are within and adjacent to the City boundaries in order to provide for orderly growth and development and land use oversight, in compliance with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

- Establish more efficient and logical geographic boundaries for planning and zoning purposes.
- Provide for a more logical jurisdictional arrangement for the efficient provision of public services.

## Significant Effects

### *North Canyon Ranch*

None of the project's effects were found to be significant and unavoidable (i.e., none would remain significant after the incorporation of mitigation measures). The following project effects were found to be potentially significant, but less than significant with incorporation of mitigation measures:

- Biological Resources
  - 4.4.3.1 Candidate, Sensitive, and Special Status Species (Mitigation requires biological monitoring and protective measures during construction; pre-construction surveys for special-status wildlife; gnatcatcher surveys; no use of anticoagulant rodenticides; Western Spadefoot Habitat Management Plan for creation or restoration of habitat; and pre-construction nesting bird surveys);
  - 4.4.3.2 Sensitive Natural Communities (Mitigation and Monitoring Plan required for sensitive plant communities; no use of invasive plants in landscaping; Invasive Plant Species Management Plan);
  - 4.4.3.3 Protected Wetlands, Waters, and Riparian Habitat (Habitat Mitigation and Monitoring Program);
  - 4.4.3.5 Local Policies and Ordinances Protecting Biological Resources (Mitigation for tree protection during construction)
- Cultural, Tribal Cultural, and Paleontological Resources
  - 4.5.3.2, 4.5.3.3: Archaeological and Paleontological Resources (Mitigation requires an Archaeological and Paleontological Construction Monitoring Plan, appropriate discovery protocol, and final reports)
  - 4.5.3.4, 4.5.3.5: Human Remains and Tribal Cultural Resources Listed in or Eligible for the California Register of Historic Resources (CRHR) (Only construction requires mitigation: Requires the same mitigation for archaeological resources and includes mitigation protocol for the unexpected discovery of human remains)
- Geology and Soils
  - 4.6.3.3, 4.6.3.4, 4.6.3.6, and 4.6.3.7: Seismic Ground Failure Risk, Landslide Risk, Geologic Stability, and Expansive Soil (Mitigation requires removal and recompaction of soil to remove landslide potential, and assure stable slopes and foundations, using design criteria to be established in City reviewed and approved geotechnical reports)
- Noise
  - 4.10.3.2: Groundborne Vibration or Groundborne Noise Potential (Construction-phase noise and vibration – (NOI-1 is required, restricting the use of heavier equipment near any off-site residence)
- Public Services
  - Physical Impacts to Fire Protection Service Facilities [Mitigation requires a Fire Protection Plan (FPP) including the Fuel Modification Plan]
- Utility and Service Systems
  - 4.15.2.3.1, 4.15.2.3.2 Wastewater Facilities and Capacity and New or Expanded Facilities (Mitigation requires the applicant to abide by a City-approved sewer report)

- Wildfire
  - 4.16.3.1 Substantially Impair Emergency Response or Evacuation Plan (Mitigation requires an FPP, including the Fuel Modification Plan)

### *Required Island Annexations*

The Required Island Annexations were found to have no significant impact or require any mitigation, since the only action required would be the jurisdictional change from unincorporated County territory to City jurisdiction. A few vacant parcels may be developed with up to an estimated five single-family residences. However, there are no plans for such development. Where future development is proposed, it would be subject to site plan review to determine whether CEQA documentation would be needed.

## **Alternatives Selected for Evaluation**

### *North Canyon Ranch*

As noted above, alternatives are limited to those that would avoid or substantially lessen any of the significant effects of the proposed project, and of those alternatives, the EIR need only examine those that could feasibly attain most of the basic project objectives. In considering whether to evaluate the listed alternatives, the ability to satisfy the project objectives was considered. To explore ways to reduce project impacts, particularly significant impacts (even though they are mitigatable), the following alternatives were selected and evaluated below:

- Alternative 1: No Project (no development)
- Alternative 3: General Plan Alternative [full buildout of existing General Plan designations established for the North Canyon Ranch site, as an area within Simi Valley’s City Urban Boundary (CURB) and Sphere of Influence (SOI)]
- Alternative 2: Reduced Units and Reduced Footprint Project (same land use types but in differing amounts)

The analysis later in this Section evaluates each alternative and its potential impacts and ability to meet project objectives, as compared to the proposed project.

### *Required Island Annexations*

The purpose of evaluating alternatives is to examine ways to reduce the project’s significant impacts, yet the Required Island Annexations have no significant impacts. The proposed action is to change the jurisdiction of the Island areas from unincorporated County territory to property within and fully a part of the City of Simi Valley, as required by the Ventura County Local Agency Formation Commissions (LAFCo). No development is proposed at this time. The purpose of the annexation is to create a more organized jurisdictional pattern, and orderly development, which allows for more efficient governance of the properties now known as County Islands. For these reasons, an analysis of specific alternatives is not meaningful. The following discussion provides additional exploration of alternatives for the Annexation Areas.

A no project alternative would retain the County Islands in County jurisdiction. The “no project” alternative would result in the LAFCo requirement being unfulfilled, resulting in a policy conflict with LAFCo land use policy. The no project alternative would propose no development, but neither does the proposed project. Thus, other issues and impacts of the proposed project would be identical for the Required Island Annexations.

A reduced project alternative for the County Islands is not plausible since the proposed project would result in no physical change in the environment and thus no significant impacts. Even a reduction of land use would require demolition of existing development, which would result in demolition impacts which are greater than with the proposed project. Again, no physical change in the environment is proposed in the Required Island Annexations.

## **Alternatives Considered but Rejected**

### *North Canyon Ranch*

Alternatives to the location and type of land use were also considered. With regard to location, there are no properties of sufficient size for the project that are designated in the General Plan for Residential Medium Density (3.6 – 5.0 du/ac), and Residential Moderate Density (5.1 – 10.0 du/ac) development. Alternative land uses could be considered; however, the City is in need of housing units to meet the City’s Regional Housing Needs Assessment (RHNA) and Housing Element goals, and there is not a general need for more commercial space given current land use trends. Mixed use is generally desirable as it reduces vehicle trips by placing commercial uses and services close to housing. While the project is 100 percent residential, it would be located proximate to the Simi Valley Town Center Mall and adjacent commercial uses, which along with the existing multi-family residential development to the south of the project site and the proposed project uses creates a mixed-use node within the City. Since alternatives to location and type of land use were found not reasonably viable, they were rejected from further analysis.

### *Required Island Annexations*

The goal with the County Islands is to annex them to the City, to achieve the LAFCo goal of orderly development, consistent with the Cortese-Knox-Hertzberg Local Government Reorganization Act. These Island areas are fully developed, except for five parcels that could potentially be developed for single-family use and thus a change in location is not logical or possible. As the Islands are largely subdivided and developed, consideration of an alternative to alter the land use does not make sense and would also not achieve the LAFCo goal. Based on this, alternatives to the location and type of land use for the Required Island Annexations were eliminated from further analysis.

## **5.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE**

### **Environmental Impacts of Alternative 1**

The North Canyon Ranch project site is comprised of Assessor Parcel Number (APN), 615-0-500-0075, and totals approximately 160.32 acres of unincorporated Ventura County territory, within the City’s SOI and CURB. Under this No Project Alternative, no development would occur. The site would remain vacant and undeveloped. The existing, previously modified areas onsite would remain as they are. These include some graded areas, unimproved dirt roads, artificial slopes with concrete terrace drains, and two debris basin that protect urban areas to the south from stormwater and debris flows. The remainder of the site would stay in its current undeveloped condition, without any of the proposed project features. Thus, no housing would be constructed and the extension of Falcon Street through the property would not occur. Because no development would be proposed, none of the project entitlements would be proposed.

### *Aesthetics*

The No Project Alternative would not change the aesthetic condition of the site and would not alter the existing condition. The proposed project would result in less than significant impact as the site is not visible from many locations; however, the No Project Alternative would have a slightly reduced, less than significant impact.

### ***Agricultural Resources and Open Space***

The project site is Farmland Monitoring and Mapping Program designated Grazing Land but is not used for current or recent grazing or other agricultural uses and the site is not enrolled in a Williamson Act contract. The project site is also designated as County-zoned open space. The No Project Alternative would not alter or change the existing conditions, so there would be no impact. Like the proposed project, impacts would be less than significant; but the impacts of this alternative would be even less.

### ***Air Quality***

The No Project Alternative would not generate any new air pollutants since there since there would be no construction or operation of any development at the project site. This alternative would not add new population density and would not conflict with the 2022 Air Quality Management Plan (AQMP) as no residential population would be introduced to the project site. The proposed project would generate less than significant emissions from construction and operations. This alternative would have no impact, as such, this alternative would have less impact than the proposed project.

### ***Biological Resources***

The No Project alternative would make no modifications to the site, and thus all existing biological resources would remain. None of the biological resource mitigation measures would occur either. There would be no impacts with this alternative, and the less than significant with mitigation impacts of the project would be avoided.

### ***Cultural, Tribal Cultural and Paleontological Resources***

The No Project Alternative would involve no ground disturbance or grading, so it would not affect cultural resources, tribal cultural resources, and/or paleontological resources. Although the proposed project would not disturb any known cultural resources, grading could disturb unidentified archaeological and/or paleontological resources. Mitigation measures are implemented for the proposed project to less than significant. As such, this alternative would have less impact than the proposed project.

### ***Geology and Soils***

The project site currently consists previously modified areas including some graded areas, unimproved dirt roads, artificial slopes with concrete terrace drains, and two debris basin that would remain the same with this alternative and the rest of the site is vacant and undeveloped. The No Project Alternative would not alter or develop the project site; thus, no structures would be exposed to geological hazards that could be present at the project site. The project site is located on soils that range non-expansive to highly expansive. The Geotechnic Study Report recommends several mitigation measures the proposed project would implement to increase building and people safety for a less than significant impact. Since the No Project alternative does not propose to develop the project site, this alternative would have less impact than the proposed project.

### ***Greenhouse Gas Emissions***

Under the No Project Alternative, the site would remain as-is and no ground disturbance or development would occur. The project site does not emit any greenhouse gas (GHG) emissions since there are no emission sources located on the project site. The No Project Alternative would keep the site undeveloped, emitting no GHG. While the proposed project would have a less than significant impact, this alternative would have less impact.

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### ***Hydrology and Water Quality***

The project site is primarily drained by three watershed sub-drains that are separated by ridgelines generally aligned north and south within the subject property. The western sub-drain extends upslope to the west and north of the site onto adjacent property. The central and eastern sub-drains also extend off-site to the north onto adjacent undeveloped property, but to a lesser extent than the western sub-drain. Although the subject property is currently undeveloped, under existing conditions the southern portion of the site has been previously altered somewhat in connection with development of the adjacent Simi Town Center Mall by placement of fill soil and construction of two temporary detention ponds located along the southern site boundary. Currently, a series of ditches, swales, and possibly pipes help to convey stormwater flows from undisturbed northern portions of the watershed to the two existing temporary detention ponds in the southern portion of the site. The two temporary detention ponds currently intercept and capture stormwater flows from the site's watershed sub-basins. The western pond collects runoff from the western sub-drain, while the eastern pond collects runoff from the central and eastern sub-drains. The proposed project would modify drainage onsite to avoid flooding and to assure no significant impacts to drainage. Under the No Project Alternative, the project site would not change so it would maintain existing drainage patterns, thus having no impact. The proposed project impact would be less than significant and, as such, this alternative would have less impact.

### ***Land Use and Planning***

Although designated for residential development under the City of Simi Valley General Plan as a CURB and SOI area, under the No Project Alternative, no zone change would occur, and the project site would remain as Open Space under Ventura County zoning. Since the No Project Alternative would not undergo any development, there would be need for a City general amendment to reconfigure the general plan designation boundaries, or for a City zone change. Additionally, the project site would not be annexed to the City. This alternative would not propose development to that would change the General Plan and would have no impact on land use and planning or related policies. For most issues, this alternative would have less impact than the proposed project's less than significant impact. However, the alternative would also not have the beneficial impact of the project with regard to provision of needed housing, a key policy consideration for the City, and therefore would have a more adverse impact than the proposed project on this topic.

### ***Noise***

The project site is currently undeveloped and does not generate noise. Under the No Project Alternative, the project would remain the same and not create short- or long-term noise sources. The proposed project's noise impacts would be significant, but mitigatable. Thus, this alternative would have less noise impact than the proposed project.

### ***Population and Housing***

The No Project Alternative would not create any housing and would not generate any population or employment growth. Since there would be no residential dwelling units developed for this alternative, the project would not assist the city with reaching the RHNA and Housing Element goals. So, the project may have less impact than the proposed project, but it does not help the City achieve housing goals, which is a less beneficial impact.

### ***Public Services - Fire Services, Police Services, Schools***

Implementation of the No Project Alternative would result in any development, and thus would not create the demand for fire services, police services, and schools. This alternative would have no impact; therefore,

it would reduce the proposed project's less than significant impact for police and schools and avoid the mitigation measure requiring an approved FPP.

### ***Parks and Recreation***

There are several Rancho Simi Recreation and Park District (Park District) parks and recreational facilities near the project site. Since the No Project Alternative would involve any development and thus would not generate any population or employment growth, the facilities would not be impacted. As such, this alternative would reduce the proposed project's less than significant impact. However, the No Project Alternative would also not provide 70.82 acres of designated open space or the two proposed pocket parks totaling 0.43 acres.

### ***Transportation***

The City's General Plan identifies a future arterial street segment of Falcon Street as a "Minor Arterial (Not Built)" to extend through the proposed project site from its western terminus just west of Erringer Road, to connect with the northern terminus of First Street at the northwestern boundary of the Simi Town Center Mall. The planned roadway would complete a segment of the City's desired street pattern for the northwest portion of the City, providing for improved circulation and emergency ingress and egress there. Under the No Project Alternative, extension of Falcon Street through the project site would not be developed, and thus the intended benefit to area circulation would not occur. The alternative would not generate any vehicle miles traveled (VMT) since there would be no development, and thus would have less of a VMT impact than the proposed project's less than significant impact. However, without providing the extension of Falcon Street, it would not provide a benefit to area circulation that was intended in the City General Plan.

### ***Utilities and Service Systems – Water Supply, Wastewater, Solid Waste***

The No Project Alternative would not create additional demand for public utilities such as water, wastewater, and solid waste collection and disposal and thus no impact the physical facilities associated with them. The proposed project would require mitigation measures to reduce impacts to less than the significant. As such, this alternative would no impact on utilities infrastructure, which is less than the proposed project's less than significant impact.

### ***Wildfire***

The North Canyon Ranch site, located at the urban-wildland interface, is designated within a State Responsibility Area (SRA) Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire Regulation (CAL FIRE) and as a Very High Fire Hazard Severity Zone (VHFHSZ) by the City of Simi Valley in the existing Simi Valley General Plan and the associated General Plan EIR. The VCFD provides fire protection services within the City of Simi Valley, including the project site. Under the No Alternative Project, the alternative would not increase the risk of fire hazards or safety since the project site would remain unchanged. The project would create 207 total dwelling units on the urban wildland interface, which would require adoption of the project Fire Plan, regulatory compliance and design features and an approved FPP, including a fuel modification plan and adequate access, to assure a less than significant impact from wildfire. This alternative would have no impact, and therefore less of an impact than the proposed project. However, development of the proposed project will allow for a new fuel modification zone within the project ownership, with an ongoing project responsibility to maintain it.

### ***Alternative 1's Ability to Meet Project Objectives***

The No Project alternative would not meet the project objectives, which are restated as follows:

- Construct a variety of housing types to expand the City of Simi Valley's housing stock (i.e., both single family and multi-family housing) and help to meet the City RHNA projections.
- Provide new housing designed and built to modern energy-efficient standards.
- Establish open space areas within the subdivision to provide for aesthetic and health benefits of the future project and surrounding area residents.
- Construct the extension of Falcon Street, from Erringer Road on the east to the northerly terminus of First Street on the west, fulfilling a City General Plan component that promotes mobility within the City for use by automobiles, busses, and bicycles.

The alternative would not provide housing in a variety of housing types to expand the City of Simi Valley's housing supply and help to meet the City's RHNA projections and would not implement the General Plan-proposed extension of Falcon Street. Without the development, energy-efficient standards would not be applicable. No public open space would be provided, although the site would remain as privately owned, natural open space. Thus, in terms of the objectives, the project would be preferred over the No Project alternative.

## **5.2 ALTERNATIVE 2: GENERAL PLAN ALTERNATIVE**

### **Environmental Impacts of Alternative 2**

Another type of no project alternative for a project that requires a General Plan Amendment is to consider the development that could occur if the amendment were not granted. The General Plan alternative is a scenario where up to the maximum units allowed by the General Plan within the North Canyon Ranch project site would be developed. The current General Plan designations for the site are Open Space (1 du/40 ac), Residential Medium Density (3.6-5.0 du/ac), and Residential Moderate Density (5.1 – 10.0 du/ac). The General Plan alternative would fully develop these planned areas for a total of 406 units, consisting of 355 townhomes within the Moderate Density area on the east, and 51 single family homes within the Medium Density area on the west, as shown in **Figure 5-1, General Plan Alternative**.

The alternative would have proportionately adjusted parking, amenities and landscaping. As the plan calls for the Falcon Street to First Street connection within the property, this alternative assumes it is constructed. A general street pattern has not been established; however, construction of the development would disturb approximately 45.7 of the 160-acre project site, not including fuel modification or stabilized slopes, within the Moderate and Medium Density designations on Figure 5-1. By comparison, the proposed project would modify 90.6 acres of the site, also without fuel modification, but including slope stabilization. The amount of slope stabilization for the alternative is not known; thus, it is difficult to compare the two development options without further design of the General Plan alternative. For the purposes of this analysis, the disturbance is assumed to be slightly less than with the project, and the density of development would be greater.

### ***Aesthetics***

Distant scenic view opportunities in the project vicinity are generally limited to views of hills and mountain ridgelines that surround the City. Public vantage points are generally limited to open space areas and along roadway corridors. There are no officially designated State or County Scenic Highways in the City of Simi Valley, although the California Scenic Highway Mapping System identifies the Ronald Reagan Freeway (SR-118, or the 118 Freeway) within the City as an Eligible State Scenic Highway. Existing land uses



**Figure 5-1, General Plan Alternative**

adjacent to the proposed development area consist of multi-family residences and “big box” stores associated with the Simi Valley Town Center Mall to the south, which substantially block public views of the project site from roadways in the project vicinity.

Due to the location and elevation of the project site, as shown in the Aesthetics Section, the project would not block or substantially obscure views of the hills or ridgelines that surround the City. Although the General Plan alternative would likely require more grading than the project, like the project it would develop the land closest to the southern portion of the site, thus retaining hills on site and being less visible from behind the surrounding land uses. Like the project, the alternative would be most visible from the public view at the current terminus of Falcon Street. There are no clear or close views of the project site from the 118 Freeway. The design of the alternative would be similar to the proposed project with earth tone exterior finishes to blend with the aesthetic of the neighboring residential developments. Landscaping would be provided throughout the developed portions of the project site with shrubs and trees. The alternative would have a similar source of light along roadways and multi-family parking areas which would be required to comply with City standards. Since the alternative would have a larger development footprint, its impact would be somewhat greater than the proposed project, but both would have less than significant impacts.

### ***Agricultural Resources and Open Space***

The project site does not contain FMMP-designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and is not zoned for agricultural use. The project site is FMMP-designated as Grazing Land, although the property has not been utilized for grazing or irrigated agricultural production within the past seven years. The North Canyon Ranch property has been pre-planned for orderly development by the General Plan, so it would not directly or indirectly impact disorderly development of open space or undeveloped land. The proposed project and General Plan alternative would have similar effects to agricultural resources and open space, resulting in a similar less than significant impact.

### ***Air Quality***

The AQMP incorporates Southern California Association of Governments (SCAG) estimates for population growth, that are also used by cities and counties within the SCAG region. Assuming the General Plan alternative, the project site would be fully developed to the maximum currently allowable density, which would be 406 units. Using the average household size of 2.98 from the Population and Housing Section, the alternative would represent less than one percent of the projected growth estimates used in the AQMP. Although the alternative would generate more growth (i.e., more units and more population) than the alternative, the alternative’s growth would also fall well within the projected population growth forecast of the City and would not conflict with the AQMP. The alternative would use the same construction equipment, but the construction timeframe would be longer due to an increase in dwelling units constructed. The alternative would implement the same design features and follow regulation to ensure minimization of construction impacts and it is assumed the construction program could be designed to remain below the maximum daily emissions thresholds of the VCAPCD, although the overall amount of pollutant emissions would be higher than with the project. Additionally, the alternative would have a small increase in operational impacts due to an increased number of units and population (e.g., 207 project units compared to 406 alternative units), but impacts would be less than significant since they would not jeopardize attainment of air quality standards individually or cumulatively. The alternative would also implement MM AQ-1 Valley Fever during construction which is based upon the VCAPCD Assessment Guidelines. Therefore, air quality impacts would be less than significant after mitigation for the alternative; however, they would be increased from the proposed project due to the increased size of the General Plan alternative.

### ***Biological Resources***

Comparing the General Plan alternative footprint in Figure 5-1 to the biological resources and impacts identified in the Biological Resources Section, it is possible to generalize the potential physical impacts of the alternative, keeping in mind that the slope stabilization areas, which would require additional ground disturbance, have not yet been identified for the alternative. Falcon Street would still be built, but the alternative footprint would not develop any uses south of Falcon Street, leaving that portion of the identified gnatcatcher habitat open, which would result in roughly 20 - 25 percent less impact area to those two habitat areas, combined. Also, more of the small flowering morning glory habitat would remain in the eastern portion of the site, assuming slope stabilization can void this area. The location of the spadefoot toad would be avoided more with the alternative as well, whereas the multi-family portion of the project would develop this area. Because slope stabilization limits are not yet known, once they are added, the areas that would be less affected by this alternative (compared to the project) would be better known, but the footprint would definitely be less overall. These impacts also do not consider fuel modification, which would need to occur with any alternative; however, it is assumed that the VCFD allow special consideration for sensitive species in these areas, with an adjusted approach to fuel modification (e.g., hand thinning where appropriate). This alternative has the benefit of leaving a large area in the center of the site open, allowing the gnatcatcher and toad clearer passage to the north and into the open areas beyond the site. Impacts with this alternative would be less than with the project, and impacts would be less than significant with mitigation scalable to the alternative footprint and impacts.

### ***Cultural, Tribal Cultural and Paleontological Resources***

Under both the project and the General Plan alternative, grading and other ground-disturbing activities would occur for development of the project site. Given that grading could uncover previously unknown archeological resources, implementation of mitigation measures is required for the project and the alternative. Although no known paleontological resources were identified on the site during site surveys (as described in the Cultural and Tribal Cultural Resources Section), ground disturbance activities could result in uncovering of unknown paleontological resources, and this requires mitigation for potential discovery. Additionally, in the unlikely event human remains are discovered, both the project and the alternative would implement a mitigation measure to avoid potential inadvertent impacts. The General Plan alternative and proposed project would have similar impacts, though the alternative would have a somewhat decreased development footprint, and therefore a somewhat reduced potential impact. With the use of the mitigation measures identified in this EIR, the impacts the project and the alternative would both be reduced to less than significant.

### ***Geology and Soils***

The General Plan alternative would develop the project site to the maximum amount of dwelling units allowed, providing more units and higher densities, though the alternative would have a somewhat smaller developmental footprint. As the alternative would be located on the same site, similar geologic characteristics would apply. The project site is located near the Simi-Santa Rosa fault system with eight subsidiary faults south and adjacent to the project site that were proven to be inactive at the time of development of the mall site and were determined by the North Canyon Ranch geology report to not be a constraint to development. The previously mentioned Simi-Santa Rosa fault could create substantial shaking if a seismic event occurred along fault; however, all new structures would be required to comply with all applicable provisions in the current California Building Standards Code (CBSC). The North Canyon Ranch geotechnic study concluded that there is no groundwater within the upper fifty feet of the soil profile, so liquefaction would not have adverse effects at the project site. Mitigation measures for seismic compression and landslides were introduced in the Geology and Soils Section, that would also apply to the alternative. As with the proposed project, the alternative would be required to comply with the

California State Construction General Permit and implement a Stormwater Pollution Prevention Plan (SWPPP), which requires best management practices. The North Canyon Ranch geology study determined portions of onsite alluvial soils are subject to hydroconsolidation, which requires mitigation measures to reduce potential adverse effects. The project geology study also identified the presence of onsite soils ranging from non-expansive to highly expansive, providing recommendations that have been used as mitigation measures to reduce potential adverse effects. Similarly, the General Plan alternative would be required to comply with the CBSC. Impacts of the project and the alternative would be similar and would be reduced to less than significant with regulatory compliance and the mitigation measures presented in this EIR.

### ***Greenhouse Gas Emissions***

The General Plan alternative would develop the project site to the maximum allowable density, which would increase the amount of development in comparison to the proposed project. GHG emissions during construction would result mainly from trip generation and use of heavy equipment and trucks. Due to the size of the alternative, it would result in more GHG emissions during construction, due to the longer timeframe. As construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. A proposed project lifetime of 30 years is recommended by South Coast Air Quality Management District (SCAQMD) for amortizing construction related GHG emissions. With amortization, the difference would not be great, but the alternative would have higher emissions. During operation, the alternative would have the same GHG sources as the proposed project but with higher emissions due to the increased size of the alternative (i.e., more units and more trips). Since there are no adopted numerical standards for GHG emissions, impacts are determined based on consistency of state, regional, and local plans. As with the proposed project, the alternative would be consistent with SCAG RTP/SCS, Climate Change Scoping Plan, and the Simi Valley Climate Action Plan (CAP). Therefore, the alternative project would have a greater emissions impact than the proposed project, but both would be consistent with plan policy and have less than significant impacts.

### ***Hydrology and Water Quality***

The alternative project would propose single-family and multi-family residences across the 160-acre site for a total of 406 dwelling units, which is the maximum density allowed by the General Plan. The alternative would develop drainage facilities including drainage basins, surface and subsurface drainage conveyance infrastructure, and improvements to the existing temporary detention basins throughout the project site. The design and capacity of the drainage basins would be based on the current Ventura County Technical Guidance Manual for Stormwater Quality Control Measures. Like the project, the alternative would be subject to compliance with the Los Angeles Regional Water Quality Control Board (LARWQCB) municipal separate storm sewer system (MS4) permit for Ventura County. Like the project it would also require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit which in turn requires the developer to submit a SWPPP for approval by the City of Simi Valley and the LARWQCB for Best Management Practices (BMPs) implemented during construction. It is assumed that construction of the alternative development would disturb somewhat less of the project site. The construction program would follow regulatory controls and BMPs. The alternative would be required to capture, treat, and retain and infiltrate runoff from storm events, to demonstrated in a LID plan that would be reviewed and approved by the City. Through design and implementation of regulatory controls, runoff during operation would properly to avoid substantial erosion or siltation, flooding or impediment of flood flows, or runoff in exceedance of the capacity of the existing or planned drainage system. As such, the alternative and proposed project would have similar, less than significant impacts.

## ***Land Use and Planning***

The General Plan alternative would develop portions of the project site with single-family and multi-family residents, with almost double the number of units. The development would not divide an existing community since the project site is located at the edge of development. Once developed, the project and the alternative would provide for a more unified development pattern and improve the roadway network, mobility, access and evacuation. This alternative would follow the existing pre-planned land use designations and would not require a General Plan Amendment. Like the project, the alternative would be consistent with the Housing Element and RHNA goal to provide more housing, but the alternative goes further in meeting this goal. Both the alternative and the project would provide the extension Falcon Street, as shown in the City General Plan. The alternative would also be comparable to the proposed project's consistency with applicable policies and goals from the City's General Plan, Citywide Land Use and Urban Design, Housing Element, and LAFCo goals. This alternative would improve on meeting RHNA and Housing Element goals while not requiring a General Plan Amendment. Both the proposed project and the alternative would have a less than significant impact, though the alternative's impacts would be preferred in terms of land use and planning goals.

## ***Noise***

Noise from construction of the General Plan alternative would be generated by on-site heavy equipment used from demolition, grading, and other construction related activity. This alternative would develop almost double the residential units, so construction would have a longer timeline. Since the alternative would use similar construction equipment and be located near the same sensitive receptors, noise impacts would be relatively similar except over a longer construction period (which is a short-term, temporary impact). The alternative would follow the same regulations as the proposed project and would not result in any significant construction noise impact. The proposed project would not increase traffic noise levels on nearby existing roadways enough to be readily perceptible to the human ear in an outdoor environment. Given the number of background trips on nearby roadways, although the alternative would generate roughly double the number of trips compared to the project, those trips would be a small percentage of all trips and based on rough calculations, would also not generate enough traffic noise to exceed the threshold of significance during either the existing plus alternative or future plus alternative scenarios.<sup>1</sup> No significant construction vibration impacts are expected to occur for the project, and with similar construction characteristics, the same would be true of the alternative. Both the project and the alternative would implement mitigation measure NOI-1 that prohibits operation of large bulldozers or similar equipment within 24 feet of any off-site residence. As such, the alternative would have greater noise impacts due to the longer construction period and additional operational traffic, but it is estimated that both the proposed project and alternative would have less than significant impacts with mitigation.

## ***Population and Housing***

The General Plan alternative would develop a mix of single- and multi-family residences at the allowable maximum, providing 406 dwelling units and an estimated population of 1,210. This alternative would contribute to the local (City) and regional (County) population and housing growth within the projected City projections. Since there are no existing housing or people on the project site, like the project, the

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<sup>1</sup> The greatest impact from project-related traffic noise would be at the Falcon Street west of Erringer Road segment in the existing year analysis. Assuming double the project-generated traffic for this alternative, the alternative's noise increase would be 3.8 dBA at that location, which is less than the 5 dBA significance threshold. In the cumulative future year, the greatest impact of project-related traffic noise would be on the Falcon Street east of First Street segment. Assuming double the project-generated traffic, the alternative-related noise increase at this location would be only 0.7 dBA CNEL, which would also be a less than significant. The greatest cumulative traffic noise increase (future cumulative noise minus existing noise) is on Falcon Street east of First Street and would be greater than 13.8 dBA CNEL, but the project contribution would be less than significant at 0.7 dBA CNEL.

alternative would not displace existing housing or people. This alternative would go farther than the project in help the City achieve RHNA and Housing Element goals, but both the General Plan alternative and the proposed project would have less than significant impacts.

## ***Public Services - Fire Services, Police Services, Schools***

### Fire Services

The General Plan alternative would develop single-family homes and multi-family homes for a total of 406 residential units. The VCFD currently serves the project site and the City of Simi Valley. Due to the site's close proximity to the fire station (Station 47), emergency vehicles would be able to reach the project within the VCFD response time objective of five to seven minutes for emergency calls and nine to 12 minutes for non-emergency calls. This alternative would submit a Tentative Map (TM), which as required by the Subdivision Map Act (and SVMC), would be subject to VCFD review and approval for fire safety issues and approval of an FPP, including access and fuel modification. It is estimated that, similar to the project, this alternative would not require the development of new or expanded fire protection facilities in order to adequately serve the increased population, given regulatory compliance and review. This alternative would have a somewhat greater impact due to increased service demands from a higher estimated population, but like the proposed project, impacts would be less than significant after mitigation requiring an approved FPP.

### Police Services

The General Plan alternative would develop single-family homes and multi-family homes for a total of 406 residential units. The Simi Valley Police Department (SVPD) provides police services to the City's 125,975 population and all areas of the City. While it is estimated that the proposed project would add 617 people and the alternative would add 1,210 people, neither would substantially alter the officer to population ratio, given the total size of the City population. However, the SVPD does not rely on an officer to population goal, and instead consider include response times (emergency and non-emergency), traffic accident rates and ratios, crime rates, citizen complaint to call ratios, and case clearance ratios. The project site is located near the Simi Valley Police Department headquarters (approximately 2.5 miles); therefore, like the project, the alternative would have a reasonable police response time. This alternative would include similar designs to the proposed project that would incorporate design features consistent with crime prevention through environmental design measures presented in the General Plan that would reduce potential for crime. While the alternative would have a greater population and therefore a somewhat greater demand on services, like the project, impacts would be less than significant.

### Schools

The Simi Valley Unified School District (SVUSD) provides public education facilities in the City of Simi Valley. Additionally, 16 private school are located in Simi Valley that provide varying grades from kindergarten to 12<sup>th</sup> grade. As the project is within the City's SOI and CURB, but not within the City boundaries, this alternative would be proposed to be annexed into the City and the SVUSD. The proposed project is projected to fit within the existing overall SVUSD school capacity, even if all elementary school students went to either one of the two elementary schools, one of the two middle schools, and one of the two high schools. Based on the capacity numbers evaluated in this EIR, the larger number of General Plan alternative elementary students could not be accommodated if they all went to Atherwood Elementary School, but like the project, all middle school and high school students could be accommodated even if they all went to just one of those middle or high schools. Considering and the ability of SVUSD to accommodate students at different schools when needed and considering the combined capacity of all SVUSD elementary schools, all projected school children in the General Plan alternative would be accommodated within existing capacities. Both the project and this alternative would pay the development impact fees set forth in the school district's School Facilities Needs Analysis to address the impact of

students generated by new development on school facilities. The alternative would generate more demand for school facilities, but with payment of school fees both the proposed project and the alternative would have a less than significant impact on schools.

### ***Parks and Recreation***

The Rancho Simi Recreation and Park District (Park District) owns, operates, and maintains parks and open space areas in the Cities of Simi Valley and Oak Park and unincorporated areas in the vicinity. According to the City's General Plan EIR, the Park District considers five acres of parkland per 1,000 residents as the City's minimum parkland standard. The existing parkland ratio is far above the goal, with 9.62 acres of parkland per 1,000 residents. As evaluated in the EIR, development of the project would not significantly lower the parkland per resident ratio, which already well exceeds the goal. The project would provide recreational amenities and open space within the project site consisting of 70.82 acres of open space, two (2) pocket parks totaling 0.43 acres, and additional landscaping amenities, which would reduce the need for future residents to utilize offsite recreational facilities. The General Plan alternative would have a greater increase in residents, but would also provide opens space, pocket parks and amenity areas, which are assumed to be in proportion to the increased impacts. Additionally, pursuant to applicable codes, development projects requesting tentative map approval are required to dedicate land or provide development fees to the Park District to offset potential increases in use of recreation resources. The alternative would have a greater impact to park demand than the proposed project, but both would have less than significant impacts.

### ***Transportation***

The General Plan alternative would include the connection of Falcon to First Street, as anticipated in the City of Simi Valley General Plan. This extended road would be designed with conformance of Simi Valley Standards and include sidewalks, bus turnouts, and Class II bicycle lanes on both sides of Falcon Street. The project and the alternative would both comply with the City's traffic study guidelines and construct the extension of Falcon Street through the property. The VMT threshold for the City is 16.15 VMT/Capita for home-based trips, which would not be exceeded by the project. The alternative would generate more vehicle trip miles overall, but have the same VMT/Capita, and therefore the alternative would also not exceed the City threshold. Since Falcon Street would be completed, all roads would be designed in conformance with Simi Valley standards, and the site plan would be reviewed and approved by the VCFD, this would ensure adequate emergency access. The proposed project and alternative would have similar impacts to VMT/Capita, which would be less than significant.

### ***Utilities and Service Systems – Water Supply, Wastewater, Solid Waste***

#### ***Water Supply***

The City is served by two water purveyors, the Ventura County Waterworks District No. 8 (District 8) and the Golden State Water Company. The project site is located within the service area of District 8, which serves approximately 68 percent of the developed portion of Simi Valley in addition to unincorporated areas located southeast and north of the incorporated City boundary. Given the large service area of District 8, since the proposed project's total water demand would be less than one percent of District 8's water demand in 2025 and 2045, it follows that the General Plan alternative water demands (even at double the units and demand of the project) would not significantly impact water supply. Similar to the project, his alternative would not require new or expanded water treatment facilities. Both the project and the alternative would have a less than significant impact, but the alternative's impact would have greater impact due to a higher water demand.

### Wastewater

The project site is currently vacant and surrounded to the east by residential land uses and to the south by commercial land uses that is served by the Sanitation Services Division (SSD) of the City of Simi Valley Department of Public Works (DPW). The proposed North Canyon Ranch project site is currently outside the boundaries of the service district; however, it would be included upon approval, based upon the service availability letter to the project applicant. The applicant would be required to pay sewerage system connection fees for any development on site – the project or an alternative project - prior to construction. The proposed project was found to have a less than significant impact on the sewer system. The alternative's physical improvements for wastewater would be similar to the proposed project for sewer connection and flow conveyance. The proposed project would use approximately use 2.2 percent of remaining capacity of the Wastewater Treatment Plant and based on the size of the General Plan alternative, it would utilize 4.4 percent, which is also a minimal amount. During construction of the alternative, the applicant must comply with a mitigation measure implementing the localized sewer line improvement recommendations from the latest City approved sewer report for the project, and the alternative would require comparable mitigation. Similar to the proposed project, this alternative would have a less than significant impact after mitigation but generate more wastewater and therefore have a greater impact on the Wastewater Treatment Plant than the proposed project.

### Solid Waste

The project site is currently undeveloped land. The City of Simi Valley is currently served by Waste Management for trash collection, and the project site would also be served by Waste Management, with solid waste disposal at the Simi Valley Landfill and Recycling Center (SVLRC). Given the project's size, and the short-term nature of construction relative to the longevity of the landfill capacity, the project's impacts during construction would be less than significant. The proposed project operational impact would amount to less than 0.1 percent of the daily permitted capacity at the SVLRC, which would be a less than significant impact. At roughly double the number of units, the General Plan alternative would utilize less than 0.2 percent of the capacity and would also be found less than significant. Both the project and the alternative would comply with the City Municipal Code and General Plan to address solid waste such as regulations to divert at least 75 percent of construction solid to recycling. Both the project and the alternative would have a less than significant impact, but this alternative would have an increased impact compared to the project.

### ***Wildfire***

The project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) and located at the wildland urban interface (WUI) and thus fire impacts, including emergency response and evacuation, pollutants from wildfires, firefighting-associated infrastructure, and potential indirect effects of wildfire are potential concerns for any development at the site. With the project and the alternative, the provision of the missing segment of Falcon Street, as planned by the City, through the project will aid emergency access and evacuation for the development on the site and in the surrounding area. Also, any development of the site will require firefighting-associated infrastructure, a project-specific FPP, and a project access and circulation system meeting VCFD requirements. With project design features and TM conditions, both the proposed project and the alternative would have less than significant impacts with mitigation requiring an approved FPP, including a fuel modification plan and adequate access; however, impacts would be greater with the alternative, considering more residents would be added.



### *Alternative 2's Ability to Meet Project Objectives*

The General Plan alternative would meet all of the project objectives, which are restated as follows:

- Construct a variety of housing types to expand the City of Simi Valley's housing stock (i.e., both single family and multi-family housing) and help to meet the RHNA projections.
- Provide new housing designed and built to modern energy-efficient standards.
- Establish open space areas within the subdivision to provide for aesthetic and health benefits of the future project and surrounding area residents.
- Construct the extension of Falcon Street, from Erringer Road on the east to the northerly terminus of First Street on the west, fulfilling a City General Plan component that promotes mobility within the City for use by automobiles, busses, and bicycles.

The alternative would provide more units in a variety of housing types to expand the City of Simi Valley's housing supply and help to meet the City's RHNA projections. The alternative would also provide energy-efficient development and open space areas, and would extend Falcon Street through the property, consistent with the General Plan. In this sense, the General Plan alternative would be preferred over the project, although it would have increased impacts, as described above.

## **5.3 ALTERNATIVE 3: REDUCED UNITS AND REDUCED FOOTPRINT ALTERNATIVE**

### **Environmental Impacts of Alternative 3**

The Reduced Units and Reduced Footprint alternative (Reduced alternative) consist of similar development from the project but with fewer residential dwelling units and a smaller development footprint. In this alternative scenario, construction would consist of 130 dwelling units, comprised of 50 townhome dwelling units and 80 single-family residences, with proportionally adjusted parking and amenity space. The architectural style, design, and landscaping would be similar to the proposed project. The development footprint of the project would change since the project would not develop the moderate density designated zone in the middle of the project site that the project proposes, and Falcon Street would not be connected from Erringer Road to First Street in this alternative scenario. The Reduced alternative would be designed in a way to avoid wildlife areas and add an extra 100 feet fuel modification buffer, where possible).

Development would occur only within the roughly drawn street pattern areas depicted in **Figure 5-2, Reduced Alternative**. In the image, the existing General Plan classifications for the site remain for comparison purposes, but the development would occur in the areas shown in blue and red cross-hatching.

### *Aesthetics*

Distant scenic view opportunities in the project vicinity are generally limited to views of hills and mountain ridgelines that surround the City. Public vantage points are generally limited to open space areas and along roadway corridors. There are no officially designated State or County Scenic Highways in the City of Simi Valley, although the California Scenic Highway Mapping System identifies the Ronald Reagan Freeway (SR-118, or the 118 Freeway) within the City as an Eligible State Scenic Highway. Existing land uses adjacent to the proposed development area consist of multi-family residences and "big box" stores associated with the Simi Valley Town Center Mall to the south, which substantially block public views of the project site from roadways in the project vicinity.

Due to the location and elevation of the project site, as shown in the Aesthetics Section, the project would not block or substantially obscure views of the hills or ridgelines that surround the City. Like the project it

**Figure 5-2, Reduced Alternative**

would develop the land closest to the southern portion of the site, thus retaining hills on site and being less visible from behind the surrounding land uses. Any development in this location would be most visible from the public view at the current terminus of Falcon Street. The Reduced alternative, however, would require grading than the project and develop a smaller area, resulting in an even less visible development than the project. There are no clear or close views of the project site from 118 Freeway. The design of the alternative would be similar to the proposed project with earth tone exterior finishes to blend with the aesthetic of the neighboring residential developments. Landscaping would be provided throughout the developed portions of the project site with shrubs and trees. The alternative would have a similar source of light along roadways and multi-family parking areas which would be required to comply with City standards. Since the alternative would have a smaller development footprint, it would be even less visible than the project, and have reduced impacts compared to the proposed project, though both would have less than significant impacts.

### ***Agricultural Resources and Open Space***

The project site does not contain FMMP-designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and is not zoned for agricultural use. However, the project site is designated as Grazing Land, although the property has not been utilized as grazing land or irrigated agricultural production within the past seven years. The North Canyon Ranch property has been pre-planned for orderly development with General Plan land use designations so it would not directly or indirectly impact disorderly development. The proposed project and Reduced alternative would have similar effects, resulting in a less than significant impact.

### ***Air Quality***

The AQMP incorporates SCAG estimates for population growth, that are also used by cities and counties within the SCAG region. Assuming the Reduced alternative, a smaller portion of the project site would be developed with fewer units (130, as opposed to 207 with the project). Using the average household size of 2.98 from the Population and Housing Section, like the project, the alternative at fewer units would also represent less than one percent of the projected growth estimates used in the AQMP. This alternative's growth would also fall well within the projected population growth forecast of the City and would not conflict with the AQMP. The alternative would use the same construction equipment, but the construction timeframe would be shorter due to its smaller size. The alternative would implement the same design features and follow regulation to ensure minimization of construction impacts and it is assumed the construction program would be designed to remain below the maximum daily emissions thresholds of the VCAPCD, and the overall amount of pollutant emissions would be lower than with the project. The alternative would have a reduction in operational impacts compared to the project due to the smaller number of units and population, and like the project, impacts would not jeopardize attainment of air quality standards individually or cumulatively. The alternative would also implement MM AQ-1 Valley Fever during construction, which is based upon the VCAPCD Assessment Guidelines. Therefore, air quality impacts would be less than significant after mitigation for this alternative, and impacts would be reduced compared to the proposed due to the decreased size of the Reduced alternative.

### ***Biological Resources***

Comparing the Reduced alternative footprint in Figure 5-1 to the biological resources and impacts identified in the Biological Resources Section, it is possible to generalize the potential physical impacts of the alternative, keeping in mind the slope stabilization areas, which would require additional ground, have not yet been identified for the alternative. The Reduced alternative footprint would not develop Falcon Street or any uses south of its proposed alignment, leaving a large portion of the identified gnatcatcher habitat there undeveloped, which would entirely avoid direct impact to the two habitat areas located there (shown

in green cross-hatching in Figure 5-1). The undeveloped area of this alternative would also include the location of the spadefoot toad, south of where the roadway would be if extended. Also, more of the small flowering morning glory habitat would remain in the eastern portion of the site, assuming slope stabilization can void this area. Because slope stabilization limits are not yet known, once they are added, the areas that would be still less affected by this alternative (compared to the project) would be reduced, but still more area. These impacts also do not take into account fuel modification, which would need to occur with any alternative; however, it is assumed that the VCFD allow special consideration for sensitive species in these areas, with an adjusted approach to fuel modification (e.g., hand thinning where appropriate). This alternative would clearly leave more habitat areas of concern open, resulting in a biological improvement over the project. Impacts with this alternative would be somewhat less than with the project, and impacts would be less than significant with mitigation scalable to the alternative footprint and impacts.

### ***Cultural, Tribal Cultural and Paleontological Resources***

Under both the project and the Reduced alternative, grading and other ground-disturbing activity would occur for development of the project site. Given that grading could uncover previously unknown archeological resources, implementation of mitigation measures is required for the project and the alternative. Although no known paleontological resources were identified on the site during site surveys (as described in the Cultural and Tribal Cultural Resources Section), ground disturbance activities could result in uncovering of unknown paleontological resources, and this requires mitigation for potential discovery. Additionally, in the unlikely event human remains are discovered, both the project and the alternative would implement a mitigation measure to avoid potential inadvertent impacts. The Reduced alternative and proposed project would have similar impacts, though the alternative would have a decreased development footprint, and therefore a reduced potential impact. With the use of the mitigation measures identified in this EIR, the impacts the project and the alternative would both be reduced to less than significant.

### ***Geology and Soils***

Development of the Reduced alternative would occur within in the same parcel as the proposed project but would have a reduced development area. The project site is located near the Simi-Santa Rosa fault system with eight subsidiary faults south and adjacent to the project site that were proven to be inactive at the time of development of the mall site and were determined by the North Canyon Ranch geology report to not be a constraint to the proposed development. The actual Simi-Santa Rosa fault could create substantial shaking if a seismic event occurred along fault; however, all new structures would be required to comply with all applicable provisions in the current CBSC. The North Canyon Ranch geotechnic study concluded that there is no groundwater within the upper fifty feet of the soil profile, so liquefaction would not have adverse effects at the project site. Mitigation measures for seismic compression and landslides were introduced in in the Geology and Soils Section, that would also apply to the Reduced alternative. As with the proposed project, the alternative would be required to comply with the California State Construction General Permit and implement a SWPPP, which requires best management practices. The North Canyon Ranch geology study determined portions of onsite alluvial soils are subject to hydroconsolidation, which requires mitigation measures to reduce adverse effects. The project geology study also identified the presence of onsite soils ranging from non-expansive to highly expansive, providing recommendations that have been used as mitigation measures to reduce potential adverse effects. Similarly, the Reduced alternative would be required to comply with the CBSC and the mitigation measures presented in in this EIR . Impacts of the project and the alternative would be similar and would be reduced to less than significant with regulatory compliance and the mitigation measures.

### ***Greenhouse Gas Emissions***

The Reduced alternative would develop less of the project site and develop fewer units (130 as opposed to 207), which would decrease the amount of development in comparison to the proposed project. GHG emissions during construction would result mainly from trip generation and use of heavy equipment and trucks. Due to the size of the alternative, it would result in reduced GHG emissions during construction due to the shorter timeframe. As construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. A proposed project lifetime of 30 years is recommended by SCAQMD for amortizing construction related GHG emissions. With amortization, the alternative would have lower emissions. During operation, the alternative would have the same GHG sources as the proposed project but with lower emissions due to the decreased size of the project (i.e., more units and more trips). Since there are no adopted numerical standards for GHG emissions, impacts are determined based on a project's consistency of state, regional, and local plans. As with the proposed project, the alternative would be consistent with SCAG RTP/SCS, Climate Change Scoping Plan, and the Simi Valley CAP. Therefore, the alternative project would have a reduced emissions impact than the proposed project, but both would be consistent with plan policy and have less than significant impacts.

### ***Hydrology and Water Quality***

The Reduced alternative project would propose single-family and multi-family residences across a reduced footprint on the 160-acre site for a total of 130 dwelling units, which is reduced from the project's proposed 207 units. The alternative would develop drainage facilities including drainage basins, surface and subsurface drainage conveyance infrastructure, and improvements to the existing temporary detention basins throughout the project site. The design and capacity of the drainage basins would be based on the current Ventura County Technical Guidance Manual for Stormwater Quality Control Measures. Like the project, the alternative would be subject to compliance with the Los Angeles LARWQCB MS4 permit for Ventura County. Like the project it would also require a NPDES Construction General Permit which in turn requires the developer to submit a SWPPP for approval by the City of Simi Valley and the LARWQCB for BMPs implemented during construction. The Reduced alternative would disturb less of the project site, and the construction program would follow regulatory controls and BMPs. The alternative would be required to capture, treat, and retain and infiltrate runoff from storm events, to demonstrated in a LID plan that would be reviewed and approved by the City. Through design and implementation of regulatory controls, runoff during operation would properly to avoid substantial erosion or siltation, flooding or impediment of flood flows, or runoff in exceedance of the capacity of the existing or planned drainage system. As such, the alternative and proposed project would have similar, less than significant impacts.

### ***Land Use and Planning***

The Reduced alternative would develop smaller portions of the project site with single-family and multi-family residents, for a total of 77 fewer units. The development would not divide an existing community since the project site is located at the edge of development. Once developed, the project and the alternative would provide for a unified development pattern in that the two Reduced alternative development areas would be adjacent to existing development. Unlike the proposed project, the alternative would not provide the connection of Falcon Street from Erringer Road to First Street. While it would provide adequate access for the alternative development, unlike the project it wouldn't improve the roadway network, mobility, access and evacuation for the surrounding area. Like the project, the alternative would be consistent with the Housing Element and RHNA goal to provide more housing, but the alternative would produce 77 fewer units and thus would not go as far in meeting the goal. The alternative would also be comparable to the proposed project's consistency with applicable policies and goals from the City's General Plan, Citywide Land Use and Urban Design, Housing Element, and LAFCo. This alternative would help meet RHNA and

Housing Element goals, but to a lesser degree. Both the proposed project and the alternative would have a less than significant impact, though the project's impacts would be preferred in terms of land use and planning goals as the project would provide more units.

### ***Noise***

Noise from construction of the Reduced alternative would be generated by on-site heavy equipment used from demolition, grading, and other construction related activity. As previously discussed, the alternative would develop 77 fewer residential units and have a reduced footprint, so construction would have a shorter timeline. Since the alternative would use similar construction equipment and be located nearby the same sensitive receptors, noise impacts would be relatively similar, except over a shorter construction period (which is a short-term, temporary impact). The alternative would follow the same regulations as the proposed project and would not result in any significant construction noise impact. The proposed project would not increase traffic noise levels on nearby existing roadways enough to be readily perceptible to the human ear in an outdoor environment. Given the reduced number of trips from the Reduced project, compared to the project, the alternative trips would be an even smaller percentage of all trips and therefore the alternative would also not generate enough traffic noise to have a significant impact. No significant construction vibration impacts are expected to occur for the project, and with similar construction characteristics, the same would be true of the alternative. Both the project and the alternative would implement mitigation measure NOI-1 that prohibits operation of large bulldozers or similar equipment within 24 feet of any off-site residence. As such, the alternative would have reduced noise impacts due to the shorter construction period and reduced operational traffic, but it is estimated that both the proposed project and alternative would have less than significant impacts with mitigation.

### ***Population and Housing***

The Reduced alternative would develop 130 units, comprised of 80 single-family and 80 multi-family residences, with an estimated population of 387. This alternative would contribute to the local (City) and regional (County) population and housing growth within the projected City projections. Since there are no existing housing or people on the project site, the project would not displace existing housing or people. This alternative would not go as far as the project in helping the City achieve RHNA and Housing Element goals, but both Reduced alternative and the proposed project would have less than significant impacts.

### ***Public Services - Fire Services, Police Services, Schools***

#### Fire Services

The Reduced alternative would develop single-family homes and multi-family homes for a total of 130 residential units. The VCFD currently serves the project site and the City of Simi Valley. Due to the site's close proximity to the fire station (Station 47), emergency vehicles would be able to reach the project within the VCFD response time objective of five to seven minutes for emergency calls and nine to 12 minutes for non-emergency calls. This alternative would submit a TM, which as required by standard procedure, would be subject to VCFD review and approval for fire safety issues, including access and fuel modification. The project would not require the development of new or expanded fire protection facilities in order to adequately serve the increased population, given regulatory compliance and review. As a smaller project, the Reduced alternative would also be expected to not require new or expanded fire protection facilities. As a smaller development, this alternative would have a reduced impact on service demands, but Falcon Street would not be connected from Erringer Road to First Street in this alternative scenario, which would be less desirable. Like the proposed project, impacts would be less than significant with mitigation requiring an approved FPP, but impacts would be increased due to the lack of a Falcon Street connection.

### Police Services

The Reduced alternative would develop single-family homes and multi-family homes for a total of 130 residential units. The SVPD provides police services to the City's 125,975 population and all areas of the City. While it is estimated that the proposed project would add 617 people and the alternative would add 387 people, neither would substantially alter the officer to population ratio, given the total size of the City population. However, the SVPD does not rely on an officer to population goal, and instead considers response times (emergency and non-emergency), traffic accident rates and ratios, crime rates, citizen complaint to call ratios, and case clearance ratios. The project site is located near the Simi Valley Police Department headquarters (approximately 2.5 miles); therefore, like the project, the alternative would have a reasonable police response time. This alternative would include similar designs to the proposed project that would incorporate design features consistent with crime prevention through environmental design measures presented in the General Plan that would reduce potential for crime. While the alternative would have a reduced population and therefore a reduced demand on services, both the alternative and the project would have less than significant impacts.

### Schools

The SVUSD provides public education facilities in the City of Simi Valley. Additionally, 16 private schools are located in Simi Valley that provide varying grades from kindergarten to 12<sup>th</sup> grade. As the project is within the City's SOI and CURB, but not within the City boundaries, this alternative would be proposed to be annexed into the City and the SVUSD. The proposed project is projected to fit within the existing overall SVUSD school capacity, even if all elementary school students went to either one of the two elementary schools, one of the two middle schools, and one of the two high schools. Based on the capacity numbers evaluated in this EIR, the smaller number of Reduced alternative students could also be accommodated if all went to a single elementary, middle school, or high school. The Reduced alternative would result in fewer students and thus the alternative's school demand could also be accommodated even if all elementary school students went to either one of the two elementary schools, one of the two middle schools, and one of the two high schools. Both the project and this alternative would pay the development impact fees set forth in the school district's School Facilities Needs Analysis to address the impact of students generated by new development on school facilities. The alternative would generate a reduced demand for school facilities, but with payment of school fees both the proposed project and the alternative would have a less than significant impact on schools.

### ***Parks and Recreation***

The Park District owns, operates, and maintains parks and open space areas in the Cities of Simi Valley and Oak Park and unincorporated areas in the vicinity. According to the City's General Plan EIR, the Park District considers five acres of parkland per 1,000 residents as the City's minimum parkland standard. The existing parkland ratio is far above the goal, with 9.62 acres of parkland per 1,000 residents. As evaluated in the EIR, development of the project would not significantly lower the parkland per resident ratio, which already well exceeds the goal. The project would provide recreational amenities and open space within the project site consisting of 70.82 acres of open space, two (2) pocket parks totaling 0.43 acres, and additional landscaping amenities, which would reduce the need for future residents to utilize offsite recreational facilities. The Reduced alternative would have less of an increase in residents, and would also provide open space, pocket parks and amenity areas, which are assumed to be in proportion to the alternative. Pursuant to applicable law, development projects requesting tentative map approval are required to dedicate land or provide development fees to the Park District to offset potential increases in use of recreation resources. The alternative would have a reduced impact to park demand than the proposed project, but both would have less than significant impacts.

## ***Transportation***

Both the project and the Reduced alternative and the project would generate VMT. The VMT threshold for the City is 16.15 VMT/Capita for home-based trips, which would not be exceeded by the project. The alternative would generate fewer vehicle trip miles overall, but have the same VMT/Capita, and therefore the alternative would also not exceed the City threshold. The alternative would not construct the General Plan-identified connection of Falcon to First Street through the property. Other alternative-project roads would be designed in conformance with Simi Valley standards, and the site plan would be reviewed and approved by the VCFD to ensure adequate emergency access. The alternative would be less desirable because the extension of Falcon Street would not be provided, but the overall impact of both the alternative and the project would be less than significant.

## ***Utilities and Service Systems – Water Supply, Wastewater, Solid Waste***

### Water Supply

The City is served by two water purveyors, the Ventura County Waterworks District No. 8 (District 8) and the Golden State Water Company. The project site is located within the service area of District 8, which serves approximately 68 percent of the developed portion of Simi Valley in addition to unincorporated areas located southeast and north of the incorporated City boundary. Given the large service area of District 8, since the proposed project's total water demand would be less than one percent of District 8's water demand in 2025 and 2045, it follows that the Reduced alternative water demands (reduced by 77 units) would also not significantly impact water supply. Similar to the project, his alternative would not require new or expanded water treatment facilities. Both the project and the alternative would have a less than significant impact, but the alternative's impact would have a reduced impact due to a reduced water demand.

### Wastewater

The project site is currently vacant and surrounded to the east by residential land uses and to the south by commercial land uses that is served by the City DPW, SSD. The proposed North Canyon Ranch project site is currently outside the boundaries of the service district; however, it would be included upon approval, based upon the service availability letter to the applicant. The applicant would be required to pay sewerage system connection fees for any development on site – the project or an alternative project - prior to construction. The proposed project was found to have a less than significant impact on the sewer system. The alternative's physical improvements for wastewater would be similar to the proposed project for sewer connection and flow conveyance but scaled to the reduced development. The proposed project would use approximately use 2.2 percent of remaining capacity of the Wastewater Treatment Plant and based on the reduced size of the , it would utilize even less, which would be a more minimal amount. During construction of the alternative, the applicant must comply with a mitigation measure implementing the localized sewer line improvement recommendations from the latest City approved sewer report for the project, and the alternative would require comparable mitigation. Similar to the proposed project, this alternative would have a less than significant impact after mitigation but would generate less wastewater and therefore have a reduced impact on the Wastewater Treatment Plant.

### Solid Waste

The project site is currently undeveloped land. The City of Simi Valley is exclusively served by Waste Management for trash collection, and the project site would also be served by Waste Management, with solid waste disposal at the SVLRC. Given the project's size, and the short-term nature of construction relative to the longevity of the landfill capacity, the project's impacts during construction would be less than significant. The proposed project operational impact would amount to less than 0.1 percent of the daily permitted capacity at the SVLRC, which would be a less than significant impact. At 77 fewer units, the Reduced alternative would utilize even less of the capacity and impacts would similarly be less than



significant. Both the project and the alternative would comply with the SVMC and General Plan to address solid waste such as regulations to divert at least 75 percent of construction solid to recycling. Both the project and the alternative would have a less than significant impact, but this alternative would have an increased impact compared to the project.

### ***Wildfire***

The project site is located within a VHFHSZ and located at the WUI, and thus fire impacts, including emergency response and evacuation, pollutants from wildfires, firefighting-associated infrastructure, and potential indirect effects of wildfire are potential concerns for any development at the site. With the project, the provision of the missing segment of Falcon Street, as planned by the City through the project, will aid emergency access and evacuation for the development on the site and in the surrounding area. The Reduced alternative would not provide this benefit. Any development of the site will require firefighting-associated infrastructure, a project-specific FPP, and a project access and circulation system meeting VCFD requirements, scaled to the size of the project. With project design features and TM conditions, both the proposed project and the alternative would have less than significant impacts with mitigation requiring an approved FPP, including a fuel modification plan and adequate access; however, impacts would be somewhat greater with the alternative, considering that Falcon Street would not be completed through the project site.

### ***Alternative 3's Ability to Meet Project Objectives***

The Reduced Alternative would meet most of the project objectives, which are restated as follows:

- Construct a variety of housing types to expand the City of Simi Valley's housing stock (i.e., both single family and multi-family housing) and help to meet the City RHNA projections.
- Provide new housing designed and built to modern energy-efficient standards.
- Establish open space areas within the subdivision to provide for aesthetic and health benefits of the future project and surrounding area residents.
- Construct the extension of Falcon Street, from Erringer Road on the east to the northerly terminus of First Street on the west, fulfilling a City General Plan component that promotes mobility within the City for use by automobiles, busses, and bicycles.

Like the project, the alternative would provide energy-efficient development and open space areas. However, the alternative would not provide as many units to expand the City of Simi Valley's housing supply and help to meet the City's RHNA projections and would not implement the General Plan-proposed extension of Falcon Street. Thus, the project would be preferred over the Reduced alternative, although the alternative would overall have reduced impacts, as evaluated above.

## **5.4 RIA ALTERNATIVES DISCUSSION**

Since annexation of the Island areas is required by LAFCo, practically speaking, there are no alternatives to evaluated. From a Land Use and Planning perspective, without the annexation (i.e., the No Project scenario for this part of the project), the development pattern is disorganized, as identified in LAFCo documents, and governance of the Island areas would continue to function at reduced efficiency. By comparison, annexation will result in an orderly development pattern and more efficient governance. No physical changes to the Required Island Annexations would occur as a result of the project. Thus, for all issues, the proposed annexation is the preferred scenario.

## 5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the analysis above, the alternative and project impacts are compared in **Table 5-1, Comparison for the Project and the Alternatives**. A code for the abbreviations used is provided at the bottom of the table. Impacts that are marked less than significant, also require compliance with design features, TM conditions, and regulatory compliance measures.

**Table 5-1  
Comparison of the Project and the Alternatives**

	<b>Project</b>	<b>1 - No Project</b>	<b>2 – General Plan</b>	<b>3 – Reduced</b>
<b>Project / Alternative Characteristics</b>				
Residential Units/Type	207 (157 single-family and 50 townhomes)	0	406 (51 single-family and 355 townhomes)	130 (80 single-family and 50 townhomes)
Disturbance Area	Approx. 89.02 ac.	No Disturbance	Somewhat Less	Less
Extension of Falcon Street from Erringer to First per GP	Yes	No	Yes	No
Meets the Project Objectives?	Yes	No (not at all)	Yes (and meets GP and RHNA projections to a greater degree)	Yes (but to a lesser degree)
<b>Project / Alternative Impacts</b>				
Aesthetics	LTS	NI	LTS +	LTS -
Agriculture and Open Space	LTS	NI	LTS	LTS
Air Quality	LTSAM	NI	LTSAM (+)	LTSAM (-)
Biological Resources	LTSAM	NI	LTSAM (+)	LTSAM (-)
Cultural, Tribal Cultural and Paleontological Resources	LTSAM	NI	LTSAM (slightly -)	LTSAM (-)
Geology and Soils	LTSAM	NI	LTSAM	LTSAM
Greenhouse Gas Emissions	LTS	NI	LTS (+)	LTS (-)
Hydrology and Water Quality	LTS	NI	LTS	LTS
Land Use and Planning	LTS	NI <sup>(c)</sup>	LTS (-) <sup>(a)</sup>	LTS (+) <sup>(a)</sup>
Noise	LTSAM	NI	LTSAM (+)	LTSAM (-)
Population and Housing	LTS	NI <sup>(c)</sup>	LTS (-) <sup>(a)</sup>	LTS (+) <sup>(a)</sup>
Parks and Recreation	LTS	NI	LTS (+)	LTS (-)
Public Services				
Fire	LTSAM	NI	LTSAM (+)	LTSAM (+)
Police	LTS	NI	LTS (+)	LTS (-)
Schools	LTS	NI	LTS (+)	LTS (-)
Transportation	LTS	NI <sup>(c)</sup>	LTS (+)	LTS (+) <sup>(b)</sup>
Utilities				
Water Supply	LTS	NI	LTS (+)	LTS (-)

	<b>Project</b>	<b>1 - No Project</b>	<b>2 – General Plan</b>	<b>3 – Reduced</b>
Wastewater	LTSAM	NI	LTSAM (+)	LTS (-)
Solid Waste	LTS	NI	LTS (+)	LTS (-)
Wildfire	LTSAM	NI	LTSAM (+)	LTSAM (+)
<b>SUMMARY</b>	12 LTS  8 LTSAM	20 NI (however 3 are less beneficial)	12 LTS (incl. 8 more adverse and 2 less adverse than the project)  8 LTSAM (incl. 6 more adverse and 1 slightly less adverse than the project)	13 LTS (incl. 3 more adverse and 8 less adverse than the project) 7 LTSAM (incl. 4 less adverse and 2 more adverse than the project)
<p>Key to Impact Determination Notations:  NI = No Impact; LTS = Less than Significant Impact; LTSAM = Less than Significant After Mitigation; SU = Significant Unavoidable.  Plus and Minus Markings identify where the alternative has the same impact conclusion as the project, but the impact is greater or reduced compared to the project.  <sup>(a)</sup> Impacts are considered less or more adverse than with the project in relation to RHNA numbers.  <sup>(b)</sup> Impacts are considered less or more adverse than with the project in relation to implementing the Falcon Street connection as envisioned in the General Plan.  <sup>(c)</sup> Although there would be No Impact, the alternative would also not help to meet RHNA numbers or extend Falcon Street.</p>				

As summarized in Table 5-1, based on an equal weighting of each of major environmental impact topics: The alternatives would have the following conclusions:

#### **Project Impact Summary**

- 12 Less than Significant
- 8 Less than Significant After Mitigation

The proposed project would have no significant impacts after mitigation. The impacts that would require mitigation are as follows: Air Quality; Biological Resources; Cultural, Tribal Cultural and Paleontological Resources; Noise; Fire Services, Wastewater, and Wildfire.

#### **No Project Impact Summary**

- 20 No Impact

None of the impacts of the project would occur. Also, the project would not help meet the City General Plan and RHNA goals or construct the extension of Falcon Street envisioned in the General Plan.

#### **General Plan Alternative Impact Summary**

- 12 Less than Significant (including 8 more adverse and 2 less adverse than the project)
- 8 Less than Significant After Mitigation (including 6 more adverse and 1 slightly less adverse than the project)

The primary considerations compared to the project would be that the General Plan alternative would have increased impacts with regard to Air Quality, GHG, Noise, VMT, Public Services, Parks and Recreation, Utilities, and Wildfire due to the increase in units and population. Increased impacts would also be projected for Biological Resources, because the alternative would avoid somewhat larger portions of sensitive habitats that support the gnatcatcher and/or spadefoot toad near the southern boundary from the center of

the boundary to the eastern edge of the property. Land Use and Planning impacts as well as Population and Housing impacts would be considered less adverse than the project, because more units would be provided to satisfy City General Plan and RHNA goals. The Falcon Street extension would be included, satisfying the General Plan vision for the roadway network, which would facilitate access and evacuation, similar to the project. This alternative would meet the project objectives and would actually go further in meeting the City General Plan and RHNA goals.

#### **Reduced Units and Reduced Footprint Alternative Impact Summary**

- 13 Less than Significant (including 3 more adverse and 8 less adverse than the project)
- 7 Less than Significant After Mitigation (including 4 less adverse and 2 more adverse than the project)

The primary considerations compared to the project would be that the Reduced Project alternative would have increased (more adverse) impacts with regard to Land Use and Planning impacts as well as Population and Housing, since it would provide fewer units to meet the City General Plan and RHNA goals. The alternative would have reduced impacts to Air Quality, GHG, most Public Services, Utilities, and Parks and Recreation, due to the smaller number of units. A greater number of vehicle miles would be added, but a similar VMT/Capita would occur. Wildfire and Fire Service impacts would be increased due to the lack of the Falcon Street extension through the project, which would make access and evacuation less efficient.

#### **Superior Alternative Conclusion**

Based on the analysis, the No Impact alternative would have no impacts, and thus, would be the environmentally superior alternative. After the No Project alternative, the Reduced Project alternative would have the least environmental impacts, and thus, would be the next environmentally superior alternative.