4.0 ALTERNATIVES

INTRODUCTION

This section of the environmental impact report (EIR) provides a comparative analysis of the merits of alternatives to the Proposed Project pursuant to Section 15124.6 of the California Environmental Quality Act (CEQA) Statutes and Guidelines*, as amended. According to the guidelines, an EIR shall describe a range of reasonable alternatives to the project or to its location, which would feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects. The EIR shall evaluate the comparative merits of the alternatives. It 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.*

4.1 CONSIDERATIONS

The range of alternatives in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to make a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any significant effects of the project (Section 15124.6(f)). Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the project's basic objectives. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. When addressing feasibility, the *State CEQA Guidelines* state that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." The *State CEQA Guidelines* also state that the alternative discussion need not be presented in the same level of detail as the assessment of the proposed project.

Therefore, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of detail that analysis should provide. These factors include (1) the nature of the significant impacts of the proposed project, (2) the ability of alternatives to avoid or substantially lessen impacts associated with the project, (3) the ability of the alternatives to meet most of the basic objectives of the project, and (4) the feasibility of the alternatives.

The State CEQA Guidelines Section 15126.6(e)(2) requires the analysis of a "no project" alternative. This Section further states that if the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

As discussed above, the intent of an alternatives analysis is to avoid or substantially reduce the significant and unavoidable impacts identified for the Project, which are as follows:

Aesthetics. As evaluated in **Section 3.1, Aesthetics**, despite the application of certain mitigation measures, implementation of the Hitch Ranch Specific Plan would significantly alter the visual characteristics of the Project site.

Air Quality. As evaluated in **Section 3.2, Air Quality**, despite the application of certain mitigation measures, implementation of the Hitch Ranch Specific Plan would generate daily emissions of reactive organic compounds (ROC) that would exceed the Ventura County Air Pollution Control District's (VCAPCD) threshold of significance for operational emissions at Project buildout in 2027.

All other environmental impacts of the Proposed Project are mitigatable.

Based on the Project's potentially significant impact, the established objectives of the Project (listed in Section 4.0, Project Description, in this Draft EIR), and consideration of the local plans and zoning designations that guide development of the Project Site, the following three alternatives to the Project were selected for analysis:

- Alternative 1 – No Project Alternative,
- Alternative 2 – RPD 20U-N-D Alternative,
- Alternative 3 – 415 Unit Reduced Visual Impact Alternative.

Table 4.0-1, Alternatives Impact Comparison Matrix, is included below to provide a comparison of the major components associated with the Project and each alternative. This section describes and evaluates the three alternatives listed above. In addition, State CEQA Guidelines Section 15126.6(c) requires an EIR to identify any alternatives considered for analysis but dismissed as infeasible. These potential alternatives are also described below.

4.1.1 Proposed Project Summary

The Specific Plan for Hitch Ranch proposes to develop 755 residential units on an approximately 277.30-acre site. The Proposed Project is divided into four planning areas as well as associated public facilities and an Open Space parcel. Of the total units proposed on the Project Site, 79 single-family dwelling units, natural open space, and manufactured slopes will be located in Planning Area 1. Planning Area 2 would contain 188 single-family units, a passive recreation lot, natural open space, manufactured slopes and a water quality/detention basin. Planning Area 3 would contain 160 single-family units and 93 multi-family units, a recreational lot, and manufactured slopes. Planning Area 4 would contain 235 multi-family units

(including 135 affordable apartment units) and manufactured slopes. The Open Space designation preserves open space.

4.1.2 Project Objectives

Section 3.0 identifies significant impacts that would result from implementation of the Proposed Project. The alternatives selected for analysis in this EIR were developed with the aim of minimizing environmental impacts of the Proposed Project, particularly significant impacts, while still meeting most of the project's basic objectives. Those objectives are the following:

4.1.3 Objectives of the Proposed Project

- Develop the project site with a financially feasible, residential project that meets the residential needs of the City of Moorpark.
- Provide residential development consistent with 2021-2023 City Council Goal 1: Identify options and solutions to barriers for housing for all economic and age ranges.
- Create a new community neighborhood that would allow for residential development, while preserving natural resources and open space.
- Contribute to the enhancement of Downtown High Street by providing a new residential customer base, bicycle, vehicle, and pedestrian connections to the downtown.
- Provide a range of housing opportunities with varying densities, types, styles, prices, and tenancy characteristics (for sale versus rental).
- Help to achieve Housing Element goals for affordable housing.
- Avoid leapfrog development and accommodate projected growth in a location, which is adjacent to existing infrastructure, urban services, and community facilities.
- Locate housing next to jobs and in close proximity to transit in order to reduce Vehicle Miles Traveled (VMT).
- Transition development within the project site with consideration for natural resource areas and open space.
- Provide development and transitional land use patterns that supports surrounding land uses.

- Designate sites for needed public facilities including flood control facilities, regional roadways, and trails.

- Provide residential opportunities to respond to economic and market conditions over several years.

- Provide a tax base to support public services associated with the proposed development to appropriately offset development impacts to city services.

- Retain open space and natural vegetation to exist as a buffer between on-site land uses and the surrounding resources to the extent possible while providing fire protection to the proposed land uses.

- Improve safe and adequate vehicle circulation within the regional area.

- Provide pedestrian, bicycle and equestrian trails that connect to the local and regional trail systems in the surrounding hills.

- Promote water conservation through use of drought-tolerant, fire-resistive, and native plants as appropriate.

4.1.4 Alternatives to the Proposed Project

The City of Moorpark, as the lead agency, considered several alternatives to determine if they would lessen the impacts associated with the specific plan. An alternative considered but rejected included locating the project at an alternative site. The alternatives examined within this EIR include Alternative 1, No Project Alternative; Alternative 2, RPD 20U-N-D Alternative (468 affordable units, five single-family residences); and Alternative 3, 415 Unit Reduced Visual Impact Alternative (415 single family residences).

4.2 ALTERNATIVES CONSIDERED AND REJECTED

State CEQA Guidelines Section 15124.6(c) indicates that an EIR should identify any alternatives considered by the lead agency but rejected as infeasible during the scoping process. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts.

4.2.1 Alternative Location

Consideration of an alternative location has been rejected. *State CEQA Guidelines* Section15124.6(f)(2)(a) indicates that in determining the consideration of an alternative location, "The key question and first step

in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR."

The identification of an off-site alternative is contingent on the availability of a site capable of supporting the project. In order to address an off-site alternative, areas within the City of Moorpark and its Area of Interest that could support new development have been identified through the analysis provided in the City's General Plan. The City of Moorpark General Plan identified four Specific Plan areas (Nos. 1, 2, 9, and 10) as locations of future development within the City's Area of Interest for development during General Plan buildout.

Specific Plan No. 1 is the Proposed Project, the Hitch Ranch Specific Plan. Specific Plan No. 2 is an approximate 445-acre site located north of Spring Road and east of Walnut Canyon Road. Specific Plan No. 2 site was approved for development and has been built-out consistent with the approved Specific Plan. Specific Plan No. 9 is approximately 24.8 acres with a maximum density of 80 units (density limit of 120 units). Specific Plan No. 10 is an approximately 71-acre site with a maximum permitted density of 231 units. Neither the Specific Plan No. 9 nor the Specific Plan No. 10 sites are large enough to support the proposed development assumed for the Hitch Ranch Specific Plan site. In addition, the acquisition of one of these sites or any alternative site by the applicant, which already owns the Project Site, in order to develop the project, would not feasible. Moreover, the City of Moorpark has designated the Project Site for a residential use in order to meet the long-term economic and land use goals of the City. Considering these factors, no alternative site can be identified that could reasonably support the Proposed Project.

4.3 ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT ALTERNATIVE

4.3.1 Description

Section 15126.6(e) of the State CEQA Guidelines provides guidance on consideration of the no project alternative. When examining a development project on a specific piece of property, the No Project Alternative is the circumstance under which the Proposed Project does not proceed. Under a No Project scenario, the discussion compares the environmental effects of the property remaining in its current state against the environmental effects that would occur if the Proposed Project were approved and constructed.

The No Project Alternative assumes that no development would occur on the approximately 277.30-acre Project Site. Under the No Project Alternative, the Project Site would remain in its present partially graded, highly disturbed condition. As described in Section 2.0, Project Description, a portion of the Project Site has been graded and, therefore, is either in an otherwise disturbed state (e.g., building pads,

dirt roadways), or is presently open space. Under the No Project Alternative, the potential project-related impacts associated with development of the Project Site and described in Section 3.0, Environmental Impact Analysis would not occur.

4.3.2 Impact Evaluation

Aesthetics

Alternative 1 would not alter the Project Site's existing uses or result in new construction, and the site would remain as it currently is from an aesthetics and visual characteristics perspective. Therefore, Alternative 1 would avoid the Project's significant unavoidable aesthetics impact that would occur due to the buildout of the Project Site.

Air Quality

Alternative 1 would not alter the Project Site's existing condition or result in new construction and, therefore, would not generate additional air pollutant emissions. Construction impacts under Alternative 1 would not occur and operational impacts under Alternative 1 would be avoided. Potential impacts would be less than those of the Project.

Biological Resources

Since no new development would occur under Alternative 1, no associated construction or new uses would take place in areas where biological resources and sensitive habitats exist. Specifically, none of the plant communities (including sensitive plant species) wildlife species (including sensitive wildlife species), nesting birds, protected trees, "waters of the US/waters of the State" under jurisdiction of the US Army Corps of Engineers (USACE) and/or the Regional Water Quality Control Board (RWQCB), or streambed or habitat under the jurisdiction of the California Department of Fish and Wildlife (CDFW) that exist on the Project Site would be affected. New construction and operational impacts to biotic resources would not occur. Although the Project's impacts would be less than significant, potential impacts associated with Alternative 1 would be less than those of the Project.

Cultural Resources

Under Alternative 1, development of new permanent structures and associated grading activities would not occur. Nonetheless, as the Project Site is vacant, there are no historical resources within or adjacent to the Project Site. Thus, similar to the Project, no impacts to historic resources would occur under Alternative 1. Such impacts would be similar to those under the Project.

Under Alternative 1, no grading or other earthwork activities would occur. Thus, Alternative 1 would have limited potential for uncovering archaeological resources and no impacts to archaeological and impacts would occur. Under the Project, impacts associated with the potential discovery of unknown archaeological resources would be less than significant with implementation of mitigation measures. However, because no grading or earthwork activities would occur under Alternative 1, potential impacts under Alternative 1 would be less when compared to the Project.

Energy

Under Alternative 1, new demand for electricity and natural gas would not be generated, and associated infrastructure improvements would not be constructed. As no energy use occurs on the Project Site, there would be no increase in the use of energy under Alternative 1. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1 and as a result, impacts under Alternative 1 would be less than the Project.

Geology and Soils

Alternative 1 would not alter the existing uses on the Project Site, and would not introduce infrastructure or housing units on the site. As no structures exist on the Project Site, the potential for new impacts related to slope instability, sedimentation, erosion and landform alteration associated with construction activities would not occur. Furthermore, Alternative 1 would not expose additional people and/or structures to potential adverse effects associated with geologic and seismic hazards, such as fault rupture, seismic groundshaking, liquefaction, lateral spreading, subsidence, landslides or expansive soils. Thus, the Project's less than significant impact associated with geology and soils would be avoided, and no impact would occur. Although the Project's impacts would be less than significant, potential impacts of Alternative 1 would be less than under the Project.

Greenhouse Gas Emissions

There would be no new development or operations on the Project Site, so the only new greenhouse gas (GHG) emissions would be in relation to limited weed abatement and maintenance of the Project Site. As such, impacts associated with global climate change would be minimal under Alternative 1. Potential impacts would be less than those of the Project.

Hazards and Hazardous Materials

Under Alternative 1, construction of new permanent buildings and associated grading activities would not occur. Thus, Alternative 1 would not result in potential construction-related impacts associated with

hazardous materials use, uncovering of unknown subsurface soil contamination, uncovering of unknown USTs, or development in proximity to abandoned water wells. No impacts would occur, and the less than significant impacts that would occur under the Project would be avoided.

Alternative 1 would not introduce new residential uses on the Project Site. Although the Project Site is vacant, there is some limited weed abatement and maintenance that does occur on the Project Site. These would continue under this alternative. Thus, operations under Alternative 1 would not result in an increase in potential hazards. No impacts would occur, and the Project's less than significant impacts would be avoided.

The Project Site is located within a Very High Fire Hazard Severity (VHFHS) Zone. However, as no new development would occur under Alternative 1, no new structures or associated population would be exposed to potential fire hazards. No impacts would occur, and the Project's less than significant impacts would be avoided. Therefore, impacts under the No Project/No Development Alternative would be less than the Project.

Hydrology

Under Alternative 1, the existing uses on the Project Site would remain and no new development would occur. Alternative 1 would not introduce new impervious surfaces, new landscaped areas, or drainage improvements. As no new detention basins or drainage linkages would be constructed to stabilize or improve conditions on the Project Site, hydrology impacts could be greater under this alternative. Although the No Project's impacts would be less than significant, potential impacts would be greater than those of the Project, which includes the development of five detention basins, four debris basins, and other improvements that will enhance downstream flood control and water quality.

Water Quality

Under Alternative 1, the existing uses on the Project Site would remain and no new development would occur. Alternative 1 would not introduce new impervious surfaces, new landscaped areas, or drainage improvements. As discussed above, under this alternative downstream water quality would potentially continue to degrade. Although the No Project's impacts would likely be less than significant, potential impacts would be greater than those of the Project.

Land Use and Planning

Under Alternative 1, the existing physical conditions of the Project Site would remain unchanged. No development would occur on the Project Site. The Project's requested discretionary actions, including

General Plan Amendments to the Circulation and Land Use Elements, rezoning of the site from AE-40 to Hitch Ranch Specific Plan, a vesting tentative tract map, Residential Planned Development Permit(s), and tree removal permits would not be required.

With regard to land use compatibility, Alternative 1 would not introduce new uses or new development on the Project Site. Thus, Alternative 1 would not affect existing on- or off-site land uses or existing land use relationships on the Project Site or the surrounding area. Therefore, no impacts relative to land use compatibility would occur. Although Project impacts would be less than significant, potential impacts associated with Alternative 1 would be less than those of the Project.

Noise

Under Alternative 1, construction of new permanent buildings and associated infrastructure improvements would not occur. Thus, no noise impacts associated with short-term construction would occur. Thus, the less than significant short-term noise impacts associated with construction activities would be avoided.

Under Alternative 1, no development would occur on the Project Site, no increase in traffic would occur, and no new noise sources would be introduced. As such, noise levels would remain at existing levels and no new or increased sources of noise within the project vicinity would occur as a result of Alternative 1. Therefore, Alternative 1 would result in a reduction of operational noise impacts as compared to the Project's less than significant operational noise impacts. Finally, Alternative 1 would not result in any vibration impacts during either construction or operation, and thus vibration impacts would be less than the Project's less than significant impacts.

Population and Housing

Under the No Project Alternative, no new construction would occur on the Project Site. No significant impacts related to population and housing have been identified under the Proposed Project. Therefore, impacts related to population and housing associated with the No Project Alternative would have less impact than the Proposed Project's less than significant impacts.

Public Services

Fire Service

Alternative 1 would not result in new development or land uses and thus would not increase the population on the Project Site or generate an associated increase in calls for fire protection and emergency medical services by the Ventura County Fire Department (VCFD). Therefore, the demand

for fire protection and emergency medical services in the area would remain generally unchanged from existing conditions. However, Project benefits such as construction of the extensions of Meridian Hills Drive, North Hills Parkway, High Street, Casey Road, and 'A' Street, which would provide additional emergency access and evacuation routes, would not be provided. Nonetheless, although Project impacts would be less than significant, such impacts would be less under Alternative 1.

Law Enforcement Service

Alternative 1 would not result in new development or land uses and thus would not increase the population on the Project Site or generate an associated increase in calls for law enforcement services by the Ventura County Sheriff's Department (Sheriff's Department). Therefore, the demand for law enforcement services in the area would remain generally unchanged from existing conditions. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1.

Schools

Alternative 1 would not result in new development or land uses and thus would not increase the population on the Site resulting in additional school age children in the neighborhood. Therefore, the demand for school services in the area would remain generally unchanged from existing conditions. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1.

Library Service

Alternative 1 would not result in new development or land uses and thus would not increase the population on the Project Site or generate an associated increase in the need for library services in the neighborhood. Therefore, the demand for library services in the area would remain generally unchanged from existing conditions. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1.

Recreation

Alternative 1 would not result in new development or land uses and thus would not increase the population on the Project Site or generate an associated increase in the need for recreational areas in the neighborhood. Therefore, the demand for recreational services in the area would remain generally unchanged from existing conditions. However, the Project would provide a new approximately 6.77-acre

public park, four private recreation areas, and four and one-half miles of public multi-use trails connecting to local and regional trails in the surrounding hills, that would not be developed under Alternative 1. Nonetheless, although Project impacts would be less than significant, such impacts would be avoided under Alternative 1.

Transportation

No increase in traffic would result from Alternative 1 due to construction-related trips on the local or regional street system. Although construction-related traffic impacts under the Project would be less than significant with implementation of traffic management controls where necessary, the alternative would not result in any construction-related traffic impacts. Therefore, the impact of Alternative 1 would be less than that of the Project.

Since no new development or changes in land use would occur under Alternative 1, no increase in operational traffic would occur. Although Project impacts after mitigation would be less than significant (as related to City of Moorpark criteria), such impacts would be avoided under Alternative 1.

Tribal Cultural Resources

The No Project/No Build Alternative would not require ground disturbing activities during construction. Thus, no impacts to Tribal Cultural Resources would occur under this Alternative. No known Tribal Cultural Resources have been identified within the Project Site or vicinity; however, in case of inadvertent discovery of resources, mitigation measures have been prescribed to reduce any potential impacts to a less than significant level. . Because the No Project/No Build Alternative would have no impact with respect to Tribal cultural resources and no potential to encounter previously unknown Tribal Cultural Resources, impacts would be less under this Alternative compared to the Project.

Utilities

Water Supply

Under Alternative 1, new demand for domestic water would not be generated, and new water supply and distribution improvements would not be constructed. No water would be necessary for the Project Site, as the site would remain vacant. Therefore, although Project impacts would be less than significant, such impacts would be less under Alternative 1.

Wastewater

Under Alternative 1, new wastewater flows would not be generated, as the Project Site would remain vacant. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1.

Solid Waste

Under Alternative 1, construction of new permanent structures and associated infrastructure improvements would not occur. Therefore, no construction debris or waste would be generated for disposal at a County inert landfill. No impacts would occur, and the Project's less than significant impacts would be avoided.

Since no new development would occur and existing on-site uses would remain under Alternative 1, solid waste generation associated with operation of Alternative 1 would remain consistent with existing levels. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1.

Wildfire

The Project Site is in a Very High Fire Hazard Severity Zone (VHFHSZ). Alternative 1 would not result in new development or land uses. Although Project impacts would be less than significant, such impacts would be avoided under Alternative 1. However, under this alternative no improvements to slope stability, on- and off-site drainage and flood control improvements, or roadway connectivity would occur.

4.3.3 Relationship of the Alternative to the Project Objectives

The No Project Alternative does not meet any of the basic project objectives, which are set forth in this EIR in **Section 2.0, Project Description**. Project objectives not met or impeded by the No Project Alternative are listed below.

- Develop the project site with a financially feasible, residential project that meets the residential needs of the City of Moorpark.
- Provide residential development consistent with 2021-2023 City Council Goal 1: Identify options and solutions to barriers for housing for all economic and age ranges.
- Create a new community neighborhood that would allow for residential development, while preserving natural resources and open space.

- Contribute to the enhancement of Downtown High Street by providing a new residential customer base, bicycle, vehicle, and pedestrian connections to the downtown.
- Provide a range of housing opportunities with varying densities, types, styles, prices, and tenancy characteristics (for sale versus rental).
- Help to achieve Housing Element goals for affordable housing.
- Avoid leapfrog development and accommodate projected growth in a location, which is adjacent to existing infrastructure, urban services, and community facilities.
- Locate housing next to jobs and in close proximity to transit in order to reduce Vehicle Miles Traveled (VMT).
- Transition development within the Project site with consideration for natural resource areas and open space.
- Provide development and transitional land use patterns that supports surrounding land uses.
- Designate sites for needed public facilities including flood control facilities, regional roadways, and trails.
- Provide residential opportunities to respond to economic and market conditions over several years.
- Provide a tax base to support public services associated with the proposed development to appropriately offset development impacts to city services.
- Retain open space and natural vegetation to exist as a buffer between on-site land uses and the surrounding resources to the extent possible while providing fire protection to the proposed land uses.
- Improve safe and adequate vehicle circulation within the regional area.
- Provide pedestrian, bicycle and equestrian trails that connect to the local and regional trail systems in the surrounding hills.
- Promote water conservation through use of drought-tolerant, fire-resistive, and native plants as appropriate.

4.4 ALTERNATIVE 2: RPD 20U-N-D ALTERNATIVE

4.4.1 Description

This alternative assumes development in accordance with the City's current General Plan designation (Specific Plan 1) and Zoning regulations (AE, 1 dwelling unit/40 acres, and RPD 20U-N-D, 20 dwelling units/acre).

As shown on **Figure 4.0-1, Alternative 2 – RPD 20U-N-D Alternative**, this alternative would develop 468 Low and Very Low-Income Rental Units, and five (5) 40-acre parcels for the development of single-family units (473 total units) consistent with the current zoning. This Alternative would necessitate that the City purchase the approximately 26-acre portion of the Project site zoned RPD 20U-N-D from the Project Applicant to build out the infrastructure improvements and dwelling units for affordable housing project and detention basin. This is a reduction in 282 housing units and approximately 931 fewer residents.

This Alternative is evaluated to identify alternate development that could take place on the Project Site without the application for any discretionary actions requiring approval from the City, as a practical result of the Project's non-approval.

This Alternative would reduce the number of proposed dwelling units by 282 when compared to the Project. Alternative 2 would accommodate approximately 1,561 residents (calculated as 3.3 persons per dwelling), approximately 931 fewer residents. The infrastructure improvements for this Alternative would include private access roadways and utility extensions for the five single family residential properties, a Casey Road/'A Street', High Street loop, and the 'Basin 3' detention basin. This Alternative would not include public park/recreation facilities, the extension of North Hills Parkway, or Meridian Hills Drive, and would not provide the additional circulation elements of 'A Street' north of Casey Road, and High Street west of 'A Street'. The Applicant would satisfy recreation/park space obligations solely through payment of Quimby fees.

For purposes of this analysis, it is assumed that no further project approvals would be necessary to implement Alternative 2.

4.4.2 Impact Evaluation

Aesthetics

Implementation of Alternative 2, RPD 20U-N-D, would significantly alter the visual characteristics of the site. Grading activities would affect the eastern third of the significant ridgelines that transverse the Specific Plan site. The westernmost viewshed (Open Space) would be generally unaffected by

development; under this Alternative this portion of the Specific Plan site would be retained as open space. The central area between Gabbert Road and "A" Street would have limited grading as viewed from the Poindexter Avenue location. The easterly third of the Project site would be converted from undeveloped open space to the development as provided for by the Specific Plan. Existing vacant land within the Specific Plan would be developed with residential, and recreational uses that would be visible. As a result of the implementation of the Specific Plan, this Alternative would have a significant impact to this viewshed.

Surrounding Views

View looking West Along Casey Road. The site development to the north of Casey Road involves slope grading for Casey Road with associated landscaping; the development of 468 multi-family units in three-story building east of "A" Street and south of Casey Road.

Views from Poindexter Park, East of Gisler Road, South of Poindexter Avenue. Views would include the completion of manufactured slopes along the south portions of the site in Planning Areas 4 and the completion of a detention basin north of Poindexter Avenue and the High Street extension, along with later stages of initial improvements and additional grading of the upper portion of slopes. Landscaping improvements surrounding the detention basins north of Poindexter Avenue and multi-family units in Planning Area 4 would be visible.

Views looking East from Gabbert Road. No development is proposed to occur at the Gabbert Road and Poindexter Road under Alternative 2. North Hills Parkway would not be graded or constructed. Only two single-family residences would be built in the southwesterly 80 acres that are between Gabbert Road and "A" Street. The grading and three-story multi-family buildings identified above for Planning Area 4 would be approximately one-half mile to the east of this viewing location and would remain highly visible.

Hillside Management Ordinance

The intent of the Hillside Management Ordinance (Chapter 17.38 of the Moorpark Municipal Code) is to implement the goals and policies of the *City of Moorpark General Plan*, as they relate to the development and resource management in hillside areas of the City. The directive of the Hillside Management Ordinance is to allow for "orderly and sensitive development of hillside areas in conjunction with the preservation of natural open space." **Figure 3.1-11, Slope and Ridgeline Map**, illustrates the slopes and prominent ridgeline area on the Project site. The Project site is comprised of approximately 183.2 acres with slopes less than 20 percent slopes, approximately 58.1 acres with slopes between 20 to 35 percent, approximately 27.6 acres with slopes between 35 to 50 percent, and approximately 8.4 acres with slope

greater than 50 percent. Overall, the approximately 277.30-acre Project site has an average slope of 19 percent. In general, grading of the Alternative 2 site would involve the mass grading and cut and fill over one million cubic yards of earth, which would be balanced on site. Maximum cut slopes would be approximately 70 feet high, and maximum fill areas would be approximately 75 feet high. Approximately 50 acres (18 percent) of the Project site would be graded under of implementation of Alternative 2 approximately 227 acres (82 percent) of the Project site would remain undisturbed.

Accordingly, Alternative 2 does not intend to disturb some of the steeper areas of the site, specifically the area west of "A" Street (Areas A, C & E on **Figure 3.1-12, Hillside Grading Area Identification Map)** and the area north of Planning Area 1 (Area B on **Figure 3.1-12, Hillside Grading Area Identification Map**).

Generally, the steeper slopes on the site which are being disturbed are relatively minor intermediate ridge spurs within the site shown in Grading Area D. Most of the "prominent" ridgelines and landforms are retained.

Section 17.38.030.B exempts properties with 20% or greater slopes when those slopes are associated with minor drainage courses that do not impact significant natural drainage patterns or ridgelines.

From a visibility/view perspective, most of the "prominent" slopes or ridgelines are preserved; including the larger slopes north of Planning Area 1 (Area B on **Figure 3.1-12, Hillside Grading Area Identification Map**), the larger slopes west of "A" Street (Areas A, C and E on **Figure 3.1-12, Hillside Grading Area Identification Map**), and the existing ridgeline/knoll southwest of Planning Area 2 (Area C on **Figure 3.1-12, Hillside Grading Area Identification Map**).

Much of the site was graded for ranching and farming purposes sometime in the last century so most impacts to the existing topography are not impacts to natural slopes because the natural grade has long since been disturbed.

Most of the impacts to existing topography within Planning Areas 1 & 2 are generally in areas with existing slope gradients less than 20%. Some of the more noteworthy impacts to existing slopes with gradients greater than 20% are within Planning Areas 3 & 4 on the east side of the site. However, there are a few considerations which limit the applicability of the ordinance in these areas:

As mentioned, many of these are smaller and more localized areas that likely do not qualify as "prominent" landforms (most of the impacts actually just involve filling-in existing local valleys so visual impacts are much less significant than significant cuts to ridgelines). Filling-in local valleys/ravines is permissible per Section 17.38.090.

These impacts are in denser planning areas which is generally in-line with the intent of the ordinance-increase density in one area to minimize impacts on the rest of the site where more prominent landforms are located.

A key reason for the fills in Planning Area 4 (Area D on **Figure 3.1-12, Hillside Grading Area Identification Map**) is to support Detention Basin 3, which provides a regional benefit by diverting significant quantities of storm water runoff from Walnut Canyon Channel so that existing downstream flood control infrastructure is not overwhelmed.

The Specific Plan would provide remedial measures to reduce erosion and geologic hazards; limit the alteration of visible ridgelines; preserve natural drainages; develop the densest portions of the site in the flatter portions of the site; and use native vegetation for replanting and other water-conserving techniques. In addition, the project would incorporate landscape intended to transition developed areas from natural open space areas, as well as provide buffering of views of the reduced footprint Alternative 2 site from surrounding land uses.

Under Alternative 2 North Hills Parkway is not proposed to be constructed. Further, "A" Street would not extend north of Casey Road, the Meridian Hills Drive connector would not be graded or built, and High Street would not extend westerly of "A" Street. It should be noted that construction of the North Hills Parkway and other General Plan Circulation Element roadways within Hitch Ranch, with or without development of the Specific Plan, would result in significant encroachments to the slopes greater than 20 percent. Under Alternative 2 more than 50 percent of the site with slopes of 35 to 50 percent would be retained in dedicated open space; the Hillside Management Ordinance requires 50 percent. The 50 percent or greater slope areas proposed for development are small, isolated areas that would be graded as part of the development plan. In addition, like the Project, Alternative 2 includes the preservation the prominent ridgeline on the site. Preservation of this area is consistent with the Hillside Management Ordinance requirements.

Silhouetting

A review of plans indicates that the proposed development would be built below higher ridgelines that occur off site to the north. However, from Viewing Locations A, B, and C, development is proposed either above the viewer or at a similar elevation. Therefore, project elements viewed in the foreground would obscure the higher and more distant hills and appear as silhouettes or a form of ridgeline development. This condition would apply where the northern margin of Planning Area 4 is observed from Viewing Location A, where the southern margin of Planning Area 4 is viewed from Viewing Location B, and where Planning Area 4 is viewed in the distance from Viewing Location C.

Given the change in the visual character of the site, and that background visual features would be removed and replaced with the silhouettes of the new homes, impacts to the visual resource environment would be considered significant when measured against this assessment criterion.

Landform Alterations

Terrain on the Project site consists of low hills and broad channel areas. Project construction would require substantial grading that would result in the creation of one large, generally flat pad areas. Given the substantial change in the site's existing landform from a natural rolling terrain to a "super pads," impacts to the visual resource environment would be considered significant when measured against this assessment criterion.

Effects on Views from Surrounding Residences

Views from residential areas are emphasized here for several reasons. First, many residences are directly oriented towards the Project site. Second, vistas of and across the site can be considerable. Third, the impact associated with project implementation (for these residents) would likely be the greatest alteration to their existing environmental condition. Last, residents with views of the site requested that this issue be evaluated during the project scoping meeting.

Residences South of Poindexter Avenue. Most homes south of Poindexter Avenue are oriented away from the site. Where visible, project elements that would be observable include (proceeding from east to west) (1) the contour-graded manufactured slope that occurs north of detention basin 1, (2) the high-density residential structures proposed as part of Planning Area 4, and (3) the contour graded slopes and natural open space that occurs south and west of the Planning Area 4.

Because most homes from this viewing location are not oriented towards the site, and rear yard walls preclude most vistas of the site, no significant impacts from this location are expected.

Residences to the North. New construction with residential uses are located north of the Project site; some of these have partial vistas of the Project site. Project elements that may be visible include residential development in Planning Area 4.

Homes from this viewing location are oriented towards the site with no rear yard walls to obstruct vistas of the site, however, due to the distance (over one-half mile) and lower elevation of the Planning Area 4 development, impacts associated with Alternative 2 visibility to this residential viewing audience are not considered significant.

Residences to the West. Residences to the west of the Project site are at elevations similar to those found within the Project site and would thus have views into the Project site. Areas of the Alternative 2 site adjacent to these residences are planned to be preserved as open space, which would reduce the potential for impacts to views from this location. The Project site's topography would further obscure project development from view, and no significant impacts from this location are expected.

Residences to the South and East. Residences to the east of the project occur at a lower elevation and residents would have no direct vistas of the project. Therefore, these residents would not be directly impacted by the project. Residents to the east of the site would observe an incremental change in the existing condition. However, developments would be observed as an incremental encroachment of development into the lower hillsides that is not out of character with existing development practices in the City and are not considered significant.

As with the Proposed Project, all of the proposed mitigation measures to reduce potential impacts to Aesthetics would be implemented. However, although the impacts associated with Alternative 2 would be less than those of the Project, potential impacts to scenic vistas would remain significant and unavoidable.

SOURCE: Comstock Homes, 2021.

FIGURE **4.0-1**

IMPACT SCIENCES

Alternative 2 – RPD 20U-N-D Alternative

1318.004•06/2021

Air Quality

Alternative 2 would alter far less of the Project Site's existing condition due to a reduced need for grading for infrastructure and housing construction, and would result in the construction of 282 units fewer of housing shortening the construction duration, resulting in the generation of less construction air pollutant emissions. In addition, all of the proposed mitigation measures to reduce potential impacts to air quality would still be implemented. Therefore, similar to the Proposed Project, construction impacts to air quality would be less than significant.

This alternative consists of an approximately 37 percent reduction in the number of residential units as compared to the Proposed Project. Therefore, it is reasonable to assume that operational air pollutant emissions would be reduced in a generally proportionate fashion. However, using similar metrics used to calculate the Proposed Project's operational emissions, it appears that Alternative 2 would also result in a significant and unavoidable operational impact because ROC emissions would still be above the threshold of 25 pounds per day.

Estimated Project Daily Emissions at Buildout – Alternative 2

	Emissions in Pounds per Day					
Emissions Source	**ROC**	**NO_x**	**CO**	**SO_x**	**PM10**	**PM2.5**
Emissions Totals	26	12	117	< 1	18	5
Recommended Threshold	25	25	—	—	—	—
Exceeds Threshold?	**Yes**	**No**	—	—	—	—

Biological Resources

Alternative 2 would alter far less of the Project Site's existing condition due to the lessened need for grading to install infrastructure (flood control basins, roadways, utilities, etc.), and 282 fewer units of housing construction; further, construction could largely avoid areas where biological resources and sensitive habitats exist. In addition, all of the proposed mitigation measures to reduce potential impacts to the existing on-site plant communities (including sensitive plant species), wildlife species (including sensitive wildlife species), nesting birds, protected trees, "waters of the US/waters of the State" under jurisdiction of the US Army Corps of Engineers (USACE) and/or the Regional Water Quality Control Board (RWQCB), or streambed or habitat under the jurisdiction of the California Department of Fish and

Wildlife (CDFW) would still be implemented. Although the Project's impacts would be less than significant, potential impacts associated with Alternative 2 would be less than those of the Project.

Cultural Resources

Alternative 2 would alter far less of the Project Site's existing condition due to a reduced need for grading for infrastructure and housing construction, and would result in the construction of 282 units fewer of housing. Nonetheless, as the Project Site is vacant, there are no historical resources within or adjacent to the Project Site. Thus, similar to the Project, no impacts to historic resources would occur under Alternative 2. Such impacts would be similar to those under the Project.

Alternative 2 would have a reduced need for grading for infrastructure and housing construction, and would result in reduced earthmoving activities. Thus, Alternative 2 would have a lessened potential for uncovering archaeological resources or previously unknown human remains; however, the inadvertent discovery of archaeological resources or previously unknown human remains would still be considered a significant impact. Under the Project, impacts associated with the potential discovery of unknown archaeological resources or previously unknown human remains would be less than significant with implementation of mitigation measures, and these same measures would be implemented under Alternative 2. Therefore, similar to the Proposed Project, potential impacts under Alternative 2 would be less than significant.

Energy

Under Alternative 2, the number of new housing units would be reduced by 282 units, resulting in 998 fewer residents residing on the Project Site. Therefore, demand for electricity and natural gas would less than that of the Proposed Project. Although the Project's impacts would be less than significant, potential impacts associated with Alternative 2 would be less than those of the Project.

Geology and Soils

Alternative 2 would alter portions of the Project Site for infrastructure improvements and housing construction, although to a much lesser extent than the Proposed Project. Implementation of the Alternative 2 would require grading activities to lessen impacts related to slope instability, sedimentation, and erosion. Furthermore, Alternative 2 could expose additional people and/or structures to potential adverse effects associated with geologic and seismic hazards, such as fault rupture, seismic groundshaking, liquefaction, lateral spreading, subsidence, landslides or expansive soils, although to a lesser extent than the Proposed Project. Under the Project, impacts associated geology and soils would be less than significant with implementation of mitigation measures, and these same measures would be

implemented under Alternative 2. Although the Project's impacts would be less than significant, potential impacts of Alternative 2 would be less than under the Project.

Greenhouse Gas Emissions

Under Alternative 2, the number of new housing units would be reduced by 282 units, resulting in 998 fewer residents residing on the Project Site. Therefore, greenhouse gas (GHG) emissions would be less for both construction and operation of Alternative 2. Although the Project's impacts would be less than significant, potential impacts of Alternative 2 would be less than under the Project.

Hazards and Hazardous Materials

Under Alternative 2, construction of 468 units of housing and associated grading activities would occur. However, similar to the Project, all potentially hazardous materials transported, stored, or used on-site for construction purposes and subsequently for the upkeep of public facilities, parkland and open space areas by the construction contractors, and subsequent homeowners, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable County, state, and federal regulations governing such activities. With contractor and resident compliance with the County, state and federal regulations, impacts related to accidental release or upset due to the use of hazardous materials or hazardous waste disposal by the construction and operation under Alternative 2 would be less than the Project due to less grading and fewer housing units, and less than significant.

Similar to the Project, Alternative 2 would result in an increase in population at the Project Site, and there would be a corresponding increase in the need for fire protection services, including paramedic services. The proposed residential uses are expected to create the typical range of fire service calls that other such uses create, including kitchen/house fires, garbage bin fires, car fires, electrical fires, etc. Impacts associated with the additional residents include an increase in the number of fire department responses, routine fire prevention life/safety inspections, public education activities and participation in community events. While fire service impacts would be less than significant under both the alternative and the Project, due to the reduced population under the alternative, impacts would be incrementally less when compared to the Project.

The Project Site is located in a VHFHS Zone. Therefore, similar to the Project, development under this alternative would be subject to various governmental codes, guidelines, and programs aimed at reducing the potential fire hazard risks to an acceptable level; including, but not limited to, County of Los Angeles Fire Code Section 1117.2.1 which includes building standards and landscape criteria for all new construction relating to fuel modification planning to help reduce the threat of fires in high hazard areas. Both the Project and the alternative would result in less than significant impacts with respect to location

in a fire hazard zone. However, due to the reduction in the number of residential structures in the zone, impacts associated with the alternative would be incrementally less when compared to the Project. For these reasons, Alternative 2 would result in impacts similar to the Project, although incrementally reduced, with respect to hazards and hazardous materials.

Hydrology

Alternative 2 would vastly reduce the approximately 198.7 acres (72 percent) of the Project Site that would be graded, and covered with impervious surfaces associated with the Project. As such, there would be more opportunities for infiltration with this alternative. As with the Project, urban runoff that is generated under this alternative would be conveyed and discharged into the local storm drain system. However, under Alternative 2 only one new detention basin (Basin 3) would be constructed to stabilize or improve conditions on the Project Site, and hydrology impacts could be greater under this alternative. Although the Alternative 2's impacts would be less than significant, potential impacts would be greater than those of the Project, which includes the development of five detention basins, four debris basins, and other improvements that will enhance downstream flood control and water quality.

Water Quality

Alternative 2 would introduce new impervious surfaces, new landscaped areas, and some minor drainage improvements. As discussed above, under this alternative downstream water quality could potentially continue to degrade. Although Alternative 2's impacts would be less than significant, potential impacts would be greater than those of the Project.

Land Use and Planning

Under Alternative 2, no discretionary actions would be required.

With regard to land use compatibility, Alternative 2 would introduce new development on the Project Site, however the multi-family housing would be clustered at the southeast corner of the site, where there is more urbanized development, and only five single family homes would be scattered across the remaining over approximately 200 acres of the site. Thus, Alternative 2 would not affect existing on- or off-site land uses or existing land use relationships on the Project Site or the surrounding area. Therefore, less than impacts relative to land use compatibility would occur. Although Project impacts would be less than significant, potential impacts associated with Alternative 2 would be less than those of the Project.

Noise

Under Alternative 2, construction of new permanent buildings (468 units of multi-family housing and five units of single-family housing), and associated infrastructure improvements would occur, but to a much lesser degree. Thus, noise impacts associated with short-term construction would occur. However, as with the Project, impacts associated short-term construction noise would be less than significant with implementation of mitigation measures, and these same measures would be implemented under Alternative 2.

Under Alternative 2, development of 468 units of multi-family housing and five units of single-family housing would occur on the Project Site, and an increase in traffic over existing conditions would occur. The vehicles accessing the existing roadway network have the potential to increase ambient noise levels in the project vicinity. According to Caltrans, vehicle noise emissions increase with speed, and increased traffic volumes increase traffic noise; however, it takes a doubling of traffic to increase noise levels by only 3 dB(A).[1] Further, given the immediate proximity of the Moorpark Metrolink station to PA4 where the bulk of the development would occur under Alternative 2, a shift in mode share from drive alone commutes to rail transit is appropriate. As shown in **Table 3.11-6, Project Traffic Noise Level Increases** the increase in noise levels along all study roadways would range from 0.0 to 5.1 dB(A) CNEL. The largest increase of 5.1 dB(A) CNEL would be on Gabbert Road north of Poindexter Avenue but would not result in a noise level that exceeds the City's 65 dB(A) exterior noise level standard, and would not be considered significant. Alternative 2 would result in a reduction of operational noise impacts as compared to the Project's less than significant operational noise impacts due to the reduction of housing units and traffic noise. Finally, similar to the Proposed Project, Alternative 2 would implement mitigation measures to reduce vibration impacts during construction, and thus vibration impacts would be less than the Project's less than significant impacts.

Population and Housing

No significant impacts related to population and housing have been identified under the Proposed Project. Alternative 2 would reduce the number of on-site housing units by 282 units, and the on-site population by approximately 998 residents. Therefore, impacts related to population and housing associated with Alternative 2 would have less impact than the Proposed Project's less than significant impacts.

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1 Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol.* September 2013.

Public Services

Fire Service

Alternative 2 would result in new development and thus would increase the population on the Project Site and generate an associated increase in calls for fire protection and emergency medical services by the Ventura County Fire Department (VCFD). However, the demand for fire protection and emergency medical services in the area under Alternative 2 would be less the that of the Proposed Project given the 37 percent reduction in housing units and on-site population, and in addition, as with the Proposed Project, Alternative 2 would implement mitigation measures to further reduce potential impacts. It should also be noted that some Project benefits such as construction of the extensions of Meridian Hills Drive, North Hills Parkway, and High Street, which would provide additional emergency access and evacuation routes, would not be provided under Alternative 2. Nonetheless, although Project impacts would be less than significant, such impacts would be less under Alternative 2.

Law Enforcement Service

Alternative 2 would result in new development and thus would increase the population on the Project Site and could generate an associated increase in calls for law enforcement services by the Ventura County Sheriff's Department. Therefore, the demand for law enforcement services in the area could increase from existing conditions. However, the demand for law enforcement services in the area under Alternative 2 would be less the that of the Proposed Project given the 37 percent reduction in housing units and on-site population, and in addition, as with the Proposed Project, Alternative 2 would implement mitigation measures to further reduce potential impacts. It should also be noted that some Project benefits such as construction of the extensions of Meridian Hills Drive, North Hills Parkway, and High Street, which would provide additional emergency access and evacuation routes, would not be provided under Alternative 2. Nonetheless, although Project impacts would be less than significant, such impacts would be less under Alternative 2.

Schools

Alternative 2 would result in new development and thus would increase the population on the Site resulting in additional school age children in the neighborhood. Therefore, the demand for school services in the area would increase from existing conditions. However, similar to the Proposed Project, payment of the developer fees mandated under School Facilities Act (Government Code Section 65995) would mitigate Alternative 2 impacts on the Moorpark Unified School District. This

funding would offset the costs to construct new schools necessary to house the additional students generated by Alternative 2 and impacts would be less than significant.

Library Service

Alternative 2 would result in new development and thus would increase the population on the Site resulting in additional population in the neighborhood. Therefore, the demand for library services in the area would increase from existing conditions. However, similar to the Proposed Project, project applicant would be required to pay library facilities fees to the City of Moorpark, in effect at the time of and prior to the issuance of building permits. The City would use the fees for the purposes of improving library facilities to meet the increased demand on library services generated by Alternative 2 and impacts would be less than significant.

Recreation

Alternative 2 would result in new development and thus would increase the population on the site and generate an associated increase in the need for recreational areas in the neighborhood. The Proposed Project would provide a new approximately 6.77-acre public park, four private recreation areas, and four and one-half miles of public multi-use trails connecting to local and regional trails in the surrounding hills; none of these facilities would be developed under Alternative 2. Under Alternative 2, the Applicant would satisfy recreation/park space obligations solely through payment of Quimby fees. As such impacts related to recreation would be less than significant under Alternative 2.

Transportation

An increase in traffic would result from Alternative 2 due to construction-related trips on the local or regional street system, albeit far less that the Proposed Project, due to the reduced amount of grading and construction proposed under Alternative 2. Construction-related traffic impacts under the Project would be less than significant with the implementation of traffic management controls where necessary, and Alternative 2 would implement these same controls. Therefore, as with the Proposed Project, the impact of Alternative 2 due to construction-related trips would be less than significant.

Under Alternative 2, the number of new housing units would be reduced by 282 units, resulting in 998 fewer residents residing on the Project Site. Therefore, vehicle miles traveled (VMT) by project residents would less than that of the Proposed Project. Further, Project impacts (as related to City of Moorpark criteria) would be less than significant after mitigation; Alternative 2 would implement the same mitigation as required that for the Proposed Project and impacts would be less than significant.

Tribal Cultural Resources

Alternative 2 would have a reduced need for grading for infrastructure and housing construction, and would result in greatly reduced earthmoving activities. Thus, Alternative 2 would have a lessened potential for uncovering Tribal Cultural Resources; however, the inadvertent discovery of Tribal Cultural Resources would still be considered a significant impact. Under the Project, impacts associated with the potential discovery of unknown Tribal Cultural Resources would be less than significant with implementation of mitigation measures, and these same measures would be implemented under Alternative 2. Therefore, similar to the Proposed Project, potential impacts under Alternative 2 would be less than significant.

Utilities

Water Supply

As discussed in **Section 3.17.2 Water Supply**, water demands for the Proposed Project were included in the water demand projections in the Ventura County Waterworks District (VCWWD) No. 1's 2016 Urban Water Management Plan (UWMP). As indicated in the VCWWD No. 1's UWMP, the District's total projected water supplies available over the next 20 years will meet the projected water demands associated with the Proposed Project and existing and other planned uses within the District's service area under most scenarios. Therefore, the impact of the Proposed Project on water supplies under normal year and multiple dry year scenarios would be less than significant. In addition, the amount of production relied upon in the supply-demand analysis to meet future demands will necessitate an expansion of treatment facilities, with or without the Proposed Project. As such, the impact on the expansion of facilities would be less than significant as well.

Under Alternative 2, new demand for domestic water would be generated, and new water supply and distribution improvements would need to be constructed. However, under Alternative 2, the number of new housing units would be reduced by 282 units, resulting in 998 fewer residents residing on the Project Site. Therefore, demand for potable water would less than that of the Proposed Project. Therefore, although Project impacts would be less than significant, such impacts would be less under Alternative 2.

Wastewater

As discussed in **Section 3.17.3 Wastewater**, VCWWD No. 1 owns, operates, and maintains the sewer collection system and wastewater treatment facility that serves the City of Moorpark and adjacent Ventura County, surrounding community, and specific plan site. The Moorpark Wastewater

Treatment Plant (MWWTP) has a design capacity of 5.0 mgd and has a state discharge permit for 1.5 mgd. The current average flow is 2.1 mgd.[2] The treatment plant is permitted to discharge directly into the Arroyo Simi. As discussed in **Section 3.17.3 Wastewater**, the existing wastewater collection and treatment system are sufficient to accommodate the Proposed Project at build-out conditions.

Under Alternative 2, new wastewater flows would be generated. The existing wastewater collection treatment system is sufficient to treat the new flows; however, new wastewater collection improvements would need to be constructed. Under Alternative 2, the number of new housing units would be reduced by 282 units on the Project Site; in addition, the location of the new housing units would be significantly different than that of the Proposed Project. The existing wastewater collection system, was determined to be sufficient to accommodate the Proposed Project area at build-out conditions. As such, given the reduced flow of Alternative 2, impacts would also be less than significant.

Solid Waste

Under Alternative 2, construction of new permanent structures and associated infrastructure improvements would occur. Therefore, construction debris and waste would be generated for disposal at a County inert landfill. However, under Alternative 2, the number of new housing units would be reduced by 282 units. As discussed in **Section 3.17.4, Solid Waste**, the Simi Valley Landfill currently has remaining capacity to handle the Proposed Project's estimated solid waste from construction activities. Therefore, construction-related solid waste generated from the development of the Proposed Project would result in a less than significant impact. As construction-generated waste from the implementation of Alternative 2 would be less than the Proposed Project, impacts would also be less than significant.

In addition, the land uses would be the same as those proposed under the Proposed Project and given the reduction in housing units, the demand for landfill capacity during operation under Alternative 2would be less than that of the Proposed Project. Therefore, impacts of Alternative 2 regarding solid waste, would be less than the Proposed Project, and would be less than significant.

Wildfire

The Project Site is in a Very High Fire Hazard Severity Zone; as discussed in **Section 3.18, Wildfire**, Project impacts would be less than significant with mitigation. As with the Proposed Projects, Alternative

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2 Scott Meckstroth, Deputy Director, Ventura County, Department of Water and Sanitation, personal communication, November 13, 2020.

2 would result in new development and land uses. However, under this alternative fewer improvements to slope stability, on- and off-site drainage and flood control improvements, and roadway connectivity would occur. Therefore, despite a lower density, this alternative would slightly increase impacts related to Wildfire.

4.4.3 Relationship of the Alternative to the Project Objectives

The RPD 20U-N-D Alternative does not meet most of the basic project objectives, which are set forth in this EIR in **Section 2.0, Project Description**. Project objectives not fully met or impeded by the RPD 20U-N-D Alternative are listed below.

- Develop the project site with a financially feasible, residential project that meets the residential needs of the City of Moorpark.
- Provide residential development consistent with 2021-2023 City Council Goal 1: Identify options and solutions to barriers for housing for all economic and age ranges.
- Create a new community neighborhood that would allow for residential development, while preserving natural resources and open space.
- Contribute to the enhancement of Downtown High Street by providing a new residential customer base, bicycle, vehicle, and pedestrian connections to the downtown.
- Provide a range of housing opportunities with varying densities, types, styles, prices, and tenancy characteristics (for sale versus rental).
- Help to achieve Housing Element goals for affordable housing.
- Locate housing near to jobs and in close proximity to transit in order to reduce Vehicle Miles Traveled.
- Provide development and transitional land use patterns that supports surrounding land uses.
- Designate sites for needed public facilities including flood control facilities, regional roadways, and trails.
- Provide residential opportunities to respond to economic and market conditions over several years.
- Provide a tax base to support public services associated with the proposed development to appropriately offset development impacts to city services.

- Improve safe and adequate vehicle circulation within the regional area.
- Provide pedestrian, bicycle and equestrian trails that connect to the local and regional trail systems in the surrounding hills.

4.5 ALTERNATIVE 3 – 415 UNIT REDUCED VISUAL IMPACT ALTERNATIVE

4.5.1 Description

In an effort to reduce the Proposed Project's significant and unavoidable visual impacts, Alternative 3, 415 Unit Reduced Visual Impact, would include the construction of 415 single-family residential dwelling units, organized to avoid development on the most southerly, and publicly visible, areas of the Project Site. The Alternative would include 100 single-family units in Planning Area 1, 100 single-family units in Planning Area 2 east, 150 single-family units in Planning Area 3, and 65 single-family units in Planning Area 4 north. This alternative would provide infrastructure improvements in the form of detention basins (2, 2A, 2B, and 3), and the extension of North Hills Parkway up to Gabbert Road.

No affordable housing units would be provided under this alternative, as that parcel would be developed with single family housing. Further, the approximately 6.77-acre public park area (proposed under the Project on the southern edge of the specific plan area, along the High Street frontage), would not be included under this alternative.

In addition, Alternative 3 not would provide for the extension of High Street beyond 'A Street', or provide a connection to Meridian Hills Parkway. The Applicant would satisfy recreation/park space obligations solely through payment of Quimby fees.

This Alternative would reduce the number of proposed dwelling units by 300 when compared to the Project. Alternative 3 would accommodate approximately 1,469 residents (calculated as 3.54 persons per dwelling), approximately 1,204 fewer residents.

Figure 4.0-2, Alternative 3 415 Unit Reduced Visual Impact - Land Use Plan, shows the proposed configuration of this alternative and specific plan statistical summary.

4.5.2 Impact Evaluation

Aesthetics

Implementation of Alternative 3, 415 Unit Reduced Visual Impact, would significantly alter the visual characteristics of the site. Grading activities would affect the eastern third of the significant ridgelines that

transverse the site. The westernmost viewshed (Open Space) would be generally unaffected by development; under this Alternative this portion of the Specific Plan site would be retained as open space. The central area between Gabbert Road and "A" Street would have limited grading as viewed from the Poindexter Avenue location, even though there would be development within the northeastern portion of Planning Area 2, obstructed by the development within Planning Area 4. The easterly third of the Project site would be converted from undeveloped open space to the development as provided for by the Specific Plan. However, as a result of moving the visible development within Planning Area 4 northerly, away from the slope above Basin 3, the buildable "super pad" of Planning Area 4 would be reduced to approximately 8-acres. This development area would still have visibility from the valley floor, but the lower profile of reduced height and density homes would reduce the visual perception of development. Existing vacant land within the site would be developed with residential, and recreational uses that would be visible. As a result, the implementation of this Alternative would have a significant impact to this viewshed.

Surrounding Views

View looking West Along Casey Road. As with the Project, the site development to the north of Casey Road involves the installation of noise walls and construction of single-family residences slope grading for Casey Road with associated landscaping; the development of three-story multi-family units east of "A" Street and south of Casey Road would also be visible. The view along Casey Road five to seven years after development under this Alternative would be similar to the Project.

Views from Poindexter Park, East of Gisler Road, South of Poindexter Avenue. Views from this vantage point would be of the completion of manufactured slopes along the south portions of the site in Planning Areas 4 and the completion of a detention basin north of Poindexter Avenue and the High Street extension, along with later stages of initial improvements and additional grading of the upper portion of slopes. Landscaping improvements surrounding the detention basins north of Poindexter Avenue and multi-family units in Planning Area 4 are shown. Approximately five-acres of natural slope would be retained between Basin 3 and the reduced development super pad of Planning Area 4. This natural slope would require re-landscaping consistent with fuel modification standards of the Ventura County Fire Protection District. Even with this reduction in grading and the setback from the top of the slope buildings would remain visible from Poindexter Park.

Views looking East from Gabbert Road. Views of Alternative 3 buildout from this vantage point would include infrastructure improvements (i.e., light standards and Basin 2 grading) along with single family residences along the newly constructed North Hills Parkway in the distance to the east.

Hillside Management Ordinance

The intent of the Hillside Management Ordinance (Chapter 17.38 of the Moorpark Municipal Code) is to implement the goals and policies of the *City of Moorpark General Plan*, as they relate to the development and resource management in hillside areas of the City. The directive of the Hillside Management Ordinance is to allow for "orderly and sensitive development of hillside areas in conjunction with the preservation of natural open space." **Figure 3.1-11, Slope and Ridgeline Map**, illustrates the slopes and prominent ridgeline area on the Project site. The Project site is comprised of approximately 183.2 acres with slopes less than 20 percent slopes, approximately 58.1 acres with slopes between 20 to 35 percent, approximately 27.6 acres with slopes between 35 to 50 percent, and approximately 8.4 acres with slope greater than 50 percent. Overall, the approximately 277.30-acre Project site has an average slope of 19 percent. In general, grading of the Alternative 3 site would involve the mass grading and cut and fill of approximately five million cubic yards of earth, which would be balanced on site. Maximum cut slopes would be approximately 70 feet high, and maximum fill areas would be approximately 75 feet high. Approximately 177 acres (64 percent) of the Project site would be graded under of implementation of Alternative 3. Approximately-100 acres (36 percent) of the site would remain undisturbed.

Accordingly, Alternative 3 does not intend to disturb some of the steeper areas of the site, specifically the area west of "A" Street (Areas A and C on **Figure 3.1-12, Hillside Grading Area Identification Map)** and the area north of Planning Area 1 (Area B **Figure 3.1-12, Hillside Grading Area Identification Map**).

Generally, the steeper slopes on the site which are being disturbed are relatively minor intermediate ridge spurs within the site shown in Grading Areas D and E. Most of the "prominent" ridgelines and landforms are retained.

Section 17.38.030.B exempts properties with 20% or greater slopes when those slopes are associated with minor drainage courses that do not impact significant natural drainage patterns or ridgelines.

From a visibility/view perspective, most of the "prominent" slopes or ridgelines are preserved; including the larger slopes north of Planning Area 1 (Area B on **Figure 3.1-12, Hillside Grading Area Identification Map**), the larger slopes west of "A" Street (Areas A and C on **Figure 3.1-12, Hillside Grading Area Identification Map**), and the existing ridgeline/knoll southwest of Planning Area 2 (Area C on **Figure 3.1-12, Hillside Grading Area Identification Map**).

Much of the site was graded for ranching and farming purposes sometime in the last century so most impacts to the existing topography are not impacts to natural slopes because the natural grade has long since been disturbed.

Some of the more noteworthy impacts to existing slopes with gradients greater than 20 percent are within Planning Areas 3 & 4 on the east side of the site. However, there are a few considerations which limit the applicability of the ordinance in these areas:

As mentioned, many of these are smaller and more localized areas that likely do not qualify as "prominent" landforms (most of the impacts actually just involve filling-in existing local valleys so visual impacts are much less significant than significant cuts to ridgelines). Filling-in local valleys/ravines is permissible per Section 17.38.090.

These impacts are in denser planning areas which is generally in-line with the intent of the ordinance-increase density in one area to minimize impacts on the rest of the site where more prominent landforms are located.

A key reason for the fills in Planning Area 4 (Area D on **Figure 3.1-12, Hillside Grading Area Identification Map**) is to support Detention Basin 3, which provides a regional benefit by diverting significant quantities of storm water runoff from Walnut Canyon Channel so that existing downstream flood control infrastructure is not overwhelmed.

Similarly, the area northeast of the intersection of Gabbert Road and North Hills Parkway (Area E on **Figure 3.1-12, Hillside Grading Area Identification Map**) requires some excavation cuts to provide sufficient volume storage for Detention Basin 2B.

It should be noted that a portion of the storage volume that will be provided within Basin 2B is for sediment/debris storage for the existing watershed northwest of the project. In the existing condition, sediment/debris storage for this existing watershed is not adequately provided. The proposed improvements will provide a regional benefit by ensuring that sediment and debris from the existing watershed is not transported downstream.

Similar to the Specific Plan, Alternative 3 would provide remedial measures to reduce erosion and geologic hazards; limit the alteration of visible ridgelines; preserve natural drainages; develop the densest portions of the site in the flatter portions of the site; and use native vegetation for replanting and other water-conserving techniques. In addition, Alternative 3 would incorporate landscape intended to transition developed areas from natural open space areas, as well as provide buffering of views of development under Alternative 3 site from surrounding land uses.

It should be noted that construction of the North Hills Parkway and other General Plan Circulation Element roadways within Hitch Ranch, with or without development of Alternative 3, would result in significant encroachments to the slopes greater than 20 percent. Under Alternative 3 Approximately 40 percent of the site with slopes of 35 to 50 percent would be retained in dedicated open space; the Hillside

Management Ordinance requires 50 percent. The 50 percent or greater slope areas proposed for development are small, isolated areas that would be graded as part of the development plan. In addition, similar to the Project, alternative 3 includes the preservation the prominent ridgeline on the site. Preservation of this area is consistent with the Hillside Management Ordinance requirements. Further, Section 17.38.030 M of the Hillside Management Ordinance allows the City to approve a Development Agreement to exempt a project from the requirements of the Ordinance. The Applicant will be requesting a Development Agreement for this project, once granted, impacts under the Hillside Management Ordinance would be less than significant.

Silhouetting

A review of plans indicates that the proposed development would be built below higher ridgelines that occur off site to the north. However, from Viewing Locations A, B, and C, development is proposed either above the viewer or at a higher or similar elevation. Therefore, project elements viewed in the foreground would obscure the higher and more distant hills and appear as silhouettes or a form of ridgeline development. This condition would apply where the edges of Planning Area 3 and 4 are observed from Viewing Location A, where the southern margin of Planning Area 4 is viewed from Viewing Location B, and where Planning Area 2 and 4 are viewed in the distance from Viewing Location C.

Given the change in the visual character of the site, and that background visual features would be removed and replaced with the silhouettes of the new homes, impacts to the visual resource environment would be considered significant when measured against this assessment criterion.

Landform Alterations

Terrain on the Project site consists of low hills and broad channel areas. Project construction would require substantial grading that would result in the creation of four large, generally flat pad areas. Given the substantial change in the site's existing landform from a natural rolling terrain to a series of "super pads," impacts to the visual resource environment would be considered significant when measured against this assessment criterion.

Effects on Views from Surrounding Residences

Views from residential areas are emphasized here for several reasons. First, many residences are directly oriented towards the Project site. Second, vistas of and across the site can be considerable. Third, the impact associated with project implementation (for these residents) would likely be the greatest alteration to their existing environmental condition. Last, residents with views of the site requested that this issue be evaluated during the project scoping meeting.

Residences South of Poindexter Avenue. Most homes south of Poindexter Avenue are oriented away from the site. Where visible, Alternative 3 elements that would be observable include (proceeding from east to west) (1) the contour-graded manufactured slope that occurs north of detention basin 1, (2) the high-density residential structures proposed as part of Planning Area 4, (3) the contour graded slopes and natural open space that occurs south and west of the Planning Area 4, and (4) the southern margins of the residential structures associated with development along the southern margin of the easterly remaining segment of Planning Area 2. Homes along the southern margin of these development areas would obscure views of homes proposed to the north.

Because most homes from this viewing location are not oriented towards the site, and rear yard walls preclude most vistas of the site, no significant impacts from this location are expected.

Residences to the North. New construction with residential uses are located north of the Project site; some of these have partial vistas of the Project site. Project elements that may be visible include (proceeding from north to south): (1) residential development in Planning Area 1, (2) a corridor for the North Hills Parkway-roadway consistent with the general plan, and (3) residential development in Planning Area 3.

Because homes from this viewing location are oriented towards the site with no rear yard walls to obstruct vistas of the site, and elements of the project would be partially visible, impacts associated with Alternative 3 visibility to this residential viewing audience are considered significant.

Residences to the West. Residences to the west of the Project site are at elevations similar to those found within the Project site and would thus have views into the Project site. As with the Project, areas of the Alternative 3 site adjacent to these residences are planned to be preserved as open space, which would reduce the potential for impacts to views from this location. The site's topography would further obscure Alternative 3 development from view, and no significant impacts from this location are expected.

Residences to the South and East. Residences to the east of the project occur at a lower elevation and residents would have no direct vistas of the project. Therefore, these residents would not be directly impacted by the project. Residents to the east of the site would observe an incremental change in the existing condition. However, developments would be observed as an incremental encroachment of development into the lower hillsides that is not out of character with existing development practices in the City and are not considered significant.

As with the Proposed Project, all of the proposed mitigation measures to reduce potential impacts to Aesthetics would be implemented. However, although the impacts associated with Alternative 3 would be less than those of the Project, potential impacts to scenic vistas would remain significant and unavoidable.

Area/Description:	Land Use:	Acres:	Dwelling Units/Gross Acre:	Number of Dwelling Units (DU):
Planning Area 1	Single Family Detached Units & Pvt. Streets	25.20		100
	Natural Open Space	17.33		
	Manufactured Slopes	18.96		
	Subtotal	**61.49**	**1.63**	**100**
Planning Area 2	Single Family Detached Units & Pvt. Streets	19.50		100
	Natural Open Space	45.43		
	Manufactured Slopes	7.90		
	Subtotal	**62.10**	**1.61**	**100**
Planning Area 3	Single Family Detached Units & Pvt. Streets	26.21		150
	Open Space	1.60		
	Manufactured Slopes	4.06		
	Recreation Lot	0.93		
	Subtotal	**32.80**	**4.57**	**150**
Planning Area 4	Single Family (Cluster) Detached Units	8.31		65
	Open Space	9.00		
	Manufactured Slopes	5.69		
	Subtotal	**23.00**	**2.82**	**65**
Open Space	Open Space	28.78		
	Subtotal	**28.78**		
Other Categories	Public Streets	27.51		
	VCWPD Easement (Lot AD)	2.68		
	Detention Basin 2 (Lot Z)	5.94		
	Detention Basin 2A (Lot H)	3.67		
	Detention Basin 2B (Lot V)	6.30		
	Detention Basin 3	12.30		
	Subtotal	**58.40**		
	TOTAL	**277.30**	**1.50**	**415**

SOURCE: Comstock Homes, 2021.

FIGURE **4.0-2**

IMPACT SCIENCES

Alternative 3 - 415 Unit Reduced Visual Impact - Land Use Plan

Air Quality

Alternative 3 would alter less of the Project Site's existing condition due to a reduced need for grading for infrastructure and housing construction, and would result in the construction of 300 units fewer of housing shortening the construction duration, resulting in the generation of less construction air pollutant emissions. In addition, all of the proposed mitigation measures to reduce potential impacts to air quality would still be implemented. Therefore, similar to the Proposed Project, construction impacts to air quality would be less than significant.

This alternative consists of an approximately 45 percent reduction in the number of residential units as compared to the Proposed Project. Therefore, it is reasonable to assume that operational air pollutant emissions would be reduced in a generally proportionate fashion. Using similar metrics used to calculate the Proposed Project's operational emissions, it appears that Alternative 3 would avoid the significant and unavoidable operational impact because ROC emissions would be below the threshold of 25 pounds per day.

Estimated Project Daily Emissions at Buildout – Alternative 3

	Emissions in Pounds per Day					
Emissions Source	**ROC**	**NO_x**	**CO**	**SO_x**	**PM10**	**PM2.5**
Emissions Totals	23	11	102	< 1	15	5
Recommended Threshold	25	25	—	—	—	—
Exceeds Threshold?	**No**	**No**	—	—	—	—

Biological Resources

Alternative 3 would alter less of the Project Site's existing condition due to the lessened need for grading to install infrastructure (flood control basins, roadways, utilities, etc.), and 300 fewer units of housing construction; further, construction could largely avoid areas where biological resources and sensitive habitats exist. In addition, all of the proposed mitigation measures to reduce potential impacts to the existing on-site plant communities (including sensitive plant species), wildlife species (including sensitive wildlife species), nesting birds, protected trees, "waters of the US/waters of the State" under jurisdiction of the US Army Corps of Engineers (USACE) and/or the Regional Water Quality Control Board (RWQCB), or streambed or habitat under the jurisdiction of the California Department of Fish and

Wildlife (CDFW) would still be implemented. Although the Project's impacts would be less than significant, potential impacts associated with Alternative 3 would be less than those of the Project.

Cultural Resources

Alternative 3 would alter less of the Project Site's existing condition due to a reduced need for grading for infrastructure and housing construction, and would result in the construction of 300 units fewer of housing. Nonetheless, as the Project Site is vacant, there are no historical resources within or adjacent to the Project Site. Thus, similar to the Project, no impacts to historic resources would occur under Alternative 3. Such impacts would be similar to those under the Project.

Alternative 3 would have a reduced need for grading for infrastructure and housing construction, and would result in reduced earthmoving activities. Thus, Alternative 3 would have a lessened potential for uncovering archaeological resources or previously unknown human remains; however, the inadvertent discovery of archaeological resources or previously unknown human remains would still be considered a significant impact. Under the Project, impacts associated with the potential discovery of unknown archaeological resources or previously unknown human remains would be less than significant with implementation of mitigation measures, and these same measures would be implemented under Alternative 3. Therefore, similar to the Proposed Project, potential impacts under Alternative 3 would be less than significant.

Energy

Under Alternative 3, the number of new housing units would be reduced by 300 units, resulting in 1,204 fewer residents residing on the Project Site. Therefore, demand for electricity and natural gas would less than that of the Proposed Project. Although the Project's impacts would be less than significant, potential impacts associated with Alternative 3 would be less than those of the Project.

Geology and Soils

Alternative 3 would alter portions of the Project Site for infrastructure improvements and housing construction, although to a lesser extent than the Proposed Project. Implementation of the Alternative 3 would require grading activities to lessen impacts related to slope instability, sedimentation, and erosion. Furthermore, Alternative 3 could expose additional people and/or structures to potential adverse effects associated with geologic and seismic hazards, such as fault rupture, seismic groundshaking, liquefaction, lateral spreading, subsidence, landslides or expansive soils, although to a lesser extent than the Proposed Project. Under the Project, impacts associated geology and soils would be less than significant with implementation of mitigation measures, and these same measures would be implemented under

Alternative 3. Although the Project's impacts would be less than significant, potential impacts of Alternative 3 would be less than under the Project.

Greenhouse Gas Emissions

Under Alternative 3, the number of new housing units would be reduced by 300 units, resulting in 1,204 fewer residents residing on the Project Site. Therefore, greenhouse gas (GHG) emissions would be less for both construction and operation of Alternative 3. Although the Project's impacts would be less than significant, potential impacts of Alternative 3 would be less than under the Project.

Hazards and Hazardous Materials

Under Alternative 3, construction of 415 units of housing and associated grading activities would occur. However, similar to the Project, all potentially hazardous materials transported, stored, or used on-site for construction purposes and subsequently for the upkeep of public facilities, parkland and open space areas by the construction contractors, and subsequent homeowners, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable County, state, and federal regulations governing such activities. With contractor and resident compliance with the County, state and federal regulations, impacts related to accidental release or upset due to the use of hazardous materials or hazardous waste disposal by the construction and operation under Alternative 3 would be less than the Project due to less grading and fewer housing units, and less than significant.

Similar to the Project, Alternative 3 would result in an increase in population at the Project Site, and there would be a corresponding increase in the need for fire protection services, including paramedic services. The proposed residential uses are expected to create the typical range of fire service calls that other such uses create, including kitchen/house fires, garbage bin fires, car fires, electrical fires, etc. Impacts associated with the additional residents include an increase in the number of fire department responses, routine fire prevention life/safety inspections, public education activities and participation in community events. While fire service impacts would be less than significant under both the alternative and the Project, due to the reduced population under the alternative, impacts would be incrementally less when compared to the Project.

The Project Site is located in a VHFHS Zone. Therefore, similar to the Project, development under this alternative would be subject to various governmental codes, guidelines, and programs aimed at reducing the potential fire hazard risks to an acceptable level; including, but not limited to, County of Los Angeles Fire Code Section 1117.2.1 which includes building standards and landscape criteria for all new construction relating to fuel modification planning to help reduce the threat of fires in high hazard areas. Both the Project and the alternative would result in less than significant impacts with respect to location

in a fire hazard zone. However, due to the reduction in the number of residential structures in the zone, impacts associated with the alternative would be incrementally less when compared to the Project. For these reasons, Alternative 3 would result in impacts similar to the Project, although incrementally reduced, with respect to hazards and hazardous materials.

Hydrology

Alternative 3 would reduce the approximately 198.7 acres (72 percent) of the Project Site that would be graded, and covered with impervious surfaces associated with the Project. As such, there would be more opportunities for infiltration with this alternative. As with the Project, urban runoff that is generated under Alternative 3 would be conveyed and discharged into the local storm drain system. However, under Alternative 3 would also include construction of four detention basins (2, 2A, 2B and 3) to stabilize and improve conditions on the Project site, and hydrology impacts could be similar under this alternative. Although the Alternative 3's impacts would be less than significant, the Alternative would not include the construction of development of detention/water quality basin AE, four debris basins, and other improvements that would enhance downstream flood control and water quality as proposed under the Specific Plan.

Water Quality

As described above, Alternative 3 would introduce new impervious surfaces, new landscaped areas, and some drainage improvements. As discussed above, under this alternative downstream water quality could potentially continue to degrade. Although Alternative 3's impacts would be less than significant, without the inclusion of detention/water quality basin AE, potential impacts to water quality would be greater than those of the Project.

Land Use and Planning

Under Alternative 3, similar to the Project's requested discretionary actions, General Plan Amendments to the Circulation and Land Use Elements, rezoning of the site from AE-40 to RPD, a vesting tentative tract map, Residential Planned Development Permit(s), and tree removal permits would be required.

With regard to land use compatibility, Alternative 3 would introduce new development on the Project Site; however, the proposed 415 single family homes would be organized to avoid development on the most southerly, and publicly visible, areas of the Project site. Thus, Alternative 3 would have minimal affect existing on- or off-site land uses or existing land use relationships on the Project Site or the surrounding area. Therefore, less than impacts relative to land use compatibility would occur. Although

Project impacts would be less than significant, potential impacts associated with Alternative 3 would be less than those of the Project.

Noise

Under Alternative 3, construction of new permanent buildings and associated infrastructure improvements would occur, but to a much lesser degree. Thus, noise impacts associated with short-term construction would occur. However, as with the Project, impacts associated short-term construction noise would be less than significant with implementation of mitigation measures, and these same measures would be implemented under Alternative 3.

Under Alternative 3, some development would occur on the Project Site, and an increase in traffic would occur. The vehicles accessing the existing roadway network have the potential to increase ambient noise levels in the project vicinity. According to Caltrans, vehicle noise emissions increase with speed, and increased traffic volumes increase traffic noise; however, it takes a doubling of traffic to increase noise levels by only 3 dB(A).[3] Further, given the immediate proximity of the Moorpark Metrolink station to PA-4, a shift in mode share from drive alone commutes to rail transit is appropriate. As shown in **Table 3.11-6, Project Traffic Noise Level Increases** the increase in noise levels along all study roadways would range from 0.0 to 5.1 dB(A) CNEL. The largest increase of 5.1 dB(A) CNEL would be on Gabbert Road north of Poindexter Avenue but would not result in a noise level that exceeds the City's 65 dB(A) exterior noise level standard, and would not be considered significant. Alternative 3 would result in a reduction of operational noise impacts as compared to the Project's less than significant operational noise impacts due to the reduction of housing units (300 fewer units) and traffic noise (due to 37 percent fewer housing units and residents). Finally, similar to the Proposed Project, Alternative 3 would implement mitigation measures to reduce vibration impacts during construction, and thus vibration impacts would be less than the Project's less than significant impacts.

Population and Housing

No significant impacts related to population and housing have been identified under the Proposed Project. Alternative 3 would reduce the number of on-site housing units by 300 units, and the on-site population by approximately 1,204 residents. Therefore, impacts related to population and housing associated with Alternative 3 would have less impact than the Proposed Project's less than significant impacts.

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3 Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol.* September 2013.

Public Services

Fire Service

Alternative 3 would result in new development and thus would increase the population on the Project Site and generate an associated increase in calls for fire protection and emergency medical services by the Ventura County Fire Department (VCFD). However, the demand for fire protection and emergency medical services in the area under Alternative 3 would be less the that of the Proposed Project given the 45 percent reduction in housing units and on-site population, and in addition, as with the Proposed Project, Alternative 3 would implement mitigation measures to further reduce potential impacts. It should also be noted that some Project benefits such as construction of the extensions of Meridian Hills Drive, and High Street, which would provide additional emergency access and evacuation routes, would not be provided under Alternative 3. Nonetheless, although Project impacts would be less than significant, such impacts would be less under Alternative 3.

Law Enforcement Service

Alternative 3 would result in new development and thus would increase the population on the Project Site and could generate an associated increase in calls for law enforcement services by the Sheriff's Department. Therefore, the demand for law enforcement services in the area could increase from existing conditions. However, the demand for law enforcement services in the area under Alternative 3 would be less the that of the Proposed Project given the reduction of 45 percent in housing units and on-site population, and in addition, as with the Proposed Project, Alternative 3 would implement mitigation measures to further reduce potential impacts. It should also be noted that some Project benefits such as construction of the extensions of Meridian Hills Drive, and High Street, which would provide additional emergency access and evacuation routes, would not be provided under Alternative 3. Nonetheless, although Project impacts would be less than significant, such impacts would be less under Alternative 3.

Schools

Alternative 3 would result in new development and thus would increase the population on the Site resulting in additional school age children in the neighborhood. Therefore, the demand for school services in the area would increase from existing conditions. However, similar to the Proposed Project, payment of the developer fees mandated under School Facilities Act (Government Code Section 65995) would mitigate Alternative 3 impacts on the Moorpark Unified School District. This

funding would offset the costs to construct new schools necessary to house the additional students generated by Alternative 3 and impacts would be less than significant.

Library Service

Alternative 3 would result in new development and thus would increase the population on the Site resulting in additional population in the neighborhood. Therefore, the demand for library services in the area would increase from existing conditions. However, similar to the Proposed Project, project applicant would be required to pay library facilities fees to the City of Moorpark, in effect at the time of and prior to the issuance of building permits. The City would use the fees for the purposes of improving library facilities to meet the increased demand on library services generated by Alternative 3 and impacts would be less than significant.

Recreation

Alternative 3 would result in new development and thus would increase the population on the site and generate an associated increase in the need for recreational areas in the neighborhood. The Proposed Project would provide a new approximately 6.77-acre public park, four private recreation areas, and four and one-half miles of public multi-use trails connecting to local and regional trails in the surrounding hills; none of these facilities would be developed under Alternative 3. Under Alternative 3, the Applicant would satisfy recreation/park space obligations solely through payment of Quimby fees. As such impacts related to recreation would be less than significant under Alternative 3.

Transportation

An increase in traffic would result from Alternative 3 due to construction-related trips on the local or regional street system, albeit far less that the Proposed Project, due to the reduced amount of grading and construction proposed under Alternative 3. Construction-related traffic impacts under the Project would be less than significant with the implementation of traffic management controls where necessary, and Alternative 3 would implement these same controls. Therefore, as with the Proposed Project, the impact of Alternative 3 due to construction-related trips would be less than significant.

Under Alternative 3, the number of new housing units would be reduced by 300 units, resulting in 1,204 fewer residents residing on the Project Site. Therefore, vehicle miles traveled (VMT) by project residents would less than that of the Proposed Project. Further, Project impacts (as related to City of Moorpark criteria) would be less than significant after mitigation; Alternative 3 would implement the same mitigation as required that for the Proposed Project and impacts would be less than significant.

Tribal Cultural Resources

Alternative 3 would have a reduced need for grading for infrastructure and housing construction, and would result in greatly reduced earthmoving activities. Thus, Alternative 3 would have a lessened potential for uncovering Tribal Cultural Resources; however, the inadvertent discovery of Tribal Cultural Resources would still be considered a significant impact. Under the Project, impacts associated with the potential discovery of unknown Tribal Cultural Resources would be less than significant with implementation of mitigation measures, and these same measures would be implemented under Alternative 3. Therefore, similar to the Proposed Project, potential impacts under Alternative 3 would be less than significant.

Utilities

Water Supply

As discussed in **Section 3.17.2 Water Supply**, water demands for the Proposed Project were included in the water demand projections in the Ventura County Waterworks District (VCWWD) No. 1's 2016 Urban Water Management Plan (UWMP). As indicated in the VCWWD No. 1's UWMP, the District's total projected water supplies available over the next 20 years will meet the projected water demands associated with the Proposed Project and existing and other planned uses within the District's service area under most scenarios. Therefore, the impact of the Proposed Project on water supplies under normal year and multiple dry year scenarios would be less than significant. In addition, the amount of production relied upon in the supply-demand analysis to meet future demands will necessitate an expansion of treatment facilities, with or without the Proposed Project. As such, the impact on the expansion of facilities would be less than significant as well.

Under Alternative 3, new demand for domestic water would be generated, and new water supply and distribution improvements would need to be constructed. However, under Alternative 3, the number of new housing units would be reduced by 300 units, resulting in 1,204 fewer residents residing on the Project Site. Therefore, demand for potable water would less than that of the Proposed Project. Therefore, although Project impacts would be less than significant, such impacts would be less under Alternative 3.

Wastewater

As discussed in **Section 3.17.3 Wastewater**, VCWWD No. 1 owns, operates, and maintains the sewer collection system and wastewater treatment facility that serves the City of Moorpark and adjacent Ventura County, surrounding community, and specific plan site. The Moorpark Wastewater

Treatment Plant (MWWTP) has a design capacity of 5.0 mgd and has a state discharge permit for 1.5 mgd. The current average flow is 2.1 mgd.[4] The treatment plant is permitted to discharge directly into the Arroyo Simi. As discussed in **Section 3.17.3 Wastewater**, the existing wastewater collection and treatment system are sufficient to accommodate the Proposed Project at build-out conditions.

Under Alternative 3, new wastewater flows would be generated. The existing wastewater collection treatment system is sufficient to treat the new flows; however, new wastewater collection improvements would need to be constructed. Under Alternative 3, the number of new housing units would be reduced by 300 units on the Project Site. The existing wastewater collection system was determined to be sufficient to accommodate the Proposed Project area at build-out conditions. As such, given the reduced flow of Alternative 3, impacts would also be less than significant.

Solid Waste

Under Alternative 3, construction of new permanent structures and associated infrastructure improvements would occur. Therefore, construction debris and waste would be generated for disposal at a County inert landfill. However, under Alternative 3, the number of new housing units would be reduced by 300 units. As discussed in **Section 3.17.4, Solid Waste**, the Simi Valley Landfill currently has remaining capacity to handle the Proposed Project's estimated solid waste from construction activities. Therefore, construction-related solid waste generated from the development of the Proposed Project would result in a less than significant impact. As construction-generated waste from the implementation of Alternative 3 would be less than the Proposed Project, impacts would also be less than significant.

In addition, the land uses would be the same as those proposed under the Proposed Project and given the reduction in housing units, the demand for landfill capacity during operation under Alternative 3would be less than that of the Proposed Project. Therefore, impacts of Alternative 3 regarding solid waste, would be less than the Proposed Project, and would be less than significant.

Wildfire

The Project Site is in a Very High Fire Hazard Severity Zone; as discussed in **Section 3.18, Wildfire**, Project impacts would be less than significant with mitigation. As with the Proposed Projects, Alternative 3 would result in new development and land uses. However, under this alternative fewer improvements to slope stability, on- and off-site drainage and flood control improvements, and roadway connectivity

[4] Scott Meckstroth, Deputy Director, Ventura County, Department of Water and Sanitation, personal communication, November 13, 2020.

would occur. Therefore, despite a lower density, this alternative would slightly increase impacts related to Wildfire.

4.5.3 Relationship of the Alternative to the Project Objectives

The 415 Unit Reduced Visual Impact Alternative does not meet many of the basic project objectives, which are set forth in this EIR in **Section 2.0, Project Description**. Project objectives not fully met or impeded by the 415 Unit Reduced Visual Impact Alternative are listed below.

- Develop the project site with a financially feasible, residential project that meets the residential needs of the City of Moorpark.
- Provide residential development consistent with 2021-2023 City Council Goal 1: Identify options and solutions to barriers for housing for all economic and age ranges.
- Create a new community neighborhood that would allow for residential development, while preserving natural resources and open space.
- Provide a range of housing opportunities with varying densities, types, styles, prices, and tenancy characteristics (for sale versus rental).
- Help to achieve Housing Element goals for affordable housing.
- Transition development within the project site with consideration for natural resource areas and open space.
- Provide development and transitional land use patterns that supports surrounding land uses.
- Designate sites for needed public facilities including flood control facilities, regional roadways, and trails.
- Provide residential opportunities to respond to economic and market conditions over several years.
- Provide a tax base to support public services associated with the proposed development to appropriately offset development impacts to city services.
- Improve safe and adequate vehicle circulation within the regional area.
- Provide pedestrian, bicycle and equestrian trails that connect to the local and regional trail systems in the surrounding hills.

4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The *State CEQA Guidelines* require that an environmentally superior alternative be identified among the selected alternatives (excluding the No Project alternative).[5] If the No Project Alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives.

The environmentally superior alternative would be Alternative 2 – RPD 20U-N-D Alternative. This alternative would reduce impacts related to visual resources to the greatest extent. Further, the lower density of this alternative would reduce impacts to biological and cultural resources, reduce demand for resources and services, as well as traffic volumes and noise levels.

By developing Alternative 2 rather than the Proposed Project, the applicant would not achieve the following project objectives to the same extent as they would be achieved under the Proposed Project:

- Develop the project site with a financially feasible, residential project that meets the residential needs of the City of Moorpark.
- Provide residential development consistent with 2021-2023 City Council Goal 1: Identify options and solutions to barriers for housing for all economic and age ranges.
- Create a new community neighborhood that would allow for residential development, while preserving natural resources and open space.
- Contribute to the enhancement of Downtown High Street by providing a new residential customer base, bicycle, vehicle, and pedestrian connections to the downtown.
- Provide a range of housing opportunities with varying densities, types, styles, prices, and tenancy characteristics (for sale versus rental).
- Help to achieve Housing Element goals for affordable housing.
- Locate housing near to jobs and in close proximity to transit in order to reduce Vehicle Miles Traveled.
- Provide development and transitional land use patterns that supports surrounding land uses.

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5 California Public Resources Code, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15124.6(e)(2).

- Designate sites for needed public facilities including flood control facilities, regional roadways, and trails.
- Provide residential opportunities to respond to economic and market conditions over several years.
- Provide a tax base to support public services associated with the proposed development to appropriately offset development impacts to city services.
- Improve safe and adequate vehicle circulation within the regional area.
- Provide pedestrian, bicycle and equestrian trails that connect to the local and regional trail systems in the surrounding hills.

Table 4.0-1
Alternatives Impact Comparison Matrix

Environmental Topic	Proposed Project	Alternative 1 No Project	Alternative 2 RPD 20U-N-D	Alternative 3 415 Unit Reduced Visual Impact
Aesthetics	S/U	L	S	S
Air Quality – Construction	LTS	L	L	L
Air Quality – Operational	S/U	L	S	L
Biological Resources	LTS	L	L	L
Cultural Resources	LTS	L	S	S
Energy	LTS	L	L	L
Geology and Soils	LTS	L	L	L
Greenhouse Gas Emissions	LTS	L	L	L
Hazards and Hazardous Materials	LTS	L	L	L
Hydrology and Water Quality	LTS	L	G	G
Land Use and Planning	LTS	L	L	S
Noise	LTS	L	L	L
Population and Housing	LTS	L	L	L
Public Services				
Fire Protection	LTS	L	G	S
Law Enforcement Services	LTS	L	G	S
Schools	LTS	L	L	L
Library Services	LTS	L	L	L
Recreation	LTS	L	S	S
Transportation	LTS	L	L	L
Tribal Cultural Resources	LTS	L	S	S
Utilities and Service Systems				
Water Supply	LTS	L	L	L
Wastewater Disposal	LTS	L	L	L
Solid Waste	LTS	L	L	L
Wildfire	LTS	L	G	G

LTS = Less than Significant

S/U = Significant and Unavoidable

L = Less than the Project

S = Similar to the Project

G = Greater than the Project