

CHAPTER 6 Alternatives to the Proposed Project

6.1 INTRODUCTION

Section 15126.6(a) of the CEQA Guidelines requires that an EIR describe a range of reasonable Alternatives to the project or to the location of the project that could feasibly attain the basic objectives of the project while reducing significant project impacts. An EIR is not required to consider every conceivable Alternative to a project; rather, it must consider a range of potentially feasible Alternatives that will foster informed decision-making and public participation. In addition, an EIR should evaluate the comparative merits of the Alternatives. Therefore, this chapter sets forth potential Alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines relating to the Alternatives analysis (Sections 15126.6 et seq.) are summarized below:

- The discussion of Alternatives shall focus on Alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these Alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The “no project” Alternative shall be evaluated along with its impact. The “no project” analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project is not approved.
- The range of Alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those Alternatives necessary to permit a reasoned choice. The Alternatives shall be limited to those that would avoid or substantially lessen any of the significant impacts identified for the proposed project.
- With regard to alternative locations, only locations that would avoid or substantially lessen any of the significant impacts of the proposed project need be considered for inclusion in the EIR.
- An EIR need not consider an Alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

6.2 PROJECT OBJECTIVES

The Vision is the overarching framework used to guide the formulation of updated goals and policies for the General Plan to address the role, character, and quality of the City’s built and natural environment. The Vision and Guiding Principles provide the foundation upon which the General Plan goals, policies, and implementation actions are measured. Crafted from the collective input of Simi Valley residents, elected and appointed officials, and the General Plan Advisory Committee, the Vision represents the community’s aspirations for its future and it is reflected in the goals and policies throughout the General Plan. The Vision is supported by Guiding Principles that more specifically define the expected outcomes of the updated goals and policies, and articulate specific measures to attain Simi Valley’s Vision. The Vision:

To provide a safe, functional, healthy, and environmentally sustainable community while expanding to meet the needs of the future where people can live, work, and recreate in peace and tranquility.

The City of Simi Valley has developed a set of guiding principles or objectives that provide a framework for planning and confirming growth and land use development demands. These principles direct how and where growth will be distributed throughout the City within the context of natural resource protection and neighborhood conservation and implement the Vision adopted by the City. Guiding principles are nonnegotiable criteria that will guide updating the General Plan. The principles guide development of a land use plan and constitute a set of rules by which updated policies will be written and enforced. The Guidelines also aid in ensuring internal consistency throughout the document.

- **Preserve the natural hillsides setting surrounding the City for its valuable aesthetic and visual qualities intrinsic to Simi Valley's landscape and identity.**

- > Maintain the City's hillside preservation standards as a means to protect natural environments and open spaces surrounding Simi Valley.
- > Enhance Arroyo Simi as a natural resource that serves as a scenic recreational resource as well as a public safety resource for flood protection.
- > Improve air quality through development patterns that reduce the need for automobile travel and minimize congestion.
- > Achieve sustainable levels of energy and resource consumption through efficient land use, transportation, building design, construction techniques, waste management, and efficient infrastructure design and operation.
- > Strengthen the City's water recycling program to reduce water consumption and lessen the need for imported water.
- > Partner with the Rancho Simi Recreation and Park District to promote open space attainment.

- **Community Identity, Character, and Design**

- > Provide a diversity of neighborhood environments.
- > Focus higher density developments and mixed-use projects in areas adjacent to transit stations, along transit corridors and commercial corridors, near job centers, and in strategic opportunity areas throughout the City.
- > Promote neighborhood design for development that is compatible with the scale and character of existing adjacent development.
- > Promote livable and well-designed neighborhoods with a mix of uses and services that are walkable to support improved health and the needs of families, youth, seniors, and a growing population.
 - Create vibrant public areas that serve as gathering places, town centers, and villages for the community.
 - Locate and design buildings, streetscapes, and public spaces that are pedestrian-friendly.
 - Promote developments that foster accessibility and connectivity between areas, and safely and efficiently accommodate a mixture of cars, transit, bicyclists, and pedestrians.
 - Guide new development with design standards that promote well-designed properties that are context sensitive.

■ Land Use and Growth Management

- > Utilize infill development and re-use while maintaining important qualities of community character.
- > Prioritize the reuse of obsolete or underutilized commercial centers.
- > Promote land uses that achieve the City's regional fair share of housing and strengthen its economic and jobs base.
- > Utilize sustainable development and land use planning practices that provide for the needs of existing residents and businesses while preserving choices for future generations.
- > Maintain the City Urban Restriction Boundary (CURB) as a means to maintain the City's distinct identity and to limit inefficient urban development in the natural areas surrounding Simi Valley.
- > Prioritize infill development and redevelopment within areas currently developed consistent with community character objectives.

■ Neighborhood Security and Housing Choice

- > Foster public safety through good community design and the use of Crime Prevention through Community Design (CPTED) concepts.
- > Maintain the City's rating as one of the safest cities in the nation by continuing to provide a high level of public safety services.
- > Minimize the City's vulnerability to natural and manmade disasters and strengthen the City's emergency response systems.
- > Provide a mix of housing to meet the needs of current and future residents, including an equitable distribution of affordable housing, throughout the city.
- > Encourage a mix of housing types within neighborhoods to promote a diversity of households for residents of all ages and income levels.

■ Economic Vitality and Security

- > Maintain a broad range of jobs that are accessible to all residents.
- > Attract highly skilled and professional jobs in finance, professional services, and biotech industries to match resident's education and skills.
- > Promote strategic reinvestment in underperforming commercial centers as potential for job centers and mixed-use neighborhood centers.
- > Promote clean industries and businesses that provide job opportunities, enhance the local economy, and encourage new businesses to locate adjacent to existing and planned business parks and transit corridors.

■ Public Services, Infrastructure, and Mobility

- > Promote a high level of public services to maintain the quality of life that Simi Valley residents have come to expect through good traffic circulation systems and other infrastructure, including water and sewer.
- > Reduce the City's need for imported water through increased water conservation practices and recycling.

- > Partner with the Simi Valley Unified School District to promote quality education and continued high levels of educational attainment in Simi Valley.
- > Pursue additional commuter transit service to the west end of the City by Metrolink as a means to decrease roadway congestion and enhance regional mobility for residents and visitors to the City.
- > Provide a range of transportation choices to residents that promote alternatives to automobile use including walking, biking, and public transit.
- **Health, Social, and Cultural Well Being**
 - > Recognize and preserve areas of Simi Valley that contribute to the City's history and culture.
 - > Recognize the need to provide a variety of recreation and leisure activities for the diverse population of Simi Valley as a means to support active and healthy lifestyles for residents of all ages and income groups.
 - > Support community health by promoting the availability of organic and whole food choices to residents.
 - > Recognize that trails are an important recreational asset that may be integrated with transportation systems to encourage mobility within the City.
 - > Promote ongoing volunteer opportunities and civic engagement as a means to provide social opportunities and enhance community life.

6.3 PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following are the significant and unavoidable project-specific impacts of the proposed General Plan Update that have been identified in this Draft EIR. The number of impacts found to be significant and unavoidable is low due to the fact that this Draft EIR is programmatic and because the policies presented in the General Plan Update were designed to self-mitigate to the extent possible. It should be noted that the two traffic impacts below theoretically can be mitigated to less-than-significant levels, but were found significant and unavoidable due to the uncertainty surrounding the private land acquisition that would be required to construct said improvements.

- Impact 4.3-5** Implementation of the draft General Plan Update would accommodate growth that exceeds the SCAG projections for the City and would conflict with or obstruct implementation of the Air Quality Management Plan. This is a *significant and unavoidable* impact.
- Impact 4.3-6** Implementation of the General Plan Update would result in operational emissions of PM₁₀ and PM_{2.5} that could contribute substantially to an existing or projected air quality violation. This is a *significant and unavoidable* impact.
- Impact 4.3-7** Implementation of the General Plan Update would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or state ambient air quality standard. This is a *significant and unavoidable* impact.

- Impact 4.16-3** Under Year 2030 conditions, operation of the proposed project would cause an increase in traffic, which is substantial in relation to the forecasted traffic load and capacity of the street system, and some intersections will operate below LOS C. Even with implementation of mitigation measures, this impact is considered *significant and unavoidable*.
- Impact 4.16-4** Implementation of the General Plan Update would increase the amount of traffic on CMP highways. It would exceed cumulatively an LOS E standard established by the County CMP Agency for SR-118, and therefore would result in a *significant and unavoidable* impact.

6.4 SUMMARY OF PROJECT ALTERNATIVES

Three scenarios, representing a range of reasonable Alternatives to the General Plan Update were selected for detailed analysis. The goal for evaluating any of these Alternatives is to identify ways to avoid or lessen the significant environmental effects resulting from implementation of the draft General Plan Update, while attaining most of the project objectives.

Alternatives selected for further analysis include the following:

- **Alternative 1: No Build (Zero Growth under Existing General Plan)**—Under this alternative, no future development would occur through 2035 under the existing General Plan (1988) and the General Plan Update would not be adopted. Therefore, all potential effects to environmental topics would be the same as existing conditions. This Alternative allows decision-makers to assess the impacts of approving the proposed project with the impacts of not approving the proposed project based on existing conditions while not approving any subsequent development proposals.
- **Alternative 2: No Project/Existing General Plan (1988) Build-Out**—Under this alternative, all future development would occur according to the existing General Plan (1988). This is the “No Project” alternative, since no legislative changes would be required, and the 1988 General Plan would continue to be in effect. It is assumed that the build-out would occur by 2035. This Alternative would allow decision-makers to assess the impacts of not taking additional action with respect to land use and future development.
- **Alternative 3: Reduced Density**—The reduced density alternative was derived and analyzed by using SCAG regional forecast numbers for 2030. Alternative 3 results in reductions to the number of residential units, commercial, office, Business Park, and industrial square footage as compared to the General Plan Update.

Table 6-1 (Comparison of Alternatives) identifies the level of development proposed under each of the identified alternatives.

Table 6-1 Comparison of Alternatives

<i>Alternative</i>	<i>Single Family Residential (du)</i>	<i>Retail/Service ('000 sf)</i>	<i>Office ('000 sf)</i>	<i>Business Park ('000 sf)</i>	<i>Manufacturing ('000 sf)</i>
General Plan Update (Project)	60,719	9,029	12,090	13,364	12,600
Alternative 1: No Build	44,799	6,949	999	1,116	8,241
Alternative 2: No Project/Existing General Plan B/O	48,792	6,814	2,107	3,243	16,319
Alternative 3: Reduced Density	58,000	8,901	4,822	3,773	8,135

6.5 ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

6.5.1 Alternative Site

As the General Plan Update is designed to guide development within the City of Simi Valley, an alternative site would not be an appropriate alternative to the proposed project.

6.5.2 All Residential or All Commercial

An alternative that considers a completely different mix of land uses was considered. Land use scenarios such as all residential for all new development or redevelopment would not achieve the objectives of the City, and could potentially cause greater impacts such as increased traffic and green house gas emissions since residents would be forced to drive farther for shopping or employment. Further, this could increase other impacts that were previously identified as less than significant under the draft General Plan Update. Therefore, an alternative of this type was rejected from further analysis in the EIR because it does not meet the basic objectives of the proposed project.

As with the all-residential alternative above, an all nonresidential development and redevelopment scenario could generate other impacts previously identified as less than significant under the General Plan Update and would not achieve the City's objectives. Therefore, an alternative of this type was rejected from further analysis in the EIR.

In general, an all-residential project or an all-nonresidential project would present impacts similar to the proposed project, as these projects would still present new development to the community. However, neither scenario would include mixed-use development which has been identified to address one of the City's most important goals—to create a sustainable and economically viable community where people can live, work, and play. As such, alternatives of this type were rejected from further analysis.

6.6 ALTERNATIVE 1: NO BUILD ALTERNATIVE

6.6.1 Description

Implementation of the No Build Alternative would represent zero growth through 2035, or effectively represent existing conditions. The existing General Plan (1988) would continue to be the guiding

document for development within the City but no growth would actually occur. Existing land use designations would remain the same. For Alternative 1, conditions that existed at the time the Notice of Preparation (NOP) was circulated would be used to assess the environmental impacts of Alternative 1.

6.6.2 Impact Evaluation

■ Aesthetics

Under Alternative 1, no new development would occur through 2035. As a result, theoretically, the conditions that currently exist would be the same conditions in 2035. Since no new development could occur, no additional impacts would occur that could otherwise impede or damage a scenic vista. The existing Municipal Code protects hillsides and other natural scenic features. Therefore, similar to the proposed project, no impacts would occur.

Impacts related to a substantial change in the visual character of the City were found to be less than significant for the draft General Plan Update, as new development would be subject to new policies that would improve the overall aesthetics within the City. Since Alternative 1 would not allow for any new development, the impact would be less than significant. Additionally, while these impacts would be less than significant, they would be slightly greater than the proposed project because the goals and policies of the General Plan Update that seek to improve the design and character of the City would not apply. Existing development would experience a natural deterioration but would not be rebuilt or renovated under Alternative 1.

Similar to impacts of the proposed project, impacts related to light and glare and the impact thereof on nighttime views would be less than significant. Existing urban land uses affect nighttime views but since no new development would occur, impacts would be considered less than significant.

Because the existing General Plan (1988) would not provide the same level of benefits as the proposed project, Alternative 1 is considered to have a greater aesthetic impact.

■ Agricultural Resources

Alternative 1 would not involve any new development. Therefore, impacts to agricultural resources would not occur. These impacts are similar to impacts identified for the proposed project which would also result in no impact to agricultural resources under each of the CEQA thresholds used by the City. However, the proposed project includes Policy LU-1.2, which supports the preservation and enhancement of open space and other valuable agricultural lands. These beneficial policies would not be implemented under Alternative 1.

■ Air Quality

Implementation of Alternative 1 would not involve the use of construction equipment, as no new development would occur. Therefore, no impacts related to construction noise would occur, which would be less than the less-than-significant impacts anticipated under the proposed project.

Implementation of the proposed project was found to be inconsistent with the AQMP and therefore significant and unavoidable. Since Alternative 1 is based on allowable uses/intensities set forth in the General Plan and the AQMP is based on the general plans of all of the cities in the Basin, this Alternative would have a less-than-significant impact instead of the significant and unavoidable impact of the General Plan Update.

The General Plan Update was found to have significant operational impacts related to the violation of an air quality standard or contributing to an existing or projected air quality violation due to its emission of PM_{10} and $PM_{2.5}$ particulate matter. Section 4.3 (Air Quality) found that the proposed project would result in 1,074 tons/year net increase of PM_{10} and a net increase of 203 tons per year of $PM_{2.5}$ over existing emissions. However, the General Plan Update was found to result in a net decrease of 1,374 tons/year of VOCs, a net decrease of 2,188 tons/year of NO_x , a net decrease of 3 tons/year of SO_2 , and a net decrease of 16,698 of CO. These reductions are a result of improved vehicle emissions between now and 2035, so they would beneficially impact Alternative 1 as well. However, the other factor that has led to the decrease in emissions is the types of land uses proposed in the General Plan Update versus the existing general plan. Infill land uses are proposed to shift to development types that reduce vehicle trips and VMT. The General Plan Update focuses on higher density developments and mixed-use projects in areas adjacent to transit stations, along transit corridors and commercial corridors, near job centers, and in strategic opportunity areas throughout the City, which would reduce vehicle trips. Thus impacts would be less than the proposed project as Alternative 1 would have the benefits of improved vehicle emissions without the increase in emissions related to new development.

Operation of the proposed project would increase local traffic volumes above existing conditions, but would not expose sensitive receptors to substantial localized carbon monoxide (CO) concentrations. CALINE4 modeling software was used to model area intersections. Future CO concentrations near these intersections would not exceed the national 35.0 ppm and State 20.0 ppm 1-hour ambient air quality standards or the national or State 9.0 ppm 8-hour ambient air quality standards. In fact, they are well below the threshold. Since existing traffic levels of the No Build Alternative would be less than the proposed project, it would be reasonable to expect reduced less-than-significant impacts resulting from this Alternative because the CO concentrations are below the thresholds.

Similar to the proposed project, construction and operation of commercial and office development under this Alternative would not create objectionable odors. Standard construction requirements would be imposed upon each applicant to minimize odors from construction under the proposed project, and no new future developments would occur under Alternative 1. This impact would remain less than significant, less than that of the proposed project.

■ Biological Resources

Alternative 1 would not involve any new development. Therefore, impacts to biological resources would be less than significant. These impacts are similar to (although slightly less than) impacts identified for the proposed project which would also result in less-than-significant impacts to biological resources under each of the CEQA thresholds used by the City. However, the proposed project includes goals and policies to support the preservation and enhancement of open space and other valuable biological lands,

as well as sustainable landscaping techniques. These beneficial policies would not be implemented under Alternative 1.

■ Cultural Resources

The EIR identified less-than-significant impacts related to cultural resources resulting from the project. Since Alternative 1 does not allow any additional development, impacts would likewise be less than significant. It should be noted that the proposed goals and policies included in the General Plan Update to benefit cultural and historical resources would not be implemented under Alternative 1.

■ Geology/Soils

Similar to the proposed project, Alternative 1 would expose people and/or structures to potentially substantial adverse effects resulting from strong seismic groundshaking or seismic-related ground failure due to the City's location within the seismically active Southern California region. All risks and impacts associated with geological and soil impacts identified for the General Plan Update would also apply to Alternative 1. Existing development has been constructed in adherence with applicable laws and regulations current at the time of development. As no future development would occur and all existing development was constructed in accordance with regulations current at the time of development, impacts associated with rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and landslides would continue to be less than significant. However, much of the existing older development was constructed in accordance with older building codes. New technologies and regulations would be implemented in new development contemplated under the draft General Plan Update. Therefore, new development using the latest seismic-resistant building techniques would result in less impact than under Alternative 1. Impacts of Alternative 1 would be similar to, but slightly greater than the proposed project and would be considered less than significant.

Future development under the General Plan Update would result in ground-disrupting activities, such as excavation and trenching for foundations and utilities; soil compaction and site grading; and the erection of new structures, all of which would temporarily disturb soils. This could result in soil erosion. However, all project-level plans would be required to submit a Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) and comply with all applicable requirements such as preparation of an SWPPP, NPDES Regulations, and best management practices (BMPs). Such compliance, in addition to implementation of existing code requirements, would ensure that erosion and other soil instability impacts resulting from future construction would be less than significant for the proposed project. Since Alternative 1 would not allow for new construction, no impact would result. This impact would be less than that identified for the General Plan Update.

■ Global Climate Change

An analysis of the potential significant emission of GHG under the proposed project resulted in a determination that it would result in a less-than-significant impact. During build-out and operation of the proposed project, GHGs would be emitted as the result of construction activities and deliveries; new direct operational sources, such as operation of emergency generators, natural gas usage, and operation of fleet vehicles; and indirect operational sources, such as production of electricity, steam and chilled

water, transport of water, and decomposition of project-related wastes. GHGs would also be emitted by visitors and employees travelling to, from, and within the City. As the proposed project includes goals and policies to comply with all state requirements, impacts associated with GHG emissions during construction and operational activities are considered less than significant. Alternative 1 proposes no new development, making the potential impacts associated with GHG less than significant and less than those of the draft General Plan Update. However, Alternative 1 would not realize the beneficial effects of compliance with the goals and policies set forth in the Climate Action Plan developed for the City, as well as land use patterns and alternative modes of travel put forth in the General Plan Update that aim to reduce the existing and future GHG Emissions proactively. Therefore, impacts would be greater than the General Plan Update.

■ Hazards and Hazardous Materials

Both Alternative 1 and the proposed project would involve the use of hazardous materials in the form of basic cleaning materials, landscaping chemicals, and hazardous substances used by existing businesses within the City on an ongoing basis. Future development under the General Plan Update would also involve the use of hazardous materials during construction activities, and with more development allowed, may increase the amount of hazardous materials used in the City on an ongoing basis. However, development under the General Plan Update would be required to comply with applicable laws and regulations that would reduce the risk of hazardous materials use, transportation, and disposal through the implementation of established safety practices, procedures, and reporting requirements. Since Alternative 1 allows no new development, existing conditions are expected to remain the same. Section 4.8 (Hazards and Hazardous Materials) of this EIR determined that operation of existing land uses within the City does not pose a significant hazard. Continued compliance with existing regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials. Therefore, as no new development would be allowed under Alternative 1, potential impacts with respect to hazards and hazardous materials would be similar to, but less than, the proposed project and would remain less than significant.

■ Hydrology/Water Quality

Implementation of Alternative 1 does not involve the construction of any new development projects. Therefore, no construction impacts related to hydrology and water quality would occur. This represents a reduced impact compared to the less-than-significant impact anticipated under the proposed project.

The proposed project was found to have less-than-significant impacts related to a potential violation of any water quality standards or waste discharge requirements for construction and operational activities. Compliance with NPDES permit requirements, the 2005 UWMP, and General Plan Update policies would reduce the risk of water degradation within the City from the operation of new developments to the maximum extent practicable. Under Alternative 1, existing development and ongoing operations would be subject to the same regulations as the General Plan Update but would not have the benefit of the draft General Plan Update's protective water quality and hydrology policies. Nonetheless, as Alternative 1 would not allow for new development, impacts would be less than significant and less than but similar to those anticipated under the General Plan Update.

Under the proposed project, impacts related to depletion of groundwater supplies or interference with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, were found to be less than significant. All existing land uses and future development contemplated in the General Plan Update would utilize water from Ventura County Waterworks District No. 8, which receives its potable water from MWD and Golden State Water Company. As Alternative 1 would not allow for additional growth, existing conditions would remain the same. Existing uses are not known to be substantially depleting groundwater sources or interfering with recharge. Therefore, Alternative 1 would result in somewhat reduced impacts compared to the draft General Plan Update, and result in less-than-significant impacts to groundwater, similar to the proposed project.

With respect to drainage, the proposed General Plan Update would result in changes in ground surface permeability via paving as well as changes in topography via grading and excavation. However, policies proposed in the General Plan Update would require implementation of BMPs, incorporation of stormwater detention facilities as necessary, adequate design of drainage facilities, and minimization of increases in impervious areas to reduce impacts to less-than-significant levels. Under Alternative 1 existing conditions would remain, without the benefit of the General Plan Update policies to ensure protection of resources. Nonetheless, since Alternative 1 would not allow for future development, it would result in a less-than-significant impact similar to the proposed project.

Impacts related to the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a waterway or the substantial increase in surface runoff resulting in flooding were found to be less than significant with respect to the draft General Plan Update. In addition, impacts related to the exceedance of stormwater drainage systems were determined to be less than significant for the proposed project. All development under the proposed project would comply with the General Plan Update policies, NPDES regulations, CDFG regulations, as well as the preparation of, and compliance with, a SWPPP, which would reduce the risk of flooding from drainage alterations to less-than-significant levels. Alternative 1 would not allow for additional development and existing development does not currently appear to result in significant hydrologic impacts. Therefore, Alternative 1 would have fewer impacts than the General Plan Update and would result in less-than-significant impacts to hydrology, similar to the proposed project.

As discussed in Impact 4.8-4, the capacity of the existing storm drain infrastructure throughout the City is sufficient to handle existing stormwater flows. As Alternative 1 would not result in additional development that would generate a substantial amount of stormwater for the system, impacts resulting from Alternative 1 are considered less than significant. This would be similar to, and less than, the proposed project.

The 100-year flood zone is primarily located in the area surrounding the Arroyo Simi and its tributaries. Existing residential development exists within the 100-year flood zone. Alternative 1 does not include new development, and thus would not place new structures, including housing, within the 100-year flood zone. Impacts are considered less than significant, similar to the proposed project.

The probability of dam failure in the area is low. The potential for this risk is the same for the proposed as Alternative 1. Development under the General Plan Update would not increase the risk of dam failure,

although it would increase the number of persons and amount of development exposed to this hazard. However, implementation of the flood protection policies contained in the draft General Plan Update, as described in Impact 4.8-9, would ensure that the proposed project would result in less-than-significant impacts due to dam failure. As Alternative 1 would not allow for additional development and would not increase the number of people exposed to a potential hazard, Alternative 1 would result in a reduced impact compared to the proposed project.

Overall, impacts to hydrology under Alternative 1 would be less than those identified for the General Plan Update.

■ Land Use/Planning

Alternative 1 would not allow for additional growth within the City. The existing General Plan (1988) would remain the underlying land use regulatory document; however, no growth would take place. Implementation of Alternative 1 would not result in impacts related to land use nor would it conflict with existing land use policies currently in place. Additionally, Alternative 1 would not divide an established community, nor would it conflict with a habitat conservation plan. Alternative 1 would result in a less-than-significant impact, similar to that of the draft General Plan Update. However, Alternative 1 would not implement any of the regional plans such as SCAG's 2008 Regional Transportation Plan (RTP), and the 2004 Compass Blueprint Growth Visioning Principles which are incorporated in SCAG's 2008 Regional Comprehensive Plan (RCP). As a result, impacts from Alternative 1 are less than significant, although slightly greater than the proposed project.

■ Mineral Resources

Alternative 1 would not allow for additional growth within the City. The existing General Plan (1988) would remain the underlying land use regulatory document; however, no growth would take place. Implementation of Alternative 1 would not result in impacts related to mineral resources of statewide or local importance. All of the areas currently listed as MRZ-2 (areas designated by the state which have regional or statewide importance) are either located outside of the CURB (which may not be amended prior to 2020 except with a vote of the people) or is located in areas designated as open space (or both). In both the current General Plan and the updated draft General Plan, MRZ-2 areas within the City limits and within the CURB are designated open space. Therefore impacts will be similar to those of the project and remain less than significant.

■ Noise

Implementation of Alternative 1 would not involve the use of construction equipment, as no new development would occur. Therefore, no impacts related to construction noise would occur, which would be less than the less-than-significant impacts anticipated under the proposed project.

Less-than-significant impacts related to an increase in ambient noise would occur as a result of Alternative 1. Although zero growth would occur, it is anticipated that ambient noise levels will still increase due to increased traffic from development outside of the City that would travel through Simi Valley. With respect to a substantial permanent increase in ambient noise, implementation of the General

Plan Update was found to have a less-than-significant impact. This impact was determined based on a comparison of the General Plan Update build-out with the existing ambient noise levels. Implementation of Alternative 1 would also have a less-than-significant impact, although less than that anticipated under the General Plan Update due to no new development.

Based on noise measurements and on existing and future noise modeling, noise levels in excess of City standards currently occur and would continue to occur in many residential areas and other noise-sensitive uses throughout the City. Traffic noise would be higher or louder in the future than it is now along the freeway and highways, and along most major arterial and collector roads in Simi Valley due to development outside of the City, regardless of whether the General Plan Update is adopted or not. Implementation of Alternative 1 would have no impacts related to groundborne noise or vibration. Impacts related to vibration from construction activities associated with the General Plan Update were determined to be less than significant. Operational impacts resulting from vibration were found to be less than significant for the draft General Plan Update. Less-than-significant impacts would be expected, as no new development would occur under Alternative 1, which is similar, although less substantial than impacts under the proposed project.

■ Population/Housing

Alternative 1 would not allow for additional growth, and so no measurable increase in population, housing, or employment is expected within the City, resulting in no impacts, although by no growth this alternative would be less than SCAG's forecasts. Alternatively, the General Plan Update would result in a less-than-significant impact related to future increases in population, housing, and employment and consistency with SCAG's forecasts. Therefore, Alternative 1 would result in fewer impacts related to population and housing than the proposed project.

■ Public Services

Implementation of Alternative 1 would not result in impacts to public services beyond the less-than-significant levels identified for the draft General Plan Update, because no development is proposed. Current conditions indicate that the response times for police and fire services are at acceptable levels and impacts were determined to be less than significant.

According to Section 4.14 (Public Services) of this EIR, five elementary schools and one high school operate at or above allowable capacity. Impacts of the General Plan Update were found to be less than significant due to the implementation of Policies CS-3.1 (Provision of Schools), CS-3.2 (New School Sites), and CS-3.3 (Joint-Use Facilities). As Alternative 1 would not generate additional school-aged children, Alternative 1 would not put additional strain on the school system and would result in a less-than-significant impact. However, although both Alternative 1 and the proposed project are considered to result in a less-than-significant level of impact to schools, Alternative 1 would result in a slightly reduced impact compared to the proposed project.

Impacts to libraries as a result of Alternative 1 would be similar to that of the General Plan Update: less than significant. Circulation levels have remained consistent over the past few years. Based on an anticipated population increase under the General Plan Update, the proposed project could increase

demand on library services. However, this would be a less-than-significant impact. As Alternative 1 would not result in an increase in population which could generate additional demand on library services, Alternative 1 would result in a less-than-significant impact, similar to the proposed project.

■ Recreation

Alternative 1 would not result in new development. Build out of the General Plan Update would result in a maximum direct population increase of approximately 57,154 residents over the DOF 2009 population estimate of 125,814 residents for a total population of 182,968 residents in 2035, through the creation of new housing opportunities in the City permitted under the draft General Plan Update. The aforementioned are theoretical based on maximum allowable development; SCAG projects 135,389 new residents by 2030 and a more realistic increase of 5,472 persons is expected based on historic growth trends. This population increase could result in additional demand for park and recreational areas, and possibly result in the accelerated deterioration of existing parks and recreation facilities, or create the need for the construction or expansion of such areas.

Full build out of the General Plan Update would increase population in the City and therefore demand on recreation facilities. Based on the existing City population of 125,814 residents, the current park inventory provides approximately 9.6 acres of parkland per 1,000 persons. Because the City currently has adequate parkland to support the existing population and Alternative 1 would not increase the population or demand for parks, this alternative would result in a less-than-significant impact related to parks and recreation facilities. The existing General Plan (1988) has park and recreation standards and Alternative 1 would be required to continue to follow the Parks Master Plan, even though no new development is proposed. However, under the draft General Plan Update, Policy PR-1.1 through Policy PR-1.10 would require the development of park and recreation facilities, commensurate with new development. Impacts to recreation facilities would be less than significant. Therefore, Alternative 1 would result in similar impacts to recreation as the proposed project, less than significant.

■ Transportation/Traffic

In order to assess future impacts related to Alternative 1, it would be reasonable to assume that existing conditions would persist. Growth in other areas outside of the City may continue and would affect transportation in the City, but is not accounted for in this analysis. Currently, two study area intersections and one roadway segment operates below the acceptable LOS. Significant traffic impacts would continue to occur as a result of Alternative 1. Additionally, the beneficial roadway improvements that would take place under the General Plan Update would not take place under Alternative 1. With the addition of area-wide growth occurring outside of the City, these impacts would likely worsen due to an increase in traffic from other jurisdictions and the lack of roadway improvements within the City. Under the proposed project, the intersection of Los Angeles Avenue and First Avenue would remain significant and unavoidable after the implementation of mitigation due to uncertainty regarding ROW acquisition. All other impacts were mitigable through roadway improvements. As a result, Alternative 1 would result in similar and likely worse, significant and unavoidable impacts.

Similarly, the measures related to alternative modes of travel in the General Plan Update would not be implemented as part of Alternative 1. Both Alternative 1 and the General Plan Update would result in

significant unavoidable traffic impacts for traffic trips and congestion. As Alternative 1 would not include future development and related construction activities, construction impacts to traffic would not occur. Alternative 1 would result in a less substantial impact to construction traffic than the less-than-significant impact anticipated under the proposed project.

As no new development would occur under Alternative 1, impacts related to parking would be less than significant, similar to the proposed project.

Overall, impacts related to traffic and parking would be similar under Alternative 1.

■ Utilities/Service Systems

Under Alternative 1, it is assumed that no future development would take place. As such, additional water demand is not anticipated, resulting in less-than-significant impacts. Alternative 1 would therefore result in less water usage than the proposed project by not allowing for new development.

Section 4.17 (Utilities/Service Systems) of this EIR examined the potential impacts related to water demand and availability. It was determined that the proposed project would result in less-than-significant impacts regarding the need for construction of new water treatment facilities. Given that no development would occur under Alternative 1, there would likely not be a need to construct new treatment facilities to accommodate an increase in demand in the City. Therefore, impacts from Alternative 1 would be the same as that of the proposed project.

Implementation of the General Plan Update is anticipated to result in an increase of 2.8 million gallons per day (mgd) per day of wastewater, for a total of 12.4 mgd. As discussed above, wastewater from the City's system is collected and treated at the WQCP which has a capacity to process up to 12.5 mgd, but currently averages about 9.6 mgd during wet weather periods. Increased wastewater generation due to implementation of the General Plan Update could be accommodated within the existing treatment infrastructure; therefore expansion of existing facilities would not be required under the General Plan Update and impacts would be less than significant. Under Alternative 1, the daily generation of wastewater would be approximately 2.8 mgd per day less than the proposed project and would result in a less-than-significant impact. Impacts related to Alternative 1 would be less than significant and would be less than those associated with implementation of the proposed project.

Section 4.9 (Hydrology/Water Quality) of this EIR examined the potential for significant impacts to existing storm drains in the City. The City's existing storm drain system and flood control facilities generally have sufficient capacity to provide developed areas with adequate protection from flooding.

Alternative 1 does not include future development or corresponding infrastructure improvements. Under the proposed project, development would take place that could allow for necessary infrastructure improvements. Additionally, goals and policies of the General Plan Update would require new development to ensure adequate stormwater capacity and to address existing deficiencies, resulting in a less-than-significant impact. Therefore, impacts on stormwater facilities related to Alternative 1 would be similar to those of the draft General Plan Update, but still are less than significant.

The increase of 841 tons of solid waste per day anticipated to be generated by full build-out of the General Plan Update would comprise approximately 28 percent of the 3,000-ton daily permitted capacity of the SVLRC. Waste generated by growth proposed under the General Plan Update would be accommodated by existing landfill capacities, and would result in a less-than-significant impact. Under Alternative 1, approximately 841 fewer tons of solid waste per day would be generated than under the proposed project, and Alternative 1 would result in a less-than-significant impact. Impacts related to Alternative 1 would be less than those anticipated under the draft General Plan Update, due to less development in the City.

6.6.3 Attainment of Project Objectives

Under Alternative 1, no new development would occur. The purpose of the General Plan Update is to achieve the Vision established with input from the City’s residents and decision makers. In California, the general plan acts as the constitution for development and functions as a tool for the City to exercise the power of regulating land use given to it by the state. The Vision states its intent “To provide a safe, functional, healthy, and environmentally sustainable community while expanding to meet the needs of the future where people can live, work, and recreate in peace and tranquility.” Under Alternative 1, the portion of the vision regarding resource conservation and preservation would be achieved, but would not include the variety of goals and policies of the General Plan Update to address environmental issues in light of GHGs (and appurtenant legislation), and in more sustainable ways. Much has changed in terms of this country’s perception and expectations with regard to the environment and the roles of the government and individual citizens. In order for the City to achieve economic development, which would allow the City to further provide a good quality of life to its residents (through increased tax base), new development of underperforming land uses must occur. Allowing only existing development would likely not allow for an economically viable City, since there would be no new development and no additions to existing development, including businesses and shopping centers, to address market changes and allow the City to be economically competitive. The General Plan Update would set forth a means for this sustainable, comprehensive growth, whereas Alternative 1 would not. Therefore, Alternative 1 would not fulfill the identified project objectives.

6.7 ALTERNATIVE 2: NO PROJECT/1988 GENERAL PLAN BUILD-OUT ALTERNATIVE

6.7.1 Description

Under Alternative 2, the types and densities of land uses would be those of the existing General Plan (1988). Alternative 2 would serve as a means of comparison between what is allowed under the existing General Plan and the draft General Plan Update. The existing General Plan allows for 3,719,000 more square feet of industrial uses than the Project. However, the General Plan Update allows for substantially more retail, office, and business park uses than the 1988 General Plan. In addition, the General Plan Update allows nearly 12,000 more residential units than the 1988 General Plan. Refer to Figure 6-1 (Comparison of Alternatives).

This alternative assumes that the land uses and the intensities thereof that exist currently under the 1988 General Plan remain. Development is assumed to continue by right and at current and projected growth rates. The goals and policies proposed by the General Plan Update do not apply to this alternative.

6.7.2 Impact Evaluation

■ Aesthetics

Under Alternative 2, new development would occur in accordance with what is currently allowed by the 1988 General Plan. Since new development could occur, additional impacts would occur that could otherwise impede or damage a scenic vista. The existing Municipal Code protects hillsides and other natural scenic features. Therefore, similar to the proposed project, no impacts would occur.

Impacts related to a substantial change in the visual character of the City were found to be less than significant for the draft General Plan Update, as new development would be subject to new policies that would improve the overall aesthetics within the City. Since Alternative 2 assumes new development as allowed under the 1988 General Plan, it is reasonable to assume that impacts would therefore be greater than the proposed project. While these impacts would be less than significant, they would be slightly greater than the proposed project because the goals and policies of the General Plan Update that seek to improve the design and character of the City would not apply.

Similar to impacts of the proposed project, impacts related to light and glare and the impact thereof on nighttime views would be less than significant. Existing urban land uses affect nighttime views, however, impacts would be considered less than significant.

Overall, aesthetics impacts resulting from Alternative 2 would be slightly greater than the draft General Plan Update, because the existing General Plan (1988) would not provide the same level of benefits as the proposed project.

■ Agricultural Resources

Alternative 2 would allow new development under the 1988 General Plan. No impacts were found related to the General Plan Update related to the project conflicting with any existing zoning or Williamson Act contracts since there are no areas zoned for agriculture and no active Williamson Act contracts. The implementation of Alternative 2 would result in no impacts, similar to the project.

No impacts were found related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The small piece of land designated as Prime Farmland and Farmland of Statewide Importance, located on the northeast corner of Tapo Canyon Road and Alamo Street, is currently developed with urban land uses. Therefore, implementation of Alternative 2 will have no effect on the conversion of this land since it has previously been converted to an urban use. The small area of land in the southwest portion of the City, south of Madera Road and just north of Bard Reservoir is classified as Unique Farmland. This land is currently being used for agricultural purposes and is currently zoned as RPD-Residential Planned Development and is part of the future Wood Ranch Specific Plan area. The existing General Plan designates this land as Open Space. As a result of current General Plan designation, no impacts would occur, similar to the project.

With regard to the project resulting in changes to the existing environment that would lead to the conversion of agricultural land to non-agricultural uses, there currently are no land use designations or zoning classifications specifically for agricultural uses within the City. The few small areas where existing agricultural uses currently occur are zoned for non-agricultural uses. The existing 1988 General Plan does not identify any changes in land use in these areas, since they are outside of any identified Study Area. Therefore, while the conversion to non-agricultural uses is likely to occur, it will not be a result of Alternative 2. As a result, no impacts will occur.

■ Air Quality

Implementation of Alternative 2 would involve the use of construction equipment, although less than that of the General Plan Update. Substantially more development is contemplated under the proposed project. Therefore, while impacts related to construction emissions would occur, impacts would be less than the less-than-significant impacts anticipated under the proposed project.

Implementation of the proposed project was found to be inconsistent with the AQMP and therefore significant and unavoidable. Since Alternative 2 is based on what could occur as a result of allowable uses/intensities set forth in the General Plan and the AQMP is based on the general plans of all of the cities/county areas in the Basin, this Alternative would have a less-than-significant impact instead of the significant and unavoidable impact as a result of the General Plan Update.

The General Plan Update was found to have significant operational impacts related to the violation of an air quality standard or contributing to an existing or projected air quality violation due to its emission of PM_{10} and $PM_{2.5}$ particulate matter. Section 4.3 found that the proposed project would result in 1,074 tons/year net increase of PM_{10} and a net increase of 203 tons per year of $PM_{2.5}$ over existing emissions. However, the General Plan Update was found to result in a net decrease of 1,374 tons/year of VOCs, a net decrease of 2,188 tons/year of NO_x , a net decrease of 3 tons/year of SO_2 , and a net decrease of 16,698 of CO. These reductions are a result of improved vehicle emissions between now and 2035, so they would beneficially impact Alternative 2 as well. While Alternative 2 would lead to substantially less development than the proposed project, it would be reasonable to conclude that since the buildout of the existing General Plan would result in substantially more development than currently exists, and that the Basin is in nonattainment for particulate matter, that it would contribute substantially to an existing air quality violation and remain significant and unavoidable. Further, the other factor that has led to the aforementioned pollutant decrease is the types of land uses proposed in the General Plan Update versus the existing General Plan. Land uses are proposed to shift to development types that reduce vehicle trips and VMT. For example, the General Plan Update would accommodate less strip mall commercial development compared to existing conditions. Strip mall developments typically generate a large number of daily trips. The General Plan Update focuses on higher density developments and mixed-use projects in areas adjacent to transit stations, along transit corridors and commercial corridors, near job centers, and in strategic opportunity areas throughout the City, which would reduce vehicle trips. Thus impacts related to Alternative 2 would be similar and significant like the proposed project.

Operation of the proposed project would increase local traffic volumes above existing conditions, but would not expose sensitive receptors to substantial localized carbon monoxide (CO) concentrations. CALINE4 modeling software was used to model area intersections. Future CO concentrations near these

intersections would not exceed the national 35.0 ppm and State 20.0 ppm 1-hour ambient air quality standards or the national or State 9.0 ppm 8-hour ambient air quality standards. In fact, they are well below the threshold. Although the traffic generated by the General Plan Update would be greater than that generated by Alternative 2, it would be reasonable to expect similar impacts resulting from the proposed project to Alternative 2 because the CO concentrations are so far below the thresholds.

Similar to the proposed project, construction and operation of commercial and office development under this Alternative would not create objectionable odors. Standard construction requirements would be imposed upon each applicant to minimize odors from construction, and future developments would be required to adhere to the City's solid waste regulations. Therefore, any Alternative 2-generated refuse would be stored in covered containers and trash removed at regular intervals. This impact would remain less than significant, similar to the proposed project.

■ Biological Resources

Alternative 2 would allow new development per the 1988 General Plan. Impacts under this Alternative may be greater than those of the project. The General Plan Update sets forth policies aimed at reducing potential impacts to biological resources as well as focusing future growth mostly in developed areas. Future growth under the 1988 General Plan would be expected to occur in currently undeveloped areas which could potentially result in impacts to biological resources. However, since future projects would be required to comply with CEQA, these impacts are expected to be less than significant. Nonetheless, impacts related to biological resources are considered greater than that of the project.

■ Cultural Resources

Alternative 2 would allow new development per the 1988 General Plan. Impacts under this Alternative may be greater than those of the project. In that the General Plan Update sets forth policies aimed at reducing potential impacts to cultural and historic resources as well as focusing future growth mostly in previously graded and developed areas. In addition, the implementation of a general plan update may trigger SB 18, which requires agency consultation with Native American tribes. Future growth under the 1988 General Plan would be expected to occur in currently undeveloped areas which could potentially result in impacts to cultural resources.

However, since future projects would be required to comply with the regulations set forth in the Cultural Heritage Ordinance in the Municipal Code (Ordinance No. 1150 to 2.3.5) as well as CEQA, these impacts are expected to be less than significant. Nonetheless, impacts related to cultural resources are considered greater than that of the proposed project.

■ Geology/Soils

Similar to the proposed project, Alternative 2 would expose people and/or structures to potentially substantial adverse effects resulting from strong seismic groundshaking or seismic-related ground failure due to the City's location within the seismically active Southern California region. All risks and impacts associated with geological and soil impacts identified for the General Plan Update would also apply to Alternative 2. Existing development has been constructed in adherence with applicable laws and

regulations current at the time of development. Future new development that would occur would comply with all existing regulations current at the time of development. Thus, impacts associated with rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and landslides would continue to be less than significant. Impacts of Alternative 2 would be similar to those of proposed project and would be considered less than significant.

Future development under Alternative 2 could result in ground-disrupting activities, such as excavation and trenching for foundations and utilities; soil compaction and site grading; and the erection of new structures, all of which would temporarily disturb soils. This could result in soil erosion. However, all project-level plans would be required to submit a Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) and comply with all applicable requirements such as preparation of an SWPPP, NPDES Regulations, and best management practices (BMPs). Such compliance, in addition to implementation of existing code requirements, would ensure that erosion and other soil instability impacts resulting from future construction would be less than significant for the proposed project. Since Alternative 2 would comply with the same regulations as those of the project, impacts would be less than significant and similar to impacts of the draft General Plan Update.

■ Global Climate Change

An analysis of the potential significant emission of GHG under the proposed project resulted in a determination that it would result in a less-than-significant impact. During build-out and operation of the proposed project, GHGs would be emitted as the result of construction activities and deliveries; new direct operational sources, such as operation of emergency generators, natural gas usage, and operation of fleet vehicles; and indirect operational sources, such as production of electricity, steam and chilled water, transport of water, and decomposition of project-related wastes. GHGs would also be emitted by visitors and employees travelling to, from, and within the City. As the proposed project includes goals and policies to comply with all state requirements, impacts associated with GHG emissions during construction and operational activities are considered less than significant. Alternative 2 proposes new development, making the potential impacts associated with GHG less than significant and similar to those of the General Plan Update. However, Alternative 2 would not realize the beneficial effects of compliance with the goals and policies set forth in the Climate Action Plan developed for the City, nor will it likely attain the land use patterns and alternative modes of travel put forth in the General Plan Update that aim to reduce the existing and future GHG emissions proactively. Therefore, overall, impacts would be greater than the proposed project.

■ Hazards and Hazardous Materials

Both Alternative 2 and the proposed project would involve the use of hazardous materials in the form of basic cleaning materials, landscaping chemicals, and hazardous substances used by existing businesses within the City on an ongoing basis. Future development under Alternative 2 and the General Plan Update would also involve the use of hazardous materials during construction activities, and with more development allowed, may increase the amount of hazardous materials used in the City on an ongoing basis. However, development under Alternative 2 and the General Plan Update would be required to comply with applicable laws and regulations that would reduce the risk of hazardous materials use,

transportation, and disposal through the implementation of established safety practices, procedures, and reporting requirements. Section 4.8 of this EIR determined that operation of existing land uses within the City does not pose a significant hazard. Continued compliance with existing regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials. Therefore, potential impacts with respect to hazards and hazardous materials would be similar to those of the proposed project and would remain less than significant.

■ Hydrology/Water Quality

The proposed project was found to have less-than-significant impacts related to a potential violation of any water quality standards or waste discharge requirements for construction and operational activities. Compliance with NPDES permit requirements, the 2005 UWMP, and General Plan Update policies would reduce the risk of water degradation within the City from the operation of new developments to the maximum extent practicable. Similarly, new development under Alternative 2 would be required to adhere to the same regulations, but would not have the benefit of the draft General Plan Update's protective water quality and hydrology policies. Nonetheless, as Alternative 2 would still be required to comply with the same regulatory requirements, impacts would be less than significant and similar to those anticipated under the draft General Plan Update.

Under the proposed project, impacts related to depletion of groundwater supplies or interference with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, were found to be less than significant. All existing land uses and future development contemplated in the General Plan Update would utilize water from Ventura County Waterworks District No. 8, which receives its potable water from MWD and Golden State Water Company. As future growth contemplated for Alternative 2 served as the basis for future demand in the UWMP and these uses are not known to be substantially depleting groundwater sources or interfering with recharge, Alternative 2 would result in reduced impacts than the draft General Plan Update, and result in less-than-significant impacts to groundwater, similar to the proposed project.

With respect to drainage, the General Plan Update would result in changes in ground surface permeability via paving as well as changes in topography via grading and excavation. However, policies proposed in the General Plan Update would require implementation of BMPs, incorporation of stormwater detention facilities as necessary, adequate design of drainage facilities, and minimization of increases in impervious areas to reduce impacts to less-than-significant levels. Under Alternative 2 development could occur without the benefit of the General Plan Update policies to ensure protection of resources. Nonetheless, since Alternative 2 would still be required to conform to the existing regulatory setting, it would result in a less-than-significant impact similar to the proposed project.

Impacts related to the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a waterway or the substantial increase in surface runoff resulting in flooding were found to be less than significant with respect to the draft General Plan Update. In addition, impacts related to the exceedance of stormwater drainage systems were determined to be less than significant for the proposed project. All development under the proposed project would comply with the General Plan Update policies, NPDES regulations, CDFG regulations, as well as the preparation of, and compliance with, a SWPPP, which would reduce the risk of flooding from drainage alterations to less-than-significant

levels. Alternative 2 would also be required to comply with the same regulatory framework as the project and would result in less-than-significant impacts to hydrology, similar to the proposed project.

As discussed in Impact 4.8-4, the capacity of the existing storm drain infrastructure throughout the City is sufficient to handle existing stormwater flows. As Alternative 2 has served as the basis for infrastructure planning and improvements, and would be required to comply with the City's Municipal Code, including the drainage Mitigation program, impacts resulting from Alternative 2 are considered less than significant. This would be similar to the proposed project.

The 100-year flood zone is primarily located in the area surrounding the Arroyo Simi and its tributaries. Existing residential development exists within the 100-year flood zone. Alternative 2 would be required to comply with FEMA regulations, the City's Flood Damage Prevention Ordinance, and policies set forth in the existing General Plan. Thus, impacts are considered less than significant, similar to the proposed project.

The probability of dam failure in the area is low. The potential for this risk is the same for the proposed as Alternative 2. Development under the General Plan Update would not increase the risk of dam failure, although it would increase the number of persons and amount of development exposed to this hazard. However, implementation of the flood protection policies contained in the draft General Plan Update, as described in Impact 4.8-9, would ensure that the proposed project would result in less-than-significant impacts due to dam failure. As Alternative 2 would allow for fewer residential units, it would result in a reduced impact compared to the proposed project.

Overall, impacts to hydrology under Alternative 2 would be similar to those identified for the General Plan Update.

■ Land Use/Planning

Alternative 2 would allow for additional growth within the City per the existing General Plan (1988), which would remain the underlying land use regulatory document. Implementation of Alternative 2 would not result in impacts related to land use nor would it conflict with existing land use policies currently in place. Additionally, Alternative 2 would not divide an established community, nor would it conflict with a habitat conservation plan. Alternative 2 would result in a less-than-significant impact, similar to that of the draft General Plan Update. However, Alternative 2 would not implement any of the regional plans such as SCAG's 2008 Regional Transportation Plan (RTP), and the 2004 Compass Blueprint Growth Visioning Principles which are incorporated in SCAG's 2008 Regional Comprehensive Plan (RCP). As a result, impacts from Alternative 2 are less than significant, although slightly greater than the proposed project.

■ Mineral Resources

Alternative 2 would allow for additional growth within the City per the existing General Plan (1988) which would remain the underlying land use regulatory document. Implementation of Alternative 2 would not result in impacts related to mineral resources of statewide or local importance. All of the areas currently listed as MRZ-2 (areas designated by the state which have regional or statewide importance) are either located outside of the CURB (which may not be amended prior to 2020 except with a vote of the

people) or is located in areas designated as open space (or both). In both the current General Plan and the updated draft General Plan, MRZ-2 areas within the City limits and within the CURB are designated open space. Therefore impacts will be similar to those of the project and remain less than significant.

■ Noise

Implementation of Alternative 2 would involve the use of construction equipment for the construction of future development. The City's Municipal Code Section 5-16.02(i) allows for noise resulting from construction activities to not be considered a nuisance if it occurs between the hours of 7:00 AM and 7:00 PM. Additionally, Section 5-16.02(h) prevents loud or unusual noise sources, such as pile drivers, from operating between 7:00 PM and 7:00 AM. In accordance with Section 5-16.02(i) and Section 5-16.02(h), construction activities would be limited to the hours of 7:00 AM and 7:00 PM. As construction would not occur except during times permitted in Section 5-16.02(i) and Section 5-16.02(h) of the Municipal Code, and since this code allows construction noise in excess of General Plan standards to occur between these hours, the proposed project would not violate established local standards. However, development under Alternative 2 would not include mitigation measures MM4.12-1(a-d) that would further reduce potential noise impacts resulting from construction activities. Thus impacts would be less than significant though slightly greater than those of the proposed project.

Less-than-significant impacts related to an increase in ambient noise would occur as a result of Alternative 2. Growth is anticipated such that ambient noise levels will still increase due to increased traffic from General Plan development and from development outside of the City that would travel through Simi Valley. With respect to a substantial permanent increase in ambient noise, implementation of the General Plan Update was found to have a less-than-significant impact. This impact was determined based on a comparison of the General Plan Update build-out with the existing ambient noise levels. Implementation of Alternative 2 would also have a less-than-significant impact, and would be less than that anticipated under the draft General Plan Update.

Based on noise measurements and on existing and future noise modeling, noise levels in excess of City standards currently occur and would continue to occur in many residential areas and other noise-sensitive uses throughout the City. Traffic noise would be higher or louder in the future than it is now along the freeway and highways, and along most major arterial and collector roads in Simi Valley due to development outside of the City, regardless of whether the General Plan Update is adopted or not. Implementation of Alternative 2 would have similar impacts related to groundborne noise or vibration to the proposed project. Impacts related to vibration from construction activities associated with the General Plan Update were determined to be less than significant. Operational impacts resulting from vibration were found to be less than significant for the draft General Plan Update. Less-than-significant impacts would be expected for development under Alternative 2, which is similar to those under the proposed project.

■ Population/Housing

Alternative 2 would allow for additional growth that has already been anticipated by SCAG, resulting in no impacts. Alternatively, the General Plan Update would result in a less-than-significant impact related to future increases in population, housing, and employment and consistency with SCAG's forecasts.

Therefore, Alternative 2 would result in fewer impacts to population and housing than the proposed project.

■ Public Services

Implementation of Alternative 2 would not result in impacts to public services beyond the less-than-significant levels identified for the proposed draft General Plan Update, because the development proposed is slightly less. Current conditions indicate that the response times for police and fire services are at acceptable levels and impacts were determined to be less than significant.

According to Section 4.14 of this EIR, five elementary schools and one high school operate at or above allowable capacity. Impacts of the General Plan Update were found to be less than significant due to the implementation of Policy CS-3.1 (Provision of Schools), Policy CS-3.2 (New School Sites), and Policy CS-3.3 (Joint-Use Facilities). However, Alternative 2 would not generate as many additional school-aged children since it calls for nearly 12,000 fewer dwelling units. Alternative 2 would, therefore, put less additional strain on the school system and would result in a less-than-significant impact. Both Alternative 2 and the proposed project are considered to result in a less-than-significant level of impact to schools, but since Alternative 2 would generate fewer students, it would result in a reduced impact compared to the proposed project.

Impacts to libraries as a result of Alternative 2 would be similar to that of the General Plan Update, which are less than significant. Circulation levels have remained consistent over the past few years. Based on an anticipated population increase under the draft General Plan Update, the proposed project could increase demand on library services. However, this would be a less-than-significant impact. As Alternative 2 would result in a smaller increase in population which could generate additional demand on library services, Alternative 2 would result in a less-than-significant impact, less than the proposed project.

■ Recreation

Alternative 2 would result in less new development than the proposed project. Build-out of the General Plan Update would result in a maximum direct population increase of approximately 57,154 residents over the DOF 2009 population estimate of 125,814 residents for a total population of 182,968 residents in 2035, through the creation of new housing opportunities in the City permitted under the draft General Plan Update. The aforementioned are theoretical based on maximum allowable development; SCAG projects 135,389 new residents by 2035 and a more realistic increase of 5,472 persons is expected based on historic growth trends. This population increase could result in additional demand for park and recreational areas, and possibly result in the accelerated deterioration of existing parks and recreation facilities, or create the need for the construction or expansion of such areas.

Full build out of the General Plan Update would increase population in the City and therefore demand on recreation facilities. Based on the existing City population of 125,814 residents, the current park inventory provides approximately 9.6 acres of parkland per 1,000 persons. Therefore, Alternative 2 (which proposes nearly 12,000 fewer dwelling units) would result in a less-than-significant impact to

recreation. Impacts to recreation facilities would be less than significant. Alternative 2 would result in similar, and fewer, impacts to recreation as the proposed project, which would be less than significant.

■ Transportation/Traffic

In order to assess future impacts related to Alternative 2, it would be reasonable to assume that General Plan buildout conditions would persist. Growth in other areas outside of the City may continue and would affect transportation in the City, but is not accounted for in this analysis. With the proposed programmed improvements that would occur under the 1988 General Plan, no intersections or segments would operate at unacceptable LOS. Under the General Plan Update, the intersection of Los Angeles Avenue and First Avenue would remain significant and unavoidable due to uncertainty regarding ROW acquisition. All other impacts were mitigable through roadway improvements. As a result, since Alternative 2 requires no roadway improvements to improve LOS, it would result in the reduction of a significant and unavoidable impact to a less-than-significant level.

The measures related to alternative modes of travel in the General Plan Update would not be implemented as part of Alternative 2. As Alternative 2 would include somewhat less future development and related construction activities, construction impacts to traffic would not occur. Alternative 2 would result in a reduced substantial impact to construction traffic than the less-than-significant impact anticipated under the proposed project.

Since less new development would occur under Alternative 2, impacts related to parking would be less than significant, similar to the proposed project.

Overall, impacts related to traffic and parking would be less under Alternative 2.

■ Utilities/Service Systems

According to the 2005 Urban Water Management Plan (UWMP), the total existing water demand for the City is approximately 36,402 acre-feet per year (afy), which is the sum of the demands of all land types within the City and represents the sum of Ventura County Water Works District No. 8 (VCWWD) and Golden State Water Company (GSWC) supplies. Table 4.17-3 (VCWWD No. 8 Water Supply and Demand Comparison [afy]) of the EIR shows the difference between existing and projected supply and demand. Existing surplus is 3,020 afy.

Under Alternative 2, it is assumed that future development would take place as contemplated in the 1988 General Plan. As such, additional water demand is not anticipated beyond the 2005 UWMP, resulting in less-than-significant impacts.

Section 4.17 of this EIR examined the potential impacts related to water demand and availability. It was determined that the proposed project would result in less-than-significant impacts regarding the need for construction of new water treatment facilities. Given that less overall development would occur under Alternative 2, there would likely not be a need to construct new treatment facilities to accommodate an increase in demand in the City. Therefore, impacts from Alternative 2 would be the same as that of the proposed project.

Build-out of the General Plan Update is expected to generate an additional 2.8 mgd of wastewater per day, for a total of 12.4 mgd. The Water Quality Control Plant, which treats wastewater from the City, has a current capacity of 12.5 mgd. Currently, the facility accepts approximately 9.6 mgd. The increased wastewater generation due to implementation of the General Plan Update could be accommodated within the existing treatment infrastructure; therefore expansion of existing facilities would not be required under the General Plan Update and impacts would be less than significant. Under Alternative 2, the daily generation of wastewater would be slightly less than the proposed project and would result in a less-than-significant impact. Impacts related to Alternative 2 would be less than significant and would be less than those associated with implementation of the proposed project.

Section 4.9 of this EIR examined the potential for significant impacts to existing storm drains in the City. The City's existing storm drain system and flood control facilities generally have sufficient capacity to provide developed areas with adequate protection from flooding. However, some localized areas of the City may currently require drainage improvements, regardless of the level of development.

Alternative 2 includes future development which could require corresponding infrastructure improvements. Under the proposed project, development would take place that could allow for necessary infrastructure improvements. Additionally, goals and policies of the General Plan Update would require new development to ensure adequate stormwater capacity and to address existing deficiencies, resulting in a less-than-significant impact. Therefore, impacts on stormwater facilities related to Alternative 2 would be greater than those of the draft General Plan Update, but still are less than significant.

Full build-out of the General Plan Update would result in the generation of approximately 841 tons of solid waste per day, approximately 9 tons additional solid waste per day over existing levels. Full buildout would therefore comprise of 28 percent of the Simi Valley Landfill and Recycling Center's daily permitted capacity. Impacts were found to be less than significant for the proposed project. Since the future development under Alternative 2 would be less, impacts are expected to be similar.

6.7.3 Attainment of Project Objectives

Under Alternative 2, new development would occur as contemplated in the 1988 General Plan. The purpose of the General Plan Update is to achieve the Vision established with input from the City's residents and decision makers. In California, the general plan acts as the constitution for development and functions as a tool for the City to exercise the power of regulating land use given to it by the state. The Vision states its intent "To provide a safe, functional, healthy, and environmentally sustainable community while expanding to meet the needs of the future where people can live, work, and recreate in peace and tranquility." Under Alternative 2, some portions of the vision regarding safety and functionality would be achieved, but would not include the variety of goals and policies of the General Plan Update to address environmental issues in light of GHGs (and appurtenant legislation), and in more sustainable ways. Much has changed in terms of this country's perception and expectations with regard to the environment and the roles of the government and individual citizens. In order for the City to achieve economic development, which would allow the City to further provide a good quality of life to its residents (through increased tax base), new development of underperforming land uses must occur. Allowing only development contemplated in the 1988 General Plan would likely not allow for an

economically viable City, since there would be no specific focus on infill development, including businesses and shopping centers, to address market changes and allow the City to be economically competitive. The General Plan Update would set forth a means for this sustainable and comprehensive growth, whereas Alternative 2 would not. Therefore, Alternative 2 would not fulfill the identified project objectives.

6.8 ALTERNATIVE 3: REDUCED-DENSITY ALTERNATIVE

6.8.1 Description

Under Alternative 3, the densities of land uses would be reduced compared to those of the General Plan Update. The amount of reduction was derived in accordance to SCAG's future growth projections. Alternative 3 would serve as a means of comparison between what would be allowed under the General Plan Update and a less-intense land use plan, while incorporating all of the proposed policies set forth in the draft General Plan Update. Alternative 3, while only offering a two-percent reduction in the amount of commercial/retail square footage, reduces the total number of allowable dwelling units by 2,719 units (four-percent reduction); a 60-percent reduction in allowable square feet of office uses; a 71-percent reduction in allowable square feet of Business Park; and a 35-percent reduction in allowable square feet of manufacturing uses. Refer to Figure 6-1 (Comparison of Alternatives). Development under Alternative 3 assumes that all goals and policies put in place by the General Plan Update will be in force.

6.8.2 Impact Evaluation

■ Aesthetics

Under Alternative 3, new development would occur in accordance with what is contemplated in the General Plan Update, but at a reduced rate. Since new development could occur, additional impacts would occur that could otherwise impede or damage a scenic vista. The existing Municipal Code protects hillsides and other natural scenic features. Some 53 policies were identified in Section 4.1 (Aesthetics) of this EIR that would help to reduce any impacts to visual resources. Therefore, with implementation of these policies, similar to the proposed project, no impacts would occur under this alternative.

Impacts related to a substantial change in the visual character of the City were found to be less than significant for the draft General Plan Update, as new development would be subject to new policies that would improve the overall aesthetics within the City. Since Alternative 3 assumes new development similar to that allowed under the General Plan Update but at a reduced rate, it is reasonable to assume that impacts would therefore be similar to those of the proposed project. These impacts would be less than significant.

Similar to impacts of the proposed project, impacts related to light and glare and the impact thereof on nighttime views would be less than significant.

Overall, aesthetics impacts resulting from Alternative 3 would be similar to those of the draft General Plan Update.

■ Agricultural Resources

Alternative 3 would allow new development similar to that allowed under the General Plan Update but at a reduced rate. No impacts were found related to the General Plan Update related to the project conflicting with any existing zoning or Williamson Act contracts since there are no areas zoned for agriculture and no active Williamson Act contracts. The implementation of Alternative 3 would result in no impacts, similar to the project.

No impacts were found related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The small piece of land designated as Prime Farmland and Farmland of Statewide Importance, located on the northeast corner of Tapo Canyon Road and Alamo Street, is currently developed with urban land uses. Therefore, implementation of Alternative 3 will have no effect on the conversion of this land since it has previously been converted to an urban use. The small area of land in the southwest portion of the City, south of Madera Road and just north of Bard Reservoir is classified as Unique Farmland. This land is currently being used for agricultural purposes and is currently zoned as RPD-Residential Planned Development and is part of the future Wood Ranch Specific Plan area. The existing General Plan designates this land as Open Space. As a result of current General Plan designation, no impacts would occur, similar to the project.

With regard to the project resulting in changes to the existing environment that would lead to the conversion of agricultural land to non-agricultural uses, there currently are no land use designations or zoning classifications specifically for agricultural uses within the City. The few small areas where existing agricultural uses currently occur are zoned for non-agricultural uses. Alternative 3 is similar to the proposed project but with overall reduced densities/intensities. Therefore, while the conversion to non-agricultural uses is likely to occur, it will not be a result of Alternative 3. As a result, no impacts will occur.

■ Air Quality

Implementation of Alternative 3 would involve the use of construction equipment but less than that of the General Plan Update. Substantially more development is contemplated under the proposed project than in Alternative 3. Therefore, while impacts related to construction emissions would occur, impacts would be less than the less-than-significant impacts anticipated under the proposed project.

Implementation of the General Plan Update was found to be inconsistent with the AQMP and therefore significant and unavoidable. Although Alternative 3 is less-intense development than the General Plan Update, it still represents a substantial increase from the existing General Plan and from existing conditions. Since the AQMP is based on the general plans of all of the cities/county areas in the Basin, this Alternative would have a similar significant and unavoidable impact as a result of the General Plan Update.

The General Plan Update was found to have significant operational impacts related to the violation of an air quality standard or contributing to an existing or projected air quality violation due to its emission of PM_{10} and $PM_{2.5}$ particulate matter. Section 4.3 found that the proposed project would result in 1,074 tons/year net increase of PM_{10} and a net increase of 203 tons per year of $PM_{2.5}$ over existing emissions.

However, the General Plan Update was found to result in a net decrease of 1,374 tons/year of VOCs, a net decrease of 2,188 tons/year of NO_x, a net decrease of 3 tons/year of SO₂, and a net decrease of 16,698 of CO. These reductions are a result of improved vehicle emissions between now and 2035, so they would beneficially impact Alternative 3 as well. While Alternative 3 would lead to less development than the proposed project, it would still result in substantially more development than currently exists or that the existing General Plan allows. The Basin is in nonattainment for particulate matter and Alternative 3 would contribute substantially to an existing air quality violation and remain significant and unavoidable. Thus impacts related to Alternative 3 would be similar and significant like the proposed project.

Operation of the proposed project would increase local traffic volumes above existing conditions, but would not expose sensitive receptors to substantial localized carbon monoxide (CO) concentrations. CALINE4 modeling software was used to model area intersections. Future CO concentrations near these intersections would not exceed the national 35.0 ppm and State 20.0 ppm 1-hour ambient air quality standards or the national or State 9.0 ppm 8-hour ambient air quality standards. In fact, they are well below the threshold. Although the traffic generated by the General Plan Update would be greater than that generated by Alternative 3, it would be reasonable to expect similar impacts resulting from the proposed project and from Alternative 3 because the CO concentrations are so far below the thresholds.

Similar to the proposed project, construction and operation of commercial and office development under this Alternative would not create objectionable odors. Standard construction requirements would be imposed upon each applicant to minimize odors from construction, and future developments would be required to adhere to the City's solid waste regulations. Therefore, any project-generated refuse would be stored in covered containers and trash removed at regular intervals. This impact would remain less than significant, similar to the proposed project.

■ Biological Resources

This EIR identified less-than-significant impacts related to biological resources resulting from the project, due mostly to the proposed policies found in the draft General Plan Update. Alternative 3 reduces the overall amount of allowable uses, but does not guarantee that these less intense uses would not occupy the same geographic area as the draft General Plan Update. Because development under this alternative could result in the same disturbance footprint, impacts would be similar to the proposed project. Like the proposed project, compliance with existing regulations to avoid, minimize, and mitigate potential impacts on sensitive species, in addition to the General Plan Update policies, would ensure that impacts under this alternative would likewise be less than significant.

■ Cultural Resources

This EIR identified less-than-significant impacts related to cultural resources resulting from the project. Alternative 3 reduces the amount of overall allowable uses, but does not guarantee that these less intense uses would not occupy the same geographic area as the draft General Plan Update. Because development under this alternative could result in the same disturbance footprint, impacts would be similar to the proposed project. As discussed in section 4.5, Cultural Resources, implementation of the General Plan Update goals and policies and compliance with existing local, state, and federal regulations to reduce

impacts on cultural resources, development under the draft General Plan Update would be less than significant. As development under Alternative 3 would be subject to the same regulations and General Plan Update goals and policies, the impact under this alternative would likewise be less than significant.

■ Geology/Soils

This EIR identified less-than-significant impacts related to geology and soils resulting from the project, due mostly to the proposed policies found in the draft General Plan Update. Alternative 3 reduces the overall amount of allowable uses, but does not guarantee that these less intense uses would not occupy the same geographic area as the draft General Plan Update. Development under this alternative would be subject to the City's building codes and policies contained in the General Plan and Municipal Code, which would ensure that development considers existing soil conditions and ensure that structures built as a result of implementation of the General Plan Update would perform in a manner equal to or better than the existing structures they would replace. Thus, like the draft General Plan Update, impacts under this alternative would be similar to the proposed project and would likewise be less than significant.

■ Global Climate Change

An analysis of the potential significant emission of GHGs under the proposed project resulted in a determination that it would result in a less-than-significant impact. During build-out and operation of the proposed project, GHGs would be emitted as the result of construction activities and deliveries; new direct operational sources, such as operation of emergency generators, natural gas usage, and operation of fleet vehicles; and indirect operational sources, such as production of electricity, steam and chilled water, transport of water, and decomposition of project-related wastes. GHGs would also be emitted by visitors and employees travelling to, from, and within the City. As the proposed project includes goals and policies to comply with all state requirements, impacts associated with GHG emissions during construction and operational activities are considered less than significant. Alternative 3 proposes slightly less development, making the potential impacts associated with GHG less than significant and less than those of the General Plan Update. Alternative 3 would realize the same beneficial effects of compliance with the goals and policies set forth in the Climate Action Plan developed for the City, as well as land use patterns and alternative modes of travel put forth in the General Plan Update that aim to reduce the existing and future GHG Emissions proactively.

■ Hazards and Hazardous Materials

This EIR identified less-than-significant impacts related to hazards and hazardous materials resulting from the project, due mostly to the existing regulatory setting and proposed policies found in the draft General Plan Update. Alternative 3 reduces the amount of allowable uses, but does not guarantee that these less intense uses would not occupy the same geographic area as the draft General Plan Update. Thus, impacts would be similar to the proposed project and would likewise be less than significant. However, since Alternative 3 permits less overall development, it would subject fewer people to risks associated with hazards and hazardous materials and have less impact than the project.

■ Hydrology/Water Quality

Implementation of Alternative 3 involves the construction of new development projects similar to those contemplated under the draft General Plan Update, but at a reduced rate of intensity. Therefore, construction impacts related to hydrology and water quality would be similar to those of the proposed project. This represents a similar impact to the less-than-significant impact anticipated under the proposed project.

The proposed project was found to have less-than-significant impacts related to a potential violation of any water quality standards or waste discharge requirements for construction and operational activities. Compliance with NPDES permit requirements, the 2005 UWMP, and General Plan Update policies would reduce the risk of water degradation within the City from the operation of new developments to the maximum extent practicable. Under Alternative 3, existing development and ongoing operations would be subject to the same regulations as the General Plan Update with the same benefit of the draft General Plan Update's protective water quality and hydrology policies. Thus, Alternative 3 would have similar less-than-significant impacts as those anticipated under the draft General Plan Update.

Under the proposed project, impacts related to depletion of groundwater supplies or interference with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, were found to be less than significant. All existing land uses and future development contemplated in the General Plan Update would utilize water from Ventura County Waterworks District No. 8, which receives its potable water from MWD and Golden State Water Company. As Alternative 3 would allow for less overall additional growth, less impact is expected. Therefore, Alternative 3 would result in somewhat less impact than the draft General Plan Update, and result in less-than-significant impacts to groundwater.

With respect to drainage, the proposed General Plan Update would result in changes in ground surface permeability via paving as well as changes in topography via grading and excavation. However, policies proposed in the General Plan Update would require implementation of BMPs, incorporation of stormwater detention facilities as necessary, adequate design of drainage facilities, and minimization of increases in impervious areas to reduce impacts to less-than-significant levels. Under Alternative 3, which reduces the overall intensities of land uses, and with the benefit of the General Plan Update policies to ensure protection of resources, impacts would be less-than-significant, similar to the proposed project.

Impacts related to the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a waterway or the substantial increase in surface runoff resulting in flooding were found to be less than significant with respect to the draft General Plan Update. In addition, impacts related to the exceedance of stormwater drainage systems were determined to be less than significant for the proposed project. All development under the proposed project would comply with the General Plan Update policies, NPDES regulations, CDFG regulations, as well as the preparation of, and compliance with, a SWPPP, which would reduce the risk of flooding from drainage alterations to less-than-significant levels. Alternative 3 would allow for additional development similar to the proposed project (but at a reduced rate). Impacts of the proposed project were found to be less than significant. Therefore, Alternative 3 would have similar impacts to the General Plan Update and would result in less-than-significant impacts to hydrology.

As discussed in Impact 4.8-4, the capacity of the existing storm drain infrastructure throughout the City is sufficient to handle existing stormwater flows. As Alternative 3 would result in reduced overall development intensity than that of the proposed project, impacts resulting from Alternative 3 are considered less than significant. This would be similar to the proposed project.

The 100-year flood zone is primarily located in the area surrounding the Arroyo Simi and its tributaries. Existing residential development exists within the 100-year flood zone. Alternative 3 proposes reduced overall intensity of new development but does not physically alter the locations. Impacts are therefore considered less than significant, similar to the proposed project.

The probability of dam failure in the Planning Area is low and the potential for this risk is the same for the proposed as Alternative 3. Development under the General Plan Update would not increase the risk of dam failure, although it would increase the number of persons and amount of development exposed to this hazard. However, implementation of the flood protection policies contained in the draft General Plan Update, as described in Impact 4.8-9, would ensure that the proposed project would result in less-than-significant impacts due to dam failure. As Alternative 3 would allow for fewer new residents and nonresidential square footage, additional development would increase the number of people exposed to a potential hazard at a lesser rate than the proposed project, Alternative 3 would result in less impact than the proposed project.

Overall, impacts to hydrology under Alternative 3 would be less than the draft General Plan Update.

■ Land Use/Planning

Alternative 3 would allow for overall less additional growth within the City. The General Plan Update would be the underlying land use regulatory document, at a lower level of intensity. Implementation of Alternative 3 would not result in impacts related to land use nor would it conflict with existing land use policies currently in place. Additionally, Alternative 3 would not divide an established community, nor would it conflict with a habitat conservation plan. Alternative 3 would result in a less-than-significant impact, similar to that of the draft General Plan Update. Alternative 3 would still implement all of the regional plans such as SCAG's 2008 Regional Transportation Plan (RTP), and the 2004 Compass Blueprint Growth Visioning Principles which are incorporated in SCAG's 2008 Regional Comprehensive Plan (RCP). As a result, impacts from Alternative 3 are less than significant, similar to those of the proposed project.

■ Mineral Resources

Alternative 3 would allow for additional growth within the City similar to the proposed project, but at a reduced rate. Implementation of Alternative 3 would not result in impacts related to mineral resources of statewide or local importance. All of the areas currently listed as MRZ-2 (areas designated by the state which have regional or statewide importance) are located outside of the CURB (which may not be amended prior to 2020 except with a vote of the people). In the updated draft General Plan, MRZ-2 areas within the City limits and within the CURB are designated open space. Since intensity would result in little impact to physical placement of structures and the same policies would be in effect, impacts will be similar to those of the project and remain less than significant.

■ Noise

Implementation of Alternative 3 could involve less construction equipment, as less overall development would occur. Therefore, impacts related to construction noise would be less than the less-than-significant impacts anticipated under the proposed project.

Less-than-significant impacts related to an increase in ambient noise would occur as a result of Alternative 3. Although less growth would occur, it would occur nonetheless and it is anticipated that ambient noise levels will still increase due to increased traffic from development outside of the City that would travel through Simi Valley. With respect to a substantial permanent increase in ambient noise, implementation of the General Plan Update was found to have a less-than-significant impact. This impact was determined based on a comparison of the General Plan Update build-out with the existing ambient noise levels. Implementation of Alternative 3 would also have a less-than-significant impact, although less than that anticipated under the General Plan Update due to a reduced amount of new development.

Based on noise measurements and on existing and future noise modeling, noise levels in excess of City standards currently occur and would continue to occur in many residential areas and other noise-sensitive uses throughout the City. Traffic noise would be higher or louder in the future than it is now along the freeway and highways, and along most major arterial and collector roads in Simi Valley due to development outside of the City, regardless of whether the General Plan Update is adopted or not. Implementation of Alternative 3 would not necessarily have lesser impacts related to groundborne noise or vibration than the draft General Plan Update. Although lesser overall development would occur, groundborne noise and/or vibration would occur at the individual project site. Thus, impacts would be similar to those of the proposed project. Operational impacts resulting from vibration were found to be less than significant for the draft General Plan Update. Less-than-significant impacts would be expected, as less new development would occur under Alternative 3, which is similar, although less substantial than impacts under the proposed project.

■ Population/Housing

The General Plan Update would result in a less-than-significant impact related to future increases in population, housing, and employment and consistency with SCAG's forecasts. The future development horizon for Alternative 3 was derived from SCAG projections, so Alternative 3 would be consistent with SCAG's forecasts and Alternative 3 would allow for lesser overall additional growth than the proposed project. Therefore, Alternative 3 would result in fewer impacts to population and housing than the proposed project.

■ Public Services

Implementation of Alternative 3 would not result in impacts to public services beyond the less-than-significant levels identified for the draft General Plan Update, because less development is proposed. Current conditions indicate that the response times for police and fire services are at acceptable levels and impacts were determined to be less than significant.

According to Section 4.14 of this EIR, five elementary schools and one high school operate at or above allowable capacity. Impacts of the General Plan Update were found to be less than significant due to the implementation of Policy CS-3.1 (Provision of Schools), Policy CS-3.2 (New School Sites), and Policy CS-3.3 (Joint-Use Facilities). Alternative 3 would generate fewer additional school-aged children than the project. Therefore, since the same policies and regulations hold under the Alternative 3 as with the General Plan Update, impacts will be similar and less than significant.

Impacts to libraries as a result of Alternative 3 would be similar to that of the draft General Plan Update: less than significant. Circulation levels have remained consistent over the past few years. Based on an anticipated population increase under the draft General Plan Update, the proposed project could increase demand on library services. However, this would be a less-than-significant impact. As Alternative 3 only results in a minor decrease in residential development from the draft General Plan Update, impacts would be similar to those of the proposed project.

■ Recreation

Alternative 3 would result in less overall development than the draft General Plan Update. However, Alternative 3 only proposes a 1 percent reduction in the number of residential dwelling units. The population increase contemplated by the General Plan Update was found to have the potential to result in additional demand for park and recreational areas, and possibly result in the accelerated deterioration of existing parks and recreation facilities, or create the need for the construction or expansion of such areas.

Full build out of the General Plan Update would increase population in the City and therefore demand on recreation facilities. Based on the existing City population of 125,814 residents, the current park inventory provides approximately 9.6 acres of parkland per 1,000 persons. Under Policy PR-1.1 through Policy PR-1.10, the development of park and recreation facilities would be required commensurate with new development to ensure that impacts to recreation facilities would be less than significant. Therefore, Alternative 3 would result in similar impacts to recreation as the proposed project, which would be less than significant.

■ Transportation/Traffic

In order to assess future impacts related to Alternative 3, the traffic study prepared for the project examined the reduced density as set forth in Table 6-1 above. Currently, two study area intersections and one roadway segment operate below the acceptable LOS. Table 6-2 (Comparison of Traffic Impacts) shows the comparison between the traffic impacts of Alternative 3 and the proposed project at study area intersections. As shown, implementation of Alternative 3 results in impacts similar to those of the proposed project. However, with street improvements, Alternative 3 would result in one intersection with unacceptable LOS. Impact 4.16-3 was found to have significant and unavoidable impacts because of the uncertainty of the availability of ROW acquisition required for improvements necessary to reduce impacts to less-than-significant levels. Therefore, similar significant and unavoidable impacts exist under Alternative 3.

Table 6-2 Comparison of Traffic Impacts

LOS ^a	Existing Levels	Alternative 3 (Not Mitigated)	Alternative 3 (Mitigated)	Updated General Plan (Not Mitigated)	Updated General Plan (Mitigated)
Intersections with LOS D	1	4	0	3	0
Intersections with LOS E	1	1	0	2	0
Intersections with LOS F	0	0	0	0	0

SOURCE: Iteris Corporation, *Simi Valley General Plan Update Circulation and Mobility Element* (November 2010).

a. Intersections perform at the LOS listed for either AM or PM Peak Hour or both.

The measures related to alternative modes of travel in the General Plan Update would also be implemented as part of Alternative 3. Both Alternative 3 and the proposed project would result in significant unavoidable traffic impacts for traffic trips and congestion. Alternative 3 would result in a similar less-than-significant impact to construction traffic as the General Plan Update.

As new development would occur at a reduced rate under Alternative 3, impacts related to parking would be less than significant, similar to the proposed project.

Overall, impacts related to traffic and parking would be similar under Alternative 3.

■ Utilities/Service Systems

According to the 2005 Urban Water Management Plan (UWMP), the total existing water demand for the City is approximately 36,402 afy, which is the sum of the demands of all land types within the City and represents the sum of Ventura County Water Works District No. 8 (VCWWD) and Golden State Water Company (GSWC) supplies. Table 4.17-3 of the EIR shows the difference between existing and projected supply and demand. Existing surplus is 3,020 afy.

Under Alternative 3, it is assumed that future development would take place similar to that contemplated in the General Plan Update but at a slightly less intensity. As such, additional water demand is not anticipated beyond that of the proposed project, resulting in less-than-significant impacts.

Section 4.17 of this EIR examined the potential impacts related to water demand and availability. It was determined that the proposed project would result in less-than-significant impacts regarding the need for construction of new water treatment facilities. Given that less overall development would occur under Alternative 3, there would likely not be a need to construct new treatment facilities to accommodate an increase in demand in the City. Therefore, impacts from Alternative 3 would be similar to, if not less than, that of the proposed project.

Build-out of the General Plan Update is expected to generate an additional 2.8 mgd of wastewater per day, for a total of 12.4 mgd. The Water Quality Control Plant, which treats wastewater from the City, has a current capacity of 12.5 mgd. Currently, the facility accepts approximately 9.6 mgd. The increased wastewater generation due to implementation of the General Plan Update could be accommodated within the existing treatment infrastructure; therefore expansion of existing facilities would not be required under the General Plan Update and impacts would be less than significant. Under Alternative 3, the daily generation of wastewater would be slightly less than the proposed project and would result in a

less-than-significant impact. Impacts related to Alternative 3 would be less than significant and would be less than those associated with implementation of the proposed project.

Section 4.9 of this EIR examined the potential for significant impacts to existing storm drains in the City. The City's existing storm drain system and flood control facilities generally have sufficient capacity to provide developed areas with adequate protection from flooding. However, some localized areas of the City may currently require drainage improvements, regardless of the level of development.

Alternative 3 includes future development and corresponding infrastructure improvements. Under the proposed project, development would take place that could allow for necessary infrastructure improvements. Additionally, goals and policies of the General Plan Update would require new development to ensure adequate stormwater capacity and to address existing deficiencies, resulting in a less-than-significant impact. Therefore, impacts on stormwater facilities related to Alternative 3 would be similar to those of the draft General Plan Update, and are less than significant.

Full build-out of the General Plan Update would result in the generation of approximately 841 tons of solid waste per day, approximately 9 tons additional solid waste per day over existing levels. Full buildout would therefore comprise of 28 percent of the Simi Valley Landfill and Recycling Center's daily permitted capacity. Impacts were found to be less than significant for the proposed project. Since the future development under Alternative 3 would be less than the proposed project, impacts are expected to be similar.

6.8.3 Attainment of Project Objectives

Under Alternative 3, new development would occur as contemplated in the General Plan Update but at a reduced level of intensity. The purpose of the General Plan Update is to achieve the Vision established with input from the City's residents and decision makers. In California, the general plan acts as the constitution for development and functions as a tool for the City to exercise the power of regulating land use given to it by the state. The Vision states its intent "To provide a safe, functional, healthy, and environmentally sustainable community while expanding to meet the needs of the future where people can live, work, and recreate in peace and tranquility."

Under Alternative 3, the same goals and policies that are set forth in the General Plan Update would still exist. Therefore, this Alternative would, similar to the project, incorporate many of the changes that reflect our regulatory environment and popular preferences regarding the environment, housing types, household characteristics, and economy and demographics. In addition, many of the project objectives are achieved because the Study Areas that are slated for land use change would exist under Alternative 3.

However, many of the objectives sought by the General Plan Update would not likely be achieved. The objective to focus higher-density developments and mixed-use projects in strategic locations near transit, transportation corridors, and job center could be compromised by reduced densities since fewer persons would be able to utilize the presumed benefits. In addition, the concept of livable, walkable, and well-designed neighborhoods could be hampered by lower intensity development since the aforementioned concepts rely to a large degree on a "critical mass" of local residents, nonresidential land uses, transit, and outdoor living space. Reduced densities can remove or upset the required balance.

There are a couple of objectives that focus achieving regional fair share of housing, increasing the area's economic base, and the provision of a mix of housing choices including affordable options. Alternative 3 would allow 2,719 fewer residential units than the proposed project which is substantial and limiting.

The objective to provide strategic reinvestment in underperforming commercial centers as mixed-use areas could be compromised. This is because density is a large factor in the feasibility of such infill projects.

Finally, the objective to better utilize public transit, specifically Metrolink, could be compromised under Alternative 3. Lower densities or fewer areas of development can significantly alter the ridership of transit, specifically Metrolink.

Therefore, Alternative 3 would not fulfill the identified project objectives.

6.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Alternative 1 (No Build) does not reduce any of the proposed project's significant impacts to a less-than-significant level. However it does lessen the severity of some of the impacts, as noted in Table 5-3 (Summary Comparison of Alternatives), but it also increases the severity of others. Alternative 2 would reduce the severity of some potential impacts of the currently proposed General Plan Update, while increasing the severity of others. Alternative 2 does result in the reduction of two significant impacts to less-than-significant levels. Alternative 3 does not reduce any of the proposed project's significant impacts to a less-than-significant-level, but it does reduce the severity of many of the other less-than-significant impacts. Alternative 2 would, therefore, be environmentally superior to the proposed project because it reduces one significant air quality and one significant transportation impact to less-than-significant levels. The less than significant environmental impacts to air quality, population and housing, and public services would be lessened to the greatest extent, since this alternative proposes the least amount of future overall development. However, Alternative 2 does not fully meet the project objectives, as noted above.

Table 6-3 Summary Comparison of Alternatives

<i>Environmental Issue Area</i>	<i>Proposed Project</i>	<i>Alternative 1 (No Build)</i>	<i>Alternative 2 (Development Under 1988 General Plan)</i>	<i>Alternative 3 (Reduced Development)</i>
Aesthetics	LTS	+	+	=
Agricultural Resources	LTS	+	=	=
Air Quality	(3) SU	(3) SU/-	(2) SU/-	(3) SU/-
Biological Resources	LTS	-	+	=
Cultural Resources	LTS	-	+	=
Geology/Soils	LTS	=	=	=
Global Climate Change	LTS	+	+	-
Hazards and Hazardous Materials	LTS	-	=	-
Hydrology/Water Quality	LTS	-	=	-
Land Use/Planning	LTS	+	+	=
Mineral Resources	LTS	=	=	=
Noise	LTS	-	=	-
Population/Housing	LTS	-	-	-
Public Services	LTS	=	-	=
Recreation	LTS	=	=	=
Transportation/Traffic	(2) SU	(2) SU/+	(1) SU/=	(2) SU/-
Utilities/Service Systems	LTS	-	=	-

LTS = Less than Significant; SU = Significant and Unavoidable

6.10 REFERENCES

Iteris Corporation. 2010. *Traffic Study for the Simi Valley General Plan Update Circulation and Mobility Element*, November.