5.0 ALTERNATIVES

PURPOSE

This section of the EIR provides a comparative analysis of the merits of alternatives to the proposed project pursuant to Section 15126.6 of the State CEQA Guidelines. *According to the* Guidelines, *the discussion of alternatives should focus on alternatives to a project or its location which can avoid or substantially lessen the significant effects of the project. The CEQA* Guidelines *indicate that the range of alternatives included in this discussion should be sufficient to allow decision-makers a reasoned choice. The alternatives discussion should provide decision-makers with sufficient information to allow for meaningful evaluation, analysis and comparison with the proposed project.*

INTRODUCTION

The CEQA *Guidelines* state that an EIR needs to describe a range of reasonable alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening the significant effects of the project. When addressing feasibility, the CEQA *Guidelines* state that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency..., jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to the alternative site." The CEQA *Guidelines* also state that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the proposed project.

Therefore, based on the CEQA *Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of detail of analysis that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the basic objectives of the project; and (4) the feasibility of the alternatives. These factors are unique for each project. A summary of the identified impacts of the RiverPark Project and the objectives of the project are provided below.

Impacts of RiverPark Project

The alternatives selected for analysis in this section were developed with the aim of avoiding or lessening the significant environmental impacts of the RiverPark Project as identified in this EIR while still meeting the basic objectives of the project. **Section 4.0, Environmental Impact Analysis**, of this EIR identified both significant impacts and unavoidable significant impacts associated with implementation of the proposed RiverPark Project.

Unavoidable significant impacts to Mineral Resources, Water Resources, Agricultural Resources and Cultural Resources are identified in this EIR. Development of the 155 acres of agricultural land in RiverPark Area 'A' will result in the unavoidable loss of this agricultural land. In addition, development of this portion of the site will also result in the loss of access and future ability to mine the sand and aggregate resources located beneath this agricultural land. While this portion of the Specific Plan Area has been approved for urban development since 1986, is partially developed and is located in a redevelopment area, the loss of this remaining agricultural land is considered an unavoidable significant impact. Likewise, analysis in this EIR demonstrates that mining of the aggregate resources on this portion of the site is not economically feasible. Nonetheless, the impact of loss of access to these mineral resources is also identified as an unavoidable significant impact.

Reclamation and development of RiverPark Area 'B' will result in the demolition of the remaining structures associated with the mining and materials processing activities that have historically occurred on this portion of the Specific Plan Area. Of the 10 remaining structures on the mine site, 5 are considered to have local historical significance for their association with mining in Ventura County, an industry that has made a significant contribution to the physical development of Ventura County through the construction of roads, bases, airfields, and buildings. This local historical significance is not related to the architectural character of these remaining structures. Appropriate mitigation, in the form of historical documentation, is proposed for this impact. Permanent removal of these structures is, however, considered an unavoidable significant impact of the project. Extensive analysis of the impact of the proposed RiverPark Project on surface and groundwater quality has been conducted. Conservative numerical thresholds of significance were selected for this analysis. The project as proposed includes a stormwater quality treatment system. The analysis shows that concentrations of four pollutant constituents will remain above the numerical thresholds of significance used. Runoff from storms that are more frequent than a 10-year event storm will be conveyed to the reclaimed mine pits. Concentrations of iron, manganese and nickel in this runoff are calculated to remain above the thresholds being used. Given the frequency of these large storm events, this impact would not occur often. As runoff from storms with a frequency less than a 10-year event would not enter the pits, overall

mass loading of these and other pollutant constituents would be reduced. This impact to groundwater is, however, identified as an unavoidable significant impact. The quality of surface runoff discharging to the Santa Clara River will also be treated and improved when compared to existing conditions. Concentrations of one constituent analyzed, fecal coliform, will be consistent with ambient conditions in the river, but not lower than the threshold used in the analysis. This impact to surface water quality is also identified as an unavoidable impact of the project.

Significant impacts of the project that can be mitigated to a level that is less than significant have also been identified related to the topics of aesthetics, geologic and soils hazards, biological resources, traffic, air quality, noise, public schools and police services. Impacts to school facilities are mitigated by the provision of school sites in the project and the payment of impact fees. Impacts to police services will also be mitigated by the provision of additional facilities within the Specific Plan Area.

Noise from construction activities could impact existing uses around the Specific Plan Area. Potential noise and aesthetic impacts have also been identified for one of the specially-permitted uses in the Specific Plan Area. As proposed, the RiverPark Specific Plan would allow development of a ballpark facility in Planning District D, the Town Square Commercial District, subject to the approval of a Special Use Permit by the City. Depending on the final location and design of this facility, residential uses allowed by the Specific Plan could by impacted by light and noise associated with this facility. With regards to biological resources, construction could impact active bird nests in trees on the site and new light sources and the use of non-native plants in landscaping could indirectly impact surrounding natural habitat. Traffic generated by the proposed uses will impact the operation of intersections in the area and the associated air emissions will exceed the threshold of significance used in the analysis for these emissions. The existing soil conditions on the site could also result in impacts to the land uses as proposed. Measures to mitigate all of these significant impacts to a level that is less than significant have been identified in this EIR.

Objectives of RiverPark Project

The City of Oxnard and the project applicant have identified the following objectives for the RiverPark Specific Plan in response to existing physical, environmental, demographic and market conditions:

- Create a distinctive community with a strong and inherent “sense of place”;
- Provide for development of a balanced community with a diverse mix of land uses within the City’s City Urban Restriction Boundary (CURB);

- Provide a character and quality of housing consistent with the existing character of the area and complementary with the overall range of housing opportunities provided by the City's 2020 *General Plan*;

- Promote the redevelopment of the RiverPark Area 'A' consistent with the goals of the Oxnard Community Development Commission's (CDC) Historic Enhancement and Revitalization of Oxnard (HERO) Redevelopment Project;

- Reclaim the existing sand and gravel mine site in RiverPark Area 'B' to provide additional housing opportunities in the City;

- Reclaim the existing mine pits in RiverPark Area 'B' in a manner that protects surface and groundwater quality and creates compatibility with existing and planned surrounding land uses;

- Enhance groundwater quantity and quality in the Oxnard Aquifer System by making the reclaimed mine pits available for incorporation into United Water Conservation District's groundwater recharge system;

- Provide a planning vision and guidelines for development of the RiverPark community;

- Encourage the development of a compact, cohesive community consisting of residential, commercial, open space, and public facilities connected by a coherent network of interconnected streets;

- Create a community that is compatible with the Santa Clara River by providing additional native vegetation within the Specific Plan Area to complement the natural habitat in the river and providing for connections to the regional trail planned along the river;

- Integrate public transit into neighborhoods and surrounding community;

- Provide strong pedestrian connections between land uses and provide a harmonious variety of housing choices and institutional activities.

ALTERNATIVES SELECTED FOR EVALUATION

Section 15126.6 (e) of the CEQA *Guidelines* require the analysis of a "No Project" Alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The CEQA *Guidelines* state that the No Project Alternative is the circumstance under which the project would not proceed. If the No Project Alternative will not result in the preservation of existing conditions, the consequences of not approving the project should also be discussed. In addition to the No Project Alternative, other alternatives were identified that could avoid one or more of the significant impacts of the project and meet the basic objectives of the project.

A brief description of the eight alternatives selected for evaluation in this analysis and the reasons for selecting these alternatives is provided below. Comparative analysis of these alternatives follows.

No Project/Existing Conditions Alternative

The No Project/Existing Conditions Alternative would leave the project site in its present condition. This alternative assumes no further development occurs within the Specific Plan Area. Analysis of this alternative is required by the CEQA *Guidelines*.

No Project/Existing Approvals Alternative

As a result of existing approvals, the No Project Alternative is not likely to result in the preservation of existing conditions. The majority of RiverPark Area 'A' is located within an existing specific plan area. This plan, the Oxnard Town Center Specific Plan, would allow development of up to 4.4 million square feet of commercial and public facilities uses. RiverPark Area 'B', currently located outside of the City of Oxnard, is subject to an existing mine reclamation plan approved by the County of Ventura. This alternative considers implementation of these existing plans. This alternative is also examined to meet the requirements of the CEQA *Guidelines*.

RiverPark 'A' Only Alternative

This alternative considers development of the uses proposed by the RiverPark Specific Plan for RiverPark Area 'A' only. With this alternative RiverPark 'B' would remain outside of the City of Oxnard and would not be developed. This alternative looks at reducing the magnitude of the impacts of the project by reducing the size of the Specific Plan Area.

Reduced Density Alternative

The Reduced Density Alternative considers development of the entire 701-acre Specific Plan Area under the proposed Specific Plan at approximately 75 percent of the density proposed for residential and commercial uses. This alternative was formulated to provide information on how the impacts of the project could be lessened or avoided by reducing the amount of development allowed.

Water Quality Treatment Alternative No. 1

This alternative analyzes a different water quality treatment system designed to eliminate all runoff from entering the mine pits located in RiverPark Area 'B'.

Water Quality Treatment Alternative No. 2

This alternative analyzes a different water quality treatment system designed to further improve the quality of runoff discharged to the Santa Clara River.

Historic Preservation Alternative

Preservation of the 5 existing buildings and structures on the mine site in RiverPark Area 'B' identified as having local historical significance is assessed with this alternative.

Alternative Locations

This alternative looks at the availability and suitability of other sites within the City's Planning Area for the proposed project.

ALTERNATIVES ANALYSIS

A description of each alternative is presented on the following pages along with analysis comparing the impacts that would result from the project as proposed with the alternatives.

No Project/Existing Conditions Alternative

Description

The "No Project" alternative would leave the Specific Plan Area in its present condition. Existing uses and improvements within the proposed Specific Plan Area would remain as described in **Section 2.0, Environmental Setting**, of this EIR.

Environmental Analysis

All of the significant impacts identified for the RiverPark Project in **Section 4.0, Environmental Impact Analysis**, of this EIR would be avoided by maintaining the Specific Plan Area in its current condition. No further development of RiverPark Area 'A' would preserve the existing agricultural land and future access to the aggregate resources under this land. RiverPark Area 'B' would not be annexed to the City and would remain in its current state. This would avoid the loss of the existing building and structures on the mine site identified as local historical resources. Existing drainage patterns and facilities would

not be altered and the water quality impacts identified for the proposed project would be avoided. In addition to avoiding these unavoidable significant impacts of the project, all of the other significant impacts summarized above associated with the proposed residential and commercial uses would be avoided. Those effects of the RiverPark Project that are beneficial would not occur with this alternative. Specifically, the RiverPark Project would result in a net increase in groundwater quantity and an increase in the quantity and quality of native habitat on the site.

No Project/Existing Approvals Alternative

Description

Both RiverPark Areas 'A' and 'B' have existing approvals for actions that would be implemented if the proposed project is not approved. The majority of RiverPark Area 'A' is located within an existing specific plan area. This plan, the Oxnard Town Center Specific Plan, would allow development of up to 4.4 million square feet of commercial, light industrial and public facilities uses. A small portion of the proposed RiverPark Specific Plan Area, generally located between Myrtle Street, Vineyard Avenue and the Ventura Freeway, is located outside of the Oxnard Town Center Specific Plan Area. This area is currently designated for regional commercial land uses complementary to those allowed by the Oxnard Town Center Specific Plan.

RiverPark Area 'B' is currently located outside of the City of Oxnard. The mine site is subject to an existing reclamation plan approved by the County of Ventura. The remainder of RiverPark Area 'B' consists of the existing El Rio Retention Basins, owned by the Ventura County Flood Control District. This alternative considers continued implementation of the existing Oxnard Town Center Specific Plan and the reclamation plan for the mine site. A summary of the characteristics of each of these existing approved actions is presented below.

The adopted Oxnard Town Center Specific Plan allows the development of up to 4.4 million square feet of office, research and development space, hotels, restaurants, a shopping mall, a cultural arts facility and a neighborhood park. This Specific Plan allows the development of a cluster of 12- to 24-story high-rise buildings containing office and hotel uses, surrounded by 2- to 6-story buildings. The Oxnard Town Center Specific Plan circulation plan calls for Oxnard Boulevard to be extended north from the new Oxnard Boulevard / Ventura Freeway Interchange north and then east to connect to Stroube Street in the El Rio West Neighborhood to provide access from Vineyard Avenue. Ventura Road was to be extended north and then loop to the south to connect to Oxnard Boulevard. Town Center Drive was also planned to connect Ventura Road and Oxnard Boulevard. The allowed shopping mall was located in

the southeast corner of the site. Two-story research / development and office buildings were planned along the western and northern edges of the site, as well as along the eastern edge of the site to the north of Stroube Street. A two-acre neighborhood park was also provided adjacent to the El Rio West Neighborhood north of Stroube Street.

The existing reclamation plan for the mine site in RiverPark Area 'B' was approved by the County of Ventura in 1979. This plan requires refilling the existing mine pits to an elevation within 30 feet below the original grade. Refill materials are required to consist of inert granular materials with laboratory permeabilities of 1×10^{-2} cm / sec or greater, in accordance with Condition 34 of Conditional Use Permit (CUP) 1942 issued by the County in 1980. Subsequently, the County administratively approved excavation of the stockpile area to 5-foot above the historic high groundwater level, which is above the 30-foot refill level required by the approved reclamation plan. The County has stated that the material located between the 30-foot refill level and the 5-foot above historic high groundwater level on the stockpile area can be credited towards the requirement to refill the existing pits.

Environmental Analysis

Land Use Planning, Programs & Policies

As proposed, the RiverPark Specific Plan is consistent with applicable local and regional land use plans and policies. The Oxnard Town Center Specific Plan and the approved reclamation plan are also consistent with applicable land uses plans and policies. The mix of uses, density and character of development allowed by the Oxnard Town Center Specific Plan is consistent with applicable plans and policies related to land use. The approved reclamation plan for the mine site is also consistent with applicable plans and policies. The RiverPark Specific Plan includes residential uses in RiverPark Area 'A' where the Oxnard Town Center calls for all commercial uses. The RiverPark Project includes a proposed amendment to the 2020 General Plan Land Use Map. This amendment would change the existing Regional Commercial land use designation on the northern and eastern portions of RiverPark Area 'A' and the existing El Rio West neighborhood to residential land use designations. This amendment would create a land use pattern that is more consistent and compatible with the existing El Rio West residential neighborhood.

Aesthetics

Analysis of the consistency of the proposed RiverPark Specific Plan is contained in **Section 4.2** of this EIR. The RiverPark Specific Plan would not result in development of a scale that would obstruct views

of scenic areas or degrade the visual character of the area. The only significant impact identified is the potential for lights from the ballpark facility conditionally allowed in Planning District D to impact surrounding residential uses allowed by the Specific Plan. The RiverPark Specific Plan calls for residential development along the eastern edge of the Specific Plan Area against the El Rio West residential neighborhood. Commercial buildings allowed west of Myrtle Street and south of Santa Clara River would be 3 to 5 stories in height with the exception of the hotel allowed west of Oxnard Boulevard between Town Center Drive and Santa Clara River Boulevard. The proposed Specific Plan would allow this hotel building to be up to 18 stories in height.

With the Oxnard Town Center Specific Plan, a cluster of 12- to 24-story high-rise buildings surrounded by 2- to 6-story low- and mid-rise office, hotel and research/development buildings would be developed. The RiverPark Specific Plan would result in less of a visual impact than the Oxnard Town Center Specific Plan due to the reduction in area occupied by commercial buildings and the reduction in the height of commercial buildings.

Earth Resources

RiverPark Area 'A' has relatively stable soils compared to the varied conditions in RiverPark Area 'B' that have resulted from long-term mining operations. All impacts to development in RiverPark Area 'A' can be mitigated with standard grading procedures.

Implementation of the existing reclamation plan for the mine site in RiverPark Area 'B' would involve filling the mine pits to 30 feet below original grade. Filling the pits in this manner would provide lateral support along the existing slopes, thereby increasing the factor of safety and also reducing seismically-induced lateral movements. As no urban uses are allowed by the current reclamation plan, less remedial grading would be required on the mine site. Impacts associated with development of RiverPark Area 'B' would be avoided.

Biological Resources

The remaining undeveloped portion of RiverPark Area 'A' primarily consists of agricultural land. No natural habitat exists on this portion of the site that would be impacted by development of this portion of the site. Potential indirect impacts associated with the use of non-native plants in landscaping and lighting along the Santa Clara River in RiverPark Area 'A' would be the same with this alternative. Reclamation of the mine site for open space use would reduce the potential for indirect impacts associated with the residential development proposed in RiverPark Area 'B'. As the current

reclamation plan does not provide for the establishment of the native woodland habitat along the levee included in the RiverPark Specific Plan, this additional native habitat would not be provided with this alternative. This alternative would not avoid the impacts to biological resources associated with the proposed project.

Water Resources

Impacts on surface water quality would not be substantially changed with this alternative. Runoff from both commercial and residential uses would be discharged to the Santa Clara River through the existing Stroube Street Drain. The Stroube Street Drain is master planned to collect runoff from the El Rio West residential neighborhood. This runoff would be combined with runoff from the commercial uses allowed by the Oxnard Town Center Specific Plan. While the Oxnard Town Center Specific Plan does not contain the type of water quality treatment features included in the RiverPark Specific Plan, treatment would be required to meet the currently applicable NPDES General Permit standards.

Drainage conditions in RiverPark Area 'B' would remain largely unchanged. The existing El Rio Retention Basins would remain and runoff from the agricultural area east of Vineyard Avenue and north of the El Rio Community would continue to be retained in these basins. Drainage patterns on the mine site would be altered by the cutting and filling required to implement the current reclamation plan. Currently, runoff from the adjacent industrial areas discharges to mine pits. If this runoff is routed away from the mine pits, the impact to groundwater quality would be less than the impact of the proposed project. With the proposed project, runoff from storms larger than a 10-year storm event would be conveyed from the water quality treatment basins to the mine pits. Concentrations of some metals and mineral constituents in this runoff would be above the numerical threshold of significance used in the water quality impact analysis in this EIR. As storms of this magnitude are infrequent, the identified impacts related to metals and minerals in the runoff would also occur infrequently. If runoff from the industrial areas continues to drain to the pits, impacts to groundwater quality would be greater with this alternative.

With regard to groundwater balance, the analysis of baseline conditions in **Section 4.5, Water Resources**, concludes that the 20-year average impact to groundwater from existing conditions is –573 acre feet per year (AFY). Partial filling of the mine pits would reduce the amount of time groundwater is exposed. This impact on water balance would, therefore, be reduced to some extent. The proposed RiverPark Project will result in a net gain of approximately 8,000 AFY in groundwater due to the reduction of pumping on the site for agricultural and industrial use and the use of the pits by United Water Conservation District for storage and recharge of surface flows from the Santa Clara River.

Continued implementation of the adopted Oxnard Town Center Specific Plan and the approved mine reclamation plan would not avoid the impacts to surface and groundwater identified for the proposed project, as similar land uses generating runoff with similar characteristics would be built. Impacts to groundwater quality could be less if the drainage from the existing industrial areas is routed away from the mine pits. Impacts to groundwater quantities would be greater with implementation of the existing approved plans. The proposed project would result in a beneficial impact on groundwater quantities that would not be realized with this alternative.

Agricultural Resources

This alternative would impact the approximately 155 acres of agricultural land in RiverPark Area 'A' impacted by the proposed project. This alternative, therefore, would not lessen or avoid this impact.

Transportation & Circulation

The uses allowed by the proposed RiverPark Specific Plan would generate approximately 94,500 daily trips, of which 9,860 would occur in the evening peak traffic period. Of the total daily trips, 78,840 would leave the Specific Plan Area. The remainder of the daily trips would be trips between the allowed residential, commercial and school uses contained within the Specific Plan Area. As discussed in **Section 4.7, Transportation and Circulation**, these additional trips would significantly impact 8 of the 33 intersections studied. All of these impacts can be mitigated to a level that is less than significant with roadway improvements.

The traffic study completed for the Oxnard Town Center Specific Plan EIR indicates that the proposed commercial uses would generate approximately 91,860 daily trips, with 9,380 of these trips occurring during the evening peak traffic period. As the Town Center project only includes commercial uses, all of these trips would be to and from locations outside the specific plan area, as opposed to the 78,840 trips that would leave the Specific Plan Area with the proposed RiverPark Project. For this reason, impacts on roadways and intersections in the area would, therefore, be greater with the Oxnard Town Center Specific Plan. The uses allowed by the Oxnard Town Center Specific Plan are currently reflected in the City's Traffic Model. This model indicates that the existing Oxnard Town Center Specific Plan would result in greater impacts than the proposed RiverPark Specific Plan, with significant impacts at 11 of the 33 intersections studied.

In addition, the Oxnard Town Center Specific Plan would result in greater traffic impacts to the El Rio West Residential Neighborhood, as eastbound trips would access Vineyard Avenue via Stroube Street.

The Oxnard Town Center traffic study shows 17,000 daily trips on Stroube Street. The RiverPark Specific Plan circulation system does not connect to Stroube Street. The RiverPark Specific Plan provides three connections to Vineyard Avenue that would carry a total of 3,000 daily trips. Traffic intrusion into residential neighborhoods would be reduced with the proposed RiverPark Specific Plan Project.

Air Quality

The proposed project would result in significant impacts to air quality due to the amount of ROC and NO_X emissions that would be generated. The proposed RiverPark project would generate approximately 89 pounds per day of reactive organic compounds (ROC) and 198 pounds per day of oxides of nitrogen (NO_X). Through the incorporation of mitigation measures, these impacts would be reduced to levels that are less than significant.

The air quality analysis in the Oxnard Town Center Specific Plan EIR estimated that approximately 264 pounds per day of ROC and 208 pounds per day of NO_X would be generated by the commercial uses allowed by this specific plan. This alternative would also result in a significant impact. Air quality impacts would be less, therefore, by the RiverPark Specific Plan. This is largely attributable to the mix of residential and commercial uses allowed by the RiverPark Specific Plan, which reduces trips. Both this alternative and the proposed RiverPark Project would, however, result in significant air quality impacts.

Noise

The proposed project is expected to result in significant noise impacts to existing residential uses during construction. With no development in RiverPark Area 'B', the duration of construction would be lessened. As a result, the duration of construction noise impacts would also be lessened, but not avoided. Construction noise impacts would remain as site development and individual building projects would still occur in the No Project/Existing Approvals Alternative. With the proposed mitigation measures, these construction-related noise impacts would be reduced to less than significant levels. The potential for noise from a ballpark facility in RiverPark Area 'A' to impact the residential uses around it would be avoided with this alternative as no stadium use is proposed. No significant roadway noise impacts were identified for the project. As discussed above, the Oxnard Town Center Specific Plan would result in greater traffic volumes on streets in the surrounding area, including Stroube Street. The RiverPark Project would not result in any significant roadway noise impacts.

Public Services

Public Schools

Assuming full build-out of the allowed residential uses, the proposed RiverPark Specific Plan would generate approximately 1,990 new K-12 students in the Rio Elementary and Oxnard Union School Districts. Based on the current capacity of the schools in these districts, this would result in a significant impact. The Specific Plan includes sites for two new elementary and one new intermediate school to house these students. Provision of these sites and school impact fees will mitigate the impacts of the project.

With the No Project/Existing Approvals Alternative, no residential uses would be developed in the Specific Plan Area. As no residential uses would be developed, no students would be generated and schools would not be impacted. Impacts on school facilities would be avoided.

Fire Protection

This alternative would result in the development of new uses in an area that cannot be adequately served by existing City fire stations, equipment and manpower. A new City fire station is needed in the northern portion of the City to provide adequate service. Development in RiverPark Area 'A' will also require the relocation of the existing Ventura County Fire Station located in the County's El Rio Maintenance Yard. The proposed Specific Plan includes sites for new City and County Fire Stations in RiverPark Area 'B'. These sites would not be provided with the existing Oxnard Town Center Specific Plan. Impacts on fire services would not, therefore, be substantially lessened or avoided. As sites for new fire stations would not be provided, impacts to fire protection services would be significant.

Police Protection

The Oxnard Police Department currently provides patrol service to the existing uses in RiverPark Area 'A'. Service can be provided to this area without significant impacts. Build-out of the uses under the Oxnard Town Center Specific Plan would not significantly impact police services. This alternative would avoid impacts associated with the development of the entire RiverPark 'B' area.

Parks & Recreation

The proposed RiverPark Specific Plan would generate an estimated population of 7,220 persons. Based on the City's park planning standards, approximately 11 acres of neighborhood parkland and 11 acres of community parkland would be required to meet the recreation needs of this number of residents. As the proposed project would provide the amount of parkland required, this impact would be less than significant. The proposed Specific Plan would provide one neighborhood park in RiverPark Area 'A' and two in RiverPark Area 'B'. Community park space would be provided in the form of the playfields on the elementary/intermediate school site in RiverPark Area 'B' though a joint use agreement between the City and the Rio School District.

With the No Project/Existing Approvals Alternative, no additional parkland would be required to serve new residents in the area. The Oxnard Town Center Specific Plan provides a two-acre neighborhood park for the El Rio West neighborhood. The RiverPark Specific Plan would also provide a neighborhood park for use by residents of the El Rio West neighborhood and the new residential neighborhood proposed along the El Rio West neighborhood. The RiverPark Specific Plan would also provide community parkland in the form of playfields on the elementary/intermediate school site proposed to the north of the El Rio West neighborhood. As the RiverPark Specific Plan includes sufficient neighborhood and community parkland, no impacts would be avoided or lessened with the existing plan. With the Oxnard Town Center Specific Plan, no community parkland would be provided.

Solid Waste Management

Construction waste associated with the proposed project is estimated at approximately 52,000 cubic yards. The allowed uses would generate approximately 15,100 tons per year of solid waste. As the City of Oxnard currently diverts and recycles 66 percent of the solid waste generated in the City, the total amount of solid waste to be disposed of in landfills is estimated at 5,145 tons per year. As the city is currently exceeding the mandated diversion rate for solid waste, solid waste generation impacts are considered less than significant.

As the amount of solid waste is proportional to the amount of land uses proposed within a given project, the reduction of land uses in the No Project/Existing Approvals Alternative would also result in a reduction in the amount of total solid waste generated. With the No Project/Existing Approvals Alternative construction solid waste would be reduced to an estimated 13,500 cubic yards, while solid waste from the allowed uses would be approximately 1,781 tons per year after diversion. Compared to

the proposed project, construction solid waste would be reduced by 74 percent while waste from the allowed uses disposed in landfills would be reduced by 65 percent.

Library Services

Approximately 7,220 new residents would be generated by the 2,805 residential units included in the proposed RiverPark Specific Plan. This increase in residents would result in an increase in the demand for library materials and space. The Specific Plan permits the development of a storefront library facility to serve the residents in the Specific Plan Area, as well as residents throughout the City. As such, no impact related to library facilities would occur. As no residential uses are currently allowed by the existing Oxnard Town Center Specific Plan or the reclamation plan, no impacts on library services from new residents would result.

Public Utilities

Stormwater Drainage

Drainage facilities included in the RiverPark Specific Plan provide for adequate drainage of the area and provide for drainage of offsite areas consistent with the City of Oxnard Drainage Master Plan. With the existing approved plans, the Stroube Street drain would be extended to Stroube Street, as it would with the RiverPark Project. No significant drainage impacts would occur with the project as proposed and none would occur with the existing approved plans for the site. With the RiverPark Project, an additional new storm drain would be extended in Santa Clara River Boulevard to Vineyard Avenue. This additional drain would provide an additional drainage facility to serve the northern portion of the El Rio West Community located to the east of Vineyard Avenue.

Water Supply and Distribution

Based on the calculations for the proposed project, projected potable water demand is approximately 1,835 acre feet per year (AFY). The City would gain 1,580 AFY of groundwater extraction allocations as a result of annexation of RiverPark Area 'B' and conversion of existing agricultural uses to urban uses. Individual building projects within the Specific Plan Area would be required to meet standard water conservation requirements with regards to potable water, ensure adequate water flow, and pay for the construction of improvements to the water distribution system as outlined in the City's Water System Master Plan. No significant impacts to the City's water supply would result from the RiverPark Specific Plan.

Based on the land uses allowed by the Oxnard Town Center Specific Plan, a total of 730 AFY of potable water would be required to serve this development. This is a reduction of 1,105 AFY compared to the water demand of the project. As RiverPark Area 'B' would not be annexed, the City would only acquire 426 AFY in groundwater extraction allocations associated with the agricultural use in RiverPark Area 'A'. For this reason, while demand would be lessened, the impact on the City's water supplies would be greater. Based on the information in the City's Urban Water Management Plan, sufficient supplies would be available to meet this demand and the impact of this alternative would not be significant.

Wastewater Service

The proposed project would generate an expected 0.78 million gallons per day (mgd) of wastewater. Currently, the existing wastewater conveyance system would not be able to accommodate the proposed increase in wastewater flow. Construction of the improvements identified in the City's Wastewater Collection System Master Plan would mitigate this impact. No significant impacts to the City's wastewater collection or treatment facilities would result.

The amount of wastewater is directly proportional to the amount and intensity of the proposed land uses. The land uses allowed by the Oxnard Town Center Specific Plan would generate a total of 0.30 mgd. This is a 0.48 mgd (62 percent) reduction in the amount of wastewater generated in comparison to the proposed project. With the improvements of the existing wastewater conveyance system, impacts would also be less than significant.

Energy

Construction activity is not expected to consume significant amounts of energy or natural gas due to the nature of construction activities and because the construction of residential subdivisions and other allowed uses would occur in phases from 2002 through 2020. The uses allowed by the proposed Specific Plan would consume approximately 59.6 million watts of electricity and approximately 285.5 million cubic feet of natural gas per year once fully developed. The additional electrical and natural gas demand of the project can be accommodated within long-term source and distribution planning. In addition, the project would comply with all current energy conservation standards. For these reasons, no significant impacts on electricity or natural gas supplies will result from the project.

The land uses allowed by the Oxnard Town Center Specific Plan would consume a total of 38.7 million watts of electricity and 134.5 million cubic feet of natural gas per year. This is a reduction of 35 percent in electrical demand and 53 percent in natural gas demand. No significant impact would result from the

build-out of the Oxnard Town Center Specific Plan. As the proposed project would not result in a significant impact, no significant impact would be avoided or lessened.

Cultural Resources

Reclamation and development of RiverPark Area 'B' would result in the demolition of the remaining structures associated with the mining and materials processing activities that have historically occurred on this portion of the Specific Plan Area. Of the 10 remaining structures on the mine site, 5 are considered to have local historical significance for their association with mining in Ventura County, an industry that has made a significant contribution to the physical development of Ventura County through the construction of roads, bases, airfields and buildings. This local historical significance is not related to the architectural character of these remaining structures. Appropriate mitigation, in the form of historical documentation, is proposed for this impact. Permanent removal of these structures is, however, considered an unavoidable significant impact of the project. This alternative would not avoid this impact as the existing reclamation plan would also require removal of the existing structures as a result of the grading required to partially fill the pits, which would involve excavation of the existing plant area where these buildings are located.

Hazards

The only impacts related to hazardous substances on the site identified for the project are related to existing abandoned oil wells within RiverPark Area 'B' and the possibility of the existing buildings containing building materials with asbestos and lead paints. Compliance with existing regulations would mitigate these impacts to a level that is less than significant. As the existing abandoned oil wells are located in RiverPark Area 'B', this alternative would avoid potential impacts associated with development of this area as the existing reclamation plan would leave this part of the site as open space.

RiverPark 'A' Only Alternative

Description

This alternative would involve the development of the uses proposed only in RiverPark Area 'A' in the RiverPark Specific Plan. A mix of residential and commercial uses would be allowed within this reduced Specific Plan Area. Residential uses would include 200 medium density residential units and approximately 1,340 high density units. These residential units would be located in the northern and

eastern portions of RiverPark Area 'A'. Commercial uses, consisting of 590,000 square feet of office, 1.345 million square feet of regional commercial uses and a 510,000 square foot hotel/conference center would be built on the remainder of the site.

Environmental Analysis

Land Use Planning, Programs & Policies

As proposed, the RiverPark Specific Plan is consistent with applicable local and regional land use plans and policies. This alternative would involve only development of the portion of the Specific Plan Area currently within the City of Oxnard. The mix of uses, density and character of development would be consistent with applicable plans and policies related to land use.

Aesthetics

Analysis of the consistency of the proposed RiverPark Specific Plan is contained in **Section 4.2** of this EIR. The RiverPark Specific Plan would not result in development of a scale that would obstruct views of scenic areas or degrade the visual character of the area. The only significant impact identified is the potential for lights from the ballpark facility conditionally allowed in Planning District D to impact surrounding residential uses allowed by the Specific Plan. These conditions would remain unchanged with this alternative and no impacts would be avoided or lessened.

Earth Resources

RiverPark Area 'A' has relatively stable soils compared to the varied conditions in RiverPark Area 'B' that have resulted from long-term mining operations. All impacts to development in RiverPark Area 'A' can be mitigated with standard grading procedures. Mitigation of the soils conditions in RiverPark Area 'B' to support development would not be required with this alternative. Impacts associated with development of RiverPark Area 'B' would, therefore, be avoided.

Biological Resources

The remaining undeveloped portion of RiverPark Area 'A' primarily consists of agricultural land. As this portion of the site does not contain the trees located in RiverPark Area 'B', the potential for impacting bird nests during breeding season would likely be avoided. Indirect impacts associated with lighting and the use of non-native plants in landscaping would not be avoided or substantially lessened

as development would still occur in RiverPark Area 'A'. The proposed RiverPark Specific Plan includes a proposal to create a native woodland along the western edge of the Specific Plan Area to increase native habitat values along this portion of the Santa Clara River. This additional native habitat would not be provided with this alternative.

Water Resources

Impacts on surface water quality would not be substantially changed with this alternative. The contaminants associated with residential and commercial uses would be treated with the water quality treatment facilities included in RiverPark Area 'A'. As a result, the concentrations of fecal coliform associated with this runoff, a significant surface water quality impact associated with the project, would not be avoided or lessened. As drainage conditions in RiverPark Area 'B' would remain unchanged, the impact of runoff on groundwater quality would also not be changed. The RiverPark project would only route runoff from storms larger than a 10-year event into the pits. As storms of this magnitude are infrequent, the identified impacts related to metals and minerals in the runoff would also occur infrequently. Presently all runoff from areas around the mine pits, including the industrial areas to the east and north of the pits, enters the pits at all times. As metals and minerals are presently contained in this runoff, there would still be some level of impact to groundwater quality.

Agricultural Resources

This alternative would impact the approximately 155 acres of agricultural land in RiverPark Area 'A' impacted by the proposed project. This alternative, therefore, would not lessen or avoid this impact.

Transportation & Circulation

The uses allowed by the proposed RiverPark Specific Plan would generate approximately 94,500 daily trips, of which 78,840 would leave the Specific Plan Area on a daily basis. The remainder of the daily trips would be trips between the allowed residential, commercial and school uses contained within the Specific Plan Area. As discussed in **Section 4.7, Transportation and Circulation**, these additional trips would significantly impact 8 of the 33 intersections studied. All of these impacts can be mitigated with roadway improvements.

Under this alternative, trip generation would be reduced as the residential and school uses in RiverPark Area 'B' would not be built. Total daily trip generation would be reduced by 21.5 percent to 74,240 daily trips. As both residential and commercial uses would still be built in RiverPark Area 'A',

it is likely that some trips associated with these uses would remain within the Specific Plan Area as with the proposed project. This reduction in trips would lessen some of the significant impacts of the project on intersection operations in the area, but would not result in avoidance of all impacts.

Air Quality

The proposed project would result in significant impacts to air quality due to the amount of ROC and NO_X emissions that would be generated. Through the incorporation of mitigation measures, these impacts would be reduced to levels that are less than significant.

The generation of these air quality pollutants is directly proportional to the size and scale of the proposed project. Therefore, as the RiverPark 'A' Only Alternative would reduce the size and scale of the project, ROC and NO_X emissions would also be reduced. Operational emissions for this alternative are estimated at 50 and 108 pounds per day for ROC and NO_X, respectively. Although these values are 36 percent and 32 percent less than the emissions calculated for the proposed project, they still exceed the established thresholds of significance of 25 pounds per day. Through the inclusion of all applicable mitigation measures, operational emissions could be mitigated to a level that is less than significant. Impacts associated with other air quality impact criteria, such as CO levels and AQMP consistency, were not identified as significant with the proposed project and, as such, would not be significant with the RiverPark 'A' Only Alternative. This alternative would lessen, but not avoid, the air quality impacts associated with the project as proposed.

Noise

The proposed project is expected to result in significant noise impacts to existing residential uses during construction. With no development in RiverPark Area 'B', the duration of construction would be lessened. As a result, the duration of construction noise impacts would also be lessened, but not avoided. Construction noise impacts would remain as site development and individual building projects would still occur in RiverPark Area 'A'. With the proposed mitigation measures, these construction related noise impacts would be reduced to less than significant levels. The potential for noise from a ballpark facility in RiverPark Area 'A' to impact the residential uses around it would not be avoided with this alternative. No significant roadway noise impacts were identified for the project and none would occur with this alternative.

Public Services

Public Schools

Assuming full build-out of the allowed residential uses, the proposed RiverPark Specific Plan would generate approximately 1,990 new K-12 students in the Rio Elementary and Oxnard Union High School Districts. Based on the current capacity of the schools in these districts, this would result in a significant impact. The Specific Plan includes sites to 2 new elementary and 1 new intermediate school to house these students. Provision of these sites and school impact fees will mitigate the impacts of the project.

With the RiverPark 'A' Only Alternative, approximately 1,090 students would be generated, a 900-student reduction. As both school districts are currently operating over capacity, this alternative would also result in significant school impacts. As one of the elementary school sites and the intermediate school site, which are proposed in RiverPark Area 'B', would not be provided with this alternative, impacts would not be substantially lessened with this alternative.

Fire Protection

This alternative would result in the development of new uses in an area that cannot be adequately served by existing City fire stations, equipment and manpower. A new City fire station is needed in the northern portion of the City to provide adequate service. Development in RiverPark Area 'A' will also require the relocation of the existing Ventura County Fire Station located in the County's El Rio Maintenance Yard. The proposed Specific Plan includes sites for new City and County Fire Stations in RiverPark Area 'B'. These sites would not be provided with this alternative. Impacts on fire services would not, therefore, be substantially lessened or avoided. As sites for new fire stations would not be provided, significant impacts to fire services would occur with this alternative.

Police Protection

The Oxnard Police Department currently provides patrol service to the existing uses in RiverPark Area 'A'. Service can be provided to this area without significant impacts. The proposed project would add RiverPark Area 'B' to the City. Addition of this area to the existing police patrol beat would significantly impact police services. This alternative would avoid this impact.

Parks & Recreation

The proposed RiverPark Specific Plan would generate an estimated population of 7,220 persons. Based on the City's park planning standards, approximately 11 acres of neighborhood parkland and 11 acres of community parkland would be required. As the proposed project would provide the amount of parkland required, this impact would be less than significant. The proposed Specific Plan would provide one neighborhood park in RiverPark Area 'A' and two in RiverPark Area 'B'. Community park space would be provided in the form of the playfields on the elementary / intermediate school site in RiverPark Area 'B' though a joint use agreement between the City and the Rio Elementary School District.

With the RiverPark 'A' Only Alternative, the total demand for parkland would be reduced from 22 total acres to approximately 10 acres (5 acres of neighborhood and 5 acres of community parks) due to the reduction in residential uses and population. The current land use plan includes a single neighborhood park of sufficient size to serve this population. However, no community parkland would be provided. For this reason, this alternative would result in greater impacts on parks and recreation facilities than the proposed project

Solid Waste Management

Construction waste associated with the proposed project is estimated at approximately 52,000 cubic yards. The allowed uses would generate approximately 15,100 tons per year of solid waste. As the City of Oxnard currently diverts and recycles 66 percent of the solid waste generated in the City, the total amount of solid waste to be disposed of in landfills is estimated at 5,145 tons per year. As the city is currently exceeding the mandated diversion rate for solid waste, solid waste generation impacts are considered less than significant.

As the amount of solid waste is proportional to the amount of land uses proposed within a given project, the reduction of land uses in the RiverPark 'A' Only Alternative would also result in a reduction in the amount of total solid waste generated. With the RiverPark 'A' Only Alternative, construction solid waste would be reduced to an estimated 32,000 cubic yards, while solid waste from the allowed uses would be approximately 3,000 tons per year after diversion. Compared to the proposed project, construction solid waste would be reduced by 38 percent. Waste from operation of the project disposed in landfills would be reduced by 42 percent.

Library Services

Approximately 7,220 new residents would be generated by the 2,805 residential units included in the proposed RiverPark Specific Plan. This increase in residents would result in an increase in the demand for library materials and space. The Specific Plan permits the development of a storefront library facility to serve the residents in the Specific Plan Area, as well as residents throughout the City. As such, no impact related to library facilities would occur.

The allowed library use is located within the project boundaries of the RiverPark Area 'A'. As the number of residents would decrease from 7,220 to 3,250 with this alternative, total additional demand on library services would be reduced. Impacts would remain less than significant.

Public Utilities

Stormwater Drainage

Drainage facilities included in the RiverPark Specific Plan provide for adequate drainage of the area and provide for drainage of offsite areas consistent with the City of Oxnard Drainage Master Plan. Drainage for RiverPark Area 'A' would be collected in two main storm drains that would connect to the existing Stroube Street storm drain in the southwest corner of RiverPark Area 'A'. No significant drainage impacts would occur with the project as proposed and none would occur with this alternative.

Water Supply and Distribution

Based on the calculations for the proposed project, projected potable water demand is approximately 1,835 acre feet per year (AFY). The City would gain 1,580 AFY of groundwater annexation credits as a result of annexation of RiverPark Area 'B' and conversion of existing agricultural uses to urban uses. Individual building projects within the Specific Plan Area would be required to meet standard water conservation requirements with regards to potable water, ensure adequate water flow, and pay for the construction of improvements to the water distribution system as outlined in the City's Water System Master Plan. No significant impacts to the City's water supply would result from the RiverPark Specific Plan.

The amount of potable water needed is directly proportional to the amount and intensity of the proposed land uses. Based on the proposed land uses included in the RiverPark 'A' Only Alternative, a total of 1,455 AFY of potable water would be required to serve the project. This is a reduction of 380

AFY. With this alternative the City would only acquire 426 AFY in groundwater extraction allocations associated with the agricultural use in RiverPark Area 'A'. For this reason, while demand would be lessened, the impact on the City's water supplies would be greater. Based on the information in the City's Urban Water Management Plan, sufficient supplies would be available to meet this demand and no significant impact would result.

Wastewater Service

The proposed project would generate an expected 0.78 million gallons per day (mgd) of wastewater. Currently, the existing wastewater conveyance system would not be able to accommodate the proposed increase in wastewater flow. Construction of the improvements identified in the City's Wastewater Collection System Master Plan would mitigate this impact. No significant impacts to the City's wastewater collection or treatment facilities would result.

The amount of wastewater generated is directly proportional to the amount and intensity of the proposed land uses. Based on the proposed land uses allowed by the RiverPark 'A' Only Alternative, a total of 0.54 mgd would be generated. This is a 0.24 mgd (31 percent) reduction in the total amount of wastewater generation. With the improvements of the existing wastewater conveyance system, impacts would also be less than significant with this alternative.

Energy

Construction activity is not expected to consume significant amounts of energy or natural gas due to the nature of construction activities and because the construction of residential subdivisions and other allowed uses would occur in phases from 2002 through 2020. The uses allowed by the proposed Specific Plan would consume approximately 59.6 million watts of electricity and approximately 285.5 million cubic feet of natural gas per year once fully developed. The additional electrical and natural gas demand of the project can be accommodated within long-term source and distribution planning. In addition, the project would comply with all current energy conservation standards. For these reasons, no significant impacts on electricity or natural gas supplies will result from the project.

The amount of electricity and natural gas is directly proportional to the amount and intensity of the proposed land uses. Based on the proposed land uses allowed by the RiverPark 'A' Only Alternative, a total of 41.2 million watts and 170.1 million cubic feet of natural gas per year would be consumed. This is a reduction of 30 percent in electricity demand and 40 percent in natural gas demand. As the proposed project would not result in a significant impact, no impact would be avoided or lessened.

Cultural Resources

Reclamation and development of RiverPark Area 'B' will result in the demolition of the remaining structures associated with the mining and materials processing activities that have historically occurred on this portion of the Specific Plan Area. Of the 10 remaining structures on the mine site, 5 are considered to have local historical significance for their association with mining in Ventura County, an industry that has made a significant contribution to the physical development of Ventura County through the construction of roads, bases, airfields and buildings. This local historical significance is not related to the architectural character of these remaining structures. Appropriate mitigation, in the form of historical documentation, is proposed for this impact. Permanent removal of these structures is, however, considered an unavoidable significant impact of the project. This alternative would avoid this impact as development of Area 'B' would not occur. However, it should be noted that these structures would be removed under the existing reclamation plan approved for the mine site.

Hazards

The only impacts related to hazardous substances on the site identified for the project are related to existing abandoned oil wells within RiverPark Area 'B' and the possibility of the existing buildings containing building materials with asbestos and lead paints. Compliance with existing regulations would mitigate these impacts to a level that is less than significant. As the existing abandoned oil wells are located in RiverPark Area 'B', this alternative would avoid potential impacts associated with development of this area.

Reduced Density Alternative

Description

The Reduced Density Alternative considers development of the entire 701-acre Specific Plan Area under the proposed Specific Plan at approximately 75 percent of the density proposed for residential and commercial uses. The arrangement of the proposed land uses, the circulation system and other infrastructure components would remain the same as with the proposed project.

Residential uses would include 400 low/medium density residential units, 705 medium density residential units and approximately 1,000 high density units. The amount of commercial uses allowed would include 442,000 square feet of office space, 1.0 million square feet of regional commercial uses, and a 382,000 square-foot hotel/conference center that would be built on the remainder of the site.

Environmental Analysis

Land Use Planning, Programs & Policies

As proposed, the RiverPark Specific Plan is consistent with applicable local and regional land use plans and policies. As the mix of uses, arrangement of uses and character of development would be the same with this alternative, this consistency would be maintained.

Aesthetics

The RiverPark Specific Plan would not result in development of a scale that would obstruct views of scenic areas or degrade the visual character of the area. The only significant impact identified is the potential for lights from the ballpark facility conditionally allowed in Planning District D to impact surrounding residential uses allowed by the Specific Plan. This use would still be allowed with this alternative. While the overall density of development would be reduced, the visual character of the community would be largely unchanged. No impacts would be avoided or lessened with this alternative.

Earth Resources

RiverPark Area 'A' has relatively stable soils compared to the varied conditions in RiverPark Area 'B' that have resulted from long-term mining operations. The proposed Mine Reclamation Plan includes detailed remedial grading plans to stabilize the slopes of the existing mine pits and correct existing soils conditions on this part of the Specific Plan Area. All potential impacts to development in RiverPark Area 'A' can be mitigated with standard grading procedures. As the area to be developed would be the same with this alternative, no significant impacts would be avoided or lessened with this alternative.

Biological Resources

As proposed, development of the RiverPark Specific Plan Area will result in minimal impacts to biological resources. These impacts include a potential to impact active bird nests in trees on the site during breeding season. Potential indirect impacts associated with lighting and the use of non-native plants in landscaping have also been identified. The proposed RiverPark Specific Plan includes a proposal to create a native woodland along the western edge of the Specific Plan Area to increase

native habitat values along this portion of the Santa Clara River. There would be no changes in the overall land use characteristics of the project or the potential impacts with this alternative.

Water Resources

The basic arrangement of the proposed land uses and the drainage and water quality treatment systems would remain the same with this alternative. Impacts, therefore, would be similar and none of the impacts of the project on surface and groundwater would be avoided or substantially lessened.

Agricultural Resources

This alternative would impact the approximately 155 acres of agricultural land in RiverPark Area 'A' impacted by the proposed project. This alternative, therefore, would not lessen or avoid this impact.

Transportation and Circulation

The entire RiverPark roadway network would be built with this alternative, but the intensity of the allowed land uses would be reduced. With this alternative, trip generation would be reduced in that 25 percent of the project would not be built. Under this alternative, total daily trip generation would be reduced by 26.5 percent to approximately 69,455 daily trips. As discussed in **Section 4.7, Transportation and Circulation**, these additional trips would significantly impact 8 of the 33 intersections studied. All of these impacts can be mitigated with roadway improvements. The reduction in trips associated with this alternative would lessen some of the significant impacts of the project on intersection operations in the area, but would not result in avoidance of all impacts.

Air Quality

The proposed project is expected to generate significant operational and cumulative air quality impacts with regards to ROC and NO_X emissions. Through the incorporation of mitigation measures these impacts would be reduced to levels that are less than significant.

The generation of these air quality pollutants is directly proportional to the size and scale of the proposed project. Therefore, the Reduced Density Alternative would reduce ROC and NO_X emissions. Operational emissions generated by this alternative would be approximately 57 and 114 pounds per day for ROC and NO_X, respectively. Although these values are 27 percent and 28 percent less than the emissions calculated for the proposed project, they still exceed the established thresholds of

significance of 25 pounds per day. Through the inclusion of all applicable mitigation measures, operational emissions would be less than significant. Impacts associated with other air quality impact criteria, such as CO levels and AQMP consistency, were not identified as significant for the proposed project and as such, would not be significant with the Reduced Density Alternative.

Noise

The proposed project is expected to result in significant noise impacts to existing residential uses during construction. With no development in RiverPark Area 'B', the duration of construction would be lessened. As a result, the duration of construction noise impacts would also be lessened, but not avoided. Construction noise impacts would remain as site development and individual building projects would still occur in RiverPark Area 'A'. With the proposed mitigation measures, these construction related noise impacts would be reduced to less than significant levels. The potential for noise from a ballpark facility in RiverPark Area 'A' to impact the residential uses around it would not be avoided with this alternative. No significant roadway noise impacts were identified for the project and none would occur with this alternative.

Public Services

Public Schools

Assuming full build-out of the allowed residential uses, the proposed RiverPark Specific Plan would generate approximately 1,990 new K-12 students in the Rio Elementary and Oxnard Union School Districts. Based on the current capacity of the schools in these districts, this would result in a significant impact. The Specific Plan includes sites for two new elementary and one new intermediate school to house these students. Provision of these sites and school impact fees will mitigate the impacts of the project.

With the Reduced Density Alternative, a total of approximately 1,560 students would be added to the two school districts, a 430 student reduction. As both school districts are operating at full capacity, the impact of this alternative would be significant. The schools sites would still be provided with this alternative as would school impact fees.

Fire Protection

This alternative, like the proposed project, would provide sites for new City and County Fire Stations in RiverPark Area 'B' along Vineyard Avenue. Impacts to fire services would be mitigated by the provision of these sites. As less development would occur within the Specific Plan Area, a reduction in the number of calls for service would result. As the impact of the proposed project on fire services is not significant, no impact would be avoided with this alternative.

Police Protection

The proposed project and this alternative would add RiverPark Area 'B' to the City. Addition of this area to the existing City of Oxnard police patrol beat for the northern part of the City would significantly impact police services. The police department has proposed establishment of a new storefront police station within the Specific Plan Area to mitigate this impact. This impact and the applicable mitigation would not be changed with this alternative. Impacts on police services would be lessened somewhat as fewer calls for service would be generated by the smaller amount of development in this alternative.

Parks & Recreation

The proposed RiverPark Specific Plan would allow for a maximum estimated residential population of approximately 7,220 persons. Based on the City's park planning standards, approximately 11 acres of neighborhood parkland and 11 acres of community parkland would be required. The Specific Plan provides this amount of parkland in three neighborhood parks and in the form of playfields on the elementary / intermediate school site along the eastern edge of RiverPark Area 'B'.

With the Reduced Density Alternative, the total demand for parkland would be reduced from 22 acres to 16 acres. Sufficient parkland would also be provided with this alternative.

Solid Waste Management

Construction waste associated with the proposed project is estimated at approximately 52,000 cubic yards. The allowed uses would generate approximately 15,100 tons per year of solid waste. As the City of Oxnard currently diverts and recycles 66 percent of the solid waste generated in the City, the total amount of solid waste to be disposed of in landfills is estimated at 5,145 tons per year. As the City is

currently exceeding the mandated diversion rate for solid waste, solid waste generation impacts are considered less than significant.

With the Reduced Density Alternative, construction solid waste is estimated at 40,500 cubic yards assuming no waste diversion. Compared to the proposed project, construction solid waste would be reduced by 22 percent. The amount of solid waste generated annually by the uses included in this alternative would be about 8,865 tons per year with only 3,015 tons per year expected to be disposed of in landfills. This is a 41 percent reduction in the expected solid waste anticipated for disposal in landfills. Impacts would be less than significant as long as the City maintains its existing solid waste diversion rate.

Library Services

The increase in residents associated with the proposed uses would result in an increase in the demand for library materials and space. The Specific Plan permits the development of a storefront library facility to serve the residents in the Specific Plan Area, as well as residents throughout the City. As such, no impact related to library facilities would occur.

As the total number of allowed residents would decrease from 7,220 to 5,440 with the reduced residential development in this alternative, a 25 percent reduction, the total additional demand on library services, both to the City and to the allowed library within the Specific Plan Area, would be less than the proposed project. Impacts would remain less than significant as a storefront library would be allowed to be developed in the Specific Plan Area.

Public Utilities

Stormwater Drainage

With this alternative, the same drainage facilities planned for the proposed project would be built. These facilities would have sufficient capacity to serve the Specific Plan Area and accept runoff from adjacent areas consistent with the City's Master Plan of Drainage.

Water Supply and Distribution

Projected potable water demand for the project is approximately 1,835 acre feet per year (AFY). The City would gain 1,580 AFY of groundwater annexation credits as a result of annexation of RiverPark

Area 'B' and conversion of existing agricultural uses to urban uses. Individual building projects within the Specific Plan Area would be required to meet standard water conservation requirements with regards to potable water, ensure adequate water flow, and pay for the construction of improvements to the water distribution system as outlined in the City's Water System Master Plan. No significant impacts to the City's water supply would result from the RiverPark Specific Plan.

Potable water demand would be reduced somewhat by this alternative as the amount of residential units and commercial space built would be 25 percent less. As the City's water consumption factors are per acre of land use and the amount of acres devoted to residential and commercial uses would not change with this alternative, the amount of the reduction in water demand cannot be accurately estimated. Assuming water use is directly proportional to the intensity of use, the amount of total water demand could be reduced by as much as 25 percent (approximately 460 AFY).

Wastewater Service

The proposed project would generate an expected 0.78 million gallons per day (mgd) of wastewater. Currently, the existing wastewater conveyance system would not be able to accommodate the proposed increase in wastewater flow. However, as a result of the project, existing infrastructure would be upgraded to accommodate the expected flows. No significant impacts would occur. A similar amount of wastewater would be generated with this alternative.

Energy

The proposed project would consume approximately 59.6 million watts of electricity and approximately 285.5 million cubic feet of natural gas on an annual basis once fully built out. The additional electrical and natural gas demand of the project can be accommodated within long-term source and distribution planning. In addition, the project would comply with regulations against the wasteful use of energy. For these reasons, no significant impacts on electrical supply or natural gas will result from the project.

The amount of electricity and natural gas is directly proportional to the amount and intensity of the proposed land uses. Based on the proposed land uses included in the Reduced Density Alternative, a total of 46.7 million watts and 225 million cubic feet of natural gas per year would be consumed. This is a reduction of approximately 22 percent. As the project would comply with regulations against the wasteful use of energy, no significant impacts on electrical supply or natural gas will result from this alternative.

Cultural Resources

This alternative would involve the development of RiverPark Area 'B'. As result, this alternative, like the proposed project, would result in the demolition of the remaining buildings on the existing mine site, including 5 identified as being of local historical significance. This alternative, therefore, would not avoid or lessen this impact of the project.

Hazards

As this alternative would involve development of the entire Specific Plan Area, potential impacts related to the presence of hazardous building materials in existing buildings and existing closed oil wells would be the same. These impacts can be mitigated through compliance with existing regulations.

Water Quality Treatment Alternative No. 1

Description

This alternative considers an alternative method of treatment for stormwater flows to avoid the impacts associated with stormwater discharges to the mine pits. Based on the analysis presented in **Section 4.5, Water Resources**, of this EIR, runoff from storms with a frequency over that of a 10-year event conveyed to the reclaimed mine pits would contain concentrations of iron, manganese and nickel calculated to remain above the thresholds of significance being used for these constituents in the water quality analysis.

To prevent discharges to the pits, this alternative examines the effect of building larger detention basins than those included in the water quality treatment system. This could be accomplished by constructing very large detention basins to capture and detain stormflows from the existing drainage areas. For this project alternative, additional project area in the vicinities of the North, South and East Detention Basins would be included in the project water quality treatment system. In order to accommodate runoff from a 25-year event, the cumulative storage capacity of the detention basins would need to increase by approximately 25 percent. If treatment for a 100-year event was provided, the detention basins would need to be 80 percent larger.

With the proposed stormwater treatment system design for the project, the bottom of the basins will be only 2 to 4 feet above the elevation of historic high water levels. For this reason, the treatment basins

cannot be deepened and the basins would need to expanded. The North Detention Basin would need to expand from 10 acres to between 11 and 15 acres to accommodate the 25- or 100-year events; the South Detention Basin would need to expand from 4.5 to between 5.4 and 7.7 acres; and the East Detention Basin will need to expand from 12 to between 15 and 21 acres.

Environmental Analysis

This alternative design for the water quality treatment system provided for the project is being considered to determine if surface water quality impacts could be lessened or avoided. This alternative design concept would involve changes to the storm drain and water quality treatment systems. The amount of development allowed within the Specific Plan Area would not be altered with this alternative, and impacts related to the type and intensity of land uses allowed on the site would not change. For this reason, comparative analysis is only provided for those topics where impacts would be different.

Water Resources

The proposed water quality treatment system would detain and treat all storms with runoff up to a 10-year storm event. Runoff from storms less frequent than a 10-year event storm will be conveyed to the reclaimed mine pits. Concentrations of iron, manganese and nickel in this runoff are calculated to remain above the thresholds of significance being used for these constituents in the water quality analysis. Given the low frequency of these large storm events, this impact would not occur often. Based on the historical rainfall data from 1979 to 1999, no runoff would have reached pits during this 20-year period if the proposed stormwater treatment system had been in place. As runoff from storms with a frequency less than a 10-year event would not enter the pits, overall mass loading of these and other pollutant constituents would be reduced. Iron concentration in discharges to the Water Storage/Recharge basins would be greater than ambient groundwater concentrations, but would be lower than the Secondary Maximum Contaminant Levels (SMCL) set by the State Department of Health Services for drinking water and the existing discharge concentration. Manganese concentration in discharges to the Water Storage/Recharge basins would be greater than ambient groundwater concentrations, but would be less than the existing discharge concentration and matches the SMCL. Nickel concentration in discharges to the Water Storage/Recharge basin would be greater than the ambient groundwater concentrations, but would be lower than the Primary Maximum Contaminant Levels set by the State Department of Health Services for drinking water.

This alternative would further reduce the occurrence of discharges to the pits by increasing the capacity of this system to treat larger storms. Technical evaluations have not yet been conducted in the scientific community to understand the changes in stormwater quality that occur with increasing storm size, such as between the 10-, 25- and 100-year events. For this reason, this alternative would not avoid the impact on groundwater quantity

Public Utilities

Stormwater Drainage

This alternative would require expansion or duplication of the existing Stroube Drain system to accommodate greater detention basin effluent flowrates, or the basins would need to be increased further in size to increase the ability to control outflow rates to match the capacity of the existing storm drain system. Provided these additional improvements are made, no additional significant impacts would result.

Water Quality Treatment Alternative No. 2

Description

This alternative analyzes a different water quality treatment system designed to further improve the quality of runoff discharged to the Santa Clara River. Based on the analysis presented in **Section 4.5, Water Resources**, of this EIR, stormwater discharges to the Santa Clara River would contain concentrations of fecal coliform greater than the numerical threshold of significance selected for this analysis. Discharges to the Santa Clara River are anticipated to have a fecal coliform concentration of 2,027 MPN / 100 mL based on analogous runoff data. The threshold of significance being used in this analysis is 200 MPN / 100 mL based on Basin Plan standards. The fecal coliform threshold is based on a Basin Plan Objective that is lower than what has been observed historically in the Ventura River during rainfall events that would be expected to generate such runoff. The anticipated runoff concentration is substantially less than the maximum observed ambient river concentration of 5,000 MPN / 100 mL. As the estimated concentrations exceed the significance threshold being used, this impact is identified as significant.

This alternative considers replacing the lined detention basins included in the proposed stormwater treatment system with infiltration basins in order to allow for treatment by infiltration through the vadose zone. These basins would capture and infiltrate flow rates and flow volumes up to the 10-year

event. Flows from storms larger than the 10-year event would be allowed to overflow into the mine pits. These basins would be unlined to allow rapid infiltration, and their depths would be limited to approximately 5 to 9 feet to ensure that a minimum vadose zone thickness of 5 feet is maintained, relative to historic high groundwater level. To allow for storage of the entire 10-year runoff volume, the acreage of these basins would need to increase to provide equivalent storage volume capacity given the 9 to 10 foot depth of these basins. The North Detention Basin would need to expand its footprint from 10 acres to 16 acres; the South Detention Basin from 4.5 to 5.2 acres; and the East Detention Basin from 12 to 13 acres. Pretreatment sedimentation basins/forebays and/or entry energy dissipation structures would also be required to allow sediment loads to settle out prior to entering the infiltration basins. For this project alternative, additional land would be required around the North, East and South Detention Basins. Loss of development acreage would result from the increase in infiltration basin capacity. In RiverPark Area 'A', within Drainage Area 1, a new detention basin requiring between 9 and 12 acres would also be required to treat runoff from Area 'A'. In addition, periodic basin bottom maintenance would be required to sustain optimal infiltration rates in the basins.

Environmental Analysis

This alternative design for the water quality treatment system provided for the project is being considered to determine if surface water quality impacts could be lessened or avoided. This alternative design concept would involve changes to the storm drain and water quality treatment systems. The amount of development allowed within the Specific Plan Area would not be altered with this alternative, and impacts related to the type and intensity of land uses allowed on the site would not change. For this reason, comparative analysis is only provided for those topics where impacts would be different.

Water Resources

Because of existing and proposed project grades, it is not possible to maintain a minimum 10-foot vadose zone thickness (relative to historic high groundwater level) beneath each proposed infiltration basin. A minimum vadose zone thickness of 10 feet is required beneath urban infiltration basins according to the design criteria specified in Attachment A to the Ventura County NPDES permit. The impacts to the Santa Clara River would also remain for storms greater than the 10-year event since excess flows from Drainage Area 1 would still be diverted to the River, and would still contain fecal coliform concentrations exceeding Basin Plan Objectives despite the increased magnitude of dilution. For these reasons, this alternative design would lessen, but not avoid the identified impact of fecal coliform concentrations.

Historic Preservation Alternative

Description

This alternative would involve the preservation of the 5 existing buildings and structures associated with the mine site in RiverPark Area 'B' identified as having local historical significance. Of the ten buildings and structures on the mine site, five are not eligible as historic resources under CEQA because they are not 50 or more years of age. These five buildings and structures are an office / residence, the Administrative Building, the Asphalt Plant, the Concrete Plant, and the Rock Plant.

The remaining 5 buildings and structures, which are an office building (circa 1920), a residence / lab / garage (circa 1942), and three metal storage buildings, (circa 1942) are of sufficient age to be potential historic resources. In this case, these 5 buildings and structures are associated with an industry that has made a significant contribution to the physical development of Ventura County through the construction of roads, bases, airfields and buildings. As a result of this association these buildings are considered to be of local historical significance.

Environmental Analysis

This alternative is being considered to examine the potential to lessen or avoid the impact to the historic resources present on the site. The amount of development allowed within the Specific Plan Area would not be altered with this alternative, and impacts related to the type and intensity of land uses allowed on the site would not change. For this reason, comparative analysis is only provided for those topics where impacts would be different.

Earth Resources

The existing buildings are currently located about 10 feet higher than the grades planned for the surrounding areas. Unless these structures are taken off their foundations and lowered onto new foundations at the planned grade for this area, these structures would remain on an elevated island of land. Different grading techniques would be required to leave this island of land and implement the required slope remediation and proposed grading plans.

These structures are located within about 150 feet of the existing northwestern slope of the Brigham pit and within about 100 feet of the Vickers pit. Leaving these structures in place would interfere with the laying back of the existing native slopes at a 20 percent gradient prior to placing the fill into the pits

proposed to create the development area planned. Consequently, structures left within those areas would preclude overexcavation of the mine site plant area within at least 50 feet of their footprint and would preclude the full implementation of the slope remediation plan. Not fully implementing the slope reclamation plan would increase the potential for differential settlement in the fills placed along the development edge and west of the development area to create the dry swale planned for the treatment of stormwater and the adjacent maintenance road.

Historic Resources

As this alternative would preserve the existing structures, and the impact to these historic resources would be avoided.

Alternative Locations

No suitable alternative locations exist for the proposed RiverPark Specific Plan that could feasibly meet the basic objectives of the project. As identified in the introduction to this section, two of the basic objectives of the project are:

- Provide for development of a balanced community with a diverse mix of land uses within the City's City Urban Restriction Boundary (CURB);
- Promote the redevelopment of the RiverPark Area 'A' consistent with the goals of the Oxnard Community Development Commission's (CDC) Historic Enhancement and Revitalization of Oxnard (HERO) Redevelopment Project;

No other sites of a suitable size exist within the City's HERO Redevelopment Program Area to accommodate even part of the proposed project. RiverPark Area 'A' is the largest sub-area within this redevelopment project area. The proposed project site is also the only area available within the City's CURB of a size that could accommodate a mixed residential/commercial community of the size proposed. The City's CURB, when adopted, was largely consistent with the existing LAFCO Sphere of Influence line for the City of Oxnard, which was reflected in the Land Use Element of the City's 2020 *General Plan*. As shown in Figure V-1 of the Land Use Element of the *General Plan*, only two major areas remain in the City's CURB of over 400 acres that are not fully planned at this time. The first is the 430-acre Sakioka Farms property located immediately south of the Ventura Freeway between Rice Avenue and the Revolon Slough, which is the edge of the City's Planning Area. This site is designated for Light Industrial and Business and Research and Research Park Uses on the 2020 General Plan Land Use Map. This site is called out as a future specific plan area in the Land Use Element and the owner of the site is currently preparing a specific plan for the site. This site is, therefore, not suitable or

available. The only other large area that is currently still being planned is the Ormond Beach Specific Plan Area, located on the southern edge of the City. The majority of this approximately 1,300-acre area is located south of Hueneme Road with the remainder located immediately north of Hueneme Road. Planning and environmental review studies of this area have been ongoing for approximately 15 years. Numerous environmental constraints exist that need to be reflected in the planning of this area. The current owners of property within this Specific Plan Area are participating in this planning effort. This site is also not suitable or available.

CONCLUSIONS

No Project /Existing Conditions Alternative

This alternative would avoid the significant impacts identified for the RiverPark Project, including the unavoidable significant impacts of the project related to the loss of agricultural and mineral resources and the loss of the 5 buildings located on the existing mine site that have local historical significance. Several of the beneficial impacts of the RiverPark Project would not be realized, however, including increases in the quantity and quality of natural habitat on the site and a net increase in groundwater recharge quantities. In addition, the RiverPark Project would reduce water quality impacts to the existing mine pits by preventing runoff from storms smaller than a 10-year event from entering the pits. Currently, runoff from the adjacent industrial areas discharges into the pit.

No Project/Existing Approvals Alternative

With the existing approved plans for RiverPark Areas 'A' and 'B', the Oxnard Town Center Specific Plan would be built out and the mine site would be reclaimed in conformance with the existing reclamation plan. As RiverPark Area 'A' would still be developed, the unavoidable impact of the project on agricultural land and the underlying mineral resources located in this portion of the site would not be avoided. As no residential uses would be built with the existing approvals, impacts on school and park facilities would be lessened as would water demand and wastewater generation. Traffic and aesthetic impacts would be greater due to the intensity of commercial development allowed by the Oxnard Town Center Specific Plan. As with the No Project/Existing Conditions Alternative, several of the beneficial impacts of the RiverPark Project associated with reclamation of the mine site under the proposed reclamation plan and specific plan would not be realized, including increases in groundwater quantity, improvement in groundwater quality and increases in natural habitat. In addition, sites would not be provided for public facilities including schools, parks and sites for new City and County fire stations.

RiverPark 'A' Only Alternative

This alternative would not avoid the impact of the project on the agricultural land and the underlying mineral resources located in RiverPark Area 'A'. As with the No Project Alternative, certain benefits of the RiverPark Project associated with the proposed reclamation and development plans for RiverPark Area 'B' would not result. The reduction in residential development would reduce traffic and air quality impacts as well as impacts on public services. Water quality impacts would not be substantially lessened due to the similarities in runoff characteristics.

Reduced Density Alternative

The Reduced Density Alternative would also involve development of the entire Specific Plan Area. For this reason, the unavoidable significant impacts of the project on agricultural, mineral and historic resources would not be avoided. With similar uses and design of the drainage and stormwater treatment system, the impacts of the project on surface and groundwater quality would also not be avoided. All of the beneficial amenities of the RiverPark Project would be provided with reduced traffic impacts, air quality impacts and impacts on public service and utilities.

Water Quality Treatment Alternative No. 1

This alternative would lessen water quality impacts to groundwater by reducing the frequency of storm discharges to the pits. No difference in the quality of runoff from larger storm events has been documented, however. This alternative would be significantly more expensive than the RiverPark Project plan because of the substantial additional excavation, construction and maintenance costs of the larger treatment basins. The extra costs associated with this alternative plan would provide only limited benefit to the groundwater quality impacts since only stormflows less frequent than the 10-year event would be affected.

Water Quality Treatment Alternative No. 2

This treatment alternative would not avoid the surface water quality impacts associated with the project.

Historic Preservation Alternative

This alternative would avoid impacting the 5 existing buildings identified as local historic resources. Preservation of these buildings may not be feasible given the grading required to implement both the existing reclamation plan and the RiverPark Project.

Alternative Locations

This alternative looks at the availability and suitability of other sites for the proposed project within the City's Planning Area. No site of a sufficient size to support development of a balanced community of this size or smaller is available within the City's CURB.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6 (e) (2) requires an EIR to identify an environmentally superior alternative. Of the eight alternatives considered in this section, the Reduced Density Alternative is environmentally superior to the other alternatives and the project as proposed. The basic objectives of the project would also be met with this alternative. This alternative would not be financially feasible as the amount of revenue would be reduced substantially while site development costs would remain the same as with the proposed project. Financial analysis of this alternative, presented in **Appendix 5.0**, demonstrates that this alternative is not feasible. Of the other alternatives considered, the RiverPark 'A' Only alternative would also be environmentally superior to the project as proposed. This alternative would also partially meet the project objectives. Financial analysis of this alternative demonstrates the reduction in the size of the project would also result in revenues not being sufficient to cover the costs of the project.