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3.1 INTRODUCTION

This section identifies and describes on-site and off-site alternatives pursuant to NEPA and CEQA requirements. **Subsection 3.2** discusses the regulatory setting for the alternatives analysis presented herein. **Subsection 3.3** presents alternatives that were considered, but rejected from further analysis in the EIS/EIR, and explains the reasons for the exclusion of such alternatives. **Subsection 3.4** describes the proposed on-site Project alternatives analyzed in this EIS/EIR.

The environmental impacts of the proposed Project (Alternative 2) and the on-site alternatives are discussed by environmental issue in **Section 4.0** of this EIS/EIR. A comparative impact assessment of the alternatives is provided in **Section 5.0** of this EIS/EIR.

3.2 REGULATORY SETTING

3.2.1 NEPA

Under NEPA, the range of alternatives required in an EIS is governed by the rule of reason, which provides an EIS to set forth only those alternatives necessary to permit a reasoned choice. An EIS must consider a reasonable range of alternatives as defined by the specific facts and circumstances of the proposed action. Alternatives must fulfill the basic requirements of a project's statement of purpose and need. NEPA also requires that alternatives be feasibly carried out in the context of technical, economic, environmental, and other factors. If alternatives have been eliminated from detailed study, the EIS must briefly discuss the reasons for their elimination. Under NEPA, feasible alternatives must be addressed at the same level of detail as a proposed project. In addition, under NEPA, the alternatives analysis should present the environmental impacts of the proposed project and the alternatives "in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public." (40 C.F.R. § 1502.14.) Under NEPA, the focus is on considering alternatives and the proposed action "so that reviewers may evaluate their comparative merits." (40 C.F.R. § 1502.14.)

The "No Action" alternative, which maintains existing conditions and practices on a project site, must be included among the alternatives analyzed. The federal lead agency also should identify its preferred alternative. In short, alternatives should be feasible and meet the basic project purpose and need.

In addition to the NEPA alternatives analysis, the Corps is required to analyze alternatives pursuant to the section 404(b)(1) guidelines (40 C.F.R. Part 230). Under that analysis, the Corps determines the Least Environmentally Damaging Practicable Alternative (LEDPA). The section 404(b)(1) alternatives analysis is to be completed concurrently with the EIS/EIR and provided as an appendix in the Final EIS/EIR. Requirements of the section 404(b)(1) alternatives analysis are discussed in greater detail in **Section 4.6**, Jurisdictional Waters and Streams, of this EIS/EIR.

Federal Executive Order No. 11988 also requires the Corps to consider alternatives that would avoid, if practicable, adverse effects and incompatible development in a 100-year floodplain. If avoidance is not practicable, the agency should design the action to minimize such effects.

3.2.2 CEQA

The range of alternatives under CEQA is similarly governed by the rule of reason. The State CEQA Guidelines section 15126.6 states that an EIR must describe a "range of reasonable alternatives" to the project or its location, which would feasibly attain most of the project objectives while avoiding or substantially lessening the significant effects of a proposed project, and evaluate the comparative merits of each alternative. An EIR must consider a reasonable range of alternatives that will foster informed decision making and public participation. The EIR also should identify any alternatives that were considered but rejected as infeasible and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from further detailed consideration in an EIR are: (a) failure to meet most of the basic project objectives; (b) infeasibility; or (c) inability to avoid significant environmental impacts. CEQA also makes clear that an EIR must include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." (Cal. Code Regs., tit. 14, § 15126.6, subd. (d).)

An EIR must include a "No Project" alternative, similar to the "No Action" alternative required under NEPA. The description of each alternative must be sufficient to allow meaningful evaluation and comparison with a proposed project. The lead agency also must identify the environmentally superior alternative.

3.3 ALTERNATIVES CONSIDERED BUT REJECTED

This EIS/EIR evaluates potential off-site alternatives in order to comply with NEPA and CEQA requirements. While the Los Angeles County Board of Supervisors approved the Specific Plan and considered off-site alternatives under CEQA in the associated environmental documentation, off-site alternatives were not considered under NEPA. To satisfy NEPA requirements, off-site alternatives are presented in this section. There were initially 23 potential off-site alternatives, which were narrowed to three off-site alternative locations; however, after further analysis, all of the off-site alternatives that were considered have been eliminated from further consideration in this EIS/EIR for the reasons described below.

In addition, as discussed below, a "Total Avoidance" alternative was considered. This alternative would arise if the Corps did not approve the long-term section 404 permit to allow implementation of the regulated activities and infrastructure addressed in the RMDP component of the proposed Project. Under this alternative, the only development facilitated by the RMDP component is the Specific Plan, and the alternative assesses those portions of the Specific Plan within the Project area that could be accessed and constructed while still avoiding areas within the Corps' jurisdiction. This alternative also was eliminated from further consideration in this EIS/EIR for the reasons described below.

3.3.1 Alternative Off-Site Locations Considered

The proposed RMDP would provide habitat conservation and management, and infrastructure improvements to facilitate development of the previously approved Specific Plan. The proposed SCP would implement a conservation and management plan for the applicant's land holdings in Los Angeles County that contain known spineflower populations, and facilitate development in the Specific Plan,

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VCC, and a portion of the Entrada planning area. Implementation of the RMDP and SCP at an off-site alternative location without also implementing the same or similar development projects as the Specific Plan, VCC, and Entrada would not meet any of the applicant's project objectives/purpose and need. Therefore, this assessment of potential off-site alternatives focuses on locations that are potentially capable of meeting most of the objectives/purpose and need under the RMDP and SCP components of the proposed Project, plus the applicant's objectives associated with the Specific Plan, VCC, and Entrada developments.

The Specific Plan, VCC, and Entrada are intended to meet the expected demands for increased housing and employment opportunities in northern Los Angeles County.

In *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 572-573, the court stated that it is reasonable to compare the impacts of a project located on an alternative site if an alternative site offers substantial environmental advantages over the project site; if developing the alternative site is feasible, considering economic, environmental, social, technological, and other factors; and if the size of the alternative site can accommodate the proposed project. The court decision also suggested that it is not reasonable to compare the impacts that a project would have on an alternative site if that site is under multiple ownerships; if the site is outside the lead agency's jurisdiction; if the site has General Plan land use designations that are inconsistent with the proposed project; or if the site has poor access to urban services.

In an effort to consider the regional context for purposes of a section 404 permit and not limit too narrowly the area where alternative sites might be located, a regional search for alternative sites was undertaken as part of this EIS/EIR. While the criteria that are suggested in the *Goleta* decision could have been used to narrow the analysis, most of those criteria were not used in order to ensure that a broad list of possible sites was considered and reviewed under NEPA. Potential sites were identified with the only parameters being that the sites had to be reasonably available for purchase, and they had to be located within the very broad geographic region of Ventura, southern Kern, and central to northern Los Angeles counties. This search identified a total of 23 alternative site locations, which are listed in **Table 3.0-1** and are illustrated on **Figure 3.0-1**. A majority of these 23 sites were rejected from further consideration based on the following screening criteria:

- Some sites were too small to accommodate the amount of development proposed in the Specific Plan, VCC planning area, and a portion of the Entrada planning area.

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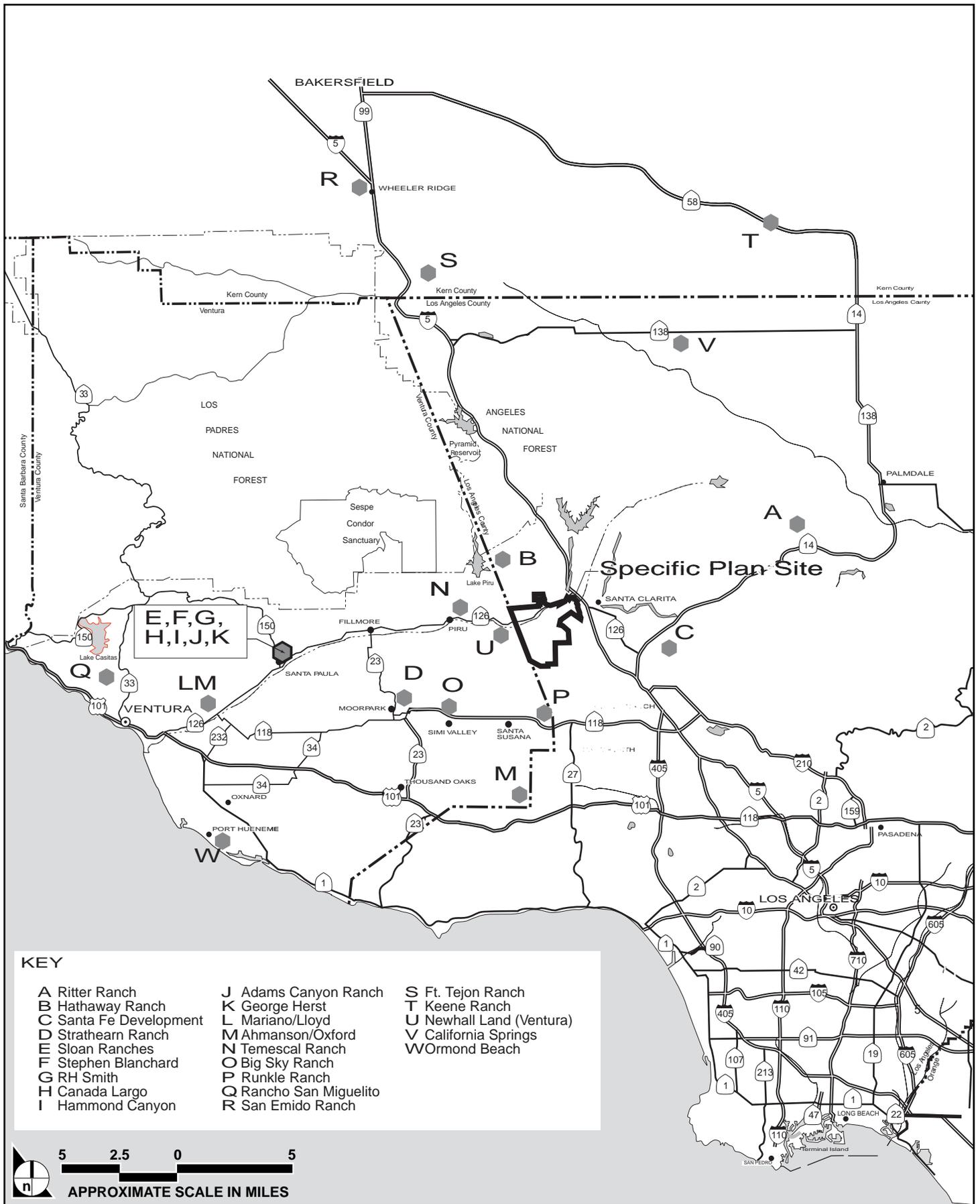
**Table 3.0-1
Alternative Sites Considered**

Site	Site Name or Owner	Size (Acres)
A	Ritter Ranch	11,000
B	Hathaway Ranch	6,195
C	Santa Fe Development	1,296
D	Strathearn Ranch	3,165
E	Sloan Ranches	4,326
F	Stephen Blanchard	1,907
G	RH Smith	3,691
H	Canada Largo	5,374
I	Hammond Canyon	1,896
J	Adams Canyon Ranch	5,000
K	George Herst	1,520
Subtotal (Sites E through K) ¹		23,714
L	Mariano/Lloyd	5,419
M	Ahmanson/Oxford	5,495
N	Temescal Ranch	7,580
O	Big Sky Ranch	6,200
P	Runkle Ranch	3,580
Q	Rancho San Miguelito	8,030
R	San Emido Ranch	119,000
S	Ft. Tejon Ranch	250,000
T	Keene Ranch	6,000
U	Newhall Land (Ventura)	15,000
V	California Springs	8,000
W	Ormond Beach	1,200

Note:

¹ Sites E through K are being considered together as one parcel due to their location and size. Individually, none of the sites are large enough to accommodate the development proposed in the Specific Plan, VCC, and Entrada planning areas. However, because they are all very near to one another, it is conceivable that they could be developed in a coordinated fashion.

Source: Impact Sciences, Inc., 2007.



SOURCE: Newhall Ranch Specific Plan - 1999, URS Corporation – August 2005

FIGURE 3.0-1

Alternative Site Locations

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- Some sites were located outside the Santa Clarita Valley market and planning area, which is where the Specific Plan, VCC, and Entrada areas are located. The Project area's market and planning area has been determined to be bound on the north by Pyramid Lake, on the west by eastern Ventura County (including areas generally east of the cities of Fillmore, Moorpark, and Camarillo), on the south by the central and northern portions of the city of Los Angeles, and on the east by the southwestern Antelope Valley.
- Some sites were in isolated locations that cannot be efficiently connected with existing urban infrastructure.
- Some sites have been entitled for urban development and are being actively planned for development by the present owner, or are under construction.

As shown in **Table 3.0-2**, all but three of the 23 potential alternative sites were rejected from consideration based on the above screening criteria.¹ The three remaining potentially viable alternative sites, Hathaway Ranch, Temescal Ranch, and the applicant's land holdings in Ventura County (Newhall-Ventura), have been carried forward for additional analysis in **Subsection 3.3.2**, below. Locations and boundaries of these three alternative sites are shown on **Figure 3.0-2**.

Subsection 3.3.3, below, describes one additional on-site alternative that was ultimately rejected from further consideration in this EIS/EIR. This alternative is referred to as the "Total Avoidance" alternative, because it would allow the proposed Project to proceed to the extent possible, but any facilitated development would be extremely limited in order to avoid all areas within Corps jurisdiction.

The following two **Subsections, 3.3.2 and 3.3.3**, describe the remaining three potentially viable off-site alternatives and the one additional on-site "avoidance" alternative. The subsections also explain the reasons for rejecting or otherwise eliminating these four alternatives from further analysis in this EIS/EIR.

3.3.2 Analysis of Three Potentially Viable Off-Site Alternatives

This subsection describes existing environmental conditions and the likely impacts occurring from developing Hathaway Ranch, Temescal Ranch, or Newhall-Ventura as compared to the proposed Project, which, if approved, would facilitate development on the Specific Plan, VCC, and portions of the Entrada planning area. Refer to **Figure 3.0-2** for the location of these alternative sites relative to the Project area. **Table 3.0-3** provides a summary analysis of relative impacts for each of the three alternative sites as compared to the proposed Project. The table indicates whether or not each alternative site could result in less impacts when compared to approving the proposed Project, including the development facilitated on the Specific Plan, VCC, and portions of the Entrada planning area in the Santa Clarita Valley. In addition, the table includes an assessment of each site's ability to substantially meet the applicant's objectives/purpose and need as well as the Project area's development feasibility given the existing zoning within the Project area.

¹ A description of the reasons for rejecting all but three of the 23 potential alternative sites is found in the Revised Draft Specific Plan EIR (SCH No. 1995011015, March 1999).

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**Table 3.0-2
Off-Site Alternative Locations Considered and Rejected from Further Consideration**

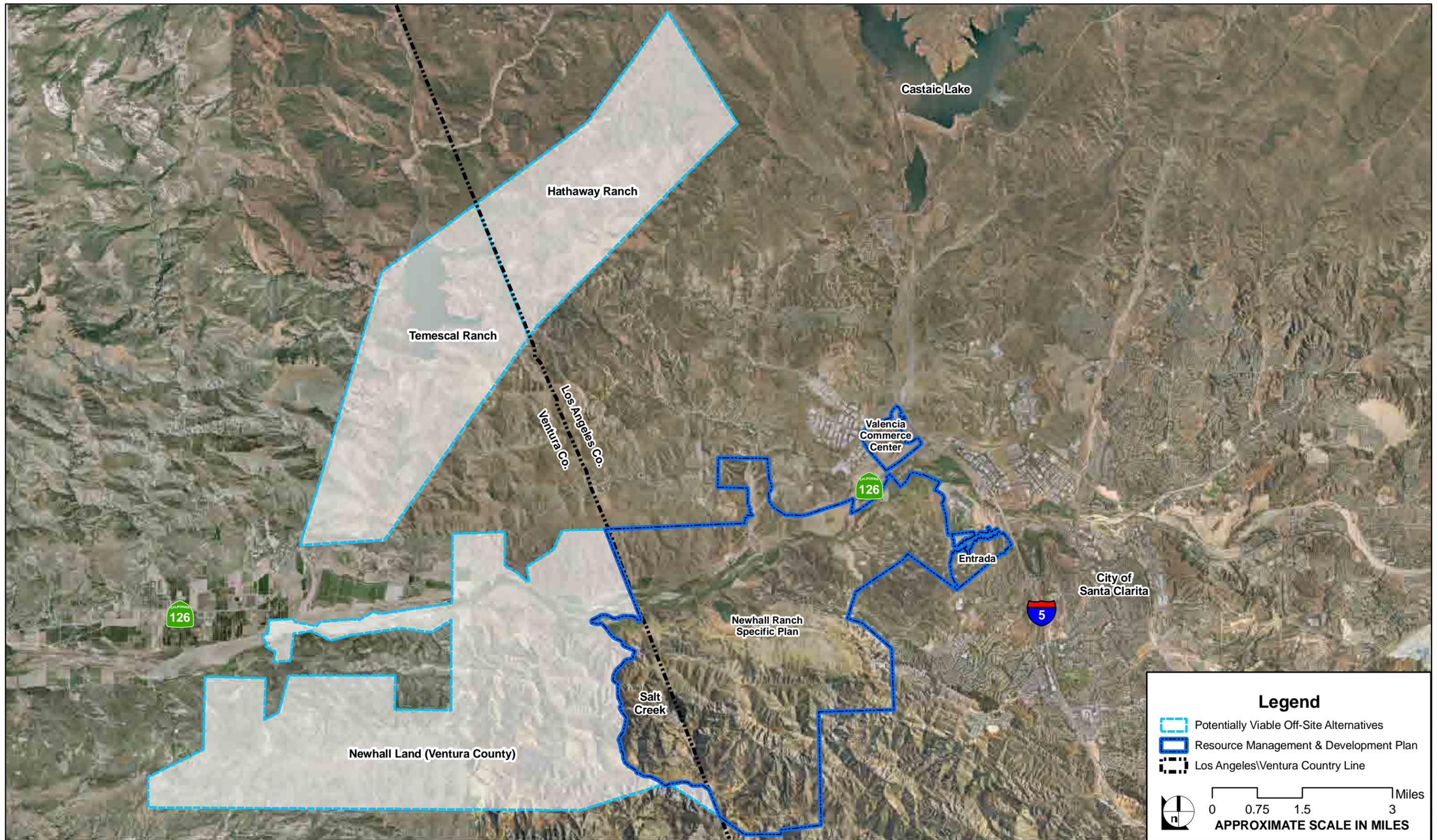
Site ¹	Site Name or Owner	Site Already Entitled or Currently Under Urban Development	Site too Small to Accommodate Development Facilitated in Project Area	Site Outside of Santa Clarita Valley Market and Planning Area	Site Unavailable for Development Due to Land Trust Status
A	Ritter Ranch	X			
B	Hathaway Ranch				
C	Santa Fe Development		X		
D	Strathern Ranch	X	X		
E	Sloan Ranches			X	
F	Stephen Blanchard			X	
G	RH Smith			X	
H	Canada Largo			X	
I	Hammond Canyon			X	
J	Adams Canyon Ranch			X	
K	George Herst			X	
Subtotal (Sites E through K)²					
L	Mariano/Lloyd			X	
M	Ahmanson/Oxford				X
N	Temescal Ranch				
O	Big Sky Ranch	X			
P	Runkle Ranch		X		
Q	Rancho San Miguelito			X	
R	San Emidio Ranch			X	
S	Ft. Tejon Ranch			X	
T	Keene Ranch			X	
U	Newhall Land (Ventura)				
V	California Springs			X	
W	Ormond Beach		X	X	

Notes:

¹ Refer to **Figure 3.0-1** for the general location of the 23 alternative sites considered.

² Sites E through K are being considered together as one parcel due to their location and size. Individually, none of the sites are large enough to accommodate the development proposed in the Specific Plan, and VCC and Entrada planning areas. However, because they are all very near to one another, it is conceivable that they could be developed in a coordinated fashion.

Source: URS, 2007.



SOURCE: URS, PACE 2008

FIGURE 3.0-2

LOCATION OF POTENTIALLY VIABLE OFF-SITE ALTERNATIVES SELECTED FOR ANALYSIS

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**Table 3.0-3
Comparison of Impacts and Issues for the Three Off-Site Alternatives
(Hathaway Ranch, Temescal Ranch, and Newhall-Ventura)**

Environmental Issue/Consideration	Alternative Sites ¹		
	Hathaway Ranch	Temescal Ranch	Newhall-Ventura
Likely to Lessen Impacts Relative to Proposed Project?²			
Surface Water Hydrology and Water Quality	No	No	No
Flood Control	Yes	No	No
Geomorphic and Riparian Resources	Yes	Yes	No
Groundwater	No	No	No
Biological Resources	Yes	Yes	No
Jurisdictional Streams and Wetlands	Yes	Yes	Yes
Air Quality	No	No	No
Traffic	No	No	No
Noise	No	No	No
Cultural Resources	No	No	No
Paleontological Resources	No	No	No
Agriculture and Soils	Yes	Yes	No
Geology and Geologic Hazards	No	No	No
Land Use	No	No	No
Visual Resources	Yes	Yes	No
Parks, Recreation, and Trails	No	No	No
Public Safety	Yes	No	No
Public Services	No	No	No
Hazards and Hazardous Materials	Yes	No	No
Socioeconomics/Environmental Justice	No	No	No
Able to Substantially Meet Objectives/ Purpose and Need?	No ³	No ³	No ³
Feasible to Develop Project Area Based on Existing Zoning?	No ³	No ³	No ³

Notes:

¹ Refer to **Figure 3.0-2** for location of these three alternative sites relative to the proposed Newhall Ranch site.

² Findings assume mitigation measures commensurate with the proposed Specific Plan, VCC, and Entrada developments would be implemented for the three specified off-site alternatives.

³ The approved Specific Plan site is consistent with the applicant's Specific Plan objectives and would be consistent with the existing zoning for that site. The VCC site also meets the applicant's objectives for completing build-out of the industrial/office/business park uses within the VCC, and such development is consistent with the zoning for that site. Lastly, the portion of the Entrada development facilitated by the SCP component of the proposed Project is consistent with the applicant's objectives; however, general and local plan amendments and a zone change are required for Entrada and such development applications are currently pending in Los Angeles County.

Source: URS, 2007.

3.3.2.1 Hathaway Ranch Alternative

Hathaway Ranch is approximately 5,988 acres in size, and is located in unincorporated Los Angeles County, generally between the Ventura County line on the west and I-5 on the east, and Hasley Canyon on the south and the Angeles National Forest on the north (see **Figure 3.0-2**). Hathaway Ranch is located approximately five miles north of the Project area. Topography on the Hathaway Ranch site is highly variable, with elevations ranging from approximately 1,100 feet above mean sea level to in excess of 2,500 above mean sea level; very little flat land exists on this site. Historic uses of the site include cattle grazing, oil and natural gas operations, and mineral resource mining. As the Hathaway Ranch site is undeveloped, no vehicular access is available via improved roadways and no water or wastewater lines serve the site. The eastern portion of the site is within the CLWA service area.

The impact of developing the land uses facilitated by the proposed Project on the Hathaway Ranch site is described below. **Table 3.0-3**, above, provides a matrix that compares, from a relative impact standpoint, development facilitated by the proposed Project with a similar level of development on the three off-site locations that were considered to be potentially viable prior to their removal from further consideration.

3.3.2.1.1 *Meeting Basic Project Objectives/Purpose and Need*

An off-site location alternative such as Hathaway Ranch has the potential to result in new urban development that may implement objectives of the development facilitated by the proposed Project (*i.e.*, Specific Plan, VCC, and Entrada). However, many of the primary objectives identified for the Specific Plan, VCC, and portions of Entrada would not be achieved with implementation of this alternative. Specific objectives not fully met or impeded with the Hathaway Ranch alternative site are listed below:

RMDP/SCP Purpose and Need Summary

- The purpose and need of the RMDP component of the proposed Project is to practicably and feasibly achieve the basic objectives of the approved Specific Plan and thereby help meet the regional demand for housing and jobs in northern Los Angeles County; and
- The purpose and need of the SCP component of the proposed Project is to implement a practicable and feasible spineflower conservation plan that provides for the long-term persistence of spineflower within the applicant's land containing known spineflower populations, and to authorize the take of spineflower in areas located outside of designated preserves, in order to facilitate development in portions of the Specific Plan, and the VCC and Entrada planning areas.

Specific Plan Objectives Summary

- Avoid leapfrog development and accommodate projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Arrange land uses to reduce vehicle miles traveled and energy consumption;

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- Provide a safe, efficient, and aesthetically attractive street system with convenient connections to adjoining regional transportation routes;
- Facilitate public transit by reserving right-of-way for future Metrolink line, space for a park and ride and/or Metrolink station, and by providing bus pull-ins along highways;
- Establish a diverse system of pedestrian and bicycle trails, segregated from vehicle traffic, to serve as an alternative to the automobile because the development would be too far removed from existing infrastructure to allow for commuting by walking or biking;
- Retain a major open area, which could act as a regional recreational park and an ecological preserve;
- Preserve the site of the historical Asistencia (San Fernando Mission Annex);
- Preserve or minimally impact the most significant ridgelines and other major topographical landforms; and
- Implement the spineflower mitigation program, which is part of the approved Specific Plan.

VCC Objectives Summary

- The VCC site is considered a major expansion area for the existing Valencia industrial/business park/office center, which serves the growing business and employment needs of the Santa Clarita Valley and surrounding communities;
- The VCC is designed to accommodate a broad range of employment uses, including light manufacturing, research and development, warehousing, distribution uses, office uses, and service-orientated businesses in close proximity to the Santa Clarita Valley and surrounding communities;
- Proximity to two major transportation facilities, the I-5 and SR-126, and the existing industrial center in Valencia, combine to make the VCC a logical site for industrial/business park/office uses to serve the Santa Clarita Valley and surrounding communities; and
- Facilitate completion of the Valencia industrial/business park/office center, and authorize the take of spineflower in the VCC planning area.

Entrada Objectives Summary

- A portion of the Entrada planning area would include a mix of residential, commercial, non-residential, open space, and public services in close proximity to the I-5 corridor and surrounding existing uses within the Santa Clarita Valley;
- Similar to the Specific Plan site, Entrada avoids leap-frog development and accommodates projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;

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- Similar to the Specific Plan site, Entrada land uses are arranged to reduce vehicle miles traveled and energy consumption; and
- A portion of Entrada would allow for implementation of a practicable and feasible spineflower conservation plan that would provide for the long-term persistence of spineflower within the Entrada planning area, and, at the same time, facilitate development within a portion of Entrada.

3.3.2.1.2 *Potential for the Alternative to Avoid or Lessen Impacts*

This section provides a general comparison of the likely environmental impacts of the Hathaway Ranch alternative site, and includes conclusions as to whether this alternative would have the potential to avoid or substantially lessen the environmental impacts of the proposed Project, including facilitated development (*i.e.*, Specific Plan, VCC, and portions of Entrada). A general comparison of relative impact levels associated with development of the Hathaway Ranch alternative and the Project area is included in **Table 3.0-3**, above.

Surface Water Hydrology and Water Quality. The Hathaway Ranch site generally drains in a south-southwest fashion and several drainages on the site (*e.g.*, Devil Canyon and Santa Felicia Canyon) drain to Lake Piru in Ventura County. The United Water Conservation District (UWCD) operates Lake Piru which provides water conservation, flood control, groundwater recharge, recreation, irrigation, and municipal and industrial water supplies. Development of the Hathaway Ranch site would have the potential to result in urban runoff water quality and sedimentation impacts to Lake Piru, an important water resource in this region. From a water quality perspective, development of the Hathaway Ranch alternative site would not be expected to avoid or substantially lessen impacts compared to development facilitated by the proposed Project.

For each alternative site, it is assumed that, if development were to occur on it, each would need to construct its own water reclamation plant. It is also assumed that each site would create a reclaimed water system where reclaimed water would be used on the site to reduce its potable water demands. Based on the above, the amount of wastewater generated by development on the Hathaway Ranch alternative site would be the same as that generated by development facilitated by the proposed Project; and, therefore, wastewater impacts would be expected to be the same. Consequently, the Hathaway Ranch alternative site would not be expected to avoid or substantially lessen wastewater disposal impacts compared to development facilitated by the proposed Project.

Flood Control. The Hathaway Ranch alternative site is not located on the Santa Clara River. Consequently, fewer stormwater protection facilities would be needed if the development facilitated by the proposed Project were moved to the Hathaway Ranch site. However, both alternatives would convert open land to an urban condition with surfaces impervious to water. It is expected that development of the Hathaway Ranch alternative site also would require similar types of drainage structures in upland areas in order to reduce downstream impacts. It is expected that the Hathaway Ranch alternative site would be less prone to flooding than the Project area. On balance, the Hathaway Ranch alternative site would be expected to have fewer flood-related impacts than the proposed Project.

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Geomorphic and Riparian Resources. The Hathaway Ranch site includes several on-site tributary drainages to Lake Piru, but there are no river watercourses like the Santa Clara River flowing through the Project area. As a result, development facilitated by the proposed Project is expected to have greater geomorphic and riparian resource impacts when compared to the Hathaway Ranch alternative site. The river geomorphic changes (natural or otherwise) may include changes to the existing hydraulics of the river course, increased scouring, increased water depths, and associated impacts on erosion, sedimentation, water quality, and aquatic and riparian river habitats.

Groundwater. The southeastern quadrant of the Hathaway Ranch alternative site encompasses a portion of the northwest extent of the Santa Clara River Valley East Groundwater Subbasin. The northern portion of the proposed Project area also encompasses a portion of the west-central portion of the Santa Clara River Valley East Groundwater Subbasin. Development of the Hathaway Ranch site would potentially impact recharge and/or groundwater quality in the upper portion of the overall groundwater basin area, whereas the proposed Project area would draw water from the lower, alluvial portion of the basin where groundwater wells are located in the vicinity of the Santa Clara River. The use (*i.e.*, groundwater pumping) of this groundwater basin occurs in the deeper Alluvium in the vicinity of the Santa Clara River where groundwater levels are their most stable. In addition, as to the Specific Plan site within the Project area, the applicant's groundwater supplies from the Alluvial aquifer, which are presently used for agricultural purposes, would be converted to potable supply uses, resulting in no net increase in groundwater usage. Consequently, the Hathaway Ranch alternative site is not likely to lessen impacts to groundwater when compared to the Project area.

Biological Resources. A search of the California Natural Diversity Database (CNDDDB, April 2005 edition) was conducted to identify known occurrences of sensitive species or habitats on the Hathaway Ranch site. The database did not contain any records of sensitive plants or animals on the site, but indicated that limited patches of a sensitive habitat, Southern Coast Live Oak Riparian Forest, were present. No on-site biological surveys were conducted, thus sensitive species may exist on the Hathaway Ranch site but have not been detected. Biological impacts related to the general loss of habitat would be similar to those associated with the development facilitated the proposed Project. However, because Hathaway Ranch is not located within a County-designated Significant Ecological Area (SEA), does not contain known occurrences of listed species, is not within the critical habitat of the endangered least Bell's vireo, and does not have habitat suitable for the unarmored threespine stickleback or other sensitive aquatic species, development of the Hathaway Ranch alternative site would be expected to involve lesser impacts to biological resources than the development facilitated by the proposed Project.

Jurisdictional Waters and Streams. The Hathaway Ranch site is located in the mountains on the north side of the Santa Clara River Valley, and does not contain any major rivers or impoundments. There are a total of approximately 25.5 linear miles of intermittent and ephemeral drainages on site, encompassing a total jurisdictional area of approximately 101 acres. In comparison, the RMDP component of the proposed Project contains approximately 49 linear miles of drainages with a total CDFG jurisdictional area of 946 acres. Although available information was not sufficient to allow the mapping of wetlands on the Hathaway Ranch site, it is unlikely that palustrine wetlands exist due to the lack of perennial water sources. Depressional wetlands may occur on site, but are likely limited in extent due to the relatively steep topography and arid conditions.

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The total area of the Hathaway Ranch alternative site is 6,195 acres, which is approximately one-half the size of the 11,999-acre Specific Plan site. The approved Specific Plan site also would retain approximately 8,236 acres in open space. Providing an urban development project on Hathaway Ranch that provides a similar number of residential units and amount of commercial area as would be facilitated by the proposed Project would require the use of virtually all of the Hathaway Ranch alternative site, which would substantially limit the ability to avoid or protect sensitive habitat areas located on the site, as applicable.

The total size of the Hathaway Ranch alternative site is 6,195 acres, and build-out of a development facilitated by the proposed Project would require virtually all of the Hathaway Ranch site. Although this development would affect nearly the entire site, jurisdictional waters on site are so limited in extent and quality that even complete elimination of these drainages would constitute a lesser impact on waters and wetlands than the proposed Specific Plan development facilitated by the proposed Project. Therefore, with respect to jurisdictional waters and streams, the Hathaway Ranch site could foreseeably lessen the impacts of the proposed Project.

Air Quality. Long-term air pollutant emissions from residential and commercial land uses are typically a result of the vehicle-miles traveled (VMT) generated by a project. The use of construction equipment to develop a project also would result in a short-term source of air emissions. The Hathaway Ranch alternative would be expected to generate more VMT than a similarly sized project located on the Project area (see traffic discussion below). Therefore, the Hathaway Ranch site would be expected to result in increased long-term air emissions when compared to the Project area. The short-term construction-related emissions that would result from the development facilitated by the proposed Project would be generally similar to construction emissions that would occur at the Hathaway Ranch site. Therefore, due to an increase in VMT, the Hathaway Ranch project site would not be expected to result in less air quality impacts than development of the Project area.

Traffic. It is assumed that internal traffic patterns on Hathaway Ranch would operate in a manner similar to the Project area after build-out. This presumes that it is possible to create the same development concept in approximately the same spatial arrangement being proposed for the Project area. Given this overall assumption, the primary difference between developing on the Hathaway Ranch site and developing on the Project area is how vehicular traffic would move to and from the two sites. In the case of the Hathaway Ranch site, it is located at a greater distance from existing traffic infrastructure than the Project area; and, therefore, suffers from a lack of vehicular access; Hathaway Ranch is not served directly by a major State highway and is much farther removed from one of the State's major north-south freeway corridors (I-5) than the Project area. Consequently, the amount of transportation infrastructure required to serve the Hathaway Ranch site would be substantially greater than that needed to serve the Project area. If a connection with I-5 were to occur with the Hathaway Ranch alternative, it would occur north of SR-126. Consequently, potential impacts to the I-5 interchanges at Magic Mountain Parkway and Valencia Boulevard could be avoided by being transferred to northern locations. However, Hathaway Ranch would not likely offer the future potential of direct commuter rail service that developing the Project area could offer. Travel distances and VMT between Hathaway Ranch and the surrounding employment centers found in the Santa Clarita Valley also would be greater with development on the

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Hathaway Ranch site. In conclusion, development of the Hathaway Ranch alternative would not be expected to lessen traffic impacts compared to the development facilitated by the proposed Project.

Noise. Vehicle noise impacts associated with the Hathaway Ranch site would be dispersed over a wider area than by the Project area due to the greater distances traveled. The adverse long-term noise impact to the Travel Village RV Park by developing the Project area would, however, be avoided. This is because the traffic generated on Hathaway Ranch would not travel past Travel Village RV Park (on SR-126 west of Commerce Center Drive) to the same degree as it would with the development facilitated by the proposed Project. It is expected that most of the Hathaway Ranch traffic would travel more directly to I-5. As a result, adverse noise impacts could be created in other noise sensitive areas located to the north where connections to I-5 might occur with the Hathaway Ranch alternative (*e.g.*, in Hasley Canyon and in the residential areas located in Castaic). In conclusion, while the adverse noise impact to the Travel Village RV Park with the development facilitated by the proposed Project would be avoided by the Hathaway Ranch alternative, it is likely that other adverse noise impacts would be created in the noise sensitive residential areas located to the north. The Project and Hathaway Ranch sites would both result in construction activities that have the potential to result in short-term noise impacts adjacent to the two project sites. Therefore, the potential for noise impacts resulting from the development of both sites is similar, and the alternative location would not substantially lessen Project-related noise impacts.

Cultural/Paleontological Resources. Bibliographic references, previous survey reports, and archaeological site records were obtained from a records search of the California Historical Resources Information System (CHRIS) in order to identify prior archaeological studies and known cultural resources within or adjacent to the Hathaway Ranch alternative site. The records search was conducted on August 23 and 24, 2005, at the South Central Coastal Information Center (SCCIC), at the California State University, Fullerton. The study area contained the Hathaway Ranch site and 0.25-mile search radius surrounding the site.

The CHRIS records search revealed that there are 33 archaeological sites and seven isolated artifacts within the Hathaway Ranch site. Additionally, there are two sites and four isolates recorded within the 0.25-mile search radius. One survey has been conducted within the study area. In addition, there are 12 "unmappable" surveys, which could potentially have included portions of the site, but which contained no locational data. The Hathaway Ranch site is considered to be highly sensitive for cultural resources.

Archaeological surveys of the 11,999-acre Specific Plan site identified eight prehistoric resources sites, one isolate location, and one historical site. Most of the identified sites have experienced minor to extensive disturbance, and known artifacts were collected from several sites during field investigations. As a result, the Specific Plan site is considered to have a very low density of archaeological remains. The VCC site is partially built-out and the environmental documents to date have identified cultural resource sites, along with appropriate archeological assessment mitigation measures. Archeological resources are known to exist in the vicinity of the Entrada site; however, the Entrada cultural resources report summarized information provided from a records search and from field surveys but concluded that there were no known archeological or historical resources on site. As to paleontological resources, the Entrada report found there was no potential to directly or indirectly impact any paleontological resources or unique geologic features because no such resources or features exist on or near the Entrada site.

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Due to the smaller size (6,195 acres) of the Hathaway Ranch site, and the sensitive nature of the cultural resources known to exist on the site, it is considered unlikely that development of the Hathaway Ranch site would lessen impacts to cultural resources compared to the development facilitated by the proposed Project. In addition, build-out of the development facilitated by the proposed Project would require nearly the entire Hathaway Ranch site, making avoidance of sensitive cultural resources extremely difficult and limiting mitigation opportunities.

The Project area is underlain by several geological formations that have the potential to contain paleontological resources. Potential impacts to sensitive paleontological resources would be reduced to a less-than-significant level through implementation of previously adopted and proposed mitigation measures. It is anticipated that if fossil-bearing geological formations were located on the Hathaway Ranch site, implementation of similar mitigation measures also would reduce potential impacts to a less-than-significant level. Therefore, potential paleontological resource impacts that may be associated with the Hathaway Ranch and Project sites would be expected to be similar.

Agriculture and Soils. Due mainly to its distance from the Santa Clara River Valley, the Hathaway Ranch site does not support the same quality of agricultural soil conditions as the Project area. Specifically, this site contains no Prime Farmlands, no Farmland of Statewide or Local Importance, and no Unique Farmlands (soils are suitable for livestock grazing). Consequently, the impact on agricultural resources from developing the Hathaway site would be less than that associated with the development facilitated by the proposed Project.

Geology and Geologic Hazards. From an exposure to seismic events standpoint, the impact of developing the Hathaway Ranch site would be similar to the development facilitated by the proposed Project. Both sites are affected by faulting and would require mitigation for potential landslide hazards. However, from a grading standpoint, impacts on the Hathaway Ranch alternative site would be greater than in the Project area because more earthwork would be required to create land level enough to accommodate urban development. The terrain on the Hathaway Ranch is steeper and more varied than on the portions of the Project area that are proposed for development. Thus, it is concluded that development of the Hathaway Ranch alternative site would not lessen geologic-related impacts associated with grading and modification of topography compared to the Project area.

Land Use. Development of either the Hathaway or Project sites would result in permanent changes from existing land uses (*i.e.*, oil production, grazing, agriculture, and open area/wildlife habitat) to urban uses. The Hathaway site also includes the Hathaway Ranch "dude ranch" tourist attraction. The Hathaway site is currently zoned A-2, Heavy Agriculture, which would not allow the proposed residential density/urban uses in the Project area, unless the Hathaway Ranch site could be successfully rezoned to allow such uses. Development of the Specific Plan and VCC sites would be consistent with the Los Angeles County General Plan, but the Entrada planning area would require general and local plan amendments and rezoning. On balance, the Project area (*i.e.*, consisting of the Specific Plan, the VCC planning area, and portions of the Entrada planning area) is superior to the Hathaway site with regard to land use consistency, and implementation of that alternative would not reduce project impacts.

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Visual Resources. Due to intervening topography, the fact that a state highway (SR-126) does not run through this site, and with a greater distance from potential viewers, development on Hathaway Ranch would be less visible from either I-5 or SR-126 and the existing population center in the Santa Clarita Valley. Due to these factors, the significant visual impacts to the rural appearance of the Santa Clara River Valley and Chiquito Canyon that would occur on the Project area would not occur on the Hathaway Ranch alternative site. However, developing Hathaway Ranch would still be converting an open area to urban uses, which would be considered visually significant. Nonetheless, development of the Hathaway Ranch site would be expected to lessen visual impacts compared to the Project area.

Parks, Recreation, and Trails. The Hathaway Ranch alternative site and the Project area would be required to meet local Quimby Act requirements for the provision of park space. However, at only approximately 6,195 acres, it would not be possible to develop the land uses within the Project area on the Hathaway Ranch alternative site and still preserve in perpetuity the substantial amount of land that would be dedicated to public uses within the Project area. Development of the Hathaway Ranch site would provide much less parks and recreation benefits than that associated with development within the Project area.

Public Safety. Past and present uses of the Hathaway Ranch alternative site (oil production, grazing, and agriculture) are similar in nature to those within the Project area. Consequently, potential environmental safety impacts relating to these uses would be similar to those within the Project area. However, given its more remote location, it is expected that the Hathaway Ranch site would not be as impacted by natural gas lines and electrical transmission lines, nor is it within the inundation area of the Castaic Dam. For these reasons, public safety impacts would be potentially less on the Hathaway Ranch site than within the Project area.

Public Services

Fire and Police Protection. It is assumed that the Hathaway Ranch alternative site would be required to fund an adequate level of fire protection and law enforcement to ensure adequate on-site protection. However, Hathaway Ranch is farther from a response time standpoint from existing fire and police stations located within the Santa Clarita Valley; and, therefore, would not be as well served as the Project area. Consequently, impacts related to fire and police protection would be incrementally worse with development on Hathaway Ranch as compared to the Project area.

Schools and Libraries. From an education and library standpoint, it is assumed that the Hathaway Ranch alternative site would need to meet similar requirements for funding in order to provide education and library services for its residents. Based on the above information, impacts to schools and libraries under the Hathaway Ranch alternative would be expected to be similar to those that would occur with the development facilitated by the proposed Project.

Water Availability. The potable water demands of development on the Hathaway Ranch site would be generally the same as the water demands for the Project area. The Hathaway Ranch site is only partially within the service area boundary of CLWA (a water wholesaler) and is not served by a water retailer. Groundwater supplies are likely not of sufficient quantity or quality to serve the development facilitated by the proposed Project. Consequently, the Hathaway Ranch site would need to be annexed into the

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CLWA service area, and would have to either annex to the nearest water retailer service area (likely either Newhall County Water District or Los Angeles Water District No. 36) or create a new water retail agency. CLWA has the present policy of allowing annexations into its service area only if enough water is simultaneously brought into the district to serve the development proposed on the annexed land. It is considered likely that development on Hathaway Ranch could be heavily dependent on imported water. Additionally, Hathaway Ranch does not have the rights to groundwater as does the applicant in the Santa Clarita Valley. Due to the steeper topography, the Hathaway Ranch site would require an increased amount of water pumping infrastructure. Due to the problematic prospects of delivering enough potable water to the Hathaway Ranch, water impacts would likely be greater with development of Hathaway Ranch than the development facilitated by the proposed Project. In summary, development of the alternative Hathaway Ranch site would not be expected to lessen water supply impacts compared to the Project area.

Energy Use and Solid Waste Disposal. On the Hathaway Ranch site, the same amount of energy (natural gas and electricity) would be required, and the same amount of solid waste generation would occur, as for the development facilitated by the proposed Project. Access to energy (electricity and natural gas) sources would be more costly because existing infrastructure is not present in the immediate area at a capacity sufficient to meet the needs of the proposed development. Solid waste generation would be similar for the Hathaway and Project sites, but disposal would be more costly for the Hathaway site as access to disposal sites would require longer truck trips. Therefore, these impacts would be somewhat greater than those associated with the development facilitated by the proposed Project. In addition, the Hathaway Ranch alternative would generate more vehicle miles traveled resulting in greater demand for petroleum products than within the Project area. Consequently, the Hathaway Ranch alternative site would not lessen impacts compared to the Project area with respect to the cost of energy, solid waste disposal, and consumption of petroleum products.

Hazards and Hazardous Materials. The Hathaway site is considered to have fewer man-made hazards and less potential for the presence of hazardous materials relative to the Project area. The development facilitated by the proposed Project has a remote potential for being flooded due to a catastrophic dam failure at Castaic Lake. Additionally, the Project area is comprised of more historical and ongoing oil and gas related facilities that may operate in the future in the general vicinity of developed areas within the Project area. It is expected that any decommissioned oil and gas facilities would be remediated to applicable regulatory standards, thereby removing any potential health and safety related hazards. In addition, the applicant's past and present agricultural crop activities, including the use of agricultural-related chemicals, have the potential to pose a slight residual health hazard during site development in affected areas. In addition, the Project area is traversed by several high voltage transmission lines that emit electromagnetic fields and can ignite wildfires in rare instances during high wind events. The Hathaway Ranch site is considered to have a lower impact potential than the Project area from a relative overall hazard perspective.

Socioeconomics/Environmental Justice. Los Angeles County population, housing, and employment projections for the Hathaway Ranch site do not call for the urban level of development that would result if the development facilitated by the proposed Project were relocated to Hathaway Ranch. Consequently, such development on the Hathaway Ranch site would not be consistent with the County's 2000 growth

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projections per U.S. Census data and Southern California Association of Governments (SCAG) projections. This site is within Census Tract 9201.4 (which has a projected population of 4,160 people for 2020). Because planning for many of the infrastructure requirements of the region is based on the SCAG projections, this census tract would have significantly more people within it than is planned, which is considered to be a significant infrastructure/utility impact (if this same development were to occur within the Project area, the population would be accounted for in SCAG regional projections except for the Entrada planning area).

SCAG projects that this census tract will have 1,172 housing units by 2020. However, by constructing the 20,885 residential units on the Specific Plan site, and the 1,725 residential units facilitated in the Entrada planning area, this census tract would have significantly more units than accounted for by SCAG projections and current regional plans (*2004 Regional Transportation Plan/Growth Vision: Socio-economic Forecast Report*). By comparison, all of the units proposed on the Specific Plan site are accounted for in SCAG's regional plans, and plans to amend SCAG's regional plans for Entrada are in the planning process.

Regarding employment, SCAG projects that this census tract will have 395 jobs by the year 2020. Adding the approximately 20,000 jobs created by the Specific Plan alone, this census tract would have more jobs available than accounted for by SCAG in its current regional plans.

Using Hathaway Ranch for urban development facilitated by the proposed Project would provide housing and employment opportunities to accommodate regional population growth. However, the 6,195-acre Hathaway Ranch site is approximately one-half the size of the 11,999-acre Specific Plan site alone. Therefore, it is unlikely that the Hathaway Ranch site would be able to support full build-out of the housing and commercial development facilitated by the proposed Project. Therefore, the Hathaway Ranch site would not provide the full housing- and jobs-related benefits that would result from the use of the Project area. Also, the Hathaway Ranch site would be inconsistent with the regional population, housing, and employment conditions that are planned for by SCAG in its 2004 Regional Transportation Plan/Growth Vision, nor would it be consistent with the County's 2000 projections for the Santa Clarita Valley. Therefore, development of the Hathaway Ranch site would not lessen socioeconomic impacts/issues when compared to the development facilitated by the proposed Project.

Executive Order No. 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, signed by President Clinton on February 11, 1994, requires federal agencies to identify and address disproportionately high and adverse effects of federal actions on the health or environment of minority and low-income populations. According to the federal guidelines, the environmental justice screening analysis assesses whether "the potentially affected community includes minority and/or low income populations." The guidelines indicate that a minority population exists when the minority population is 50 percent of an affected area's total population. The 50 percent threshold also is used to determine the presence of low-income populations in the study area.

The population in the Hathaway Ranch study area (Census Block 9201.4) is not composed of 50 percent or more minorities and the economic status of the residents in the study area is not 50 percent or more low

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income. The same is true for the Project area. Therefore, development of either the Hathaway Ranch site or the Project area would not result in disproportionate impacts on minority or low income populations.

3.3.2.2 Temescal Ranch Alternative

The Temescal Ranch alternative site is approximately 7,580 acres in size, and is located in unincorporated Ventura County, northeast of the community of Piru (see **Figure 3.0-2**, above). Lake Piru, owned by UWCD, extends through the northern one-third of the property. The Piru recreational area with lake access is located on the western side of the lake. The Santa Felicia Dam extends across the southern extent of the lake. Piru Canyon and Piru Creek traverse the central portion of the property, extending from the dam to the property's southern boundary. The valley floor portion of the Temescal Ranch site predominantly consists of rangeland. It is approximately two miles northwest of the Project area. Topography on the Temescal Ranch site is highly variable, with elevations ranging from approximately 780 feet above mean sea level to approximately 3,000 above mean sea level. Within the overall Temescal Ranch site, lands along the eastern side of Piru Canyon consist of steep, hilly terrain, while the western side offers gentler slopes and features plateaus overlooking the canyon. Historic uses of the Temescal Ranch site include cattle grazing, agriculture, and oil production. Other than Lake Piru, the Temescal Ranch site is undeveloped. Vehicular access is available to the Temescal Ranch site from SR-126, via Piru Canyon Road, and no water or wastewater lines serve the site. A portion of the Temescal Ranch site is within the UWCD service area.

3.3.2.2.1 *Meeting Basic Project Objectives/Purpose and Need*

An off-site location alternative such as Temescal Ranch has the potential to result in new urban development that may implement objectives of the development facilitated by the proposed Project. However, many of the primary objectives identified for the Specific Plan, VCC, and portion of Entrada would not be achieved with implementation of this alternative. Specific objectives not fully met or impeded with the Temescal Ranch alternative are listed below:

RMDP/SCP Purpose and Need Summary

- The purpose and need of the RMDP component of the proposed Project is to practicably and feasibly achieve the basic objectives of the approved Specific Plan and thereby help meet the regional demand for housing and jobs in northern Los Angeles County; and
- The purpose and need of the SCP component of the proposed Project is to implement a practicable and feasible spineflower conservation plan that provides for the long-term persistence of spineflower within the applicant's land containing known spineflower populations, and to authorize the take of spineflower in areas located outside of designated preserves, in order to facilitate development in portions of the Specific Plan, and the VCC and Entrada planning areas.

Specific Plan Objectives Summary

- Avoid leapfrog development and accommodate projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Arrange land uses to reduce vehicle miles traveled and energy consumption;
- Provide a safe, efficient, and aesthetically attractive street system with convenient connections to adjoining regional transportation routes;
- Facilitate public transit by reserving right-of-way for future Metrolink line, space for a park and ride and/or Metrolink station, and by providing bus pull-ins along highways;
- Establish a diverse system of pedestrian and bicycle trails, segregated from vehicle traffic, to serve as an alternative to the automobile because the development would be too far removed from existing infrastructure to allow for commuting by walking or biking;
- Retain a major open area, which could act as a regional recreational park and an ecological preserve;
- Preserve the site of the historical Asistencia (San Fernando Mission Annex);
- Preserve or minimally impact the most significant ridgelines and other major topographical landforms; and
- Implement the spineflower mitigation program, which is part of the approved Specific Plan.

VCC Objectives Summary

- The VCC site is considered a major expansion area for the existing Valencia industrial/business park/office center, which serves the growing business and employment needs of the Santa Clarita Valley and surrounding communities;
- The VCC is designed to accommodate a broad range of employment uses, including light manufacturing, research and development, warehousing, distribution uses, office uses, and service-orientated businesses in close proximity to the Santa Clarita Valley and surrounding communities; and
- Proximity to two major transportation facilities, the I-5 and SR-126, and the existing industrial center in Valencia, combine to make the VCC a logical site for industrial/business park/office uses to serve the Santa Clarita Valley and surrounding communities.
- Facilitate completion of the Valencia industrial/business park/office center, and authorize the take of spineflower in the VCC planning area.

Entrada Objectives Summary

- A portion of the Entrada planning area would include a mix of residential, commercial, non-residential, open space, and public services in close proximity to the I-5 corridor and surrounding existing uses within the Santa Clarita Valley;
- Similar to the Specific Plan site, Entrada avoids leap-frog development and accommodates projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Similar to the Specific Plan site, Entrada land uses are arranged to reduce vehicle miles traveled and energy consumption; and
- A portion of Entrada would allow for implementation of a practicable and feasible spineflower conservation plan that would provide for the long-term persistence of spineflower within the Entrada planning area, and, at the same time, facilitate development within a portion of Entrada.

3.3.2.2.2 *Potential for the Alternative to Avoid or Lessen Impacts*

This section provides a general comparison of the likely environmental impacts of the Temescal Ranch alternative site, and includes conclusions as to whether this alternative would have the potential to avoid or substantially lessen the environmental impacts of the proposed Project, including the facilitated development (Specific Plan, VCC, and a portion of Entrada). A general comparison of relative impact levels associated with development of the Temescal Ranch alternative and the Project area is included in **Table 3.0-3**, above.

Surface Water Hydrology and Water Quality. The Temescal Ranch site generally drains in south-southwest fashion and several drainages on the site (*e.g.*, Deer Canyon, Reasoner Canyon, Santa Felicia Canyon/Lechler Canyon) drain to Lake Piru in the north-central portion of the site. Lake Piru was formed when Santa Felicia Dam was constructed by UWCD in 1955. A multi-use facility serving Ventura County, Lake Piru provides water conservation, flood control, seawater intrusion abatement, groundwater recharge, irrigation, and municipal and industrial water supplies. Santa Felicia Dam is 200 feet high and stores 88,340 acre-feet of water in the 1,200-acre expanse of Lake Piru. Lake Piru receives rainfall runoff from a 432 square mile watershed in the Los Padres and Angeles National Forests. Lake Piru is hydrologically connected to Pyramid Lake to the north and to the Santa Clara River to the south via Piru Creek. Piru Creek below Lake Piru traverses approximately four miles of the central and southern portions of the Temescal Ranch site. Development of the Temescal Ranch site would have the potential to result in urban runoff water quality and sedimentation impacts to Lake Piru and Piru Creek. From a water quality perspective, development of the Temescal Ranch alternative site would not be expected to avoid or substantially lessen impacts compared to development facilitated by the proposed Project.

For each alternative site, it is assumed that if development were to occur on it, each would need to construct its own water reclamation plant. It is also assumed that each site would create a reclaimed water system where reclaimed water would be used on the sites to reduce their potable water demands. Based on the above, the amount of wastewater generated by development on the Temescal Ranch alternative site

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would be the same as that generated by development facilitated by the proposed Project; and, therefore, wastewater impacts would be expected to be the same. Consequently, the Temescal Ranch alternative site would not be expected to avoid or substantially lessen wastewater disposal impacts compared to development facilitated by the proposed Project.

Flood Control. The Temescal Ranch site is not located on the Santa Clara River. Consequently, fewer stormwater protection facilities would be needed if the development facilitated by the proposed Project were moved to the Temescal Ranch site. However, Piru Creek traverses the Temescal Ranch site below Lake Piru. In addition, both the Temescal Ranch alternative and the Project area would convert open land to an urban condition with surfaces impervious to water, and it is expected that development of the Temescal Ranch alternative site would require similar types of drainage structures in upland areas in order to preclude downstream impacts. Potential flood-related impacts are generally the same for Temescal Ranch and the Project area. Consequently, the Temescal Ranch alternative site would not be expected to avoid or substantially lessen flood-related impacts when compared to the proposed Project.

Geomorphic and Riparian Resources. The Temescal Ranch site includes several on-site tributary drainages to Lake Piru, but there are no river watercourses like the Santa Clara River flowing through the Project area. However, Piru Creek is located below Lake Piru and traverses approximately four miles of the central and southern portions of the Temescal Ranch site. Development of Temescal Ranch would result in potential erosion, sedimentation, and water quality impacts to Lake Piru and Piru Creek. Nonetheless, on balance, development on the Temescal Ranch alternative site is expected to result in lesser geomorphic and riparian resource impacts when compared to the development facilitated by the proposed Project. The river geomorphic changes (natural or otherwise) may include changes to the existing hydraulics of the river course, increased scouring, increased water depths, and associated impacts on erosion, sedimentation, water quality, and aquatic and riparian river habitats.

Groundwater. The Temescal Ranch site encompasses a portion of the Piru Groundwater Basin below Lake Piru. The Piru Groundwater Basin extends from approximately five miles northeast of the town of Piru downstream to between Piru and Fillmore in Ventura County. The basin includes unconfined shallow alluvial aquifers underlain by unconfined San Pedro aquifers. The Temescal Ranch site is located on, and above, the upper portion of the Piru Groundwater Basin north of the confluence of Piru Creek and the Santa Clara River. The alluvial thickness varies from 20 feet on the upstream end, to approximately 160 feet near Piru, and to 60 feet near the downstream extent of the aquifer. The water-bearing San Pedro Formation is composed of permeable sands and gravels that extend thousands of feet below ground surface. Groundwater gradient direction is generally to the west in the basin. Recharge of the basin is primarily from percolation of surface waters, and the depth to water is highly variable ranging from 0 to 110 feet below ground surface. Development of the Temescal Ranch site would have the potential to impact percolation and potentially water quality in the upper portions of the Piru Groundwater Basin below Lake Piru. The proposed Project area would draw water from the lower, alluvial portion of the basin where groundwater wells are located in the vicinity of the Santa Clara River. The use (*i.e.*, groundwater pumping) of this groundwater basin occurs in the deeper Alluvium in the vicinity of the Santa Clara River where groundwater levels are their most stable. In addition, as to the Specific Plan site within the Project area, the applicant's groundwater supplies from the Alluvial aquifer, which are presently used for agricultural purposes, would be converted to potable supply uses, resulting in no net

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increase in groundwater usage. Consequently, the Temescal Ranch alternative site is not likely to lessen impacts to groundwater when compared to the Project area.

Biological Resources. A search of the CNDDDB, April 2005 edition, was conducted to identify known occurrences of sensitive species or habitats on the Temescal Ranch site. The database indicated one record of a sensitive species on the site (Santa Ana sucker) and indicated that sensitive habitats, including Southern Coast Live Oak Riparian Forest, Southern Cottonwood-Willow Riparian Woodland, Southern Sycamore-Alder Riparian Woodland, and California Walnut Woodland, were present. No on-site biological surveys were conducted, thus sensitive species may exist on the site but have not been detected. While the Temescal Ranch site does contain habitat types considered sensitive (including habitats listed above and wetlands within and near such locations as Piru Creek), biological impacts related to development would be expected to be less than those associated with the development facilitated by the proposed Project. This is because Temescal Ranch is not within a County-designated SEA, is not within the critical habitat of the endangered least Bell's vireo, and does not have habitat suitable for the unarmored threespine stickleback, which is also an endangered species. However, biological impacts related to the general loss of habitat would be similar to those associated with the Project area, and would not be lessened by adoption of the Temescal Ranch alternative site.

Jurisdictional Streams and Wetlands. The Temescal Ranch alternative site is located adjacent to the Hathaway Ranch site, and receives flows from the drainages on Hathaway Ranch. These flows and others entering the site are impounded in Lake Piru. Approximately 75 percent of Lake Piru, or 995 acres, is within the boundaries of Temescal Ranch. The largest stream on the Temescal Ranch site is Piru Creek, which is fed perennially by releases from Santa Felicia Dam at the downstream end of Lake Piru. The on-site jurisdictional area of Piru Creek is approximately 250 acres. In addition to Piru Creek and Lake Piru, the Temescal Ranch site contains approximately 11.7 miles of intermittent and ephemeral tributaries to these waters, constituting 47 acres of jurisdiction (excluding Lake Piru and Piru Creek). The RMDP component of the proposed Project (Alternative 2) contains approximately 946 acres of jurisdictional area of which 99.8 acres would be permanently impacted .

The total area of the Temescal Ranch alternative site is 7,580 acres, which is substantially smaller than the 11,999-acre Specific Plan/RMDP site. Site development constraints also exist on the Temescal Ranch, including Lake Piru and Piru Creek, which would further limit the area available for new urban development. The approved Specific Plan/RMDP site also would retain approximately 10,220 acres in open space. Providing an urban development project on Temescal Ranch that provides a similar number of residential units and amount of commercial area as would be facilitated by the proposed Project would require the use of virtually all of the Temescal Ranch alternative site, which would substantially limit the ability to avoid or protect sensitive habitat areas located on the site. Development of this alternative site instead of the Project area would result in potentially smaller effects on jurisdictional waters (*i.e.*, 99.8 acres for the proposed Project versus 47 acres for Temescal Ranch). Therefore, development of the Temescal Ranch alternative site would be expected to lessen impacts compared to the Project area with respect to impacts on jurisdictional streams and wetlands.

Air Quality. Long-term air emissions from residential and commercial land uses are typically a result of the VMT generated by a project. The amount of long-term vehicular-related air emissions generated by

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developing the Temescal Ranch site would be greater than the amount that would occur from the development facilitated by the proposed Project. Short-term construction-related activities at the Temescal Ranch and Project sites would generally be similar. As a result, construction-related emissions also would be similar. Therefore, overall impacts associated with development of the Temescal ranch site would not be expected to be less than those associated with the Project area with respect to impacts upon local and regional air quality.

Traffic. The primary road that currently exists on the Temescal Ranch site (Piru Canyon Road) is designated as a Local Scenic Road as is SR-126 to the south of the site. It is assumed that internal traffic patterns on the Temescal Ranch site would operate in a manner similar to the Project area after build-out. This presumes that it is possible to create the same development concept in approximately the same spatial arrangement being proposed for the Project area. Given this overall assumption, the primary difference between developing on the Temescal Ranch site and developing the Project area is how vehicular traffic would move to and from the two Project sites. Temescal Ranch is located at a greater distance from existing traffic infrastructure than is the Project area; the Temescal Ranch site is not served directly by a major state highway (SR-126), and is much further removed from one of the state's major north-south freeway corridors (I-5). Consequently, the amount of transportation infrastructure needed to reach the Temescal Ranch site would be substantially greater than that needed for the Project area.

Because SR-126 would serve as the primary means of connection between Temescal Ranch and the employment centers in the Santa Clarita Valley, SR-126 and its interchange at I-5 would be more heavily impacted by the Temescal Ranch alternative than by the development facilitated by the proposed Project. However, traffic generated on the Temescal Ranch site would only access I-5 at SR-126, and potential impacts to the I-5 interchanges at Magic Mountain Parkway and Valencia Boulevard would likely be avoided. The Temescal Ranch site would not offer the future potential of direct commuter rail service offered by developing the Project area. Travel distances and VMT between Temescal Ranch and the surrounding employment centers found in the Santa Clarita Valley also would be greater with development on the Temescal Ranch site. In conclusion, development of the Temescal Ranch alternative site would not be expected to lessen traffic impacts compared to development facilitated by the proposed Project.

Noise. Vehicle noise impacts associated with the Temescal Ranch site would be dispersed over a wider area than by the Project area due to the greater distances traveled. The adverse long-term noise impact to the Travel Village RV Park near the intersection of SR-126 and I-5 would likely be increased with development at Temescal Ranch, because more traffic would be expected to travel past this location. Development of the Temescal Ranch and Project sites would both involve construction activities that would have the potential to result in short-term noise impacts to noise sensitive uses located adjacent to the Project sites, including recreational users at Lake Piru and Piru Creek for the Temescal Ranch site. Noise impacts resulting from the development of both Project sites would be expected to be similar although somewhat greater for the Temescal Ranch site. Therefore, development of the Temescal Ranch alternative site would not be expected to lessen impacts compared to the proposed Project area with respect to noise impacts.

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Cultural/Paleontological Resources. Bibliographic references, previous survey reports, and archaeological site records were obtained from a records search of CHRIS in order to identify prior archaeological studies and known cultural resources within or adjacent to the Temescal Ranch site. The records search was conducted on August 23 and 24, 2005, at SCCIC, at California State University, Fullerton. The study area contained the Temescal Ranch alternative site and 0.25-mile search radius surrounding the site.

The CHRIS records search revealed that there are three known archaeological sites within the Temescal Ranch alternative site. An additional seven isolated artifacts were recorded within the 0.25-mile search radius. Fifteen surveys have been conducted within the study area, and an additional six "unmappable" surveys, lacking locational data, could potentially have included portions of the site. The Temescal Ranch alternative site is considered to be sensitive for cultural resources.

Due to the smaller size (7,580 acres) of the Temescal Ranch site and the nature of the cultural resources known to exist on the site, build-out of the development facilitated by the proposed Project would require nearly the entire Temescal Ranch site, making avoidance of cultural resources extremely difficult. Therefore, development of the Temescal Ranch site would not be expected to lessen impacts to cultural resources compared to the Project Area.

The Project area is underlain by several geological formations that have the potential to contain paleontological resources. Potential impacts on paleontological resources can be reduced to a less-than-significant level through implementation of previously adopted and proposed mitigation measures. It is anticipated that if fossil-bearing geological formations are located on the Temescal Ranch site, implementation of similar mitigation measures also would reduce potential impacts to a less-than-significant level. Therefore, potential paleontological resource impacts that may be associated with the Temescal Ranch and Project sites would be expected to be similar.

Agriculture and Soils. Portions of the Temescal Ranch site contain soils similar to those found on the lowland portions of the Project area. Specifically, both sites contain Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. Much of the Temescal Ranch site is in uplands where the agricultural productivity is diminished due to poorer soil types; this is true on the Project area as well. However, the Temescal Ranch alternative site contains less important farmland than does the Project area; and, therefore, this alternative site might foreseeably lessen Project impacts on agricultural resources.

Geology and Geologic Hazards. From an exposure to seismic events and a grading impact standpoint, developing the Temescal Ranch alternative site would be similar to the development facilitated by the proposed Project. Both sites are affected by faulting and would require mitigation for potential landslide hazards. Also, given that the terrain found on the Temescal Ranch site is similar to that found in the Project area, a similar amount of earthwork would be required to create land level enough to accommodate urban development. Hence, the Temescal Ranch alternative would not be expected to result in less impact than the Project area with respect to impacts related to geology and geologic hazards.

Land Use. Development of either Temescal Ranch or the Project sites would result in permanent changes to existing land uses (*i.e.*, cattle grazing, agriculture, oil production). It is assumed that existing water supply and recreation uses located on Temescal Ranch that are provided by Lake Piru and Piru Creek

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would be avoided by new development. The entire Temescal Ranch site is designated as "Open Space" (80-acre minimum lot size), which is incompatible with development of the site for urban uses similar to the development facilitated by the proposed Project. The Temescal Ranch site also would be inconsistent with Ventura County goals and policies regarding conversion of land from agricultural production (*e.g.*, in Piru Canyon) to urban land uses. A General Plan Amendment to change the site's Open Space land use designation to urban land uses would require voter approval under the requirements of the Ventura County Save Open-Space and Agricultural Resources (SOAR) initiative. Development of the Project area would be consistent with the Los Angeles County General Plan, as amended, except as it relates to a portion of the Entrada planning area. Therefore, development of the Temescal Ranch site would not reduce impacts compared to the Project area from a land use consistency standpoint.

Visual Resources. The Temescal Ranch alternative site does not have a major east-west highway (SR-126) that traverses through the site like the proposed Project. It also is located farther away from potential viewers from highways and other roads due to intervening topography. As a result, development on the Temescal Ranch alternative site would be less visible from I-5, SR-126, and existing population centers when compared to the proposed Project. Due to these factors, the significant visual impacts resulting from the Temescal Ranch alternative site would be expected to be less than the proposed Project. However, the Temescal Ranch alternative site would still convert open area to urban uses, which would be considered a significant and potentially unavoidable visual impact, which is similar to the visual impacts associated with the proposed Project. On balance, development of the Temescal Ranch alternative site would be expected to result in fewer significant visual impacts when compared to the proposed Project.

Parks, Recreation, and Trails. The Temescal Ranch alternative site and the Project area would be required to meet local Quimby Act requirements for the provision of park space. However, at only 7,580 acres, it would not be possible to develop the land uses within the Project area on the Temescal Ranch site and still preserve in perpetuity the substantial amount of land that would be dedicated to public uses as would be provided in the Project area. In addition, Lake Piru and Piru Creek below Lake Piru are currently used extensively for recreational purposes on the Temescal Ranch site. Urban development on Temescal Ranch would be expected to adversely impact existing recreational uses on the Temescal Ranch site, whereas the proposed Project would facilitate recreation resources on the Project area. Based on the above information, development of the Temescal Ranch site would not result in less impact than the Project area relative to impacts on parks and recreation.

Public Safety. Past and present uses of the Temescal Ranch alternative site (namely, recreation, oil production, grazing, and some agriculture) are similar in nature within the Project area. Given its location, it is expected that Temescal Ranch does not contain the number of natural gas and electric transmission lines as exist on the Project area. However, a portion of Temescal Ranch is within the potential inundation zone of Santa Felicia Dam, which presents a potential public safety hazard in the unlikely event of catastrophic dam failure. Overall, the Temescal Ranch and the Project area are considered to be similar from a public safety standpoint.

Public Services

Fire and Police Services. It is assumed that the Temescal Ranch alternative site would be required to fund an adequate level of fire protection and law enforcement to ensure adequate on-site protection.

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However, Temescal Ranch is located in eastern Ventura County along SR-126, an area that is not urbanizing to any substantial degree. As a result, assistance from Ventura County agencies would need to travel much further distances to the Temescal Ranch site than would Los Angeles County agencies if development were to occur on the Project area. In the event of an emergency, it is likely that Los Angeles County would need to assist Ventura County agencies if the Temescal Ranch alternative site was developed instead of the Project area. The Project area is closer to an existing urban area, and is much more able to handle large-scale emergencies. Consequently, impacts relative to fire and police services would be increased with development on the Temescal Ranch site when compared to development on the Project area. Hence, development of the Temescal Ranch alternative site would not result in fewer impacts than the Project area with regard to fire and law enforcement services.

Schools and Libraries. From an education and library standpoint, it is assumed that the Temescal Ranch alternative site would need to meet similar requirements for funding in order to educate and provide library services for its residents. Accordingly, development of the Temescal Ranch alternative site would not be expected to result in fewer impacts to schools and libraries than the development facilitated by the proposed Project.

Water Availability. The potable water demands of developing the Temescal Ranch site would be generally the same as the water demands for the Project area. Temescal Ranch is only partially within the service area boundary of UWCD (a water wholesaler) and is not served by a water retailer. Also, groundwater supplies are likely not of sufficient quantity or quality to serve the development facilitated by the proposed Project. Consequently, the Temescal Ranch site would need to be annexed into the UWCD service area, and would have to either annex to the nearest water retailer service area (in the community of Piru) or create a new water retail agency. Like CLWA, UWCD has the present policy of allowing annexations into its service area only if enough water is concurrently brought into the district to serve the development proposed on the annexed land. It is likely that development on the Temescal Ranch site would be dependent on imported water while the Project area's potable water supplies are primarily from the local groundwater basin. Due to the problematic prospects of delivering sufficient potable water to the Temescal Ranch, water availability impacts would likely be greater with the Temescal Ranch alternative than with development occurring on the Project area. Therefore, impacts of developing the Temescal Ranch alternative site would not be expected to be less than the Project area with regard to water availability.

Energy Use and Solid Waste Disposal. Energy use (on-site) and solid waste generation and disposal would be similar for the Temescal Ranch alternative site and the Project area. Access to energy (electricity and natural gas) sources and to solid waste disposal sites is approximately the same for both sites and these impacts would be similar. However, because the Temescal Ranch alternative would generate a larger amount of vehicle miles traveled, its demand for petroleum products is expected to be greater than the demands of the Project area. Development of the Temescal Ranch alternative site would not be expected to result in less impact than the development facilitated by the proposed Project relative to the cost of energy, solid waste disposal, and consumption of petroleum products.

Hazards and Hazardous Materials. With the exception of Lake Piru, the Temescal Ranch site is considered to have fewer man-made hazards and less potential for the presence of hazardous materials as

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compared to the Project area. The Project area has a remote potential for being flooded due to a catastrophic dam failure at Castaic Lake. Similarly, the Temescal Ranch site has a remote potential for being flooded due to a catastrophic dam failure at Lake Piru, which would theoretically inundate the entire Piru Valley. There are more historical and ongoing oil and gas related facilities that may operate in the future in the general vicinity of developed areas on the Project area. It is expected that any decommissioned oil and gas facilities would be remediated to applicable regulatory standards, thereby removing any potential health and safety related hazards. Temescal Ranch's and the Project area's past and present agricultural crop activities, including the use of agricultural related chemicals, have the potential to pose a slight residual health hazard during site development in affected areas. The Project area is traversed by several high voltage transmission lines that emit electromagnetic fields and have the potential to ignite wildfires in rare instances during high wind events. Neither of these potential transmission line-related hazards is considered to be significant. A higher percentage of the overall Temescal Ranch site could be impacted by flooding from a catastrophic dam failure than the Project area, thus, development of the Temescal Ranch site would not be expected to lessen impacts relative to hazards when compared to the Project area.

Socioeconomics and Environmental Justice. The Temescal Ranch site is in a rural location that is not projected for urban development in any regional planning horizon. Temescal Ranch falls into Census Tract 200 in southern Ventura County. SCAG projects that the population within this Census Tract will reach approximately 2,725 by 2020. This projection predicts a much slower growth rate than projections for Los Angeles County and significantly lower population, housing, and employment numbers than proposed for the Project area. Therefore, because this area is not planned for this level of development, developing the Temescal Ranch site rather than the Project area would result in potentially significant socioeconomic impacts.

Using the Temescal Ranch for urban development facilitated by the proposed Project would provide housing and employment opportunities to accommodate regional population growth. However, the 7,500-acre Temescal Ranch site is substantially smaller than the 11,999-acre Specific Plan site alone. Therefore, it is unlikely that the Temescal Ranch site would be able to support full build-out of the housing and commercial development facilitated by the proposed Project. In addition, the Temescal Ranch site would not be expected to be able to provide the full housing- and jobs-related benefits that would result from development facilitated by the proposed Project. Therefore, development of the Temescal Ranch alternative site would not be expected to result in less impact than the development facilitated by the proposed Project with respect to socioeconomic issues.

Executive Order No. 12898, *Federal Actions to Address Environmental Justice In Minority and Low-Income Populations*, signed by President Clinton on February 11, 1994, requires federal agencies to identify and address disproportionately high and adverse effects of federal actions on the health and environment of minority and low-income populations. According to federal guidelines, the environmental justice screening analysis assesses whether "the potentially affected community includes minority and/or low-income populations." The guidelines indicate that a minority population exists when the minority population is 50 percent of affected area's total population. The 50 percent threshold also is used to determine the presence of low-income populations in the study area.

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The population in the Temescal Ranch study area (Census Tract 200) is not composed of 50 percent or more minorities and the economic status of the residents in the study area is not 50 percent or more low income. Therefore, development of either the Temescal Ranch or the Project sites would not result in disproportionate impacts on minority or low-income populations.

3.3.2.3 Newhall-Ventura Alternative

The Newhall-Ventura alternative site is located in unincorporated Ventura County, adjacent to the western boundary of the Project area. The alternative site is approximately 15,000 acres in size. This irregularly shaped site is generally bound by SR-126 on the north, the Santa Susana Mountains on the south, Los Angeles County on the east, and extends approximately two miles west of the community of Piru (refer to **Figure 3.0-2**, above). The northwest portion of the Newhall-Ventura alternative site encompasses a portion of the Santa Clara River floodplain and extends north of SR-126. Topography on the site is highly variable, with elevations ranging from approximately 630 feet above mean sea level in the Santa Clara River Valley to approximately 3,000 above mean sea level in the Santa Susana Mountains. Lands in the river valley are generally level, with elevations rising to the south in the mountains. Historic uses of the site include cattle grazing, agriculture and oil production. The site is heavily developed with agricultural uses (row crops, citrus, *etc.*) and also maintains a number of rural-type residences and structures. Vehicular access is available to this site from SR-126, and no wastewater lines serve the site. The site is within both the UWCD and CLWA service areas.

3.3.2.3.1 *Meeting Basic Project Objectives*

An off-site location alternative such as the Newhall-Ventura site has the potential to result in new urban development that may implement objectives of the development facilitated by the proposed Project. However, many of the primary objectives for the Specific Plan, VCC, and Entrada would not be achieved with implementation of this alternative. Specific objectives not fully met or impeded with the Newhall-Ventura alternative site are listed below:

RMDP/SCP Purpose and Need Summary

- The purpose and need of the RMDP component of the proposed Project is to practicably and feasibly achieve the basic objectives of the approved Specific Plan and thereby help meet the regional demand for housing and jobs in northern Los Angeles County; and
- The purpose and need of the SCP component of the proposed Project is to implement a practicable and feasible spineflower conservation plan that provides for the long-term persistence of spineflower within the applicant's land containing known spineflower populations, and to authorize the take of spineflower in areas located outside of designated preserves, in order to facilitate development in portions of the Specific Plan, and the VCC and Entrada planning areas.

Specific Plan Objectives Summary

- Avoid leapfrog development and accommodate projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Arrange land uses to reduce vehicle miles traveled and energy consumption;
- Provide a safe, efficient, and aesthetically attractive street system with convenient connections to adjoining regional transportation routes;
- Facilitate public transit by reserving right-of-way for future Metrolink line, space for a park and ride and/or Metrolink station, and by providing bus pull-ins along highways;
- Establish a diverse system of pedestrian and bicycle trails, segregated from vehicle traffic, to serve as an alternative to the automobile because the development would be too far removed from existing infrastructure to allow for commuting by walking or biking;
- Retain a major open area, which could act as a regional recreational park and an ecological preserve;
- Preserve the site of the historical Asistencia (San Fernando Mission Annex);
- Preserve or minimally impact the most significant ridgelines and other major topographical landforms; and
- Implement the spineflower mitigation program, which is part of the approved Specific Plan.

VCC Objectives Summary

- The VCC site is considered a major expansion area for the existing Valencia industrial/business park/office center, which serves the growing business and employment needs of the Santa Clarita Valley and surrounding communities;
- The VCC is designed to accommodate a broad range of employment uses, including light manufacturing, research and development, warehousing, distribution uses, office uses, and service-orientated businesses in close proximity to the Santa Clarita Valley and surrounding communities; and
- Proximity to two major transportation facilities, the I-5 and SR-126, and the existing industrial center in Valencia, combine to make the VCC a logical site for industrial/business park/office uses to serve the Santa Clarita Valley and surrounding communities.
- Facilitate completion of the Valencia industrial/business park/office center, and authorize the take of spineflower in the VCC planning area.

Entrada Objectives Summary

- A portion of the Entrada planning area would include a mix of residential, commercial, non-residential, open space, and public services in close proximity to the I-5 corridor and surrounding existing uses within the Santa Clarita Valley;
- Similar to the Specific Plan site, Entrada avoids leap-frog development and accommodates projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Similar to the Specific Plan site, Entrada land uses are arranged to reduce vehicle miles traveled and energy consumption; and
- A portion of Entrada would allow for implementation of a practicable and feasible spineflower conservation plan that would provide for the long-term persistence of spineflower within the Entrada planning area, and, at the same time, facilitate development within a portion of Entrada.

3.3.2.3.2 *Potential for the Alternative to Avoid or Lessen Impacts*

This section provides a general comparison of the likely environmental impacts of the Newhall-Ventura alternative site, and includes conclusions as to whether this alternative would have the potential to avoid or substantially lessen the environmental impacts of the proposed Project, including the development facilitated by the proposed Project. A general comparison of relative impact levels associated with development of the Newhall-Ventura alternative site and the Project area is included in **Table 3.0-3**, above.

Surface Water Hydrology and Water Quality. The majority of the Newhall-Ventura site drains in a northerly direction to the Santa Clara River. Exceptions include the portion of the site south of Oak Ridge; drainage flows in this area are in a generally southern direction. In addition, the northeast portion of the site drains in a generally southern direction to the Santa Clara River. Intermittent drainages on the site include those in Tapo Canyon, Eureka Canyon, Smith Canyon, the mouth of Salt Creek, and the headwaters of Tripas Canyon. From a water quality perspective, the development facilitated by the proposed Project and development at the Newhall-Ventura alternative site are considered similar.

It is assumed that the Newhall-Ventura site would need to construct its own water reclamation plant. It is also assumed that the site would create a reclaimed water system where reclaimed water would be used on the site to reduce its potable water demands. Based on the above, the amount of wastewater generated by development on the Newhall-Ventura alternative site would be the same as that generated by the development facilitated by the proposed Project; and, therefore, wastewater impacts would be the same. Consequently, the Newhall-Ventura alternative site would not be expected to result in less impact than the Project area from a wastewater disposal perspective.

Flood Control. The potential impacts of flooding due to development on the Newhall-Ventura alternative site would be similar to those within the Project area. The Santa Clara River runs through both sites (approximately five miles in the Project area and about six miles in the Newhall-Ventura site), and both

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scenarios would involve the conversion of open land to an urban condition with impervious surfaces. It is expected that development on both sites would necessitate similar types of drainage improvements in order to preclude downstream impacts. Thus, the Newhall-Ventura alternative site would not result in less impacts than the Project area with regard to flood impacts.

Geomorphic and Riparian Resources. Like the Project area, the Santa Clara River runs through the Newhall-Ventura property site. There also are several intermittent drainages throughout the Newhall-Ventura site. Because of the Santa Clara River and associated tributary drainages, the geomorphic and riparian resource impacts are expected to be the same or similar with respect to the Newhall-Ventura site and the Project area. The river geomorphic changes (natural or otherwise) may include changes to the existing hydraulics of the river course, increased scouring, increased water depths, and associated impacts on erosion, sedimentation, water quality, and aquatic and riparian river habitats.

Groundwater. The northern portions of the Newhall-Ventura site encompass a portion of the Piru Groundwater Basin along the Santa Clara River floodplain (refer to previous discussion of the Piru Groundwater Basin in **Subsection 3.3.2.2.2** [Temescal Ranch]). Development of the Newhall-Ventura site would be expected to impact percolation and potentially water quality in the Piru Groundwater Basin. As to the Specific Plan site within the Project area, the applicant's groundwater supplies from the Alluvial aquifer, which are presently used for agricultural purposes, would be converted to potable supply uses, resulting in no net increase in groundwater usage. Consequently, the Newhall-Ventura alternative site is not likely to lessen impacts to groundwater when compared to the Project area.

Biological Resources. A search of the CNDDDB, April 2005 edition, was conducted to identify known occurrences of sensitive species or habitats on the Newhall-Ventura alternative site. The database indicated that the site includes sensitive species, including the endangered least Bell's vireo, Western yellow-billed cuckoo, and the Santa Ana sucker, among others. In addition, CNDDDB indicated that the site contains sensitive habitats, including Southern Coast Live Oak Riparian Forest, Valley Oak Woodland, and California Walnut Woodland. Biological impacts related to development of the Newhall-Ventura alternative site would be similar to those associated with the development facilitated by the proposed Project. This is because both sites are within the critical habitat of the endangered least Bell's vireo, and have habitat suitable for the unarmored threespine stickleback and other riparian species. Potential biological impacts related to the general loss of habitat also would be similar on both sites. Given the above, the Newhall-Ventura alternative site would not result in fewer impacts than the development facilitated by the proposed Project with regard to impacts upon biological resources.

Jurisdictional Streams and Wetlands. The applicant's property in Ventura County is adjacent to the Project area, immediately downstream along the Santa Clara River. An approximately 787-acre portion of the Santa Clara River lies within the Project area, accounting for the majority of the area's jurisdictional waters. This compares to approximately 946 acres and 49 linear miles on the Newhall-Ventura alternative site. In addition, the Newhall-Ventura alternative site contains 53.8 miles of intermittent and ephemeral drainages that ultimately convey flows to the Santa Clara River. In total, the Newhall-Ventura property is comprised of approximately 990 acres of jurisdictional waters. Although available information was not sufficient to allow the mapping of wetlands on the site, it is assumed that jurisdictional riparian areas and palustrine fringe wetlands are present along the edges of the Santa Clara River. Depressional wetlands

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also may occur on site, but are likely limited in extent due to relatively steep topography and arid climate conditions.

As the total size of the Newhall-Ventura site is approximately 15,000 acres, the development facilitated by the proposed Project could be accommodated on the site. This alternative site is larger than the Project area, and both sites contain reaches of the Santa Clara River. Although the quantity and quality of jurisdictional streams and wetlands on these two sites are approximately similar, development on the Newhall-Ventura site would result in greater preservation of these resources because development could be designed to affect a smaller percentage of jurisdictional streams and wetlands due to the larger size of the Newhall-Ventura site. Therefore, the Newhall-Ventura alternative site could potentially be developed so as to reduce impacts to jurisdictional streams and wetlands compared to the proposed Project area.

Air Quality. Long-term air emissions from residential and commercial land uses are typically a result of the VMT generated by a project. The amount of vehicular-related air emissions generated by developing the Newhall-Ventura site would be expected to be greater than would occur from the development facilitated by the proposed Project due to the relative distances from I-5. Short-term construction-related activities and emissions at the two sites would generally be similar. Long-term air quality impacts generated by the development facilitated by the proposed Project would be expected to be greater if development were relocated to the Newhall-Ventura alternative site. Therefore, development of the Newhall-Ventura alternative site would not be expected to result in fewer impacts than the Project area with regard to air quality impacts.

Traffic. It is assumed that internal traffic patterns on the Newhall-Ventura alternative site would operate in a manner similar to the Project area after build-out. This presumes that it is possible to create the proposed development concept in approximately the same spatial arrangement on both sites. Given this overall assumption, the primary difference between developing on the Newhall-Ventura site and developing the Project area is how vehicular traffic would move to and from the two sites. The alternative site is located a greater distance from existing traffic infrastructure than is the Project area; and the Newhall-Ventura site is further removed from a major north-south freeway corridor (I-5). Consequently, the amount of transportation infrastructure required to serve the Newhall-Ventura site would be greater than that needed to serve the Project area. No secondary connection with I-5 would be possible with the Newhall-Ventura alternative; SR-126 would serve as the primary means of connection with the employment centers in the Santa Clarita Valley. Under this condition, SR-126 and its interchange at I-5 would be more heavily impacted with the Newhall-Ventura alternative. However, it also would be true that, because no connection with I-5 at Magic Mountain Parkway and Valencia Boulevard would occur, impacts to the I-5 interchanges at Magic Mountain Parkway and Valencia Boulevard could be reduced. Travel distances and VMT between the Newhall-Ventura site and the surrounding employment centers found in the Santa Clarita Valley would be greater with development on the alternative site. In conclusion, development of the Newhall-Ventura site would be expected to increase impacts compared to the Project area with regard to traffic and circulation impacts. The increase in impacts is primarily due to: (a) the lack of a secondary connection with I-5, in which to distribute projected vehicle trips; (b) increased vehicle miles traveled between the alternative site and the employment centers found in the Santa Clarita Valley; and (c) a greater need to extend traffic infrastructure to the alternative site.

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Noise. If development were relocated to the Newhall-Ventura alternative site, vehicular noise emissions would occur over a wider area due to the greater distances traveled between the site and employment centers in the Santa Clarita Valley. Also, the adverse noise impact generated by vehicular travel at the Travel Village RV Park by the development facilitated by the proposed Project would likely be worsened because more traffic would travel past this location. However, the adverse short-term impacts caused by construction-related activities would not affect Travel Village if development were to occur on the Newhall-Ventura alternative site. Consequently, potential long-term noise impacts would be expected to be of a greater magnitude if the Newhall-Ventura alternative site were developed. On balance, development of the Newhall-Ventura alternative site would not be expected to result in less noise impacts when compared to the Project area.

Cultural/Paleontological Resources. Bibliographic references, previous survey reports, and archaeological site records were obtained from a CHRIS records search in order to identify prior archaeological studies and known cultural resources within or adjacent to the Newhall-Ventura alternative site. The records search was conducted on August 23 and 24, 2005, at SCCIC, at California State University, Fullerton. The study area contained the Newhall-Ventura alternative site and 0.25-mile search radius surrounding the site.

The CHRIS records search revealed that there are two known archaeological sites within the Newhall-Ventura alternative site. In addition, there is one isolated artifact recorded within the 0.25-mile search radius. Twenty-three surveys have been conducted within the study area, and an additional 16 "unmappable" surveys, lacking locational data, could potentially have included portions of the site. The Newhall-Ventura alternative site is considered sensitive for cultural resources.

Archaeological surveys of the 11,999-acre Specific Plan site identified eight prehistoric resources sites, one isolate location, and one historical site. Most of the identified sites have experienced minor to extensive disturbance, and known artifacts were collected from several sites during field investigations. As a result, the Project area is considered to have a very low density of archaeological remains.

Given the relatively large size of the Newhall-Ventura alternative site (approximately 15,000 acres), and the limited amount of cultural resources known to occur on the site, the impacts to cultural resources on the Newhall-Ventura alternative site would be similar to impacts on the Project area. Build-out of the development facilitated by the proposed Project would require less than one-half of the site, and development could likely be configured to avoid significant cultural resource impacts. On balance, development of the Newhall-Ventura alternative site instead of the Project area would not be expected to result in fewer impacts to cultural resources.

The Project area is underlain by several geological formations that have the potential to contain paleontological resources. Potential impacts to sensitive paleontological resources would be reduced to a less-than-significant level through the implementation of proposed mitigation measures. It is anticipated that if fossil-bearing geological formations were located on the Newhall-Ventura alternative site, implementation of similar mitigation measures also would reduce potential impacts to a less-than-significant level. Therefore, potential paleontological resource impacts that may be associated with the Newhall-Ventura alternative site and the Project area would be similar, and development of the Newhall-

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Ventura site instead of the Project area would not be expected to result in fewer impacts to paleontological resources.

Agriculture and Soils. The soils in the upland portions of the Newhall-Ventura alternative site are similar to those present on the Project area with respect to surface textures, depths, and erosion susceptibility. For agricultural purposes, there is a greater amount of prime, unique, and other important farmland on the Newhall-Ventura alternative site when compared to the Project area, and the blocks of agricultural land are generally larger in size thereby making them more viable for farming than the land found on the Project area. Both sites contain Prime and Unique Farmland, and Farmland of Statewide Importance. The Newhall-Ventura site has a greater amount of soils conducive to citrus production than does the Project area. In addition, Ventura County policies promote preservation of agricultural lands in lieu of urban development and development of the Newhall-Ventura site would be inconsistent with these policies. Consequently, development of the Newhall-Ventura site would not result in less impacts than the Project area with regard to impacts to agricultural resources.

Geology and Geologic Hazards. With respect to seismic hazards, the impact of developing the Newhall-Ventura alternative site would be similar to that on the Project area. Both sites are affected by faulting and would require mitigation of potential landslide hazards. However, from a grading standpoint, impacts on the Newhall-Ventura alternative site would be greater than those on the Project area. The terrain on the Newhall-Ventura site is steeper and more varied than on the Project area; thus more earthwork would be required to create land level enough to accommodate the same amount of development. Therefore, development of the Newhall-Ventura alternative site would not result in fewer impacts than the Project area with regard to geologic resources.

Land Use. Development of the Newhall-Ventura alternative site would convert existing agriculture, grazing, oil production, open space/ wildlife habitat land uses to urban uses. The Newhall-Ventura site is currently designated Agriculture (40-acre minimum lot size) and Open Space (80-acre minimum lot size). A General Plan Amendment to change the Newhall-Ventura site's Open Space and Agriculture land use designation to an urban land use would require voter approval under the requirements of the Ventura County SOAR initiative. Thus, development of the Newhall-Ventura alternative site would not be consistent with Ventura County policies. As a result, development of the Newhall-Ventura alternative site would not result in fewer impacts than the Project area from a land use policy consistency perspective.

Visual Resources. A major state highway (SR-126) runs through both the Newhall-Ventura alternative site and the Project area, and both sites are visible to a large, mobile viewing audience. The portion of SR-126 that traverses the Newhall-Ventura site is designated a Local Scenic Highway by Ventura County. Both sites would also involve the conversion of a largely rural area to an urban condition if they were to be developed. However, portions of the Project area are hidden from viewers along SR-126 by intervening topography. The Newhall-Ventura site is not nearly as hidden from view, and topographic conditions indicate that most, if not all, development on this site would be visible to travelers on SR-126 and would significantly impact the visually rural character of the Santa Clara River Valley (probably more so than the development facilitated by the proposed Project, due to its greater visibility). Therefore, the significant visual impact that the Project area would have on the Valley would be transferred to the west from Los Angeles County into Ventura County, and would be intensified. On the other hand, the

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Newhall-Ventura site is not visible to existing residents in Chiquito Canyon, and the significant impact resulting from the development at this location would be avoided if the Newhall-Ventura site were developed instead of the Project area. Due to this environmental trade-off of impacts (*i.e.*, greater impact in Ventura County but less impact in Chiquito Canyon), the visual impact of developing the Newhall-Ventura site is more or less similar to the impact created by the development facilitated by the proposed Project. On balance, the Newhall-Ventura alternative site would result in similar impacts to the Project area with regard to visual impacts. Development of the Newhall-Ventura alternative site would not be expected to reduce impacts to visual resources when compared to the Project area.

Parks, Recreation, and Trails. The Newhall-Ventura alternative site and the Project area would be required to meet local Quimby Act requirements for the provision of park space. At over 15,000 acres, the Newhall-Ventura alternative site could accommodate a project the size of the Project area and still preserve in perpetuity a similar amount of land that would be dedicated to the public for open space purposes. Based on the above information, impacts to parks and recreation would be similar to the Project area. Development of the Newhall-Ventura alternative site would not be expected to reduce impacts compared to the Project area with respect to parks, recreation, and trails.

Public Safety. Past and present uses of the Newhall-Ventura alternative site (namely oil and natural gas operations, grazing and some agriculture) are similar in nature to those on the Project area. The Newhall-Ventura site has some of the same natural gas and electrical transmission lines traversing it as are found on the Project area and both sites are within the inundation area of Castaic Dam. Consequently, potential public safety impacts relating to these uses would be similar on both sites. Given the above, development of the Newhall-Ventura alternative site would not reduce impacts compared to the Project area with respect to environmental safety issues.

Public Services

Fire and Police Services. It is assumed that the Newhall-Ventura alternative site would be required to fund an adequate level of fire protection and law enforcement to ensure sufficient on-site protection. However, the Newhall-Ventura site is located in eastern Ventura County, an area that is not urbanizing to any substantive degree. As a result, in the event of an emergency on the site, Ventura County agencies would need to travel much farther distances to this site than would Los Angeles County agencies if development were to occur on the Project area. In the event of an emergency, it is likely that Los Angeles County would need to assist Ventura County agencies if the Newhall-Ventura alternative site were developed instead of the Project area. The Project area is much closer to an existing urban area, which is able to handle large-scale emergencies. Consequently, impacts related to fire and law enforcement protection would be worse if development were relocated to the Newhall-Ventura alternative site. Thus, development of the Newhall-Ventura alternative site would not result in fewer impacts than the Project area with regard to impacts on fire and law enforcement services.

Schools and Libraries. From an education and library standpoint, it is assumed that the Newhall-Ventura alternative site would need to meet similar requirements for funding in order to educate and provide library services for its residents. Based on the above information, impacts to schools and libraries under the Newhall-Ventura alternative would be expected to be similar to those on the Project area. Thus,

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development of the Newhall-Ventura alternative site would not be expected to result in fewer impacts than on the Project area with respect to impacts upon education or libraries.

Water Availability. The potable water demands of development on the Newhall-Ventura alternative site are expected to be similar to the water for the Project area. The Newhall-Ventura alternative site is partially within the service area boundaries of CLWA and UWCD (water wholesalers) and is not served by a water retailer. The Newhall-Ventura alternative site would not need to annex any additional land into CLWA's or UWCD's service area, but would need to either annex to an existing water retailer service area or create a new water retail agency. Because the Newhall-Ventura alternative site is adjacent to the Project area, and because the applicant owns both sites, it is likely that the conditions of water availability are similar. Therefore, development of the Newhall-Ventura alternative site would not be expected to reduce impacts compared to the Project area with regard to water availability.

Energy Use and Solid Waste Disposal. Regarding energy use and solid waste disposal, the same amount of energy (natural gas and electricity) demand and solid waste generation would occur regardless of which site were developed. Access to energy (electricity and natural gas) sources and to solid waste disposal sites also are approximately the same for both sites. However, because the Newhall-Ventura alternative would generate a larger amount of vehicular traffic miles traveled, an increased demand for petroleum products would be expected. Consequently, development of the Newhall-Ventura alternative would not be expected to result in fewer impacts than the Project area with respect to the impacts on petroleum products.

Hazards and Hazardous Materials. Man-made and natural hazards are similar on the Project area and the Newhall-Ventura alternative sites. Therefore, development of the Newhall-Ventura site would not be expected to result in less impacts than the Project area with regard to hazards and hazardous materials.

Socioeconomics and Environmental Justice. The Newhall-Ventura alternative site is in a rural location, one that is not projected for urban development in any regional planning horizon. The Newhall-Ventura site falls into Census Tract 200 in southern Ventura County. SCAG projects that the population within this Census Tract will reach approximately 2,725 by 2020. This projection predicts a much slower growth rate than projections for Los Angeles County and significantly lower population, housing, and employment numbers than the Project area. Because the Newhall-Ventura alternative site is not planned for this level of development, developing this site rather than the Project area would result in significant unplanned population, housing, and employment impacts. The 15,000-acre size of the Newhall-Ventura site could physically accommodate the urban development facilitated by the proposed Project, which would provide housing and employment opportunities to accommodate regional population growth. However, it is unlikely that urban development could be accommodated from a regulatory standpoint on the Newhall-Ventura site due to existing land use designation constraints and Ventura County's SOAR requirements (refer to **Subsection 3.3.2.3**, Land Use). Although the Newhall-Ventura site is adequate in terms of size, it is unlikely that it could be used to provide the housing and jobs-related benefits that would result from the use of the Project area. Development of the Newhall-Ventura alternative site would not result in less impacts than the Project area with respect to socioeconomic issues.

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Executive Order No. 12898 *Federal Actions to Address Environmental Justice I Minority and Low-Income Populations*, signed by President Clinton on February 11, 1994, requires federal agencies to identify and address disproportionately high and adverse effects of federal actions on the health and environment of minority and low-income populations. According to federal guidelines, the environmental justice screening analysis assesses whether "the potentially affected communities includes minority and/or low-income populations." The guidelines indicate that a minority population exists when the minority population is 50 percent of affected area's total population. The 50 percent threshold also is used to determine the presence of low-income populations in the study area.

The population in the Newhall-Ventura study area (Census Block 200) is not composed of 50 percent or more minorities and the economic status of the residents in the study area is not 50 percent or more low income. Therefore, development of either the Newhall-Ventura alternative site or the Project area would not result in disproportionate impacts on minority or low-income populations.

3.3.3 Total Avoidance of Jurisdictional Waters Alternative

The Specific Plan site within the Project area requires a section 404 permit in order to construct the land uses approved by the Specific Plan.² The Total Avoidance alternative assumes that the Corps does not approve a long-term section 404 permit, which would allow implementation of the RMDP conservation and infrastructure components for the Specific Plan within the Corps' jurisdiction. Under this alternative, development of Specific Plan land uses could theoretically occur, but only in those areas of the Specific Plan that could be accessed and constructed while still avoiding all areas within the Corps' jurisdiction. However, as discussed below, this alternative is not considered reasonable or feasible because, while it would lessen significant environmental impacts relative to implementation of the approved Specific Plan, it would not meet the applicant's objectives/purpose and need, and would not allow feasible development to occur consistent with the approved Specific Plan (see **Table 3.0-4**).

² Under the proposed Project, a section 404 permit is not requested for the VCC or Entrada planning areas.

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**Table 3.0-4
Comparison of Impacts and Issues for the Total Avoidance Alternative**

Environmental Issue/Consideration	Total Avoidance Alternative
Likely to Lessen Impacts Relative to Approved Specific Plan? ¹	Yes
Able to Substantially Meet Basic Objectives/Purpose and Need?	No ²
Feasible to Develop Site?	No ²

Notes:

¹ This is because most of the Project area cannot feasibly be developed to facilitate the approved Specific Plan because of the need to avoid all areas within Corps jurisdiction. Without development of the approved Specific Plan, none of the open space to be dedicated within the Specific Plan area would occur.

² Implementation of the total avoidance alternative do not meet any of the basic objectives/purpose and need of the proposed Project, including the applicant's objectives in implementing the approved Specific Plan, because the Specific Plan site could not feasibly be developed as approved and, at the same time, avoid all areas within the Corps' jurisdiction..

Source: URS, 2008.

For purposes of NEPA and CEQA analysis of alternatives, the Total Avoidance alternative is *different* from the "No Action/No Project" alternative evaluated in detail in this EIS/EIR. Under the "No Action/No Project" alternative, *neither* the Corps nor CDFG would issue any of the requested permits, agreements, and authorizations required to implement both the RMDP and SCP components of the proposed Project. Accordingly, under the "No Action/No Project" alternative, none of the development facilitated by approval of the RMDP would occur, none of the open space within the Project area would be dedicated or managed, and none of the spineflower preserves and associated management would be implemented.

3.3.3.1 Meeting Proposed Project Objectives/Purpose and Need

The proposed Project's objectives/purpose and need are described in detail in **Section 2.0**, Project Description, of this EIS/EIR. Summarized below is the statement of the Project objectives and purpose/need that would not be met if the Total Avoidance alternative were implemented, including the objectives associated with development of the Specific Plan, and the VCC and Entrada planning areas.

RMDP/SCP Purpose and Need Summary

- The purpose and need of the RMDP component of the proposed Project is to practicably and feasibly achieve the basic objectives of the approved Specific Plan and thereby help meet the regional demand for housing and jobs in northern Los Angeles County; and
- The purpose and need of the SCP component of the proposed Project is to implement a practicable and feasible spineflower conservation plan that provides for the long-term persistence of spineflower within the applicant's land containing known spineflower populations, and to authorize the take of spineflower in areas located outside of designated preserves, in order to facilitate development in portions of the Specific Plan, and the VCC and Entrada planning areas.

Specific Plan Objectives Summary

- Create a major new community with inter-related Villages that allows for residential, commercial, and industrial development, while preserving significant natural resources, important landforms, and open areas;
- Avoid leapfrog development and accommodate projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Arrange land uses to reduce vehicle miles traveled and energy consumption;
- Provide a complementary and supportive array of land uses, which will enable development of a community with homes, shopping, employment, schools, recreation, cultural and worship facilities, public services, and open areas;
- Organize development into Villages to create a unique identity and sense of community for each;
- Design Villages in which a variety of higher-intensity residential and non-residential land uses are located in proximity to each other and to major road corridors and transit stops;
- Establish land uses and development regulations, which permit a wide-range of housing densities, types, styles, prices, and tenancy (for sale and rental);
- Designate sites for needed public facilities such as schools, fire stations, libraries, water reclamation plant, and parks;
- Provide a tax base to support public services;
- Design a mobility system, which includes alternatives to automobile use;
- Provide a safe, efficient, and aesthetically attractive street system with convenient connections to adjoining regional transportation routes;
- Facilitate public transit by reserving right-of-way for future Metrolink line, space for a park and ride and/or Metrolink station, and by providing bus pull-ins along highways;
- Establish a diverse system of pedestrian and bicycle trails, segregated from vehicle traffic, to serve as an alternative to the automobile because the development would be too far removed from existing infrastructure to allow for commuting by walking or biking;
- Retain a major Open Area, which could act as a regional recreational park and an ecological preserve;

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- Provide Neighborhood and Community Parks and improvements, which satisfy park dedication requirements and meet the recreational needs of local residents;
- Locate Neighborhood Parks adjacent to schools and establish joint-use agreements between park and school districts;
- Provide a range of recreational opportunities, including active and passive parks, an 18-hole golf course; and a recreational lake;
- Provide an extensive system of pedestrian, bicycle, and hiking trails within the Villages, and hiking trails within the Special Management Areas and Open Area;
- Preserve the site of the historical Asistencia (San Fernando Mission Annex);
- Provide a 6.8 mgd water reclamation plant and supplementary distribution system to use recycled water; and
- Implement the spineflower mitigation program, which is part of the approved Specific Plan.

As to the SCP component of the proposed Project, the Total Avoidance alternative also would not satisfy the objective/purpose and need set forth in the SCP, because the alternative would not allow a comprehensive approach to preserving and protecting the spineflower populations not only on the Specific Plan site, but also in a portion of the Entrada planning area. The majority of the proposed spineflower preserves are located in upland areas outside of the Corps' jurisdiction. However, by restricting all Specific Plan development to non-jurisdictional areas under the Total Avoidance alternative, the alternative may have the effect of reducing the spineflower preserve acreage within the Specific Plan site in order to accommodate Specific Plan infrastructure and development that could not be constructed in the Corps' jurisdictional areas. In addition, by excluding Specific Plan development in the Corps' jurisdiction, the Total Avoidance alternative would not allow for development of spineflower preserves connected to open space areas within the entire Project area; thus, impeding the basic objectives/purpose and need of the SCP component of the proposed Project.

VCC Objectives Summary

- The VCC site is considered a major expansion area for the existing Valencia industrial/business park/office center, which serves the growing business and employment needs of the Santa Clarita Valley and surrounding communities;
- The VCC is designed to accommodate a broad range of employment uses, including light manufacturing, research and development, warehousing, distribution uses, office uses, and service-orientated businesses in close proximity to the Santa Clarita Valley and surrounding communities;
- Proximity to two major transportation facilities, the I-5 and SR-126, and the existing industrial center in Valencia, combine to make the VCC a logical site for industrial/business park/office uses to serve the Santa Clarita Valley and surrounding communities; and

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- Facilitate completion of the Valencia industrial/business park/office center, and authorize the take of spineflower in the VCC planning area.

Entrada Objectives Summary

- A portion of the Entrada planning area would include a mix of residential, commercial, non-residential, open space, and public services in close proximity to the I-5 corridor and surrounding existing uses within the Santa Clarita Valley;
- Similar to the Specific Plan site, Entrada avoids leap-frog development and accommodates projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers;
- Similar to the Specific Plan site, Entrada land uses are arranged to reduce vehicle miles traveled and energy consumption; and
- A portion of Entrada would include the implementation of a practicable and feasible spineflower conservation plan that would provide for the long-term persistence of spineflower within the Entrada planning area, while facilitating development within a portion of Entrada.

3.3.3.2 Planning/Economic Infeasibility

Under the Total Avoidance alternative, the following RMDP/SCP infrastructure associated with the Santa Clara River could not be implemented because such infrastructure is within the Corps' jurisdiction:

- Three bridges crossing over the Santa Clara River to facilitate the Specific Plan's approved traffic circulation plan and associated land uses;
- Bank stabilization features along portions of the north and south banks of the Santa Clara River, which provide flood protection and facilitate development of residential, non-residential, and commercial uses approved by the Specific Plan;
- Installation of the proposed utility corridor along a portion of the north bank of the Santa Clara River, which would facilitate residential, non-residential, and commercial development approved by the Specific Plan;
- Installation of storm drain outlets along portions of the north and south banks of the River, which facilitate approved Specific Plan development; and
- SR-126 road widening, which is a part of Caltrans' local and regional effort to accommodate existing and approved development in the Santa Clarita Valley, including the approved Specific Plan, VCC, and other properties west of I-5, including Entrada.

As to the Santa Clara River bridge crossings, the analysis in the Newhall Ranch Revised Additional Analysis (Vol. VIII, May 2003) found that the bridge crossings were essential for the safe and adequate

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circulation of traffic for the Specific Plan and the region. The bridge crossings also furthered numerous Los Angeles County General Plan transportation, land use, noise, safety, energy conservation, and air quality goals and policies. In addition, the bridges connect the development areas south of Santa Clara River to SR-126, a major east-west state highway that serves local and regional traffic. Each bridge crossing also connects to, and is a continuation of, existing arterial roads (*e.g.*, Commerce Center Drive, Chiquito Canyon Road), creating a functional regional circulation system. The bridges, therefore, improve traffic flow, efficiency, and reduce automobile vehicles miles traveled. Further, the bridge crossings were found to provide an opportunity for utilities to serve the Specific Plan without additional disturbance to riparian resources. The bridges also ensure multiple access routes in the event of fire or other unforeseen events, and they ensure that response times in and around the Specific Plan site are not impaired (*e.g.*, police, fire, and emergency medical).³

Conversely, if the Specific Plan were implemented without the bridge crossings (and thereby avoiding impacts to Corps' jurisdiction) an efficient and functional circulation system for the Specific Plan and the region would be significantly impaired. Los Angeles General Plan goals and policies related to transportation, land use, noise, safety, energy conservation, and air quality would be hindered, as the Specific Plan site and the surrounding roadway system (without the bridges) would be subjected to additional vehicles miles traveled and transportation-related noise, fuel consumption, safety hazards, and air emissions. From a land use perspective, implementation of the Specific Plan without the bridge crossings also would trigger the need for amendments to the General Plan, Area Plan, and Specific Plan because the changes would conflict with the approved General Plan and Specific Plan.

As to the bank stabilization features along portions of the north and south banks of the Santa Clara River, including storm drain installation, the infrastructure provides necessary flood/drainage protection and facilitates development of residential, non-residential, and mixed-use/commercial uses approved by the Specific Plan. In addition, while the bank stabilization would encroach into the existing River channel in some areas, in most areas, it would be placed outside of the Corps' jurisdiction. Elimination of the bank stabilization would render infeasible the approved Specific Plan development in the vicinity of the Santa Clara River. If the bank stabilization and drainage outlets were moved into upland areas, it would further reduce developable areas within the approved Specific Plan, and trigger the need for General Plan, Area Plan, and Specific Plan amendments.

Finally, as to Caltrans' SR-126 road widening project, total avoidance of the Corps' jurisdiction would impede this essential local and regional project that is planned to accommodate existing and approved development in the Santa Clarita Valley, including portions of the approved Specific Plan, VCC, and other properties west of I-5, including Entrada.

³ See, Newhall Ranch Specific Plan Revised Additional Analysis (Vol. VIII, May 2003), Section 2.4, pp. 2.4-39 - 2.4-52, and "Newhall Ranch Engineering Design Summary and Report for Bridge Crossings of the Santa Clara River," Sikand Engineering Associates (Revised August 7, 2000), found in the Newhall Ranch Draft Additional Analysis (Vol. III, April 2001).

3.3.3.3 Logistical Infeasibility

The Total Avoidance alternative also would limit grading to areas between the tributary drainages located within the Specific Plan, and create numerous grading pockets as compared to the Specific Plan's approved Conceptual Grading Plan (see, **Figure 2.0-19**). In addition, if the Total Avoidance alternative was implemented, it would cause an imbalance in on-site grading, in that the cut needed would far exceed the available locations for fill; and, thus, result in a need for a net off-site export of over 19.9 million cubic yards. This, in turn, would greatly increase truck trips (approximately 1.5 million truck trips or approximately 3,320 days of truck traffic) to and from the Specific Plan site, increasing air emissions, noise impacts, and traffic impacts from the increased truck trips, all of which is inconsistent with the approved Specific Plan's provisions calling for a balanced on-site cut and fill grading operation.

For all the above planning/economic and logistical reasons, the Total Avoidance alternative is considered infeasible and not analyzed further in this EIS/EIR.

3.3.4 **Off-Site Alternative Locations Conclusion**

As shown on **Table 3.0-3**, above, implementation of the proposed Project is the preferred option, when compared to development of any of the three off-site alternative locations (Hathaway Ranch, Temescal Ranch, and Newhall-Ventura). Specifically, development on the Hathaway Ranch alternative site would be expected to result in potentially equal or greater impacts in 13 environmental categories (hydrology and water quality, flood control, groundwater, air quality, traffic, noise, cultural resources, paleontological resources, geology and geologic hazards, land use, parks/recreation/trails, public services, socioeconomics/environmental justice). Conversely, when compared to the proposed Project, the Hathaway Ranch site would result in fewer impacts in only seven environmental categories (geomorphic and riparian resources, biological resources, jurisdictional streams and wetlands, agriculture and soils, visual resources, public safety, and hazards and hazardous materials).

As to the Temescal Ranch site, development would be expected to result in equal or greater impacts in 17 environmental categories (hydrology and water quality, flood control, groundwater, jurisdictional streams and wetlands, air quality, traffic, noise, cultural resources, paleontological resources, geology and geologic hazards, land use, visual, parks/recreation/trails, public safety, public services, hazards and hazardous materials, and socioeconomics/environmental justice). Conversely, when compared to the proposed Project, the Temescal Ranch site would result in fewer impacts in only three environmental categories (geomorphic and riparian resources, biological resources, agriculture and soils).

As to the Newhall-Ventura site, equal or greater impacts would be expected to occur in 19 environmental categories (hydrology and water quality, flood control, geomorphic and riparian resources, groundwater, biological resources, air quality, traffic, noise, cultural resources, paleontological resources, agriculture and soils, geology and geologic hazards, land use, visual, parks/recreation/trails, public safety, public services, hazards and hazardous materials, and socioeconomics/environmental justice). Conversely, when compared to the proposed Project, the Newhall-Ventura site would result in fewer impacts in only one environmental category (jurisdictional streams and wetlands) when compared with the proposed Project.

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The above analysis also indicates that the three off-site alternatives (Hathaway Ranch, Temescal Ranch, Newhall-Ventura) have a greater potential to result in growth-inducing impacts because none of the sites currently support infrastructure like that required to facilitate development under the proposed Project. Once that infrastructure was developed, it is likely that additional commercial and residential development would arise along new roads and utility corridors. As a result, it is anticipated that areas that are currently quite rural in nature would be incrementally urbanized when compared to the planned development facilitated by the proposed Project.

Based on the above analysis, none of the three off-site alternatives would clearly result in fewer overall impacts than the proposed Project. In addition, none of the alternative sites are considered to be capable of meeting the applicant's primary objectives/purpose and need associated with the proposed Project. Therefore, the three off-site alternatives have been eliminated from further consideration in this EIS/EIR.

As to the Total Avoidance alternative, it is likely to result in fewer environmental impacts relative to the proposed Project; however, the alternative does not meet a number of the applicant's primary objectives/purpose and need associated with the proposed Project. In addition, under this alternative, development of the Specific Plan site is rendered infeasible. For all these reasons, the Total Avoidance alternative has been eliminated from further consideration in this EIS/EIR.

3.4 OVERVIEW OF ON-SITE ALTERNATIVES ANALYZED

There are seven on-site alternatives described and analyzed in this EIS/EIR, including the No Action/No Project Alternative (Alternative 1), the applicant's proposed Project (Alternative 2), and five other "build" alternatives (Alternatives 3-7). Land use plans for six of the seven alternatives are shown graphically in the discussion of each alternative (there is no land use plan for the No Action/No Project Alternative). These alternatives are evaluated in **Section 4.0**, Environmental Impact Analysis of Alternatives and Mitigation, and **Section 5.0**, Comparison of Alternatives, of this EIS/EIR.

In general, the No-Action/No Project Alternative (Alternative 1) is a description of what would occur should the lead agencies (*i.e.*, the Corps and CDFG) decide not to approve the permits and other approvals associated with the proposed Project. Thus, the No Action/No Project Alternative would result in the inability to develop any of the RMDP infrastructure or facilitated development, none of the proposed spineflower preserves would be established, and none of the open space within the Project area would be dedicated and managed as contemplated by the proposed Project.⁴

Alternative 2 (proposed Project) would implement the RMDP and SCP components of the proposed Project and facilitate development of the approved Specific Plan, the approved development in the VCC planning area, and the planned development in a portion of the Entrada planning area.

⁴ If implemented, the Specific Plan would provide approximately 10,200 acres of open space (including the 1,517-acre Salt Creek area), the VCC planning area would provide 143.6 acres, and the Entrada portion would provide 129.5 acres, for a combined total of approximately 10,473 acres of open space (see **Table 3.0-5**).

3.0 DESCRIPTION OF ALTERNATIVES

The five build alternatives (Alternatives 3-7) address a broad range of different configurations for the major RMDP infrastructure in or adjacent to waters of the U.S. (Santa Clara River and tributary drainages), which are necessary to facilitate development of the Specific Plan. These alternatives also focus on different configurations for the spineflower preserves, which, in turn, affects the conservation of sensitive biotic and aquatic resources within a managed open space/preserve system.

Combined, the five build alternatives focus on avoiding or minimizing impacts to jurisdictional waters and spineflower. As impacts to jurisdictional waters are primarily associated with construction of bridges, bank stabilization, the grading and realigning of tributary drainages to facilitate Specific Plan development, and the conversion of minor tributary drainages to buried storm drains, alternative configurations for the major RMDP infrastructure are reflected in each build alternative. Similarly, because the proposed Project could impact spineflower outside of designated preserves, a broad range of spineflower preserve design options and their connectivity to open space were evaluated. Each of the build alternatives (Alternatives 3-7) reduce the RMDP infrastructure and increase the size of spineflower preserves, resulting in reduced development facilitated in the Specific Plan and the VCC and Entrada planning areas, and, correspondingly, minimize or avoid jurisdictional waters and spineflower impacts. The build alternatives also have been designed so that the impact reduction characteristics of the preceding alternative are generally incorporated into the subsequent alternatives.

For example, Alternative 3 would modify the proposed RMDP and SCP, respectively, by eliminating the planned Potrero Canyon Road bridge and increasing spineflower preserve acreage in the Specific Plan's Airport Mesa preserve and on Entrada. Alternative 4 would eliminate Potrero Canyon Road bridge, but retain the preserve acreage added by Alternative 3, and increase further the preserve acreage in the Specific Plan's Airport Mesa, Potrero, and Grapevine Mesa preserves and on Entrada. Alternative 4 also would add a spineflower preserve in the VCC planning area. Alternative 5 would widen tributary drainages, add a spineflower preserve within the VCC planning area, and would include the same three bridge crossings over the Santa Clara River as the proposed Project Alternative 6 would eliminate the planned Commerce Center Drive bridge and maximize spineflower preserve buffers and open space connectivity. Alternative 7 would incorporate a two-prong approach: (i) preservation of all spineflower occurrences along with 300-foot buffers; and (ii) elimination of two planned bridges (Commerce Center and Potrero Canyon Road bridges), and the avoidance of the 100-year floodplain along the Santa Clara River and nearly all of the tributary drainages.

3.0 DESCRIPTION OF ALTERNATIVES

**Table 3.0-5
Development Facilitated by RMDP Component of Proposed Project (Alternative 1)**

Land Use Category ¹	Acres	Res. ³ DU	Comm. ⁴ MSF ²	Percent Res. Reduction (DU)	Percent Comm. Reduction (MSF)	Total Res. Reduction (DU)	Total Comm. Reduction (MSF)
Specific Plan							
Single-Family Residential	-	-	-	100	100	9,081	0
Multi-Family Residential	-	-	-	100	100	11,804	0
Commercial	-	-	-	100	100	0	5.55
Public Facilities ⁵	-	-	-	100	100	-	-
Open Space ⁶	<i>Total Open Space of 10,200 acres not dedicated and managed under Alternative 1</i>						
Subtotal Specific Plan	0	0	0	100	100	20,885	5.55
Total Specific Plan Reduction Compared to Proposed Project							
Entrada Development							
Single-Family Residential	-	-	-	100	100	428	
Multi-Family Residential	-	-	-	100	100	1,297	
Commercial	-	-	-	100	100	0	0.45
Public Facilities	-	-	-	100	100	-	-
Open Space	<i>Total Open Space of 129.5 acres not dedicated and managed under Alternative 1</i>						
Subtotal Entrada	0	0	0	100	100		
Total Entrada Reduction Compared to Proposed Project						1,725	0.45
Valencia Commerce Center							
Commercial	-	-	-	100	100		1.10
Industrial Park	-	-	-	100	100		2.30
Public Facilities	-	-	-	100	100		-
Open Space	<i>Total Open Space of 143.6 acres not dedicated and managed under Alternative 1</i>						
Subtotal VCC	0	0	0	100	100		
Total VCC Percentage Reduction Compared to Proposed Project						0	3.40
Grand Total Project Percentage Reduction Compared to Proposed Project						22,610	9.40

Notes:

¹ In some instances, the land use categories for the Specific Plan, Entrada, and VCC have been consolidated to simplify presentation of the land use data.

² MSF means million square feet.

³ Residential includes single-family (detached homes) and multi-family (condo/townhomes).

⁴ Commercial includes business park, office, retail, etc.

⁵ Public Facilities includes parks, schools, libraries, etc.

⁶ Open Space means natural (preserved) and manufactured open space, and includes the Specific Plan's High Country SMA/SEA 20, River Corridor SMA/SEA 23, Open Areas, spineflower preservations areas, and other specified open areas, primarily located within the Specific Plan's Estate Residential designation. Open Space does not include the Salt Creek area, adjacent to the Specific Plan boundary, comprised of about 1,517 acres. If the Salt Creek area is included (as proposed in Alternative 2), the total Open Space is approximately 10,200 acres (8,683 + 1,517 = 10,200).

Source: The Newhall Land and Farming Company, 2008.

3.0 DESCRIPTION OF ALTERNATIVES

Each of the alternatives are summarized further below so that reviewers may evaluate the comparative merits of the proposed Project (Alternative 2) and the other identified alternatives.

Alternative 1 (No Action/No Project):

- The proposed RMDP and SCP would not be approved, and the requested federal and state permits and authorizations would not be granted.
- Existing land use practices, including oil and gas, grazing, and cultivated agriculture, would continue on the Specific Plan and Entrada sites.
- No spineflower preserves or natural open space/conservation areas would be dedicated and managed without Specific Plan, VCC, and Entrada approvals.
- The approved Specific Plan and remaining portion of the VCC would not be developed.
- The planned development within a portion of the Entrada project area would not occur.

Alternative 2 (Proposed Project):

- The RMDP and SCP would be approved as proposed by the applicant, and the requested federal and state permits and authorizations would be granted.
- Three major bridges across the Santa Clara River and associated bank stabilization would be constructed, including the Commerce Center Driver bridge (already approved by the Corps and CDFG in 1999), the Potrero Canyon Road bridge, and the Long Canyon Road bridge.
- Major tributary drainages would be regraded and realigned to facilitate and protect Specific Plan development.
- Several minor tributary drainages would be graded and converted to buried storm drain systems.
- Five spineflower preserves would be established within the Specific Plan site and the Entrada planning area, totaling 167.6 acres and preserving 68.6 percent of the cumulative area occupied by spineflower in the Project area;⁵ and no spineflower preserve would occur within the VCC planning area.
- The alternative would facilitate Specific Plan, VCC, and Entrada development, including 22,610 residential units and 9.40 million square feet (msf) of commercial/industrial/business park floor area.

⁵ The phrase "cumulative area occupied" is used in the SCP to mean the total area of mapped spineflower within the preserve between 2002 and 2007.

3.0 DESCRIPTION OF ALTERNATIVES

Alternative 3 (Elimination of Planned Potrero Bridge and Additional Spineflower Preserves):

- The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications.
- Two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Commerce Center Driver bridge (already approved by the Corps and CDFG in 1999) and the Long Canyon Road bridge. The Potrero Canyon Road bridge would not be constructed under this alternative.
- Major tributary drainages would be regraded and realigned under this alternative; however, the channels would be wider than those of the proposed Project. The cismontane alkali marsh in lower Potrero Canyon would be preserved.
- Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa area and on Entrada. This alternative would provide a total of 221.8 acres of spineflower preserves and protect 77.5 percent of the cumulative area occupied by spineflower in the Project area.
- This alternative would facilitate development within the Specific Plan, VCC, and Entrada, including 21,558 residential units and 9.33 msf of commercial/industrial/ business park floor area.

Alternative 4 (Elimination of Planned Potrero Bridge and Addition of VCC Spineflower Preserve):

- The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications.
- Two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Commerce Center Driver bridge (already approved by the Corps and CDFG in 1999) and the Long Canyon Road bridge. The Potrero Canyon Road bridge would not be constructed under this alternative.
- Major tributary drainages would be regraded and realigned under this alternative, but cismontane alkali marsh in lower Potrero Canyon would be preserved.
- Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa, Potrero Canyon, and Grapevine Mesa areas and on Entrada. A preserve also would be established within the VCC planning area. Alternative 4 would provide a total of 259.9 acres of spineflower preserves, and protect 82.5 percent of the cumulative area occupied by spineflower in the Project area.
- This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 21,846 residential units and 5.93 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

3.0 DESCRIPTION OF ALTERNATIVES

Alternative 5 (Widen Tributary Drainages and Addition of VCC Spineflower Preserve):

- The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications.
- The three bridges across the Santa Clara River and the associated bank stabilization would be constructed as under the proposed Project (Alternative 2).
- Major tributary drainages would be regraded and realigned under this alternative, but would result in impact reductions in the Chiquito Canyon, San Martinez Grande Canyon, and Potrero Canyon drainages compared to the proposed Project (Alternative 2).
- Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa, Potrero Canyon, and Grapevine Mesa areas and on Entrada. A preserve also would be established within the VCC planning area. Alternative 5 would provide a total of 338.6 acres of spineflower preserves, and protect 84.2 percent of the cumulative area occupied by spineflower in the Project area.
- This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 21,155 residential units and 5.87 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

Alternative 6 (Elimination of Planned Commerce Center Drive Bridge and Maximum Spineflower Expansion/Connectivity):

- The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications.
- Two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Potrero Canyon Road bridge (extended span similar to the proposed Project (Alternative 2) and Alternative 5) and the Long Canyon Road bridge. The previously approved Commerce Center Drive bridge would not be constructed under this alternative.
- Major tributary drainages would be regraded and realigned under this alternative. However, all realigned channels would be wider under this alternative than under the proposed Project (Alternative 2), and the majority of proposed road crossings along the channels would be bridges as opposed to culverts.
- This alternative would designate spineflower preserves on the applicant's property with known spineflower populations (Specific Plan, four preserves; Entrada, one preserve; and VCC, one preserve). Alternative 6 would significantly increase preserve acreage, and provide a total of 891.2 acres of spineflower preserves, protecting 88.5 percent of the cumulative area occupied by spineflower in the Project area.

3.0 DESCRIPTION OF ALTERNATIVES

- This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 20,212 residential units and 5.78 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

Alternative 7 (Avoidance of 100-Year Floodplain, Elimination of Two Planned Bridges, and Avoidance of Spineflower):

- The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications
- Only one bridge across the Santa Clara River would be constructed, located at Long Canyon Road. The Potrero Canyon Road bridge and the already approved Commerce Center Drive bridge would not be constructed under this alternative. Bank stabilization along the Santa Clara River would be constructed outside the 100-year floodplain.
- Under this alternative, major tributary drainages would not be regraded or realigned. Bank stabilization would be constructed to protect development, but would be located outside the 100-year floodplain of these drainages. In addition, the Middle Canyon and Magic Mountain Canyon drainages, which are proposed for conversion to buried storm drains under the proposed Project (Alternative 2), would be preserved.
- Alternative 7 was designed to achieve maximal avoidance of the cumulative area occupied by spineflower within the Project area. This alternative would designate spineflower preserves with 300 feet of expansion area surrounding the cumulative area occupied spineflower locations, and provide a total of 660.6 acres of spineflower preserves, protecting 98.2 percent of the cumulative area occupied by spineflower in the Project area.⁶
- This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 17,323 residential units and 3.82 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

3.4.1 Alternative 1: No Action/No Project Alternative

The purpose of the "No Project" alternative under CEQA and the "No Action" alternative under NEPA is to enable the lead agencies to evaluate the difference in impacts between approving and not approving a proposed action (or project). The Corps and CDFG have combined No Project/No Action alternative because under the circumstances present in this case they are identical. The combined No Project/No Action Alternative describes what would likely occur if neither the Corps nor CDFG issued any of the requested discretionary approvals for the proposed Project. The No Action/No Project Alternative would result in the inability to develop any of the RMDP infrastructure or facilitated development, none of the proposed spineflower preserves would be established, and none of the open space within the Project area would be dedicated and managed as contemplated by the proposed Project.

⁶ The term "expansion area" is used in the SCP to represent the area interior to the core that is not part of the cumulative area occupied. (See, *e.g.*, SCP, Table 3.0-34.)

3.0 DESCRIPTION OF ALTERNATIVES

Under the No Action/No Project Alternative (Alternative 1) there would be no change in existing land use practices and existing agriculture, grazing, and oil leasing activities would continue (see **Figure 2.0-6**, Existing Agricultural, Grazing, and Oil Leasing Activities in Project Area). There also would be no spineflower preserves established or other natural open space set-aside and managed, consistent with the RMDP and SCP components of the proposed Project. Because the requested federal and state permits, which are needed to facilitate development, would not be granted, the previously approved Specific Plan and VCC developments would not proceed; and, the planned development within a portion of the Entrada planning area would not proceed due to the existence of spineflower on site (see **Table 3.0-5**, above).

Some minimal level of urban development could theoretically occur in the Project area under the No Action/No Project Alternative by obtaining required Corps/CDFG permits on an individual tract map basis. However, this theoretical development approach is inconsistent with the primary objectives, purpose, and need of the approved Specific Plan. The creation of a major new community with interrelated villages that allow for the residential, commercial, and non-residential development contemplated in the approved Specific Plan would not occur. Similarly, the preservation of significant natural resources, important landforms, and open areas would not occur. Implementation of the spineflower mitigation program, which is part of the approved Specific Plan, also would not occur. It is also inconsistent with the approved Specific Plan's primary objective of managing on-site resources, and utilizing comprehensive, landscape-level planning within the Project area.

Other important objectives that would be precluded by tract map-by-tract map development include the issuance of a long-term section 404 permit and a Master Streambed Alteration Agreement within the RMDP area, which would streamline the permitting processes for qualified RMDP infrastructure projects, minimize duplication of effort, ensure consistency with overlapping jurisdiction and responsibilities between the Corps and CDFG, and facilitate long-term region-based planning and mitigation, management, monitoring, and maintenance efforts to address impacts to the affected riparian habitats.

Because tract map-by-tract map development is not the applicant's proposed Project, and because such an approach is not considered feasible or practicable for the reasons stated above, the theoretical development under such an option is not considered reasonably foreseeable in light of the specific facts and circumstances presented.

3.4.2 Alternative 2: Applicant's Proposed Project

As described in **Section 2.0**, Project Description, and **Subsection 3.4**, above, Alternative 2 represents the applicant's proposed Project. Under Alternative 2, the RMDP and SCP would be approved as proposed by the applicant and the requested federal and state permits, agreements, and authorizations would be granted. The three major bridges crossing the Santa Clara River would be constructed (Commerce Center Drive bridge, Potrero Canyon Road bridge, and Long Canyon Road bridge), along with bank stabilization. Major tributary drainages would be regraded and realigned to facilitate and protect Specific Plan development. Several minor tributaries also would be graded and converted to buried storm drain systems.

3.0 DESCRIPTION OF ALTERNATIVES

Five spineflower preserves would be established within the Specific Plan site and the Entrada planning area, totaling 167.6 acres and preserving 68.6 percent of the cumulative area occupied by spineflower in the Project area. No spineflower preserve would occur within the VCC planning area, facilitating completion of the build-out of the VCC commercial/business park complex. Alternative 2 would facilitate Specific Plan, VCC, and Entrada development, including 22,610 residential units and 9.40 msf of commercial/industrial/business park floor area.

3.4.2.1 Description of Regulated Activities

3.4.2.1.1 *RMDP Component (Alternative 2)*

Under the proposed RMDP, infrastructure would be constructed in and adjacent to the Santa Clara River and tributary drainages within the Project area, which is needed to implement the approved Specific Plan. The proposed RMDP infrastructure is described in detail in **Subsection 2.6** of this EIS/EIR.

Santa Clara River. **Figure 3.0-3** depicts the locations of the Alternative 2 proposed RMDP Santa Clara River features relative to river jurisdictional areas. As shown, two proposed bridges, Potrero Canyon bridge and Long Canyon Road bridge, and one previously approved bridge, Commerce Center Drive Bridge, would be located across the main stem of the Santa Clara River. As shown, buried bank stabilization would be installed on the north side of the Santa Clara River from Castaic Creek to the western Project boundary. The WRP outfall to the Santa Clara River also would be installed as part of the approved Newhall Ranch WRP. As shown, the geofabric utility corridor bank protection is proposed on the north side of the Santa Clara River between San Martinez Grande Canyon and Chiquito Canyon. Buried bank stabilization would be installed on the south side of the Santa Clara River from the vicinity of the proposed Long Canyon Road Bridge to the vicinity of the proposed Potrero Canyon Bridge. As shown, bank stabilization areas exist on the north and south banks of the Santa Clara River.

Figure 3.0-3 also presents three Santa Clara River cross-sections (A, B, and C) that depict existing and proposed surface elevations, including variations due to proposed fill and bank stabilization features. For example, up to approximately 20 feet of fill is proposed on the south side of the Santa Clara River to the west of the proposed Long Canyon Road Bridge (refer to cross section B on **Figure 3.0-3**). As shown in **Figure 3.0-3**, the Santa Clara River remains in a largely preserved condition under this alternative. **Figure 3.0-3** depicts the proposed RMDP riparian/upland revegetation zones in green and the newly created river channel in blue.

Table 3.0-6 summarizes the characteristics of the major RMDP infrastructure along the Santa Clara River, including north side (20,016 lf) and south side (9,763 lf) buried bank stabilization to be constructed along the Santa Clara River. This table also shows 22 storm drain outlets along the north bank and three such outlets on the south bank of the Santa Clara River (25 storm drain outlets total). In addition, the table documents the length, width, and vertical clearance of the three bridges, as well as the number of piers supporting the bridges.