

4.0 ALTERNATIVES

INTRODUCTION

This section of the Environmental Impact Report (EIR) provides a comparative analysis of the merits of alternatives to the proposed project pursuant to Section 15126.6 of the *California Environmental Quality Act (CEQA) Guidelines*, as amended. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant effects of the project. According to the *State CEQA Guidelines*, the EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the project. When addressing feasibility, the *State CEQA Guidelines* Section 15126.6 states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The *State CEQA Guidelines* also specify that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the project.

Therefore, based on the *State CEQA Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. These factors would be unique for each project.

Project Objectives

As set forth in **Section 2.0, Project Description**, the applicant proposes to redevelop uses on the project site in order to meet the following objectives:

- Fulfill the City’s General Plan and Local Coastal Program objectives for commercial development in the Civic Center area.
- Provide several compatible uses, meeting both local and visitor-serving needs, within one shopping center in a convenient location with shared parking.
- Afford a wider range of organic grocery and produce options to support the Malibu community and reduce reliance on out-of-town markets and vehicle trips.
- Extend the shopping experience that exists on Cross Creek Road into a park-like atmosphere, which will provide a physical and visual link to Legacy Park.

- Situate the project in an area where it is clustered with other similar uses along the eastern portion of Civic Center Way.
- Increase pedestrian interaction among the business and public spaces along Civic Center Way and Cross Creek Road.
- Create a visually appealing and inviting project to add to the Civic Center of Malibu.
- Revegetate the site with plantings that incorporate the plants species of both Malibu's and the Santa Monica Mountain's native coastal plant community.
- Provide an aesthetic relationship with the Santa Monica Mountains and Malibu Creek.
- Minimize and eliminate negative impacts to the neighborhood.
- Deliver project features that contribute significant benefits to the community.
- Comply with Measure R.

SELECTION OF ALTERNATIVES FOR ANALYSIS

According to the *State CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or substantially lessen the significant effects of the project. The *State CEQA Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. The alternative discussion should also provide decision makers with an understanding of the merits and disadvantages of these alternatives.

Section 3.0, Environmental Impact Analysis, of this EIR concludes that proposed project implementation would result in significant and unavoidable environmental impacts. These impacts include short-term noise impacts during construction.

In response to these impacts, the City of Malibu, as Lead Agency, identified and considered several alternatives to the proposed project to determine if these alternatives could avoid or substantially lessen these significant impacts. These alternatives included a no-project alternative, a reduced ancillary retail square footage alternative, a two-story building alternative, a reduced supermarket square footage alternative, an alternate site in the Civic Center area alternative, an alternative uses alternative, and a subterranean parking lot alternative. However, as described below, the reduced supermarket square footage alternative, the alternative site alternative, the alternative use alternative, and the subterranean parking alternative were all found to be infeasible and therefore were eliminated from detailed consideration. The remaining three alternatives are evaluated in detail below.

The *State CEQA Guidelines* state that an “EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”¹

The *State CEQA Guidelines* also state that “[t]he range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.”²

In defining the feasibility of alternatives, the *State CEQA Guidelines* state that “[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.”³

The limitations of the Malibu General Plan and the Local Coastal Program (LCP) are constraints which could make an alternative infeasible and which the Lead Agency can consider in limiting its range of alternatives.⁴ A narrow range of alternatives is permitted where, due to legal, planning and other constraints, the agency does not have a broader range of potentially feasible alternatives to choose from.⁵

Taking into account the requirements of the Malibu General Plan, Zoning Code, and LCP that strictly limit the uses and floor to area ratio (FAR) of any development proposed for the site, the EIR’s alternatives analysis considers a “reasonable range” of alternatives. The applicable constraints and project location dictate that any alternative will have substantially the same impacts as the project.

¹ *State CEQA Guidelines* Section 8 15126.6(a)

² *State CEQA Guidelines* Section 15126.6(f)

³ *State CEQA Guidelines* Section 15126.6(f)(1)

⁴ See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 569-573; *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1141-1142; *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1751-1754.

⁵ See *Marin Mun. Water Dist. v. KG Land California Corp.* (1991) 235 Cal.App.3d 1652, 1664-1666; *Remy & Thomas* (11th Ed. 2007), § p. 567, citing *Mountains Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 135-136.

The LCP specifies that the maximum FAR in the Civic Center is 0.15, except that the project FAR may be increased to 0.20 if public benefits and amenities are provided pursuant to a development agreement or planned development.⁶

The LCP requires that all commercial projects in the Civic Center provide at least 25 percent open space and at least 40 percent landscaping.⁷ Furthermore, the LCP includes broad front, rear, and side yard requirements.⁸

The General Plan and LCP require that the project incorporate recreational opportunities and allow for pedestrian and bicycle circulation.⁹

The Malibu General Plan Land Use Policies 4.1, 4.3.2, and Implementation Measure 36 require commercial buildings to be equivalent in height and bulk with adjacent residences. The LCP also requires that the project be designed to “minimize conflicts with adjacent residential uses.”¹⁰

There are additional site constraints. The Fire Department requires 26-foot access roads with appropriate turn-arounds and requires that any structures be reached within a 150-foot fire access radius.¹¹

Alternatives considered but not evaluated in detail

Section 15126.6(c) of the *State CEQA Guidelines* states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Provided below are the reasons for not providing detailed evaluation of some of the alternatives initially developed by the Lead Agency.

Alternative Site

The proposed project consists of the development of the two contiguous parcels at the corner of Civic Center Way and Cross Creek Road in the Civic Center area of the City of Malibu. Specifically, the objectives of the project focus on the development of the site with a commercial shopping center which

⁶ LCP, Land Use Policy 5.18; LIP, §3.8(A)(5)(e)(4).

⁷ LIP, § 3.8(A)(5)(b).

⁸ LIP, § 3.8 (A)(2).

⁹ See General Plan Land Use Goal 3 and Land Use Policies 2.1.6, 4.3.5, and 4.36; LCP Land Use Policies 5.8 and 5.14.

¹⁰ LCP, Land Use Policy 5.9.

¹¹ Uniform Fire Code, § 902.2.1.

provides several compatible uses, meeting both local and visitor-serving needs, within one convenient location with shared parking. While other vacant, unentitled, parcels are left in the Civic Center area they are located west of the County Library/Courthouse complex, bordering on Stuart Ranch Road. These parcels are separated from the cluster of retail/restaurant development along Cross Creek Road, and by the approved, but as yet unbuilt, La Paz office-retail development and the County parcel. This alternative is inconsistent with project objectives, since clustering of retail development is a goal not only of the proposed project, but of the City's LCP, and General Plan. It would not fulfill the project objective of clustering commercial development with other similar uses to increase pedestrian interaction along Civic Center Way and Cross Creek Road. Lastly, the development of the same uses at a different location would likely result in similar construction related noise impacts. Thus, the selection of an alternative site may not avoid significant impacts.

As indicated in *State CEQA Guidelines* Section 15126.6(c) "among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts." As discussed above, the relocation of the project to an alternative site would not be feasible because developing an alternative site would not meet the project, LCP, and the City's General Plan objectives, and because development on an alternative site would not necessarily avoid or substantially lessen any of the significant effects of the project. Therefore, this alternative has been eliminated from detailed consideration.

Reduced Supermarket Square Footage Alternative

The reduction of the supermarket square footage would allow for the provision of more open space on the project site, in accordance with the requirements of the LCP that all commercial projects in the Civic Center provide at least 25 percent open space and at least 40 percent landscaping. However, reduction of the market square footage would not be feasible as the size of the market currently described under the proposed project is the minimum square footage required for a Whole Foods market, the proposed anchor tenant. The market is the "anchor use" whose prestige and name recognition would attract other well-regarded tenants to the center. Whole Foods would serve as the primary draw to bring shoppers to the site, while the inclusion of smaller retailers and restaurants would enable multiple tasks to be accomplished in the same location, using the same parking lot. Independent retail market analysis has shown that numerous Malibu residents shop at other Whole Foods markets in West Los Angeles, Santa Monica, and the West San Fernando Valley. The loss of Whole Foods as the anchor tenant would significantly reduce the economic viability of the project. Therefore, this alternative has been eliminated from detailed consideration.

Subterranean Parking Lot Alternative

A project utilizing subterranean parking would potentially allow for the provision of more open space on the project site, in accordance with the requirements of the LCP that all commercial projects in the Civic Center provide at least 25 percent open space and at least 40 percent landscaping. However, subterranean parking is considered inappropriate for the supermarket use proposed as the anchor on the site. Subterranean parking combined with supermarket uses in low-density suburban areas is generally found to be problematic, as it diminishes convenient access to and from the market for shoppers. Many shoppers, rather than maneuvering shopping carts in and out of an elevator, will simply park on the street nearby, or utilize other nearby surface lots allocated for other businesses.

In addition, there are special circumstances due to the property elevation in relation to the water table in the area that make it potentially damaging to the aquifer to use underground parking which would allow for more landscaped space at ground level. On this site, historic high groundwater is reported to be 5 feet below grade.¹² According to the project geologist, underground parking in an area of high ground water requires constant pumping of the underground parking area and causes disposal issues. Also, because of the narrow distance between grade and the high water table, the use of subterranean parking to achieve more landscaped space at ground level would displace a corresponding amount of water, elevating the water table on adjacent properties, which may be exacerbated when coupled with the subterranean parking garage approved on the adjoining La Paz site. In addition, protection of the water table from potential pollution, especially important for properties closer to Malibu Creek, may not be controllable on a fail-safe basis from an underground garage.

Protection of the water table from pollution in such an instance would be extremely wasteful of energy, since pumps would have to run 24-hours per day to clear water from the garage and that water, once removed, would be considered potentially toxic, and could not be discharged directly into the storm drain system. The high water table also makes irrigation of large areas a concern due to potential ground water mounding, which could affect both the subject property and other properties in the area.

Further, given the additional amount of excavation, soil export and the added duration of construction time, this alternative would not necessarily avoid or substantially lessen any of the significant effects of the project and could potentially result in new air quality or geotechnical impacts. Therefore, this alternative has been eliminated from detailed consideration.

¹² Van Beveren and Butelo, Inc. 2007. *Report of Geologic and Geotechnical Investigation Proposed Rancho Malibu Resort*.

Alternative Uses

Alternatives involving agricultural, residential, and/or industrial land uses were dismissed as being infeasible because the project site is not zoned for such uses, such uses would not meet any of the project objectives and they would not be compatible with existing commercial and Civic Center land uses in the surrounding area. In addition, the physical characteristics of such uses would be purely conjectural; CEQA does not require speculative analysis.¹³ Therefore, this alternative has been eliminated from detailed consideration.

PROJECT ALTERNATIVES

Section 3.0, Environmental Impact Analysis, determined that implementation of the proposed project would result in the following significant and unavoidable impact:

- Short-term project-level construction impacts related to noise

Please refer to **Section ES, Executive Summary**, for a complete list of all project impacts, cumulative impacts, and mitigation measures related to the proposed project.

Based on considerations of avoiding or substantially reducing significant impacts associated with the proposed project, as well as consideration of the basic objectives of the project, public comments received in response to the Notice of Preparation (NOP), discussions with City staff, the public, and other public agencies, the following three alternatives to the proposed project were selected for analysis:

- Alternative 1: No Project/No Development Alternative
- Alternative 2: Code Complying Alternative
- Alternative 3: Two-story Building Alternative

Alternative 1 – No Project/No Development

Under *State CEQA Guidelines* Section 15126.6(e)(3)(B), the No Project Alternative analysis may involve two separate evaluations. The first involves analysis of a No Project Alternative that compares the proposed project's significant impacts to the existing development on the project site (No Project/No Development Alternative). The second No Project Alternative analysis evaluates the consequences of foreseeable development if the proposed project is not approved. Under this analysis, if disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "No Project" (i.e., No Project/Foreseeable Development) consequence should be

¹³ *State CEQA Guidelines* Section 15145

discussed. Although it is foreseeable that another proposal for development of the site would occur in the future if the proposed project were not approved, given the broad array of permitted uses at the project site, the physical characteristics of such a future development cannot be known at this time. Consequently, any discussion of a No Project/Foreseeable Development alternative would be purely conjectural; as previously stated, CEQA does not require speculative analysis. Thus, this section only analyzes the No Project/No Development Alternative. Under the No Project/No Development Alternative, the project site would remain in its current state, with no new construction or development occurring within the foreseeable future.

Aesthetics

The No Project/No Development Alternative would not alter the physical appearance of the project site as no new construction would occur. The existing topographic and vegetative characteristics of the site would remain unchanged. The views of the northern hillside from vantage points to the south looking in a northerly direction and views from the south would continue to be unobstructed as they overlook the project site. The project site would, however, remain somewhat incompatible with the existing and planned environment within the Civic Center area, as the project site would neither be developed for local and visitor-serving uses or be in a state of natural open space. The project site is routinely disked for fire prevention measures, which detracts from its natural landform. Aesthetic and view impacts would be considered less than significant.

The No Project Alternative would not require the need for additional lighting or introduce new sources of daytime glare, as no new development would occur. Therefore, no impacts associated with light and glare would be created. Although the proposed project would also result in less than significant impacts related to aesthetics, the No Project/No Development Alternative would not introduce any new structures into the project site. As such, impacts would be reduced as compared to the proposed project.

Air Quality

The No Project Alternative would not result in any grading or construction activities. It would also not involve the construction of any new uses that would have the potential to generate air emissions. Therefore, no air pollution would be generated by this alternative. The proposed project would generate air emissions that would not exceed South Coast Air Quality Management District (SCAQMD) thresholds and as a result would be less than significant. However, as no impact would occur under the No Project Alternative, impacts would be reduced as compared to the proposed project.

Biological Resources

The No Project Alternative would not involve any additional development on the project site. The site is currently devoid of any natural vegetation except for three small groups of western sycamore trees (containing a total of eight trees) in the northwest portion of the site. The portions of the project site with exposed soil are routinely disked for fire prevention measures, which is a practice that will continue in the future under this alternative. The existing native trees referenced above would remain intact. Impacts upon biological resources would therefore be less than significant. The proposed project would require mitigation for the removal of the eight sycamore trees. With mitigation, impacts would be less than significant. As no changes would occur on the site under this alternative, impacts would be reduced as compared to the proposed project.

Cultural Resources

As discussed in the environmental analysis in **Section 3.4, Cultural Resources**, the project site does not contain any known significant historic, archaeological, or paleontological resources, and there are no known cemeteries or burial grounds on the project site. The No Project Alternative would include no new activities or development which could have the potential, albeit unlikely, to unearth any unknown significant cultural resources, or disturb any previously unknown human remains. The proposed project would also result in less than significant impacts with regard to cultural resources. However, as no impact would occur under this alternative, impacts would be reduced as compared to the proposed project.

Geology and Soils

Under the No Project Alternative, existing conditions on the project site would not be altered. As the No Project Alternative would not develop any new habitable structure, no impacts associated with geology, and soils, including risk of loss, injury, or death involving seismic ground shaking, would occur to on the project site. While the proposed project would result in less than significant geologic impacts, no impact would occur under the No Project alternative; impacts would be reduced as compared to the proposed project.

Greenhouse Gas Emissions

The No Project Alternative would not result in any grading or construction activities. It would also not involve the construction of any new uses that would have the potential to generate greenhouse gas emissions through stationary or mobile sources. Therefore, while the proposed project would result in

less than significant impacts related to greenhouse gas emissions, no impact would occur under the No Project alternative; impacts would be reduced as compared to the proposed project.

Hazards and Hazardous Materials

The No Project Alternative would not result in any grading or construction activities. It would also not involve the construction of any new uses that would have the potential to transport, use, or dispose of hazardous materials to, from, or at the project site. Although the proposed project would result in less than significant impacts related to hazards and hazardous materials, under this alternative no impact would occur; impacts would be reduced compared to the proposed project.

The project site, and all of Malibu, is considered a Very High Fire Hazard Severity Zone and has been impacted by wildfires in the past. This alternative would not introduce new buildings to contribute to wildfire evacuation risks associated with employees and patrons fleeing the site and adding incrementally to evacuation congestion and hazards. While the proposed project would result in less than significant impacts related to fire hazards, no new uses would occur on the project site and no impact would occur; impacts would be reduced as compared to the proposed project.

Hydrology and Water Quality

The No Project Alternative would not involve any changes to the existing topographic or hydrologic characteristics of the site. No new sources of surface water contamination would be introduced to the environment and no impacts to hydrology, drainage or water quality would occur. While the proposed project would result in less than significant impacts related to hydrology and water quality, no impact would occur under the No Project Alternative; impacts would be reduced as compared to the proposed project.

Land Use and Planning

There would be no impacts to land use and planning under this alternative. The project site would remain vacant and no new uses or development would be planned. The proposed project would result in less than significant land use impacts. Therefore, as no impacts would occur under the No Project Alternative, impacts would be reduced compared to the proposed project.

Noise

Under the No Project Alternative, no new activities or development would occur. As such the existing noise environment would remain unchanged. The significant and unavoidable construction noise impact

associated with the proposed project would not occur under this alternative. As such, noise impacts would be reduced as compared to the proposed project.

Public Services (Fire Protection and Police Protection)

The No Project Alternative would not create any new uses or increase human activity on the project site. As such, demands for fire and police services would not increase above existing minimal demands. The project site would continue to be disked for fire prevention measures in accordance with the local fire hazard reduction regulations. Such practices would ensure the site is maintained in a manner that minimizes the fire hazard to the maximum extent practical. The proposed project would result in less than significant public services impacts. Therefore, as no impacts would occur under the No Project Alternative, impacts would be reduced compared to the proposed project.

Recreation

Under the proposed project impacts on recreation would be less than significant. Under the No Project Alternative, no new construction would occur on the project site, and therefore; the construction of “Shane’s Park,” as well as other open space public seating areas, pathways, and the provision of bicycle racks and hitching posts would not occur. Therefore, while the No Project Alternative would have a less than significant impact on recreation, it would not provide the beneficial uses provided under the proposed project. Impacts would be reduced under the proposed project compared to the No Project Alternative.

Transportation and Traffic

The No Project Alternative would not generate any new vehicle trips. No construction would take place and no new uses would be introduced to the project site. Traffic conditions would remain essentially unchanged, with the exception of the anticipated ambient growth in the City of Malibu. These conditions are reflected in the Cumulative Base (i.e., Future Without Project scenario), presented in the traffic impact analysis in **Section 3.13, Transportation and Traffic**. The current and projected level of service under this scenario for each of the study intersections is also presented in **Table 4.0-1**.

As shown in **Table 4.0-1**, future traffic conditions in the City of Malibu would continue to worsen, even without construction of the proposed project. Further, under the No Project Alternative, **Mitigation Measures 3.13-1 through 3.13-3**, set forth in **Section 3.13, Transportation and Traffic**, would not be implemented. Although impacts would be reduced to less than significant under the proposed project, no new trips would be added to the project site under the No Project Alternative. Therefore, traffic impacts would be reduced with the No Project Alternative.

**Table 4.0-1
Future (2017) + Without Project Traffic Conditions**

No.	Intersection	Peak Hour	Existing LOS	V/C (Delay)	Future LOS
1.	Kanan Dume Rd. & Pacific Coast Hwy.	Weekday AM	A	0.485	A
		Weekday PM	B	0.778	C
		Saturday Mid-day	C	0.778	C
2.	Malibu Canyon Rd. & Pacific Coast Hwy.	Weekday AM	B	0.773	C
		Weekday PM	B	0.810	D
		Saturday Mid-day	C	0.937	E
3.	Malibu Canyon Rd. & Civic Center Way	Weekday AM	A	0.532	A
		Weekday PM	A	0.528	A
		Saturday Mid-day	A	0.372	A
4.	Webb Way/Stuart Ranch Road & Civic Center Way	Weekday AM	B	11.68 sec.	B
		Weekday PM	C	53.17 sec.	F
		Saturday Mid-day	A	13.27 sec.	B
5.	Cross Creek Rd. & Civic Center Way	Weekday AM	A	8.98 sec.	A
		Weekday PM	A	13.04 sec.	B
		Saturday Mid-day	A	14.34 sec.	B
6.	Webb Way & Pacific Coast Hwy.	Weekday AM	A	0.589	A
		Weekday PM	B	0.843	D
		Saturday Mid-day	C	0.891	D
7.	Cross Creek Rd. & Pacific Coast Hwy.	Weekday AM	A	0.675	B
		Weekday PM	C	0.976	E
		Saturday Mid-day	C	1.011	F
8.	Malibu Pier Signal & Pacific Coast Hwy.	Weekday AM	A	0.647	B
		Weekday PM	B	0.773	C
		Saturday Mid-day	B	0.774	C
9.	Carbon Canyon Rd. & Pacific Coast Hwy.	Weekday AM	A	0.616	A
		Weekday PM	B	0.768	C
		Saturday Mid-day	B	0.790	C
10	Las Flores Canyon Rd. Pacific Coast Hwy.	Weekday AM	A	0.656	B
		Weekday PM	B	0.815	D
		Saturday Mid-day	B	0.815	D

*Note: All-Way Stop Control Delay shown in Seconds Per Vehicle
Source: Overland Traffic Consultants, 2015*

Utilities (Water Service, Wastewater, Solid Waste, Electricity and Natural Gas)

The No Project Alternative would not include any new uses. As such, the No Project Alternative would not result in any activities that would affect local utility service providers. No natural gas or electricity would be consumed. The absence of new development the project site would not necessitate any

infrastructure improvements or generate the need for solid waste disposal services. The proposed project would result in less than significant utilities impacts. Therefore, as no impacts would occur under the No Project Alternative, impacts would be reduced compared to the proposed project.

Relationship of Alternative 1 to Project Objectives

The No Project Alternative would completely avoid the anticipated construction impacts that would occur with implementation of the proposed project. However, this alternative would fail to meet any of the Project Applicant's stated objectives. **Table 4.0-2** provides a summary of the project objectives and a discussion of the No Project Alternative's ability to meet the project objectives.

While the No Project Alternative would be environmentally superior to the proposed project, it is not a preferred alternative.

**Table 4.0-2
Proposed Project vs. No Project Alternative Comparison**

Objective	Consistency
Fulfill the City's General Plan and Local Coastal Program objectives for commercial development in the Civic Center area.	The No Project Alternative would not meet this objective. Under this alternative, no commercial development would take place on the project site; it would remain an unattractive vacant lot.
Provide several compatible uses, meeting both local and visitor-serving needs, within one shopping center in a convenient location with shared parking.	The No Project Alternative would not meet this objective. This alternative would not provide a 24,549 sf Whole Foods market, 13,876 sf of retail/restaurant space or 4,800 sf of outdoor dining area. This alternative would not provide any shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative the children's parks, community gardens, ancillary retail, and restaurant facilities with outdoor dining would not be constructed. The project objective of serving as a center for multiple activities, and thus minimizing vehicle trips and air quality impacts, would not be met.
Afford a wider range of organic grocery and produce options to support the Malibu community and reduce reliance on out-of-town markets and vehicle trips.	The No Project Alternative would not meet this objective. Under this alternative, no grocery store would be built; no new local source for the purchase of organic grocery and produce items would be provided. The project objective of helping to minimize vehicle trips and air quality impacts would not be met.
Extend the shopping experience that exists on Cross Creek Road into a park-like atmosphere, which will provide a physical and visual link to Legacy Park.	The No Project Alternative would not meet this objective. This alternative would not provide a 24,549 sf Whole Foods market, 13,876 square feet of retail/restaurant space or 4,800 sf of outdoor dining area. As a result, this alternative would not provide any shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative, landscaping and open space would not be provided, thus this alternative would not provide a park-like atmosphere with a physical and visual link to Legacy Park.

Objective	Consistency
Situating the project in an area where it is clustered with other similar uses along the eastern portion of Civic Center Way.	The No Project Alternative would not meet this objective. This alternative would not provide a 24,549 sf Whole Foods market, 13,876 square feet of retail/restaurant space or 4,800 sf of outdoor dining area. As a result, the site would not provide a cluster of similar uses, as it would provide no opportunities for grocery or retail shopping and dining.
Increase pedestrian interaction among the business and public spaces along Civic Center Way and Cross Creek Road.	The No Project Alternative would not meet this objective. Under this alternative, no commercial development would take place on the project site; it would remain an unattractive vacant lot. There would be no opportunities for interaction with other businesses and public spaces along Civic Center Way and Cross Creek Road.
Create a visually appealing and inviting project to add to the Civic Center of Malibu.	The No Project Alternative would not meet this objective. Under this alternative, unlike with the proposed project, no landscaping, children’s parks, community garden, or public open space would be provided; the project site would remain an unattractive vacant lot.
Revegetate the site with plantings that incorporate the plants species of both Malibu’s and the Santa Monica Mountain’s native coastal plant community.	The No Project Alternative would not meet this objective. Unlike with the proposed project, no landscaping or gardens would be provided; the project site would remain an unattractive vacant lot.
Provide an aesthetic relationship with the Santa Monica Mountains and Malibu Creek.	The No Project Alternative would partially meet this objective. Under this alternative the children’s parks, and community garden would not be constructed. Further, this alternative would not provide a park-like atmosphere with a physical and visual link to Legacy Park. However, as no building would be built, there would be no blocking of views through the project site.
Minimize and eliminate negative impacts to the neighborhood.	The No Project Alternative would partially meet this objective. Under this alternative, no construction would take place, and there would be no construction noise impacts and traffic in the area would be reduced as compared to the “Future with Project” condition. However, the project site would remain an unattractive vacant lot.
Deliver project features that contribute significant benefits to the community.	The No Project Alternative would not meet this objective. This alternative would not provide a 24,549 sf Whole Foods market, 13,876 sf of retail/restaurant space or 4,800 sf of outdoor dining area. As a result, this alternative would provide fewer shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative the children’s parks, community gardens, ancillary retail, and restaurant facilities with outdoor dining would not be constructed. Further, this alternative would not provide a park-like atmosphere with a physical and visual link to Legacy Park.

Alternative 2: Code Complying Alternative

As previously discussed, the proposed Whole Foods and the Park Shopping Center Project requires a number of discretionary approvals to comply with the City of Malibu’s General Plan, the Malibu Municipal Code (MMC) and the Local Coastal Plan (LCP), therefore another alternative is to look at proposed “Code Complying Alternative” which would not require any minor modifications or variances

as this alternative would provide the code specified Yard Setbacks, Open Space and Landscaped Area (65 percent). Further, because the building is set more than 250 feet from the adjoining horse training facility the Code Complying Alternative would not require the construction of a 12-foot sound wall to reduce potential sudden noise impacts. Development under this alternative would provide parking per the MMC for a supermarket, and the circulation required by the Los Angeles County Fire Department (LACFD). Further, this alternative could avoid or reduce the severity of project-related significant impacts resulting from construction by reducing the amount of development on the project site.

The proposed project site totals approximately 256,168 square feet (sf). Development under the Code Complying Alternative would consist of a supermarket (28,879 sf) and 129 parking spaces. Pursuant to the MMC and the LCP, a total of 166,509 sf of landscape area and open space are required to be provided.¹⁴ The total landscape area and open space provided under the Code Complying Alternative would be 166,719 sf. Therefore, the Code Complying Alternative would meet the requirement.

Under this alternative the 28,879 sf supermarket building would be set as close as possible the south end of the project site, while remaining in compliance with the required 143.4-foot front yard setback. The building height would range from 24 feet from existing grade at the flat roof portion and 28 feet at the sloped roof portion. As with the proposed project this height increase above the 18-foot allowable height is due in part to the fact that building finished floors must be raised by a minimum of 3 feet above the existing grade to meet Federal Emergency Management Agency (FEMA) requirements, and is also necessary to provide a screen for the rooftop mechanical equipment required for commercial use.

Due to the reconfiguration of the site under this alternative, it cannot be assumed that Whole Foods would be the tenant. Therefore, it is assumed that the architecture of the proposed grocery store building would be a generic “box” without any stylistic “branding,” in order to appeal to the greatest number of potential tenants. Public entrances to the building would be provided on the north side of the building. The trash enclosure and loading dock would also be located on the north side of the building. The site plan and elevations for the building are shown in **Figure 4.0-1, Code Complying Alternative Site Plan** and **4.0-2, Code Complying Alternative Building Elevations**.

The FAR under this alternative would be 0.113, and therefore in compliance with the MMC and LCP.

The Code Complying Alternative would not provide the following project features: outdoor seating and dining areas, the “horse parking” area, Shane’s Inspiration Playground, the Sensory Garden, and the Kitchen Community Learning Garden.

¹⁴ Local Implementation Plan Section 3.8(A)(5)(b)

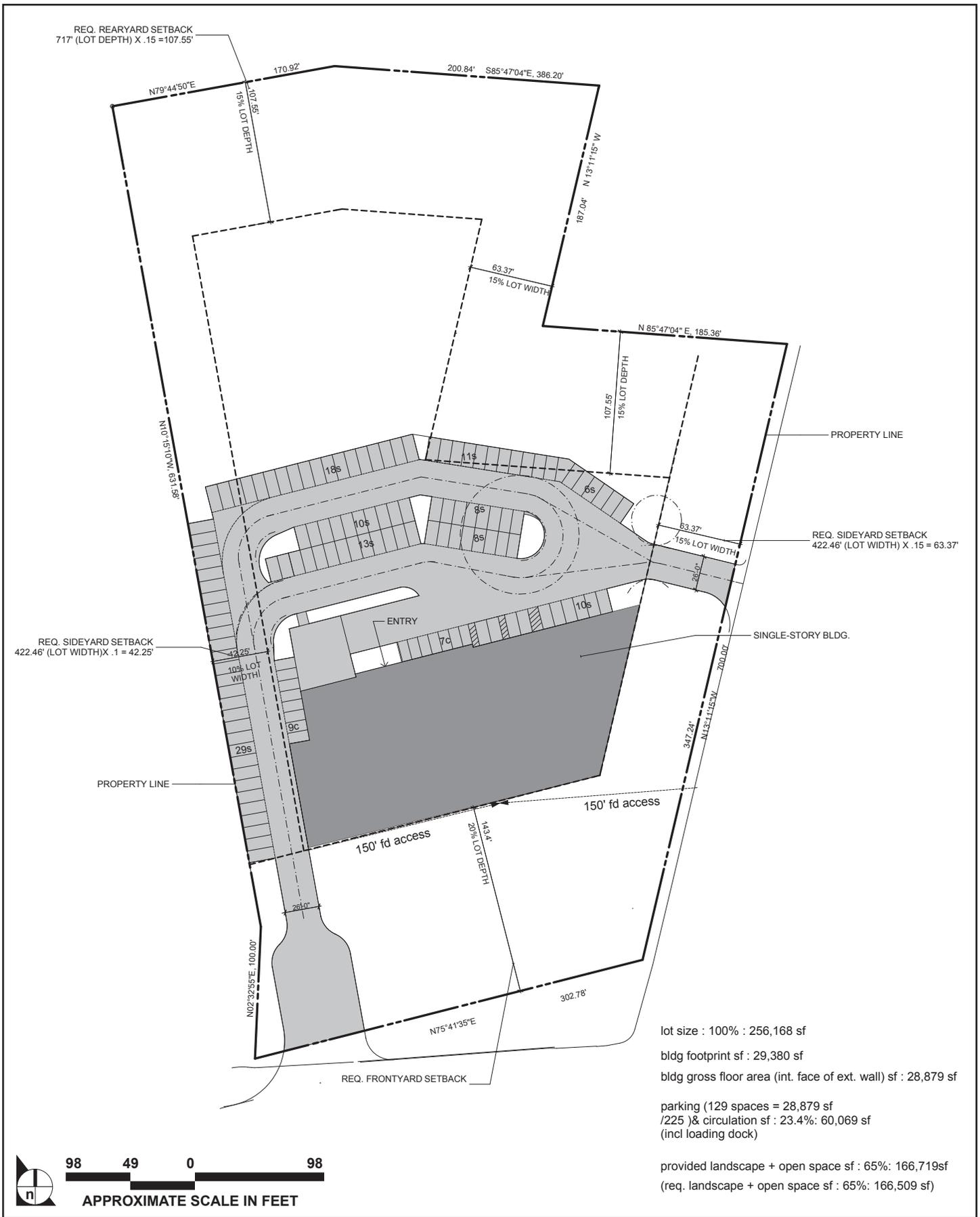
Aesthetics

Under this alternative, the project site would be developed with one new building, surface parking, and landscaping/open space improvements. As the number of buildings proposed would be reduced, this reduction in development intensity would and minimize the scale of the project. Further, as this alternative would reduce the number of buildings and automobiles on-site, as well as the need for nighttime lighting, impacts to light and glare would be lessened. However, visual access to the Santa Monica Mountains from Civic Center Way would be impacted due to the location of the supermarket. By nature of its use, the market would have to be at least 24 feet tall, therefore blocking views of the rear of the project site, thus reducing the visual value of the landscaping in the rear of the site. Impacts under this alternative would be less than significant. The proposed project does not result in significant aesthetic impacts, and due to the increased blockage of views toward project site open space and the Santa Monica Mountains this alternative would be similar to the project's less than significant impacts to visual resources.

Air Quality

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open space improvements. No significant impacts during construction were identified related to air quality for the proposed project. As fewer buildings would be constructed overall, construction duration would be reduced thereby reducing the overall air quality emissions compared to the proposed project. Parking areas would also be reduced, as parking would only be provided in accordance with code and less parking would be required compared to the proposed project. As a result, air pollutant emissions during construction would be reduced due to the reduction in building construction and architectural coatings, etc. Air quality emissions would be incrementally reduced compared to the proposed project, and would not exceed significance thresholds.

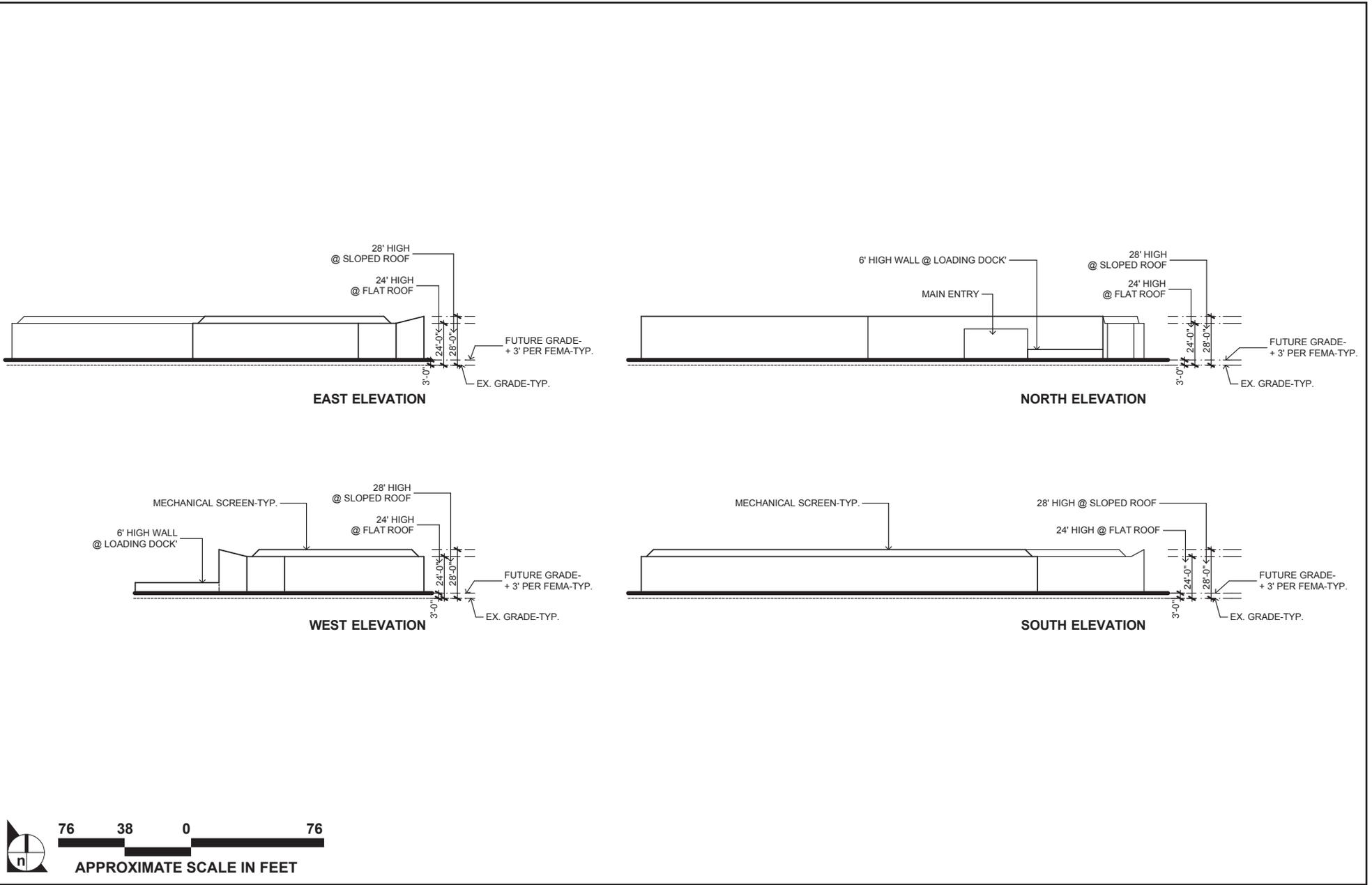
No significant and unavoidable operational air quality impacts were identified as part of the proposed project. As fewer uses would be constructed on the site for this alternative, overall operational emissions would be reduced compared to the proposed project. Therefore, the Code Complying Alternative would have a reduced impact compared to the Proposed Project, and would not have any significant air quality impacts.



SOURCE: Goldman Firth Rossi Architects, December 2014

FIGURE 4.0-1

Code Complying Alternative Site Plan



SOURCE: Goldman Firth Rossi Architects, December 2014

FIGURE 4.0-2

Code Complying Alternative Building Elevations

Biological Resources

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. As under this alternative the location of the building has shifted to the south, the eight native sycamore trees located on the northern portion of the project site could remain. Similar to the proposed project and as required under the MMC and LCP, all new landscaping would be drought tolerant and would incorporate the plants species of both Malibu's and the Santa Monica Mountain's native coastal plant communities to the extent feasible.

No significant and unavoidable project or cumulative impacts to biological resources were identified with implementation of the proposed project. Similarly, the Code Complying Alternative would not significantly impact biological resources present on the project site. Therefore, impacts would be similar under both the proposed project and the Code Complying alternative.

Cultural Resources

As discussed in the environmental analysis in **Section 3.4, Cultural Resources**, the project site does not contain any known significant historic, archaeological, or paleontological resources, and there are no known cemeteries or burial grounds on the project site. The Code Complying Alternative would include the development of one new building, surface parking, and landscaping/open scape improvements, which could have the potential, albeit unlikely, to unearth previously unknown significant cultural resources, or disturb previously unknown human remains. However, implementation of **Mitigation Measures 3.4.1 through 3.4.3**, forth in **Section 3.4, Cultural Resources**, would ensure that impacts to cultural resources would be less than significant, and impacts would be similar as compared to the proposed project.

Geology and Soils

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. However, this alternative reduces development intensity by eliminating four buildings compared to the proposed project. Demolition, excavation, grading, and structure development parameters associated with this alternative would be less than the proposed project.

No significant and unavoidable project or cumulative impacts to geology and soils, including risk of loss, injury, or death involving seismic groundshaking, were identified with implementation of the proposed project. Given the reduced development intensity associated with this alternative, no significant impacts

with regard to geology and soils can be reasonably anticipated and impacts would be similar as compared to the proposed project.

Greenhouse Gas Emissions

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open space improvements. Demolition, excavation, and grading, associated with this alternative would be similar to the proposed project. However, this alternative reduces development intensity by eliminating four buildings compared to the proposed project. Consequently, construction emissions of greenhouse gases (GHGs), primarily as a result of a reduction in construction vehicle trips, would be reduced as well.

The reduction in development intensity would also reduce overall operational emissions. GHG emissions would therefore be reduced as compared to the proposed project, and also would not exceed significance thresholds.

No significant and unavoidable project or cumulative impacts to GHG emissions were identified with implementation of the proposed project. Given the reduced development intensity associated with the Code Complying Alternative, no significant impact related to GHG emissions can be reasonably anticipated.

Hazards and Hazardous Materials

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open space improvements. Similar to the construction of the proposed project, development under this alternative would involve the use of those hazardous materials that are typically necessary for construction of commercial development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). However, similar to the proposed project the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. Therefore, development under this alternative would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. As the amount of construction taking place would be decreased under this alternative, impacts would be reduced as compared to the proposed project.

The Code Complying Alternative consists of the development of commercial retail uses (a grocery store) and a related surface parking lot with landscaping. Due to the retail nature of the alternative, a variety of products would be transported to and exist on-site to be used and offered for sale and used for ongoing cleaning and landscaping maintenance. Such products would only be considered hazardous if used

inappropriately or if exposed to unfavorable conditions. Similar to the proposed project, all potentially hazardous materials transported, stored, offered for sale, or used on-site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. With compliance with existing local, state, and federal regulations, the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment. Therefore, impacts related to this issue would be less than significant, and similar to the proposed project.

The project site, and all of Malibu, is considered a Very High Fire Hazard Severity Zone and has been impacted by wildfires in the past. This alternative would introduce a new building to the project site which could contribute to wildfire evacuation risks associated with employees and patrons fleeing the site and incrementally add to evacuation congestion and hazards. While implementation of this alternative could affect vehicle/capacity ratios and the level of service of roadways in the site vicinity, with implementation **Mitigation Measures 3.13-1** through **3.13-3**, set forth in **Section 3.13, Transportation and Traffic** similar to the proposed project, this alternative would have less than significant impacts to area traffic on both on a project and cumulative level. Further, increases in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the proposed project, this impact is not considered significant since emergency response times would not be substantially affected. In addition, similar to the proposed project, this alternative would comply with all applicable code and regulatory measures regarding fire safety and fuel modification, as well as implement **Mitigation Measures 3.11-1-1** through **3.11-1-7** set forth in **Section 3.11.1, Public Services – Fire Protection**. Therefore, similar to the proposed project, impacts would be less than significant.

Hydrology and Water Quality

Under the Code Complying Alternative the development intensity on the site would be reduced. Demolition, excavation, grading, and structure development parameters associated with this alternative would be similar to the proposed project. Further, as required by the MMC, LCP and the City's MS4 permit, development under this alternative would be required to provide a Water Quality Mitigation Plan, as well as implement **Mitigation Measures 3.8-1** and **3.8-2**, set forth in **Section 3.8, Hydrology and Water Quality**.

No significant and unavoidable project or cumulative impacts to hydrology, drainage, or water quality were identified with implementation of the proposed project. Given the reduced development intensity

associated with the Code Complying Alternative, no significant impacts to hydrology and water quality can be reasonably anticipated and impacts would be similar to the proposed project.

Land Use and Planning

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. Following the granting of the requested discretionary approvals as listed in **Section 2.0 Project Description**, there would be no impacts to land use and planning under the proposed project or this alternative. As the Code Complying Alternative would not require the discretionary approvals needed by the proposed project, impacts would be less as compared to the proposed project.

Noise

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. Demolition, excavation and grading and grading requirements associated with this alternative would be similar to what would be required for the proposed project although the duration of construction may be reduced.

Despite the inclusion of **Mitigation Measures 3.10-1** through **3.10-7**, as set forth in **Section 3.10, Noise**, significant and unavoidable construction noise could occur as a result of both the Code Complying Alternative and proposed project although the duration of construction would be incrementally reduced as a result of fewer buildings being constructed on the site. Nonetheless, significant impacts would still be expected under the Code Complying Alternative as temporary construction noise could exceed thresholds.

With the implementation of **Mitigation Measures 3.10-8** through **3.10-10**, as set forth in **Section 3.10, Noise**, no significant and unavoidable project or cumulative impacts to noise environment would result with operation of the proposed project. The Code Complying Alternative would be required to implement the same Mitigation Measures. Therefore, operational impacts associated with noise would be similar to the proposed project under the Code Complying Alternative.

Public Services (Fire Protection and Police Protection)

Police Protection

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements.

As the Code Complying Alternative would result in fewer buildings constructed on the site and an associated reduction in the number of employees and visitors, an incremental reduction in the number of police calls compared to the proposed project could occur. No significant and unavoidable project or cumulative impacts to police protection were identified with implementation of the proposed project. Similarly, the Code Complying Alternative would not significantly impact police protection service to the project site. Therefore, impacts would be similar under this alternative to the proposed project.

Fire Protection

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open space improvements.

As the Code Complying Alternative would result in fewer buildings constructed on the site, an incremental reduction in the number of fire calls compared to the proposed project could occur. Further, with the implementation of **Mitigation Measures 3.11-1-1 through 3.11-1-7** set forth in **Section 3.11.1, Public Services – Fire Protection**, no significant and unavoidable project or cumulative impacts to fire protection would occur with operation of the proposed project. Similarly, the Code Complying Alternative would not significantly impact fire protection service to the project site. Therefore, impacts would be similar under this alternative to the proposed project.

Recreation

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open space improvements. However, this alternative would not include the construction of “Shane’s Park,” as well as other open space public seating areas, pathways, and the provision of hitching posts. Therefore, this alternative would not provide the same beneficial public uses as provided under the proposed project. No new housing is proposed under this alternative which could bring additional users into the vicinity. Therefore, similar to the proposed project, this alternative would not result in the increased use or substantial physical deterioration of existing neighborhood and regional parks or recreational facilities and impacts would be less than significant.

Transportation and Traffic

As discussed in **Section 3.13, Transportation and Traffic**, once completed and fully occupied (anticipated by the end of 2017), the proposed project would result in approximately 2,290 weekday vehicle trips with 101 AM peak hour trips and 154 PM peak hour trips. In addition, the proposed project would generate an estimated 2,528 weekend trips with 226 weekend peak hour trips.

Under the Code Complying Alternative, the project site would be developed with a 28,879 sf grocery store use, surface parking, and landscaping/open space improvements. The Code Complying Alternative

would potentially result in 2,364 weekday trips,¹⁵ with approximately 83 AM peak trips and 242 PM peak hour trips.¹⁶ This increase in trips (72 trips, 3.1 percent) would incrementally increase impacts under this alternative, and similar to the proposed project impacts would be significant without mitigation. However, similar to the proposed project, the Code Complying Alternative would implement **Mitigation Measures 3.13-1 through 3.13-3**, set forth in **Section 3.13, Transportation and Traffic**, and project and cumulative impacts with mitigation would be less than significant.

Utilities (Water Service, Wastewater, Solid Waste, Electricity and Natural Gas)

Water

Development of the project site as a neighborhood shopping center would increase water demand, as operation of the site would require potable water for restrooms (i.e., sinks, toilets), washing of dishes, and food service. Further, the proposed project would also include drought tolerant landscaping which would require additional water for plant maintenance.

As discussed in section **3.14.3, Water Supply**, the proposed project is expected to require approximately 11,208 gallons of water per day (gpd), see **Table 4.0-3**. No significant and unavoidable project or cumulative impacts to water service were identified with operation of the proposed project.

**Table 4.0-3
Code Complying Alternative Approximate Water Consumption**

Use ¹	Wastewater Flow (gpd)	Generation Rate	Potable Water Consumption (gpd)
Grocery Store	5,776	1.20	6,931
Total Alternative Water Consumption			5,892

¹ Refer to Section 3.14.3 Water Supply, projected water consumption rates associated with the proposed project are assumed to be 120 percent of the wastewater generated for a given land use.

¹⁵ As with the proposed project, due to the nature of the land use proposed, some people traveling on Civic Center Way may stop at the project to or from another destination (pass-by trips). These vehicles normally passing the site are not new vehicle trips added to the street by the project and therefore are not considered in the project traffic impact analysis. A pass-by trip credit of 20 percent has been applied to the trip generation average rates, per data contained in the ITE Trip Generation Manual to account for the pass-by trips.

¹⁶ ITE Land Use Code 850 (Supermarket) trip generation average rates:
 - Daily Trip Rate: 102.24 trips/1,000 sf of floor area; 50% inbound/50% outbound
 - AM Peak Hour Trip Rate: 3.59 trips/1,000 sf of floor area; 61% inbound/39% outbound
 - PM Peak Hour Trip Rate: 10.5 trips/1,000 sf of floor area; 51% inbound/49% outbound

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements, and water consumption would be reduced by approximately 4,277 gpd. Similarly, the Code Complying Alternative would not significantly impact water supply environment.

Wastewater

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. Similar to the proposed project, development under the Code Complying Alternative would connect to the new Civic Center Water Treatment Facility (CCWTF). As described in **Section 3.14.4, Wastewater**, wastewater flow generation estimates for the CCWTF were developed for each type of land use within the Civic Center Area and specifically the proposed project site. These generation estimates were applied, by parcel, to develop the flow rates used in CCWTF project design and phasing. As the CCWTF design takes into account future wastewater flows of approximately 9,340 gpd from the project site; no significant and unavoidable project or cumulative impacts regarding wastewater were identified with operation of the proposed project.

As shown in **Table 4.0-4**, development under the Code Complying Alternative would be reduced to approximately 5,776 gpd, and similar to the proposed project, it would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities and impacts would be less than significant.

Table 4.0-4
Code Complying Alternative – Projected Wastewater Generation

Land Use	Size	Generation Rate (gallons per day)	Wastewater Generation (Gallons per day)
Grocery Store	28,879 sf	0.20 gpd/sf	5,776 gpd
Total Alternative Wastewater Generation			5,776 gpd

gpd = gallons per day; sf = square feet

Source: EPD Consultants, Inc. Wastewater Average Flow Estimate, September 2, 2011

Solid Waste

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. As shown in **Table 4.0-5**, the quantity of solid waste generated under this alternative would be reduced by approximately 47.5 percent or 12.66 tons per year. Similar to the proposed project, no project level solid waste impacts would occur for

either construction or operation. Therefore, project level impacts associated with the Code Complying Alternative would be similar to the proposed project.

**Table 4.0-5
Solid Waste Generation Proposed Project vs. Code Complying Alternative**

Land Use	Units	Quantity	Generation Factor ¹	Daily Generation (lbs/day)	Annual Generation (tons/year)
Proposed Project					
Whole Foods	sf	24,549	3.12 lbs/1,000 sf/day	76.59	13.97
Commercial	sf	13,876	5 lbs/1,000 sf/day	69.38	12.66
Total:				145.97	26.63
Code Complying Alternative					
Grocery Store	sf	28,879	3.12 lbs/1,000 sf/day	90.17	16.46
Commercial	sf	0	5 lbs/1000/sf/day	0	0
Total:				90.17	16.46

Source: Impact Sciences, Inc., 2015.

sf = square feet.

¹ Generation factor provided by the solid waste daily generation rates in tons per year are derived from CalRecycle.ca.gov. Commercial Sector: Estimated Solid Waste Generation and Disposal Rates

As shown in **Table 3.14.5-3, Cumulative Development Solid Waste Generation Estimate**, related projects would generate up to 987 tons of solid waste per year. Combined with solid waste generated from this alternative, 1,003.46 tons of solid waste would be generated per year, assuming no recycling. This alternative's contribution would constitute an approximately 1.7 percent increase in solid waste generation, and would therefore not be cumulatively considerable.

Thus this alternative would contribute to an incremental cumulative impact on landfill capacity; however, with incorporation of mitigation requiring the recycling diversion of waste from landfills, similar to the proposed project, this alternative's contribution would not be cumulatively considerable.

Electricity

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. As shown in **Table 4.0-6**, the proposed project would consume approximately 1,225.85 kilowatt-hours of electricity per day. Compared to the proposed project, the Code Complying Alternative would increase electricity consumption by approximately 7.46 kilowatt-hours per day, or approximately 0.6 percent. No significant and unavoidable project or cumulative impacts regarding electricity were identified with operation of the proposed project. Electricity impacts would be very slightly increased under the Code Complying Alternative.

Therefore, although electricity use under this alternative would be more than the proposed project, the impact as a result of this very slight increase would remain less than significant.

Table 4.0-6
Electricity Consumption by Proposed Project and the Code Complying Alternative

Building	Building Size (in square feet)	Consumption Rate (kilowatt hours per 1,000 sf)	Total Consumption (kilowatt hours/year)
Whole Foods	24,549	42.7	1,048.24
Commercial/Retail ¹	13,876	12.8	177.61
Total Project Electricity Consumption			1,225.85
Grocery Store	28,879	42.7	1,233.13
Commercial/Retail ¹	0	0	0
Total Alternative Electricity Consumption			1,233.13

Source: SCAQMD, California Emissions Estimator Model Guide, Appendix D, Table 8.1
Notes: The City of Malibu is located in climate zone 8
¹ *Strip Mall electricity consumption was used as a proxy for Commercial/Retail*

Natural Gas

Under the Code Complying Alternative, the project site would be developed with one new building, surface parking, and landscaping/open scape improvements. As shown in **Table 4.0-7**, below, the proposed project would consume approximately 545.68 kilo British thermal unit (kBtu) of natural gas per year. Compared to the proposed project, the Code Complying Alternative would increase natural gas consumption by approximately 62.73 kBtu per year, or approximately 11.5 percent. No significant and unavoidable project or cumulative impacts regarding natural gas were identified with operation of the proposed project. However, natural gas impacts would be incrementally increased under the Code Complying Alternative. Although natural gas use under this alternative would be more than the proposed project, the impact as a result of this very slight increase would remain less than significant.

Relationship of the Code Complying Alternative to Project Objectives

This Alternative would meet some of the project objectives; however it would be to a lesser extent than the proposed project. **Table 4.0-8** provides a summary of the project objectives and a discussion of the Code Complying Alternative's ability to meet the project objectives.

**Table 4.0-7
Natural Gas Consumption by the Proposed Project**

Building	Building Size (in square feet)	Consumption Rate (kBtu/1,000 sf/year)	Yearly Consumption (kBtu)
Whole Foods	24,549	21.07	517.24
Commercial/Retail ¹	13,876	2.05	28.44
Total Project Natural Gas Consumption			545.68
Grocery Store	28,879	21.07	608.48
Commercial/Retail ¹	0	0	0
Total Alternative Natural Gas Consumption			608.48

Source: SCAQMD, California Emissions Estimator Model Guide, Appendix D, Table 8.1

Notes: The City of Malibu is located in climate zone 8

¹ Strip Mall natural gas consumption was used as a proxy for Commercial/Retail
sf = square feet; kBtu = Thousand British Thermal Unit

**Table 4.0-8
Proposed Project vs. Code Complying Alternative Comparison**

Objective	Consistency
Fulfill the City's General Plan and Local Coastal Program objectives for commercial development in the Civic Center area.	The Code Complying Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided; however, this alternative would not provide 13,876 sf of retail/restaurant space. As a result, this alternative would provide fewer shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative, landscaping and open space would be provided. However, the children's parks, community garden, and public open space would not be constructed on the project site. Thus this alternative would not provide a park-like atmosphere with a physical and visual link to Legacy Park.
Provide several compatible uses, meeting both local and visitor-serving needs, within one shopping center in a convenient location with shared parking.	The Code Complying Alternative would not meet this objective. Under this alternative, 13,876 sf of local and visitor serving ancillary retail/restaurant structures and 4,800 sf of outdoor dining area would not be constructed. As a result, the project would be less desirable from a convenience point of view in that fewer activities or tasks can be combined with food shopping. The project objective of serving as a center for multiple activities, and thus allowing for shared parking, as well as minimizing vehicle trips and air quality impacts, could not be met.
Afford a wider range of organic grocery and produce options to support the Malibu community and reduce reliance on out-of-town markets and vehicle trips.	The Code Complying Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided. However, because of the site layout it cannot be assumed that Whole Foods would occupy the space; the unknown tenant may or may not have a commitment to providing a wide range of organic grocery and produce options. Patrons wishing to purchase these items may still need to travel to the San Fernando Valley Santa Monica or West Los Angeles to shop at Whole Foods.

Objective	Consistency
Extend the shopping experience that exists on Cross Creek Road into a park-like atmosphere, which will provide a physical and visual link to Legacy Park.	The Code Complying Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided; however, this alternative would not provide 13,876 sf of retail/restaurant space. As a result, this alternative would provide fewer shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative, the children’s parks, community garden, and public open space would not be constructed on the project site. Thus this alternative would not provide a park-like atmosphere with a physical and visual link to Legacy Park.
Situate the project in an area where it is clustered with other similar uses along the eastern portion of Civic Center Way.	The Code Complying Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided; however, alternative would not provide 13,876 sf of retail/restaurant space or 4,800 sf of outdoor dining area. As a result, the site would not be as effective as the proposed project in providing a cluster of similar uses, as it would provide no opportunities for retail shopping and dining.
Increase pedestrian interaction among the business and public spaces along Civic Center Way and Cross Creek Road.	The Code Complying Alternative would partially meet this objective. This alternative would provide a generic grocery store building along with landscaping and public open space. However, since the children’s parks, community garden, ancillary retail, and restaurant facilities with outdoor dining would not be constructed, it is likely that foot traffic to the site would be greatly reduced.
Create a visually appealing and inviting project to add to the Civic Center of Malibu.	The Code Complying Alternative would not meet this objective. Due to the required site layout under this alternative, as it cannot be assumed that Whole Foods would be the tenant. The architecture of the proposed grocery store building would be a generic “box” in order to appeal to the greatest number of potential tenants and the children’s parks, community garden and public open space would not be constructed on the project site.
Revegetate the site with plantings that incorporate the plants species of both Malibu’s and the Santa Monica Mountain’s native coastal plant community.	The Code Complying Alternative would meet this objective. As with the proposed project, all plantings would be drought tolerant and would include species of both Malibu’s and the Santa Monica Mountain’s native coastal plant community to the extent feasible.
Provide an aesthetic relationship with the Santa Monica Mountains and Malibu Creek.	The Code Complying Alternative would not meet this objective. Due to the placement of the generic grocery store building on the southerly portion of the site under this alternative, views of the Santa Monica Mountains would be limited from Civic Center Way.
Minimize and eliminate negative impacts to the neighborhood.	The Code Complying Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided; however, this alternative would not provide 13,876 sf of retail/restaurant space. As a result, this alternative would provide fewer shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative, landscaping and open space would be provided. However, the children’s parks, community gardens, ancillary retail, and restaurant facilities with outdoor dining would not be constructed.

Objective	Consistency
Deliver project features that contribute significant benefits to the community.	The Code Complying Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided; however, this alternative would not provide 13,876 sf of retail/restaurant space or 4,800 sf of outdoor dining area. As a result, this alternative would provide fewer shopping and dining opportunities, limiting the shopping experience in the area. Under this alternative, landscaping and open space would be provided. However, since the children's parks, community garden, ancillary retail, and restaurant facilities with outdoor dining would not be constructed, it is likely that foot traffic to the site would be greatly reduced. Further, this alternative would not provide a park-like atmosphere with a physical and visual link to Legacy Park.

Alternative 3: Two-Story Building Alternative

As previously discussed, the proposed Whole Foods supermarket is of a size that is a minimum for a viable market of this type, therefore another alternative is to look at reducing the surface footprint of the ancillary retail/restaurant structures proposed. The intent of this alternative is to increase the amount of the project site available for landscaping/open space.

The proposed project site totals approximately 256,168 square feet (sf). Development under the proposed project would consist of a new 38,425 sf neighborhood shopping center designed to be anchored by a Whole Foods Market (24,549 sf) and four smaller outbuildings (3,015 sf, 3,086 sf, 3,592 sf, and 4,183 sf, respectively) and 220 parking spaces. Pursuant to the MMC and the LCP, which require that 40 percent of the gross lot area constitute landscaped area, a total of 102,467 sf of landscaping and open space are required to be provided.

Green walls are proposed on designated walls of the market and the four smaller buildings. The green walls add an additional 22,000 square feet of vertical landscape area. These green walls will add another green visual element to the project, and will add energy saving benefits due to the insulation benefits.

The project also proposes two play areas for children (Shane's Inspiration Park and a Sensory Garden), a gathering area for users, including a Kitchen Community Learning Center, and several outdoor seating areas scattered throughout the project. The overall feel of the project, given the extensive tree canopy provided by large-scale Sycamore trees, the green walls, and the on-grade planting, is designed to be that of a park like setting.

The total landscaping and open space provided under the proposed project is 52,115 sf of which 32,849 sf is provided in on grade planter areas and 19,266 sf is allocated to open space. Note that while the proposed project would provide 22,000 square feet of green wall and approximately 48,492 square feet of

new tree canopy, the City has historically interpreted “on-grade” landscaping towards a project’s total landscaped area. However, because the MMC does not define “Landscaped Area,” the Specific Plan prepared for the proposed project proposes that functional landscape elements, such as tree canopies and green walls, be included in the landscaping calculations. Under these circumstances, the project would provide greater Landscaped Area than required. However, should the decision makers determine that a more traditional interpretation of the landscape requirement is more appropriate for the site, the proposed project would be deficient by 50,352 sf (Local Implementation Plan Section 3.8(A)(5)(b)), and a variance would be required.

Under this alternative, the 13,876 sf of ancillary retail/restaurant structures, would be constructed as two, two-story buildings. The parking required under this alternative would be 220 spaces (five spaces for every 1,000 sf of retail space), as with the proposed project, since there would be no reduction in grocery store, or retail/restaurant square footage. The additional space for landscaping/open space provided under this alternative would be approximately 9,335 sf. Therefore, this alternative would provide 61,450 sf of landscaping/open space (including the children’s parks, community garden, and public seating areas as proposed under the project), an increase over the proposed project, but still deficient by approximately 41,017 sf.

Under the Two-Story Building Alternative the grocery store building remains as a single story structure at the rear of the site. The four smaller retail buildings have been “stacked” one upon the other with a maximum height of 24 feet, in compliance with the MMC and Land Use Plan (LUP). As shown in **Figure 4.0-3, Two-Story Building Alternative Site Plan** this layout would not fulfill the intent of the proposed project design, which is that of a low-rise retail village, with a series of small, intimate courtyards, anchored by the supermarket at the rear.

It should be noted that a two-story structure would be programmatically limited in that only the ground floor is appropriate for retail and useable/leasable floor area would likely be reduced due to the Americans with Disabilities Act (ADA) requirement for an elevator. Useable floor area would likely be further reduced by required stairs and second story restrooms. FEMA requires that the first floor finish floor elevation be elevated a minimum of 3 feet above grade due to flood plain restrictions on this property. The City requires that the maximum building height be taken from existing or future grade, whichever is lower. This severely limits the ceiling heights of the first and second story; where a typical retail space would have a ceiling height of 15 to 18 feet (allowing dimension for ducts and utilities), the two retail buildings under the Two-Story Building Alternative would have a maximum interior ceiling height of 11 feet.

As with the Code Complying Alternative, due to the reconfiguration of the site under this alternative, it cannot be assumed that Whole Foods would be the tenant. Therefore it is assumed that the architecture of the proposed grocery store building would be a generic “box” without any stylistic “branding,” in order to appeal to the greatest number of potential tenants.

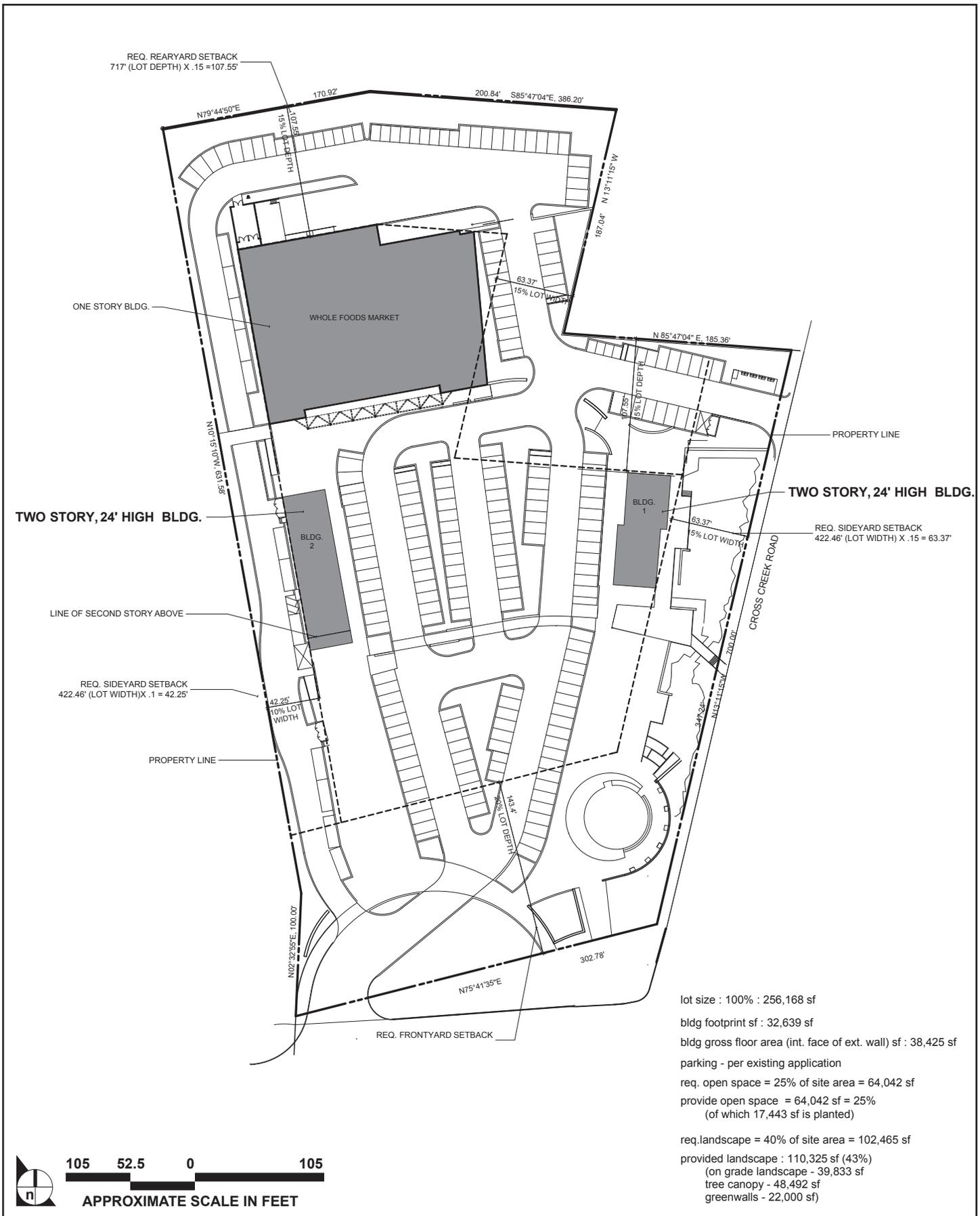
The FAR under this alternative would be 0.15, the same as for the proposed project, and therefore in compliance with the MMC and LCP.

Aesthetics

As discussed in **Section 3.1, Aesthetics**, the existing visual character of the surrounding locale is largely defined by the natural and built environment consisting of the developed areas in and around the Civic Center area and the scenic natural characteristics of the Santa Monica Mountains, the Malibu Lagoon, and the Pacific Ocean. The narrow coastal terraces and lowlands of the City, backed by steeply ascending slopes of the Santa Monica Mountains create a highly visible tiered-array of private and public properties. Regulatory policies of maintaining low scale development and low density of the built environment contribute to the City of Malibu’s scenic resources which play an important role in maintaining its appeal as a place to live and visit. Existing buildings in the project vicinity include the two-story, approximately 35-foot-tall, Malibu Country Mart professional building directly across Civic Center Way from the proposed project site, as well as other nearby two-story commercial and residential buildings further north and south on Cross Creek Road and to the west along Civic Center Way.

Per **LUP Policy 6.7**, the height of structures is to be limited to minimize impacts on visual resources. The maximum allowable height is 18 feet above existing or finished grade, whichever is lower, or where found appropriate through Site Plan Review, the maximum height shall be 24 feet (flat roofs) or 28 feet (pitched roofs) above existing or finished grade, whichever is lower. As previously discussed, due to FEMA flood protection requirement that building finished floors must be raised by a minimum of three feet above the existing grade, the proposed project buildings would extend to a maximum height of 28 feet in height. This height is also necessary to provide a screen for the rooftop mechanical equipment required for commercial use. No significant and unavoidable project or cumulative impacts to the visual resources environment were identified with construction and operation of the proposed project.

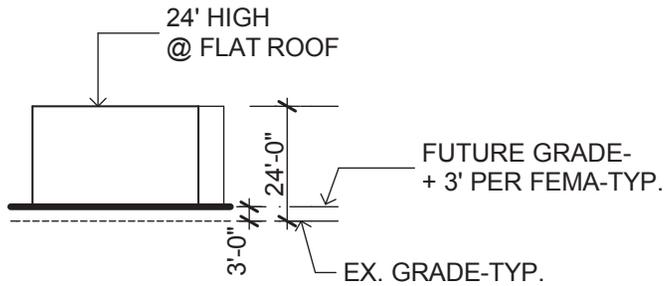
Under this alternative, the 13,876 sf of ancillary retail/restaurant structures would be constructed as two, two-story buildings of 24 feet in height, in compliance with the MMC and LUP. The parking required under this alternative would be 220 spaces, the same as for the proposed project.



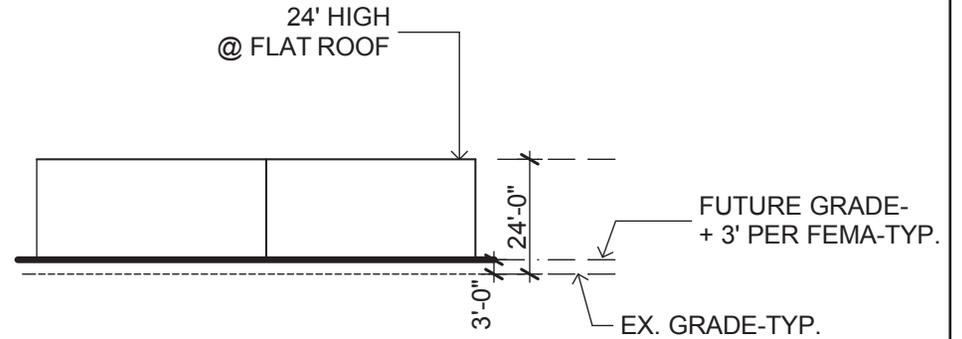
SOURCE: Goldman Firth Rossi Architects, January 2015

FIGURE 4.0-3

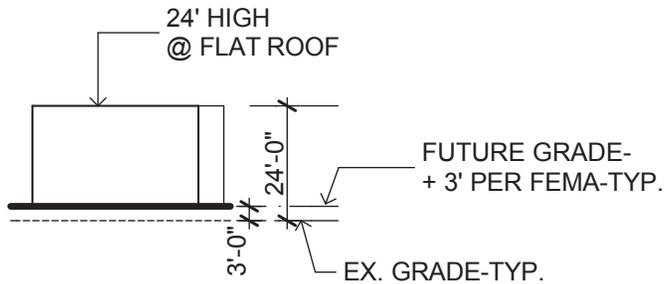
Two-Story Building Alternative Site Plan



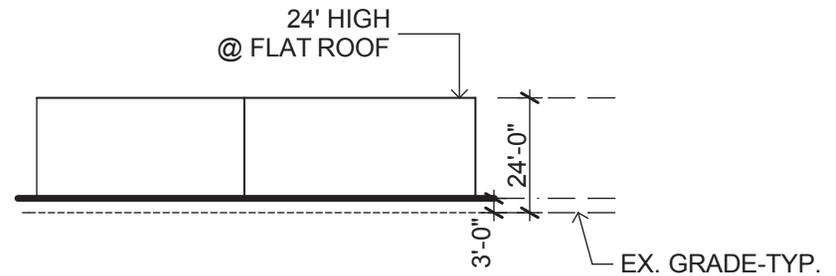
SOUTH ELEVATION



EAST ELEVATION



NORTH ELEVATION



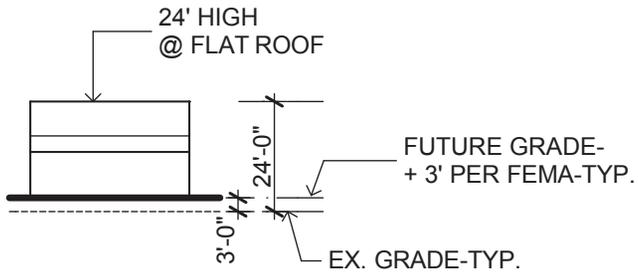
WEST ELEVATION



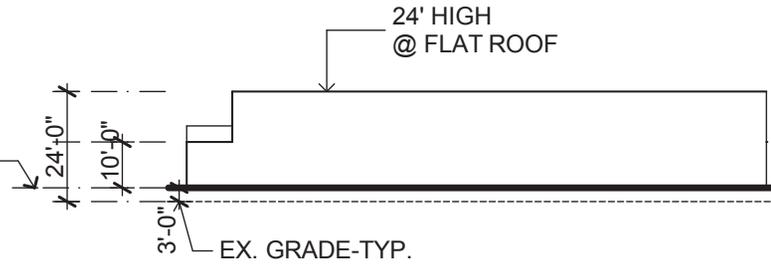
SOURCE: Goldman Firth Rossi Architects, January 2015

FIGURE 4.0-4

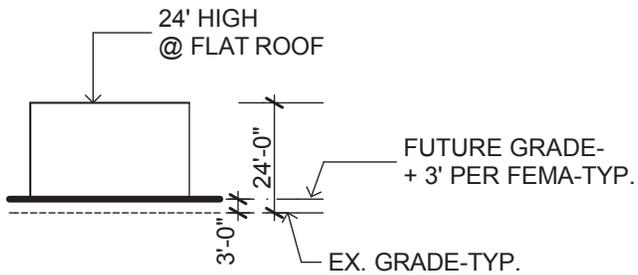
Two-Story Building Alternative Building and Elevations, Alternative 1



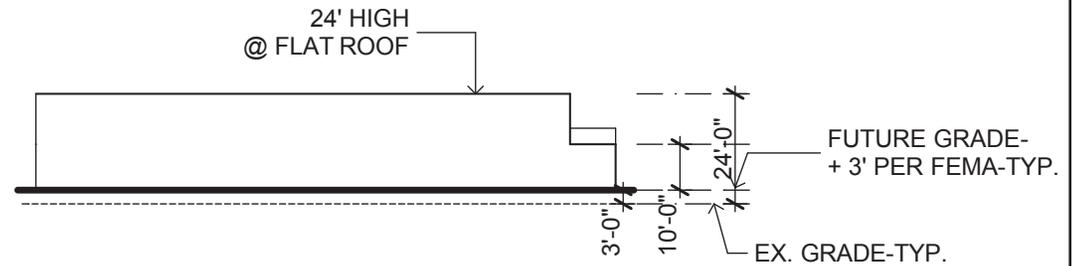
SOUTH ELEVATION



EAST ELEVATION



NORTH ELEVATION



WEST ELEVATION



SOURCE: Goldman Firth Rossi Architects, January 2015

FIGURE 4.0-5

Two-Story Building Alternative Building and Elevations, Alternative 2

The Two-Story Building Alternative would increase the general structure height in this portion of the Civic Center area. However, because existing buildings in the immediate vicinity of the project site include two-story homes that are approximately 28 feet in height, and two-story commercial buildings that are approximately 35 feet in height, changes to the aesthetic character in the vicinity would not be considered substantial.

As with the proposed project, foreground views would continue to be dominated by the roadway, parking, and the existing commercial buildings. Middle ground views would change slightly with the addition of taller buildings and trees. As shown in **Figures 3.1-12** through **3.1-15**, the Santa Monica Mountains are visible across the project site from several locations. Due to distance, as with the proposed project, background views of the mountains and hillsides would remain the dominant landscape feature under this alternative. Therefore, impacts relative to public scenic views would be less than significant.

Therefore, while impacts would be slightly greater due to taller structures than under the proposed project, impacts would still be less than significant.

Air Quality

The Two-Story Building Alternative would result in one one-story and two two-story buildings on the project site. Also included in this alternative would be additional open space compared to the proposed project.

Since construction emissions for projects of this type are directly proportional to the space being constructed, building construction emissions would be similar. There is no additional earthmoving or grading associated with this alternative, so there would be no change in emissions during those phases of construction. Consequently, construction emissions would be similar to the Proposed Project. No significant impacts during construction would occur. Similarly, there would be no change in operational emissions as there would be no change in traffic or building space. Operational emissions would be the same as for the Proposed Project. As such, impacts under this alternative would be the same as the proposed project.

Biological Resources

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open space improvements. However, this alternative does not change the nature or pattern of development. Eight native sycamore trees would be removed and be replaced with 80 new western sycamores as mitigation required under the MMC and

LCP. All new landscaping would be drought tolerant and would incorporate the plants species of both Malibu's and the Santa Monica Mountain's native coastal plant communities to the extent feasible.

No significant and unavoidable project or cumulative impacts to biological resources were identified with implementation of the proposed project. Similarly, the Two-Story Building Alternative would not significantly impact biological resources present on the project site. As such, impacts under this alternative would be the same as the proposed project.

Cultural Resources

As discussed in the environmental analysis in **Section 3.4, Cultural Resources**, the project site does not contain any known significant historic, archaeological, or paleontological resources, and there are no known cemeteries or burial grounds on the project site. The Two-Story Building Alternative would include the development of one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements, which could have the potential, albeit unlikely, to unearth previously unknown significant cultural resources, or disturb previously unknown human remains. However, implementation of **Mitigation Measures 3.4.1 through 3.4.3**, forth in **Section 3.4, Cultural Resources**, would ensure that impacts to cultural resources would be less than significant, and impacts would be similar as compared to the proposed project.

Geotechnical and Soil Resources

The Two-Story Building Alternative would consist of the development of one one-story and two two-story buildings on the project site. These building would include the same amount of grocery store, restaurant, and retail uses. Demolition, excavation, grading, and structure development parameters associated with this alternative would be similar to the proposed project.

No significant and unavoidable project or cumulative impacts to geotechnical and soil resources were identified with implementation of the proposed project. Given the similar development intensity associated with the Two-Story Building Alternative, no significantly impact geotechnical and soil resources environments can be reasonably anticipated. As such, impacts under this alternative would be the same as the proposed project.

Greenhouse Gas Emissions

The Two-Story Building Alternative would consist of the development of one one-story and two two-story buildings on the project site. These building would include the same amount of grocery store, restaurant, and retail uses. Demolition, excavation, grading, and structure development parameters

associated with this alternative would be similar to the proposed project. Therefore construction and operational emissions are assumed to be similar as well. No significant and unavoidable project or cumulative impacts to greenhouse gas emissions were identified with implementation of the proposed project. Therefore, similar to the proposed project, impacts with the Two-Story Building Alternative would be less than significant.

Hazards and Hazardous Materials

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements. Similar to the construction of the proposed project, development under this alternative would involve the use of those hazardous materials that are typically necessary for construction of commercial development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). However, similar to the proposed project the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. Therefore, development under this alternative would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. As the amount of construction taking place would be similar to the proposed project under this alternative, impacts would be comparable to the proposed project.

The Two-Story Building Alternative consists of the development of commercial retail and restaurant uses and a related surface parking lot with landscaping. Due to the commercial nature of the alternative, a variety of products would be transported to and exist on-site to be used and offered for sale and used for ongoing cleaning and landscaping maintenance. Such products would only be considered hazardous if used inappropriately or if exposed to unfavorable conditions. Similar to the proposed project, all potentially hazardous materials transported, stored, offered for sale, or used on-site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. With compliance with existing local, state, and federal regulations, the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment. Therefore, impacts related to this issue would be less than significant, and similar to the proposed project.

The project site, and all of Malibu, is considered a Very High Fire Hazard Severity Zone and has been impacted by wildfires in the past. This Alternative would introduce new buildings to the project site which could contribute to wildfire evacuation risks associated with employees and patrons fleeing the site and incrementally add to evacuation congestion and hazards. While implementation of this alternative could affect vehicle/capacity ratios and the level of service of roadways in the site vicinity,

with implementation **Mitigation Measures 3.13-1** through **3.13-3**, set forth in **Section 3.13, Transportation and Traffic**, similar to the proposed project, this alternative would have less than significant impacts to area traffic on both on a project and cumulative level. Further, increases in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the proposed project, this impact is not considered significant since emergency response times would not be substantially affected. In addition, similar to the proposed project, this alternative would comply with all applicable code and regulatory measures regarding fire safety and fuel modification, as well as implement **Mitigation Measures 3.11-1-1** through **3.11-1-7** set forth in **Section 3.11.1, Public Services – Fire Protection**. Therefore, similar to the proposed project, impacts would be less than significant.

Hydrology and Water Quality

The Two-Story Building Alternative would consist of the development of one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements on the project site. Demolition, excavation, grading, and structure development parameters associated with this alternative would be similar to the proposed project. Further, as required by the MMC, the City's MS4 permit and the LCP, development under this alternative would be required to provide a Water Quality Mitigation Plan, as well as implement **Mitigation Measures 3.8-1** and **3.8-2** set forth in **Section 3.8, Hydrology and Water Quality**.

No significant and unavoidable project or cumulative impacts to hydrology, drainage, or water quality were identified with implementation of the proposed project. Given the similar development intensity associated with the Two-Story Building Alternative, no significant impacts to hydrology and water quality can be reasonably anticipated.

Land Use and Planning

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements. Following the granting of the requested discretionary approvals as listed in **Section 2.0, Project Description**, including a Variance to provide less than the 40 percent on-site (and on-grade) landscaping requirement, there would be no impacts to land use and planning under the proposed project or this alternative. Impacts would be similar as compared to the proposed project.

Noise

The Two-Story Building Alternative would consist of one one-story and two two-story buildings, surface parking, and landscaping/open space improvements on the project site. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project. Demolition, excavation, grading, and structure development parameters associated with this alternative would be similar to the proposed project. However, given the increased complexity of constructing two two-story buildings as opposed to four one-story buildings (i.e., deeper, more complex building foundations, additional structural framing required for the first floor to support the second story, installation of elevators to meet ADA requirements, etc.), construction duration would increase.

Despite the inclusion of **Mitigation Measures 3.10-1** through **3.10-7**, as set forth in **Section 3.10, Noise**, significant and unavoidable construction noise would occur as a result of the proposed project. Similarly, the Two-Story Building Alternative would have significant and unavoidable construction noise impacts, which would occur over a longer period of time as compared to the proposed project.

With the implementation of **Mitigation Measures 3.10-8** through **3.10-10**, as set forth in **Section 3.10, Noise**, no significant and unavoidable project or cumulative impacts to noise environment would result with operation of the proposed project. The Two-Story Building Alternative would be required to implement the same Mitigation Measures. Therefore, operational impacts associated with noise would be similar to the proposed project under the Two-Story Building Alternative.

Public Services (Fire Protection and Police Protection)

Police Protection

The Two-Story Building Alternative would consist of one one-story and two two-story buildings, surface parking, and landscaping/open space improvements on the project site. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project. Demolition, excavation, grading, and structure development parameters associated with this for this alternative would be similar to the proposed project.

No significant and unavoidable project or cumulative impacts to police protection were identified with implementation of the proposed project. Similarly, the Two-Story Building Alternative would not significantly impact police protection service to the project site.

Fire Protection

The Two-Story Building Alternative would consist of one one-story and two two-story buildings, surface parking, and landscaping/open space improvements on the project site. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project. Demolition, excavation, grading, and structure development parameters associated with this for this alternative would be similar to the proposed project.

No significant and unavoidable project or cumulative impacts to police protection were identified with implementation of the proposed project. Similarly, the Two-Story Building Alternative would not significantly impact fire protection service to the project site.

Transportation and Traffic

The Two-Story Building Alternative would consist of one one-story and two two-story buildings, surface parking, and landscaping/open space improvements on the project site. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project. Demolition, excavation, grading, and structure development parameters associated with this for this alternative would be similar to the proposed project.

As the mix of uses on the site would remain the same as under the proposed project, this alternative would result in the same trip generation compared to the proposed project. However, similar to the proposed project, the Two-Story Building Alternative would implement **Mitigation Measures 3.13-1** through **3.13-3**, set forth in **Section 3.13, Transportation and Traffic**, and as with the proposed project impacts would be less than significant.

Utilities (Water Service, Wastewater, Solid Waste, Electricity and Natural Gas)

Water

The Two-Story Building Alternative would consist of one one-story and two two-story buildings, surface parking, and landscaping/open space improvements on the project site. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project and as such water consumption would be the same. No significant and unavoidable project or cumulative impacts to water service and supply were identified with operation of the proposed project. Similarly, the Two-Story Building Alternative would not significantly impact water service and supply.

Wastewater

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project and as such wastewater generation would be the same. Similar to the proposed project, development under the Two-Story Building Alternative would connect to the new Civic Center Water Treatment Facility (CCWTF). As described in **Section 3.14.4, Wastewater**, wastewater flow generation estimates for the CCWTF were developed for each type of land use within the Civic Center Area and specifically the proposed project site. These generation estimates were applied, by parcel, to develop the flow rates used in CCWTF project design and phasing. As the CCWTF design takes into account future wastewater flows from the project site, no significant and unavoidable project or cumulative impacts regarding wastewater were identified with operation of the proposed project. Similarly, development under the Two-Story Building Alternative would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities and as with the proposed project, impacts would be less than significant.

Solid Waste

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements. These building would include the same amount of commercial grocery store, general retail and restaurant uses as under the proposed project and as such solid waste generation would be the same. Similar to the proposed project, no solid waste impacts would occur for either construction or operation.

As discussed in **Section 3.14.5, Solid Waste**, while the proposed project would contribute to an incremental cumulative impact on landfill capacity, incorporation of mitigation requiring the recycling diversion of waste from landfills, the proposed project's contribution would not be cumulatively considerable. As development under this alternative would match that of the proposed project, impacts would be the same and less than significant.

Electricity

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project.

As shown in **Table 4.0-5**, the proposed project would consume approximately 1,225.85 kilowatt-hours of electricity per day. Compared to the proposed project, the Two-Story Building Alternative would have the same level of electricity consumption. No significant and unavoidable project or cumulative impacts regarding electricity were identified with operation of the proposed project. Electricity impacts would be the same under the Two-Story Building Alternative.

Natural Gas

Under the Two-Story Building Alternative, the project site would be developed with one one-story and two two-story buildings, surface parking, and landscaping/open scape improvements. These building would include the same amount of commercial grocery store, general retail, and restaurant uses as under the proposed project.

As shown in **Table 4.0-7** the proposed project would consume approximately 545.68 kBtu of natural gas per day. Compared to the proposed project, the Two-Story Building Alternative would have the same natural gas consumption. No significant and unavoidable project or cumulative impacts regarding natural gas were identified with operation of the proposed project. Natural gas impacts would be the same under the Two-Story Building Alternative.

Relationship of Alternative 3 to Project Objectives

This Alternative would meet the project objectives; with the exception of impacting the area viewshed. **Table 4.0-9** provides a summary of the project objectives and a discussion of the Two-Story Building Alternative's ability to meet the project objectives.

**Table 4.0-9
Proposed Project vs. Two-Story Building Alternative Comparison**

Objective	Consistency
Fulfill the City's General Plan and Local Coastal Program objectives for commercial development in the Civic Center area.	The Two-Story Alternative would meet this objective. Under this alternative, a generic grocery store building would be provided, along with 13,876 sf of retail/restaurant space. As a result, the project would remain desirable from a convenience point of view in that more activities or tasks could be combined with food shopping. Under this alternative, landscaping and open space would be provided, and the children's parks, community garden, and public open space would be constructed on the project site. Thus this alternative would provide a park-like atmosphere with a physical and visual link to Legacy Park.
Provide several compatible uses, meeting both local and visitor-serving needs, within one shopping center in a convenient location with shared parking.	The Two-Story Building Alternative would meet this objective. Under this alternative, 13,876 sf of local and visitor serving ancillary retail/restaurant structures would be consolidated into two two-story buildings rather than four single-story structures. As a result, the project would remain desirable from a convenience point of view in that more activities or tasks could be combined with food shopping. The project objective of serving as a center for multiple activities, and thus minimizing vehicle trips and air quality impacts, would be met.
Afford a wider range of organic grocery and produce options to support the Malibu community and reduce reliance on out-of-town markets and vehicle trips.	The Two-Story Building Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided. However, because of the site layout it cannot be assumed that Whole Foods would occupy the space; the unknown tenant may or may not have a commitment to providing a wide range of organic grocery and produce options. Patrons wishing to purchase these items may still need to travel to the San Fernando Valley Santa Monica or West Los Angeles to shop at Whole Foods.
Extend the shopping experience that exists on Cross Creek Road into a park-like atmosphere, which will provide a physical and visual link to Legacy Park.	The Two-Story Building Alternative would meet this objective. Under this alternative, a grocery store would be provided; along with 13,876 sf of retail/restaurant space and 4,800 sf of outdoor dining space. As a result, this alternative would provide shopping and dining opportunities similar to the proposed project. Under this alternative, slightly more landscaping and open space would be provided compared to the proposed project, thus this alternative would provide a park-like atmosphere with a physical and visual link to Legacy Park.
Situate the project in an area where it is clustered with other similar uses along the eastern portion of Civic Center Way.	The Two-Story Building Alternative would meet this objective. This Alternative would provide the 13,876 square feet of retail/restaurant space and 4,800 sf of outdoor dining areas in two, two-story buildings. As a result, the site would provide a cluster of similar uses, and as with the proposed project, offer with greater opportunities for shopping and dining.
Increase pedestrian interaction among the business and public spaces along Civic Center Way and Cross Creek Road.	The Two-Story Building Alternative would meet this objective. This alternative would provide three attractive buildings along with landscaping, a children's park and public open space, intended to encourage pedestrian traffic in the Civic Center area.

Objective	Consistency
Create a visually appealing and inviting project to add to the Civic Center of Malibu.	The Two-Story Building Alternative would partially meet this objective. Under this alternative, three attractive buildings along with landscaping, two children’s parks, a community garden, and public open space would be constructed on the project site. However, this layout would not fulfill the intent of the proposed project design, which is that of a low-rise retail village, with a series of small, intimate courtyards.
Revegetate the site with plantings that incorporate the plants species of both Malibu’s and the Santa Monica Mountain’s native coastal plant community.	The Two-Story Building Alternative would meet this objective. As with the proposed project, all plantings would be drought tolerant and would include species of both Malibu’s and the Santa Monica Mountain’s native coastal plant community to the extent feasible.
Provide an aesthetic relationship to the Santa Monica Mountains and Malibu Creek.	The Two-Story Building Alternative would meet this objective. Under this alternative, two, two story buildings would be constructed on the project site. Due to their distance, background views of the Santa Monica Mountains and Malibu Creek would be maintained from and through the site.
Minimize and eliminate negative impacts to the neighborhood.	The Two-Story Building Alternative would partially meet this objective. Under this alternative, a generic grocery store building along with 13,876 sf of retail/restaurant space would be provided. As a result, this alternative would provide similar shopping and dining opportunities, expanding the shopping experience in the area. Under this alternative, landscaping and open space would be provided along with two children’s parks, community gardens, ancillary retail, and restaurant facilities with outdoor dining. However, construction noise impacts under this alternative would be greater.
Deliver project features that contribute significant benefits to the community.	The Two-Story Building Alternative would partially meet this objective. Under this alternative, a generic grocery store building would be provided along with 13,876 sf of retail/restaurant space and 4,800 sf of outdoor dining area. However, because of the site layout it cannot be assumed that Whole Foods would occupy the space; the unknown tenant may or may not have a commitment to providing a wide range of organic grocery and produce options. Patrons wishing to purchase these items may still need to travel to the San Fernando Valley Santa Monica or West Los Angeles to shop at Whole Foods, increasing vehicle trips. Under this alternative, landscaping and open space would be provided, along with two children’s parks, and a community garden; foot traffic to the site would be increased. Further, this alternative would provide a park-like atmosphere with a physical and visual link to Legacy Park.

Alternatives Summary and Comparison

Table 4.0-10, Environmental Impact Comparison to the Proposed Project, compares the severity of each alternative’s impact to impacts associated with implementing the proposed project. Alternatives either result in fewer, comparable or more impacts than the proposed project.

**Table 4.0-10
Environmental Impact Comparison to the Proposed Project**

Resource Topic	Proposed Project	Alternative 1 No Project	Alternative 2 Code Complying	Alternative 3 Two-story Buildings
Aesthetics	Less Than Significant	No Impact	Comparable	Slightly Worse
Air Quality – Construction	Less than Significant	No Impact	Reduced	Comparable
Air Quality – Operations	Less than Significant	No Impact	Reduced	Comparable
Biological Resources	Less Than Significant	No Impact	Comparable	Comparable
Cultural Resources	Less Than Significant	No Impact	Comparable	Comparable
Geology & Soils	Less Than Significant	No Impact	Comparable	Comparable
Greenhouse Gas Emissions	Less Than Significant	No Impact	Reduced	Comparable
Hazards & Hazardous Materials	Less Than Significant	No Impact	Comparable	Comparable
Hydrology & Water Quality	Less Than Significant	No Impact	Comparable	Comparable
Land Use	Less Than Significant	No Impact	Superior	Slightly Superior
Noise – Construction	Significant & Unavoidable	No Impact	Reduced	Worse
Noise – Operations	Less Than Significant	No Impact	Comparable	Comparable
Public Services - Police	Less Than Significant	No Impact	Comparable	Comparable
Public Services - Fire	Less Than Significant	No Impact	Comparable	Comparable
Recreation	Less Than Significant (Beneficial)	No Impact	Comparable	Comparable
Traffic	Less Than Significant	No Impact	Increased	Comparable
Utilities - Water	Less Than Significant	No Impact	Reduced	Comparable
Utilities - Wastewater	Less Than Significant	No Impact	Reduced	Comparable
Utilities – Solid Waste	Less than Significant	No Impact	Reduced	Comparable
Utilities - Electricity	Less Than Significant	No Impact	Increased	Comparable
Utilities – Natural Gas	Less Than Significant	No Impact	Increased	Comparable

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the *State CEQA Guidelines* indicates that an analysis of alternatives to the proposed project shall identify one alternative as the environmentally superior alternative. Furthermore, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. Based on the analysis included herein, Alternative 1: No Project/No Development would be considered environmentally superior to the proposed project because it would avoid and/or substantially reduce the severity of significant impacts associated with implementing the proposed project. Alternative 1, however, would not meet any of the project objectives.

A secondary environmentally superior alternative would be Alternative 2, the Code Complying Alternative. As discussed above, the Code Complying Alternative would incrementally lessen significant

noise impacts associated with the proposed project, although these impacts would not be substantially lessened to the point where it is considered to be below a level of significance, and as discussed above, this alternative would incrementally worsen impacts to traffic, electricity and natural gas. Further, as shown in **Table 4.0-8**, the Code Complying Alternative would not attain the most of project objectives, including providing several compatible uses, meeting both local and visitor-serving needs, within one shopping center in a convenient location with shared parking and extending the shopping experience across Cross Creek Road. This alternative would attain other project objectives, but it would be to a lesser extent than the proposed project.