6.0 ALTERNATIVES

As required by Section 15126.6 of the State *CEQA Guidelines*, this section of the EIR examines a range of reasonable alternatives to the proposed project that could feasibly achieve similar objectives to those of the proposed project while reducing or eliminating the proposed project's significant environmental effects. Included in this analysis are three alternatives that involve different development scenarios for the 2008-2014 Housing Element Update and the CEQA-required "no project" alternative. As discussed in Section 2.0, *Project Description*, the City has identified four additional parcels for analysis as alternatives to the three parcels selected for analysis as part of the "proposed project." The alternative candidate sites include:

- Candidate Site #3: 3542 Coast View Drive 6.99 acres (APN 4458-021-003)
- Candidate Site #4: No address assigned 10.22 acres (APNs 4458-021-174 and -175)
- Candidate Site #5: 23801 Stuart Ranch Rd 6.45 acres (APN 4458-022-012)
- Candidate Site #6: No address assigned (known as the Wave Property) 8.48 acres (APN 4458-022-019)

The alternatives to the proposed project are:

- *Alternative* 1: *No Project*
- Alternative 2: Candidate Site #3
- Alternative 3: Candidate Site #4
- Alternative 4: Candidate Sites #5 and #6

Each of these alternatives is described and analyzed below for the issue areas for which impacts would be reduced. Any issue area not analyzed under a specific alternative (other than the No Project Alternative) would have similar impacts as the proposed project, and the same mitigation measures would be applicable to it as for the proposed project. As required by CEQA, this section also includes a discussion of the "environmentally superior alternative" among those studied.

6.1 ALTERNATIVE 1: NO PROJECT

6.1.1 Description

This alternative assumes that the 2008-2014 Housing Element Update project is not implemented and that no change from current conditions occurs.

6.1.2 Impact Analysis

The No Project alternative would involve no changes to the physical environment and thus would have no environmental effects, either adverse or beneficial. As such, this alternative would have generally reduced impacts with respect to issues such as traffic, air quality, cultural resources, biological resources, and noise. No mitigation measures would be required for this Alternative. Overall impacts would be lower than those of the proposed project since no change to environmental conditions would occur. Housing development within the City would continue, as guided by the existing Housing Element. This Alternative would not meet the very

low- and low-income housing need identified by the Regional Housing Needs Assessment (RHNA), as it would not provide adequate sites to accommodate the adjusted RHNA allocation (Note: the City current meets it RHNA requirement for moderate and above moderate households). This Alternative would not establish any of the proposed programs, policies, or actions that would generally further the goal of meeting the existing and projected housing needs of very low and low income levels of the City. Finally, implementation of this Alternative would not preclude future proposals for development of the candidate sites.

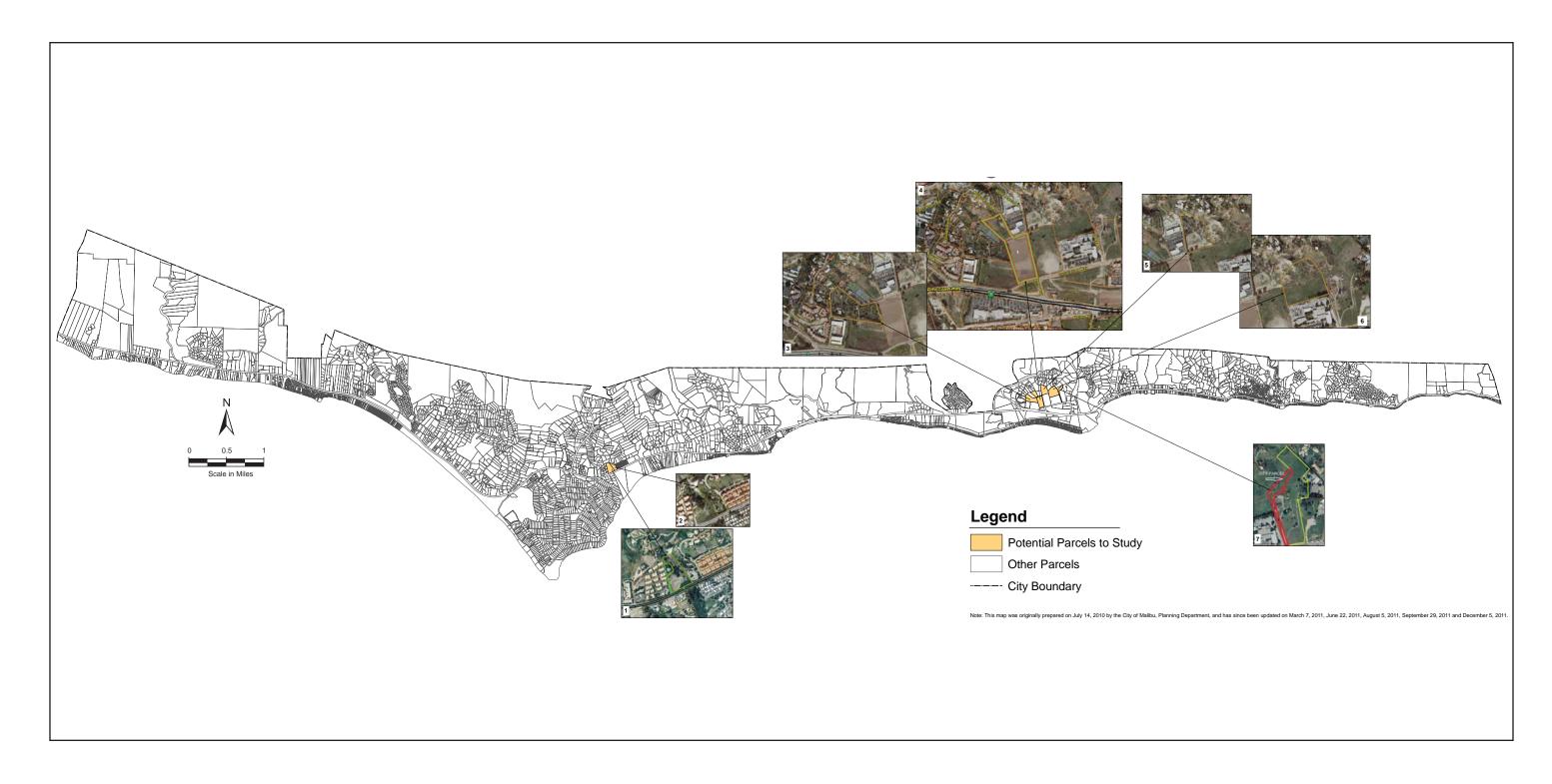
6.2 ALTERNATIVE 2: CANDIDATE SITE #3

6.2.1 Description

Alternative 2 assumes adoption of the Housing Element programs and objectives as the proposed project (refer to Section 2.0, *Project Description*), but would limit potential development to Candidate Site #3. Candidate Site #3 would include a density of 27 units/acre under an Affordable Housing Overlay (AHO) designation (as opposed to 25 units/acre proposed by the project). At a density of 27 units/acre, the development potential of Candidate Site #3 would be 188 units. Therefore, this Alternative would meet the very low- and low-income housing need identified by the RHNA, as this Alternative would provide adequate sites to accommodate the adjusted RHNA allocation. The proposed Housing Element Update would develop a total of 8.55 acres within the City, whereas Alternative 2 would only develop approximately 6.99 acres; thereby reducing the total area of disturbance by 1.56 acres. The potential development of 188 units is lower than what would be facilitated under the proposed project, which would facilitate up to 212 units.

6.2.2 Impact Analysis

- **a. Aesthetics.** Alternative 2 would facilitate 24 fewer units as compared to the proposed project and the area of disturbance would be reduced by approximately 1.56 acres. Alternative 2 would similarly result in less than significant impacts to public view of scenic resources when compared to the proposed project, as development of Candidate Site #3 would not adversely impact designated scenic resources or viewing points since there are no scenic resources or viewing points on the site or near the site. In addition, Alternative 2 would result in similar impacts related to the alteration of visual character of the Candidate Sites due to the generally similar level of overall development that would occur when compared to the proposed project, and impacts would remain Class III, *less than significant*. Alternative 2 would result in similar levels of light and glare; however, city regulations would minimize light and glare impacts, and impacts would remain Class III, *less than significant*.
- **b. Air Quality.** Alternative 2 would facilitate 24 fewer units as compared to the proposed project and the area of disturbance would be reduced by approximately 1.56 acres. As such, construction emissions would be slightly reduced; however, construction emissions would remain Class II, *significant but mitigable*. In addition, this alternative would result in a reduction in the overall energy usage, mobile emissions, and area source emissions. This would further reduce operational air quality impact associated with the proposed project and associated impacts would remain Class III, *less than significant*. Impacts related to objectionable odors would be similar under this alternative when compared to the proposed project and would remain Class III, *less than significant*. Using the California Department of Finance's



estimate of 2.38 persons per household for Malibu, Alternative 2 would result in a reduction of 58 residents as compared to the proposed project. A reduction in the number of residents generated by Alternative 2 would further reduce the Class III, *less than significant*, impact associated with Air Quality Management Plan consistency. This Alternative would incrementally reduce traffic generated by the project, as there would be an overall reduction in the number of additional vehicle miles traveled associated with a reduced number of residents generated by Alternative 2. Therefore, Alternative 2 would further reduce impacts related to carbon monoxide hotspots and such impacts would remain Class III, *less than significant*. The mitigation measures in Section 4.2, *Air Quality*, related to dust control and equipment exhaust during construction recommended for the proposed project would still apply and would reduce air quality impacts to the extent feasible.

- **c. Biological Resources.** As discussed in Section 4.3, *Biological Resources*, special-status plant species have the potential to occur on Candidate Sites #1 and #7 based on the existing habitat conditions and each species' ecological requirements (refer to Section 4.3, *Biological Resources*). Alternative 2 would reduce impacts to special-status plant species to a Class III, *less than significant* level as none are expected to occur on the site. As discussed in Section 4.3, *Biological Resources*, native tree species that are protected under the Native Tree Protection Ordinance and special status animal species may be present on Candidate Site #1, #2, and #7. Alternative 2 would reduce impacts to native tree species and special status animal species, as no such biological resources are present on Candidate Site #3.
- **d. Cultural Resources.** As discussed in Section 4.4, *Cultural Resources*, development on Candidate Sites #1, #2, and #7 would not impact any known archaeological sites; nevertheless, Mitigation Measure CR-1 is require to minimize potential impacts to unknown archaeological resources. In addition, as discussed in the Constraints Analysis (Appendix D), no known archaeological resources occur on Candidate Site #3. Development on Candidate Site #3 would similarly be required to implement Mitigation Measure CR-1. As stated in Section 4.4 and discussed in the Constraints Analysis, no historical resources occur on Candidate Site #3; therefore, impacts would be Class III, *less than significant*.
- e. Geology and Soils. As discussed in Section 4.5, Geology and Soils, the Malibu Coast Fault passes east-west through Candidate Site #7. According to the Constraints Analysis (Appendix D), no surface faults were identified on Candidate Site #3. Therefore, impacts would be reduced from Class II to Class III, less than significant. As development of this alternative would require implementation of the most recent industry standards for structural designs and California Building Code, impacts related to seismically induced ground shaking would be similar to that of the proposed project and would be Class III, less than significant. As Candidate Site #3 could potentially be underlain by artificial cut and fill and alluvial materials, development facilitated by this alternative may be subject to seismic settlement, expansion, or liquefaction. Therefore, impacts related to these hazards would be similar to those of the proposed project, and would be Class II, significant but mitigable. As discussed in Section 4.5, Geology and Soils, portions of Candidate Sites #1, #2, and #7 are located in areas of potential landslide hazard and contain slopes in excess of 30%, which could expose future residential development and people to landslide and erosion risks. According to the Constraints Analysis (Appendix D), the northern portion of Candidate Site #3 contains slopes that range from 15-29.99% and 30-49.99%. Therefore, impacts related to landslide and erosion risks would be similar to those of the proposed project and would be Class II, significant but mitigable.

f. Greenhouse Gas Emissions. Alternative 2 would facilitate 24 fewer units and 58 fewer residents, as compared to the proposed project. A reduction in the number of residents and units would result in a reduction GHG emissions associated with project construction, consumer product use, energy use, solid waste generation, water use, and mobile emissions. As such, Alternative 2 would further reduce the Class III, *less than significant*, operational and construction GHG impact. The proposed project's Class III, *less than significant*, impact related to consistency with established policies related to GHG reduction would be similar under this alternative.

g. Hazards and Hazardous Materials. As discussed in Section 4.7, *Hazards and Hazardous Materials*, the southern boundaries of Candidate Sites #1 and #2 abut Pacific Coast Highway (PCH), a major haul route within the City, and could expose future residents to potentially harmful chemicals and materials resulting from accidents along PCH. Alternative 2 would avoid these impacts as Candidate Site #3 is not located adjacent to PCH. As discussed in Section 4.7, *Hazards and Hazardous Materials*, surficial soil on Candidate Sites #1 and #2 adjacent to PCH could contain aerially-deposited lead (ADL). The Constraints Analysis (Appendix D) did not identify potential soil contamination due to ADLs as a potential constraint for Candidate Site #3. Therefore, Alternative 2 would avoid these impacts. According to Section 4.7, *Hazards and Hazardous Materials*, development facilitated by the Housing Element Update, notably on Candidate Sites #1 and #2, may require the demolition of existing residential structures that could contain asbestos or lead based paints. These impacts would be avoided under Alternative 2.

As discussed in Section 4.7, Hazards and Hazardous Materials, Candidate Site #7 has the potential to contain onsite soil contamination due to the previous agricultural use of the site. Candidate Site #3 was recently remediated and no contamination is present on the site. As result, this Alternative would reduce soil contamination impacts when compared to the proposed project. As discussed in Section 4.7, Hazards and Hazardous Materials, Preliminary Site Assessments (PSA) were conducted for all three candidate sites (#1, #2, and #7) and found that none of the candidate sites were identified on any public lists of hazardous materials sites subject to potential impacts associated with hazardous material release from nearby sites. As this Alternative would involve the application of the Affordable Housing Overlay (AHO) district and the potential development of Candidate Site #3 (which is approximately 0.30 mile west of Candidate Site #7), it can be reasonably assumed that the Class III, less than significant, impact related to potential hazards resulting from hazardous material sites would be the same under this alternative due to the proximity of nearby listed sites to both properties. As this Alternative would be required to comply with Los Angeles County Fire Department access standards to provide adequate onsite access in the event of an emergency, impacts associated with emergency response or evacuation plans would be similar to those of the proposed project and would remain Class III, less than significant. The proposed project's Class III, less than significant, impact related to wildland fire hazards would remain under Alternative 2.

h. Hydrology. Alternative 2 would result in a reduced area of disturbance by approximately 1.56 acres and therefore would result in fewer impacts related to soil erosion, stormwater runoff, and surface water quality. Impacts related to these issue areas would be Class III, *less than significant*. Similarly, impacts related to flooding, tsunamis and seiches would be Class III, *less than significant*, as Candidate Site #3 is not located in any inundation zone relative to these hazards.

- **i. Land Use.** Similar to the proposed project, Alternative 2 would generally be consistent with all policies listed in Section 4.9, *Land Use.* As a result, impacts would remain less than significant. Candidate Site #3 would primarily be surrounded by residential land uses; however, it would be located immediately adjacent to the existing Malibu Racquet Club and other vacant land that is designated for commercial land uses. Noise generated by these adjacent land uses could impact future residences on Candidate Site #3. Any noise generated by the nearby commercial uses would be intermittent in nature (e.g., deliveries, trash hauling, and parking vehicles), and would not exceed City noise standards, which are based on 24-hour average ambient noise levels. Therefore, future residential development on Candidate Site #3 would not be exposed to excessive noise from commercial operations in the vicinity. Impacts would be Class III, *less than significant*.
- **j. Noise**. Alternative 2 would facilitate a reduced number of residents, as compared to the proposed project. A reduction in the number of residents translates to a reduction of 159 (8 units x 6.65 trips per day) project-generated vehicle trips per day and a proportionate reduction in associated roadway noise. This would further reduce the Class III, *less than significant*, traffic generation noise impact. Noise impacts associated with construction would be Class II, *significant but mitigable*, and all mitigation measures recommended for the proposed project would apply. Candidate Site #3 would primarily be surrounded by residential land uses; however, it would be located immediately adjacent to the existing Malibu Racquet Club and other vacant land that is designated for commercial land uses. Noise generated by the nearby commercial uses would be intermittent in nature (e.g., deliveries, trash hauling, and parking vehicles), and would not exceed City noise standards, which are based on 24-hour average ambient noise levels. Therefore, future residential development on the Candidate Site #3 would not be exposed to excessive noise from commercial operations in the vicinity. Impacts would be Class III, *less than significant*.
- **k. Population and Housing**. Alternative 2 would facilitate 24 fewer units and 58 fewer residents, as compared to the proposed project. Therefore, this alternative would result in less growth when compared to the proposed project, and impacts would remain Class III, *less than significant*. Similar to the proposed project, impacts associated with the displacement of people of housing would be Class III, *less than significant*.
- **1. Public Services**. Alternative 2 facilitates 24 fewer units and 58 fewer residents as compared to the proposed project. A reduction in the overall number of additional residents would further reduce the proposed project's Class III, *less than significant*, impacts associated with fire protection and police protection services due to decreased demand for such services. Similarly, fewer units would generate fewer school-aged children and would therefore further reduce impacts to public school facilities. As with the proposed project, impacts associated with this Alternative would be Class III, *less than significant*.
- **m.** Transportation and Traffic. Alternative 2 would result in reduced traffic impacts at this intersection because it would generate 159 fewer vehicle trips per day. However, this Alternative would still generate vehicle trips. Impacts would remain Class II, *significant but mitigable*.

Alternative 2 would result in reduced traffic impacts at these roadway segments because it would generate fewer vehicle trips. Therefore, impacts to study intersections are assumed to remain Class III, *less than significant*.

As discussed in Section 4.13, *Transportation and Traffic*, the proposed project would result in less than significant impacts to CMP intersections. Because Alternative 2 would result in fewer vehicle trips, impacts would be less than significant. Similarly, the proposed project would result in less than significant impacts related to transportation plans, alternative transportation, traffic hazards and emergency access. Because Alternative 2 would result in fewer vehicle trips, impacts would remain Class III, *less than significant*.

n. Utilities and Service Systems. Alternative 2 would result in 24 fewer units and 58 fewer residents, as compared to the proposed project. A reduction in the overall number of additional residents would further reduce less than significant impacts associated with water demand, wastewater generation, and solid waste disposal due to decreased demand. Similar to the proposed project, impacts would be Class III, *less than significant*. Regulatory impacts regarding area landfills and impacts related to storm drain facilities would be Class III, *less than significant*.

6.3 ALTERNATIVE 3: CANDIDATE SITE #4

6.3.1 Description

Similar to the Housing Element Update, Alternative 3 would establish programs, policies and actions to generally further the goal of meeting the existing and projected housing needs of all family income levels of the community, and specifically to provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2014, as established by the Southern California Association of Governments (SCAG). This alternative would modify Candidate Site #4 as opposed to Candidate Sites #1, #2, and #7. Candidate Site #4 is comprised of two parcels (once a single parcel) that have a gross size of 10.22-acres, and which are currently zoned Community Commercial. This alternative would modify Candidate Site #4 to a density of 20 units/acre under AHO, the minimum density required by State housing law to meet the definition of "affordable". Therefore, Candidate Site #4 would have the potential for approximately 204 units, which is 8 units less than would be facilitated by the proposed project. This Alternative would meet the very-low and low income housing need identified by the RHNA, as this alternative would provide adequate sites to accommodate the adjusted RHNA allocation (see Section 2.0, Project Description). Alternative 3 would be consistent with the objectives of the Housing Element Update. The potential development of 204 units is less than the proposed project, which would facilitate up to 212 units.

6.3.2 Impact Analysis

a. Aesthetics. Alternative 3 would facilitate approximately 8 fewer units as compared to the proposed project and the area of disturbance would be reduced by approximately 1.13 acres. Alternative 3 would result in less than significant impacts to public views of scenic resources and would have less impact when compared to the proposed project, as development of Candidate Site #4 would not adversely impact designated scenic resources or viewing points

since the site does not contain any and is not located near designated scenic resources or viewing points. Alternative 3 would result in similar impacts related to the alteration of visual character of the candidate sites due to the generally similar level of overall development that would occur when compared to the proposed project, and impacts would be Class III, *less than significant*. Alternative 3 would result in similar levels of light and glare. As with the proposed project, City regulations would minimize light and glare impacts and impacts would be Class III, *less than significant*.

- b. Air Quality. Alternative 3 would facilitate approximately 8 fewer units as compared to the proposed project and the area of disturbance would be reduced by approximately 1.13 acres. A reduction in the area of disturbance would slightly reduce construction air quality impact. Nevertheless, as with the proposed project, impacts would be Class II, significant but mitigable and the mitigation measures associated with dust control and equipment exhaust during construction would apply. A reduction in the number of units developed would result in a reduction in the overall energy usage, mobile emissions, and area source emissions. This would further reduce impacts related to operational air quality and impacts would be Class III, less than significant. Impacts related to objectionable odors would be Class III, less than significant, as this Alternative would not generate odors or be exposed to odors. Using the California Department of Finance's estimate of 2.38 persons per household for Malibu, Alternative 3 would result in a reduction of approximately 19 residents as compared to the proposed project. A reduction in the number of residents generated by Alternative 3 would further reduce impacts associated with Air Quality Management Plan consistency and impacts would be Class III, less than significant. This Alternative would incrementally reduce traffic generated by the project, as there would be an overall reduction in the number of additional vehicle miles traveled associated with reduced number of residents generated by Alternative 3. Therefore, Alternative 3 would further reduce impacts related to carbon monoxide hotspots and, as with the proposed project, impacts would be Class III, less than significant.
- c. Biological Resources. According to the Constraints Analysis (Appendix D), nesting bird habitat is present within the ornamental trees on Candidate Site #4, the southwest corner of the site is adjacent to a wetland, and much of the southern portion of the site is wet and may be classified as a "farmed wetland", which may impact protected nesting birds and wetland habitat. No special-status plant species were identified in the Constraints Analysis, and as such, the proposed project's Class II significant but mitigable, impacts related to special status plant species would be reduced to Class III, less than significant, under this alternative. No protected trees were identified on the site and impacts would be Class III, less than significant. Candidate Site #4 contains nesting bird habitat; therefore, impacts related to special-status species would be similar to those of the proposed project and would be Class II, significant but mitigable.
- **d. Cultural Resources.** As discussed in Section 4.4, *Cultural Resources*, development on Candidate Sites #1, #2, and #7 would not impact any known archaeological sites; however, Mitigation Measure CR-1 is require to minimize potential impacts to unknown archaeological resources. In addition, as discussed in the Constraints Analysis (Appendix D), no known archaeological resources occur on Candidate Site #4. Development on Candidate Site #4 would similarly be required to implement Mitigation Measure CR-1. As stated in Section 4.4 *Cultural Resources*, and discussed in the Constraints Analysis, no historical resources occur on Candidate Site #4; therefore, impacts would be Class III, *less than significant*.

- e. Geology and Soils. As discussed in Section 4.5, Geology and Soils, the Malibu Coast Fault passes east-west through Candidate Site #7. According to the Constraints Analysis (Appendix D), no surface faults were identified on Candidate Site #4. Therefore, impacts related to seismically induced ground surface rupture impact would be reduced from Class II, significant but mitigable to Class III, less than significant, under this Alternative. Development under this Alternative would similarly be required to implement the California Building Code and, as such, impacts related to seismically induced ground shaking would be Class III, less than significant. Because Candidate Site #4 could potentially be underlain by artificial cut and fill and alluvial materials, development facilitated by this Alternative may be subject to seismic settlement, expansion, or liquefaction. Therefore, impacts related to these hazards would be the same as those of the proposed project and would be Class II, significant but mitigable. As discussed in Section 4.5, Geology and Soils, portions of Candidate Sites #1, #2, and #7 are located in areas of potential landslide hazard and contain slopes in excess of 30%, which could expose future residential development and people to landslide and erosion risks. According to the Constraints Analysis (Appendix D), the northern portion of Candidate Site #4 contains slopes that range from 15-29.99% and 30-49.99%. Therefore, impacts related to landslide and erosion risks would be similar to those of the proposed project and would be Class II, significant but mitigable.
- **f. Greenhouse Gas Emissions.** Alternative 3 would facilitate 8 fewer units and 19 fewer residents, as compared to the proposed project. A reduction in the number of residents and units would result in a reduction GHG emissions associated with project construction, consumer product use, energy use, solid waste generation, water use, and mobile emissions. As such, Alternative 3 would further reduce the Class III, *less than significant*, operational and construction GHG impacts. The proposed project's Class III, *less than significant*, impact related to consistency with established policies related to GHG mitigation would remain under this Alternative.
- g. Hazards and Hazardous Materials. As discussed in Section 4.7, Hazards and Hazardous Materials, the southern boundaries of Candidate Sites #1 and #2 abut PCH, a major hauling route within the City, and could expose future residents to potentially harmful chemicals and materials resulting from accidents along PCH. Candidate Site #4 is located along the northern boundary of Civic Center Way and is located approximately 250 feet north of PCH. Therefore, this Alternative would reduce impacts related to the exposure of future residents to potentially harmful chemicals and materials resulting from accidents along PCH and impacts would be Class III, less than significant. According to the Constraints Analysis (Appendix D), no hazards, other than geologic hazards, were identified on Candidate Site #4. As discussed in Section 4.7, Hazards and Hazardous Materials, surficial soil on Candidate Sites #1 and #2 adjacent to PCH could contain aerially-deposited lead (ADL). Given that Candidate Site #4 is not located adjacent to a major roadway, this Alternative would reduce impacts related to soils contaminated with ADL to Class III, less than significant. According to Section 4.7, Hazards and Hazardous Materials, development facilitated by the proposed Housing Element Update, notably on Candidate Sites #1 and #2, may require the demolition of existing residential structures that could contain asbestos or lead based paints. As Candidate Site #4 may also require the demolition of existing structures, this alternative would have similar impacts to those of the proposed project and such impacts would be Class III, less than significant.

Possible soil contamination, as a result of previous agricultural use of the site, was not identified as a potential constraint (refer to the Constraints Analysis in Appendix D). Therefore, under this Alternative impacts related to onsite soil contamination due to pesticides would be reduced from Class II, significant but mitigable to Class III, less than significant. As discussed in Section 4.7, Hazards and Hazardous Materials, PSAs were conducted for all three candidate sites (#1, #2, and #7) and found that none of the candidate sites were identified on any public lists of hazardous materials sites subject to potential impacts associated with hazardous material release from nearby sites. According to the PSA conducted for Candidate Site #7, which is approximately 0.25 miles west of Candidate Site #4, sites with environmental listings in the vicinity of Candidate Site #7 would not be expected to impact the site. Based on the proximity of Candidate Site #4 to Candidate Site #7, impacts related to potential hazards resulting from hazardous material sites would be the same under this alternative as under the proposed project and would be Class III, less than significant. As this alternative would be required to comply with Los Angeles County Fire Department access standards to provide adequate onsite access in the event of an emergency, impacts associated with emergency response or evacuation plans would be similar to those of the proposed project and would be Class III, less than significant. Impacts related to wildland fire hazards would be Class III, less than significant due to existing regulations that would minimize potential impacts.

- **h. Hydrology.** Alternative 3 would result in a reduced area of disturbance by approximately 1.13 acres and therefore would result in fewer impacts related to soil erosion, storm water runoff, and surface water quality as compared to the proposed project. Impacts related to these issue areas would be Class III, *less than significant*. Similarly, impacts related to flooding, tsunamis and seiches would be Class III, *less than significant*, as Candidate Site #4 is not located in any inundation zone relative to these hazards.
- **i. Land Use.** Similar to the proposed project, Alternative 3 would generally be consistent with all policies listed in Section 4.9, *Land Use.* As a result, impacts would remain less than significant. Candidate Site #4 would be located immediately adjacent to land that is designated for commercial land uses, which could expose future residents to nuisance noise. However, noise generated by the nearby commercial uses would be intermittent in nature (e.g., deliveries, trash hauling, and parking vehicles), and would not exceed City noise standards, which are based on 24-hour average ambient noise levels. Therefore, future residential development on Candidate Site #4 would not be exposed to excessive noise from commercial operations in the vicinity. Impacts would be Class III, *less than significant*.
- **j. Noise**. Alternative 3 would facilitate 8 fewer residences as compared to the proposed project. A reduction in the number of residents translates to a reduction of 53 project-generated vehicle trips per day (8 units x 6.65 trips per day) and a proportionate reduction in associated roadway noise. This would further reduce traffic generated noise impacts and impacts would be Class III, *less than significant*. Similar to the proposed project, noise impacts associated with construction would be Class II, *significant but mitigable*, and all mitigation measures recommended for the proposed project would apply. Similar to the proposed project, noise impacts associated with surrounding land uses would be Class III, *less than significant*.
- **k. Population and Housing**. Alternative 3 would facilitate 8 fewer affordable housing units and 19 fewer residents, as compared to the proposed project. Therefore, this alternative would result in less growth when compared to the proposed project, and impacts would

remain Class III, *less than significant*. As with the proposed project, impacts associated with the displacement of people or housing would be Class III, *less than significant*.

- **1. Public Services**. Alternative 3 would facilitate 8 fewer units and 19 fewer residents, as compared to the proposed project. A reduction in the overall number of additional residents would reduce the proposed project's Class III, *less than significant*, impacts associated with fire protection and police protection services. A reduction of 55 residents could result in a reduction in school-aged children and would therefore reduce the proposed project's Class III, *less than significant*, public school facilities impact.
- **m.** Transportation and Traffic. Alternative 3 would result in reduced traffic impacts at this intersection because it would generate 53 fewer vehicle trips. However, this Alternative would still generate vehicle trips. Impacts would remain Class II, *significant but mitigable*.

Alternative 3 would result in reduced traffic impacts at these roadway segments because it would generate fewer vehicle trips. Therefore, impacts to study intersections are assumed to remain less than significant.

As discussed in Section 4.13, *Transportation and Traffic*, the proposed project would result in less than significant impacts to CMP intersections. Because Alternative 3 would result in fewer vehicle trips, impacts would also be less than significant. Similarly, the proposed project would result in less than significant impacts related to transportation plans, alternative transportation, traffic hazards and emergency access. Because Alternative 3 would result in fewer vehicle trips, its impacts would also be Class III, *less than significant*.

n. Utilities and Service Systems. Alternative 3 would facilitate 8 fewer units and 19 fewer residents, as compared to the proposed project. A reduction in the overall number of additional residents would further reduce the proposed project's Class III, *less than significant*, impacts associated with water demand, wastewater generation, and solid waste disposal. Regulatory impacts regarding area landfills and impacts related to storm drain facilities would remain Class III, *less than significant*.

6.4 ALTERNATIVE 4: CANDIDATE SITES #5 AND #6

6.4.1 Description

Similar to the proposed project, Alternative 4 would establish programs, policies and actions to generally further the goal of meeting the existing and projected housing needs of all family income levels of the community, and specifically to provide evidence of the City's ability to accommodate the RHNA allocation through the year 2014, as established by SCAG. This alternative would modify Candidate Sites #5 and #6 as opposed to Candidate Sites #1, #2, and #7. Candidate Site #5 is a 6.45-acre parcel that is currently zoned Community Commercial. Candidate Site #6 is an 8.48-acre parcel that is also currently zoned Community Commercial. This alternative would modify Candidate Sites #5 and #6 to a density of 20 units/acre under the AHO. Therefore, this alternative would have the potential to facilitate up to 299 units, which is 87 units more than the proposed project. This Alternative would meet the very lowand low-income housing need identified by the RHNA, as this alternative would provide

adequate sites to accommodate the adjusted RHNA allocation (see Section 2.0, *Project Description*). Alternative 4 would be consistent with the objectives of the proposed project.

6.4.2 Impact Analysis

- **a. Aesthetics.** Alternative 4 would facilitate approximately 87 more units and the potential area of disturbance would be increased by approximately 6.38 acres as compared to the proposed project. Similar to the proposed project, this Alternative would result in less than significant impacts to public view of scenic resources, as development of Candidate Sites #5 and #6 would not adversely impact designated scenic resources or viewing points since they are not located adjacent to PCH. In addition, Alternative 4 would encompass greater lot coverage and result in larger structures, potentially with multiple stories, and larger parking areas, and result in increased light and glare. However, the development standards contained in the Scenic, Visual, and Resource Protection Ordinance set forth in LIP Chapter 6 would minimize aesthetic impacts. As discussed in Section 4.1 *Aesthetics*, , LIP policies regulate the aesthetic design of development, including height limitations, color palate, architectural features, location, vegetative screening, lighting and fencing requirements, which ensure that the aesthetic character of future development is consistent with surrounding development and minimized to the extent feasible. As such, impacts would remain Class III, *less than significant*.
- b. Air Quality. This alternative would include the same basic uses as the proposed project. However, the development potential would be approximately 87 units greater than that of the proposed project and the area of potential disturbance would be larger in size (an increase of approximately 6.38 acres as compared to the proposed project). The Class II, significant but mitigable, construction air quality impact would remain under this Alternative and mitigation measures recommended for the proposed project would apply. The 41% increase in the number of units developed would result in a commensurate increase in the overall energy use, mobile emissions, and area source emissions. Operational air quality impact associated with this Alternative would be greater under this alternative when compared to the Housing Element Update. The Class III, less than significant, impact related to objectionable odors would remain under this alternative. Using the California Department of Finance's estimate of 2.38 persons per household for Malibu, Alternative 4 would result in an increase of approximately 207 residents as compared to the proposed project. This Alternative could add up to 712 persons to the existing population of 12,699, which would result in a citywide population of 13,411, which is approximately 1,500 persons lower than the SCAG population forecast of 14,911 for 2014. Therefore, the Class III, less than significant, impact associated with Air Quality Management Plan consistency would remain under this alternative. The impact related to carbon monoxide hotspots would also be Class III, less than significant, under this alternative.
- **c. Biological Resources.** This Alternative would involve the application of an Affordable Housing Overlay on Candidate Sites #5 and #6. According to the Constraints Analysis (Appendix D), nesting bird habitat is present on both candidate sites and an area of coastal sage scrub in a parcel adjacent to Candidate Site #5 could support rare plants. Furthermore, Candidate Site #6 also contains nesting bird habitat and may contain several types of special-status plant and wildlife species. As special-status plant species have the potential to occur on Candidate Sites #5 and #6, this impact would be Class II, *significant but mitigable*, similar to the proposed project. As no native tress have been identified on Candidate

Sites #5 and #6, the Class III, *less than significant*, impact to native tress would be further reduced under this Alternative. As special-status wildlife species have the potential to occur and nesting bird habitat is present on Candidate Sites #5 and #6, this alternative's impact relative to wildlife species would be Class II, *significant but mitigable*, similar to the proposed project.

- **d.** Cultural Resources. As discussed in Section 4.4 *Cultural Resources*, development on Candidate Sites #1, #2 and #7 would not impact any known archaeological sites; nevertheless, Mitigation Measure CR-1 is require to minimize potential impacts to unknown archaeological resources. In addition, as discussed in the Constraints Analysis (Appendix D) no known archaeological resources occur on Candidate Sites #5 and #6. Development on Candidate Sites #5 and #6 would similarly be subject to Mitigation Measure CR-1. As stated in Section 4.4, *Cultural Resources*, and discussed in the Constraints Analysis, no historical resources occur on Candidate Sites #5 and #6; therefore, impacts would be Class III, *less than significant*.
- e. Geology and Soils. According to the Constraints Analysis (Appendix D), no surface faults were identified on Candidate Sites #5 or #6. As discussed in Section 4.5, Geology and Soils, the Malibu Coast Fault passes east-west through Candidate Site #7. Therefore, Alternative 4 would reduce seismically induced ground surface rupture impacts from Class II, significant but mitigable, to Class III, less than significant. Development under this Alternative would similarly be required to implement the California Building Code and, as such, impacts related to seismically induced ground shaking would remain Class III, less than significant. Because Candidate Site #5 and #6 could potentially be underlain by artificial cut and fill and alluvial materials, development facilitated by this alternative may be subject to seismic settlement, expansion, or liquefaction. Therefore, impacts related to these hazards would be the same as those of the proposed project and would be Class II, significant but mitigable. According to the Constraints Analysis (Appendix D), no landslide hazards were identified on Candidate Sites #5 or #6. However, Candidate Sites #5 and #6 contain areas that have slopes in excess of 30%. As discussed in Section 4.5, Geology and Soils, portions of Candidate Sites #1, #2, and #7 are also located in areas of potential landslide hazard and contain slopes in excess of 30%, which could expose future residential development and people to landslide and erosion risks. Therefore, this alternative's impacts related to landslide and erosion risks would be similar to those of the proposed project and would be Class II, significant but mitigable.
- **f. Greenhouse Gas Emissions**. Alternative 4 would facilitate an increase of 87 units and 207 residents, as compared to the proposed project. An increase in the number of residents and units would result in an associated increase in GHG emissions associated with project construction, consumer product usage, energy usage, solid waste generation, water usage, and transportation. The GHG emissions generated by the proposed project is 13% below the 3,500 tons/year GHG threshold. Alternative 4 would increase development potential by 30%. Therefore, full buildout under Alternative 4 could generate GHG emissions exceeding the 3,500 tons/year threshold. Impacts would be Class II, *significant but mitigable*. The following mitigation measure would be required if Alternative 4 is selected.
 - **ALT-4-GHG-1 Energy Efficiency Measures**. The City shall ensure that all future developments incorporate the following energy efficiency measures to the extent practical:

- Exceed adopted Title 24 energy requirements by a minimum of five percent;
- Use locally made building materials for construction of the project and associated infrastructure when such materials are locally available;
- Use of materials which are resource efficient, recyclable, with long life cycles;
- Install energy-reducing shading mechanisms for windows, porches, patios, walkways, etc.;
- Install energy reducing day lighting systems (e.g. skylights, light shelves, transom windows);
- Use of water efficient landscapes;
- Use tankless water heaters or solar water heaters;
- Use of low energy interior lighting;
- Use low energy street lights and parking lot lights (i.e. sodium);
- Use of high efficiency or gas space heating;
- Orient buildings to face either north or south, provide roof overhands, and use landscaping to create shade;
- Use of light colored water-based paint and roofing materials;
- Use of natural lighting;
- Use of built-in energy efficient appliances; and
- Use of landscaping to shade buildings and parking lots.

g. Hazards and Hazardous Materials. As discussed in Section 4.7, Hazards and Hazardous Materials, the southern boundaries of Candidate Sites #1 and #2 abut PCH, a major hauling route within the City, and could expose future residents to potentially harmful chemicals and materials resulting from accidents along PCH. Candidate Sites #5 and #6 are located west of Candidate Site #7, north of Civic Center Way, approximately 0.23 miles north of PCH. Therefore, this Alternative would reduce impacts related to the exposure of future residents to potentially harmful chemicals and materials resulting from accidents along PCH and impacts would be Class III, less than significant. According to the Constraints Analysis (Appendix D), no hazards, other than geologic hazards, were identified on Candidate Sites #5 and #6. As discussed in Section 4.7, Hazards and Hazardous Materials, surficial soil on Candidate Sites #1 and #2, adjacent to PCH, could contain aerially-deposited lead (ADL). This potential hazard is not present on Candidate Sites #5 or #6; therefore, this alternative would reduce impacts related to soils contaminated with ADL from Class II, significant but mitigable to Class III, less than significant. According to Section 4.7, Hazards and Hazardous Materials, development facilitated by the proposed project, notably on Candidate Sites #1 and #2, may require the demolition of existing residential structures that could contain asbestos or lead based paints. As no existing residential structures are present on Candidate Sites #5 and #6, this alternative would eliminate these potential impacts related to asbestos and lead-based materials.

As discussed in Section 4.7, *Hazards and Hazardous Materials*, Candidate Site #7 has the potential to contain onsite soil contamination due to the previous agricultural use of the site. As previously mentioned, no hazards have been identified on Candidate Sites #5 and #6. Therefore, the Class II, *significant but mitigable*, impacts related to onsite soil contamination due to pesticides would be eliminated. As discussed in Section 4.7, *Hazards and Hazardous Materials*,

PSAs were conducted for all three candidate sites (#1, #2, and #7) and it was determined that none of the candidate sites were on any public lists of hazardous materials sites subject to potential impacts associated with hazardous material release from nearby sites. According to the PSA conducted for Candidate Site #7, which is adjacent to Candidate Site #6 and approximately 0.15 mile east of Candidate Site #5, sites with environmental listings in the vicinity of Candidate Site #7 would not be expected to impact the site. Based on the proximity of Candidate Sites #5 and #6 to Candidate Site #7, impacts related to potential hazards resulting from hazardous material sites would be the same under this Alternative as under the proposed project and would be Class III, less than significant. As this alternative would be required to comply with Los Angeles County Fire Department access standards to provide adequate onsite access in the event of an emergency, impacts associated with emergency response or evacuation plans would be similar to those of the proposed project and would be Class III, less than significant. Similar to the proposed project, impacts related to wildland fire hazards would be Class III, less than significant, due to existing regulations that would minimize potential impacts.

- h. Hydrology. Alternative 4 would involve a reduced area of potential disturbance by approximately 6.38 acres and would therefore have potentially greater impacts related to soil erosion, stormwater runoff, and surface water quality. However, existing regulations pertaining to these issues areas would ensure that impacts remain less than significant. Impacts related to these issue areas would remain Class III, *less than significant*. While Candidate Site #5 is not located in a flood, tsunami or sieche inundation zone, a small portion of Candidate Site #6 is located within the 100-year flood zone. Per M.M.C. § 15.20.100, any development occurring within this zone would be required to build at least one foot above the flood plain elevation. Compliance with this requirement would reduce impacts to a Class III, *less than significant*, level.
- **i. Land Use.** Similar to the proposed project, Alternative 4 would generally be consistent with all policies listed in Section 4.9, *Land Use.* As a result, impacts would remain Class III, *less than significant.* Candidate Sites #5 and #6 would be located adjacent to land that is designated for commercial land uses. Noise generated by the nearby commercial uses would be intermittent in nature (e.g., deliveries, trash hauling, and parking vehicles), and would not exceed City noise standards, which are based on 24-hour average ambient noise levels. Therefore, future residential development on the candidate sites would not be exposed to excessive noise from commercial operations in the vicinity. Impacts would be Class III, *less than significant.*
- **j. Noise.** Alternative 4 would facilitate development of 87 additional residences as compared to the proposed project. An increase in the number of residents translates to an increase of 578 project-generated vehicle trips per day and an increase in associated roadway noise. This increase in traffic volumes has the potential to increase traffic related noise and further exacerbate existing unacceptable noise levels along study area roadway segments. As with the proposed project, noise impacts associated with construction facilitated by Alternative 4 would be Class III, *significant but mitigable*, and all mitigation measures recommended for the proposed project would apply. Similar to the proposed project, noise impacts associated with surrounding land uses would be Class III, *less than significant*.

- **k. Population and Housing**. This alternative could add up to 299 units and 712 persons, as compared to 212 units and 505 residents under the proposed project. When 712 persons are added to the existing population of 12,699, it would result in a citywide population of 13,411, which is approximately 1,500 persons less than the SCAG population forecast of 14,911 for 2014. Therefore, growth impacts would be Class III, *less than significant* under this Alternative. As no existing residences have been identified on Candidate Sites #5 and #6, impacts related to displacement would be Class III, *less than significant*, and would be incrementally lower than under the proposed project.
- 1. Public Services. Alternative 4 would facilitate development of 87 additional affordable housing units, as compared to the proposed project. This could result in 207 additional residents. As discussed in Section 4.12, Public Services, impacts related to fire protection service are primarily associated with response times and the average response time to Candidate Site #7 would be approximately one minute, which is within the established response time goal. Furthermore, adequate fire protection would be available to serve future development on Candidate Site #7 and no new or expanded fire facilities would be required. As previously mentioned, Candidate Site #7 is adjacent to Candidate Site #6 and approximately 0.15 mile east of Candidate Site #5. Based on the proximity of Candidate Site #7 to Candidate Sites #5 and #6, response times would be approximately one minute and impacts associated with fire protection services would be Class III, less than significant, for this Alternative. As discussed in Section 4.12, Public Services, future developers of projects facilitate by the Housing Element Update would be required to pay developer impact fees pursuant to the existing developer impact fee program. Thus, impacts to police protection services would be Class III, less than significant. As discussed in Section 4.12, Public Services, each new resident generates an average of 0.171 new students and the proposed project would generate an estimated 40 new students. Using the same generation factor, Alternative 4 would generate an additional 12 students as compared to the proposed project, for a total of 52 total students. However, as discussed in Section 4.12, Public Services, schools have the capacity accommodate additional students and an increase of 12 students would not require the construction of new facilities. As such, impacts to public school services would be Class III, less than significant.
- **m. Transportation and Traffic.** Alternative 4 would result in increased traffic impacts at this intersection because it would generate an increased number of vehicle trips. However, it is not known whether these impacts would extend beyond the identified impacts without a traffic study specifically for prepared for this site. Because Alternative 4 would result 578 additional trips beyond that generated by the proposed Housing Element, impacts to study intersections are assumed to remain Class II, *significant but mitigable*.

Alternative 4 would result in increased traffic impacts along the six roadway segments studied in Section 4.13, *Transportation and Circulation*, because it would generate 578 additional vehicle trips per day. However, it is not known whether these impacts would extend beyond the impact identified without a traffic study specifically for prepared for this site. Because Alternative 4 would result 578 additional trips, impacts to study roadway segments would be increased.

As discussed in Section 4.13 *Transportation and Traffic*, the proposed project would result in less than significant impacts to CMP intersections. Because Alternative 4 would result in an increased number of vehicle trips and population, impacts would be increased. Similarly, the



proposed project would result in less than significant impacts related to transportation plans, alternative transportation, traffic hazards and emergency access. Because Alternative 4 would result in 578 additional vehicle trips per day, impacts would be increased.

n. Utilities and Service Systems. Alternative 4 would facilitate development of 87 additional affordable housing units, as compared to the proposed project, which could accommodate up to an additional 207 residents when compared to existing conditions. As discussed in Section 4.14, Utilities and Service Systems, the proposed project would generate demand for an estimated 202 acre-feet of water per year (AFY). The addition of 207 persons as compared with the proposed project would demand an additional 64 AFY of water (207 persons x 333 gallons per person per day=68,931 gallons per day or approximately 77 AFY). The additional demand of 77 AFY would not exceed existing supplies and impacts related to water demand would be Class III, less than significant. Impacts related to wastewater generation would be similar to those of the proposed project and would be Class III, less than significant. As discussed Section 4.14, Utilities and Service Systems, the proposed project would result in the generation of 1.45 tons of solid waste per day. Alternative 4 would result in an additional generation of approximately 0.461 tons per day of solid waste (87 units x 12.8 lbs. per unit per day=1,113 lbs. per day or 0.6 tons per day). The additional generation of 0.6 tons of solid waste per day would not exceed the 6,500 tons per day surplus capacity at area landfills and impacts would be Class III, less than significant (refer to Section 4.14, Utilities and Service Systems). Similar to the proposed project, regulatory impacts regarding area landfills and impacts related to storm drain facilities would be Class III, less than significant.

6.5 ALTERNATIVES CONSIDERED BUT REJECTED

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Additional alternatives were considered for inclusion in the EIR. These alternatives were other combinations of all seven Candidate Sites and other sites contemplated during the City's site selection process. Alternative combinations of the candidate sites (e.g., the combination of Candidate Sites #6 and #7) were eliminated because several of the sites selected had already been evaluated in the EIR, or would be insufficient to meet the City's RHNA allocation requirements and thus fail to meet project objectives, or would result in overall increased environmental impacts. Other sites were eliminated from further consideration based upon a variety of physical feasibility issues and, in some cases, public controversy.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-1 provides a summary comparison of the proposed project and alternatives. The table indicates both the magnitude of each impact for each alternative (Class I, II, III, or IV) and how the impact for each alternative compares to the proposed project (superior [+], similar [=], or inferior [-]). CEQA requires the identification of the environmentally superior alternative among the options studied. When the "No Project" alternative is determined to be environmentally superior, CEQA also requires identification of the environmentally superior alternative among the development options. The "No Project" alternative would be superior in all issue areas, and thus the environmentally superior alternative.

Aside from the "No Project" alternative, Alternative 2 would result the least amount of development when compared to the other alternatives and the proposed project. Thus, Alternative 2 would result in the fewest overall impacts related to aesthetics, air quality, biological resources, geology, greenhouse gas emissions, noise, traffic and hydrology/water quality, and is considered the environmentally superior alternative among the development options. In addition, this Alternative would meet the primary objective of the proposed project, which is to provide at least 188 units, consistent with the RHNA allocation. However, this site contains existing development that would need to be completely removed prior to the construction of any development. As a result, this alternative would be less economically feasible when compared to Candidate Sites #1, #2 and #7, which are primarily undeveloped.

Alternative 3 would result in a greater level of development when compared to Alternative 2, but would result in less development when compared to Alternative 4 and the proposed project. Thus, Alternative 3 would result in fewer impacts aesthetics, air quality, biological resources, geology, GHG emissions, noise, traffic and hydrology/water quality, when compared to Alternative 4 and the proposed project, but greater impacts when compared to Alternative 2. Alternative 4 would result in the greatest level of development when compared to all alternatives and the proposed project. Thus, Alternative 4 would result in the greatest level of impacts to aesthetics, air quality, biological resources, geology, GHG emissions, noise, traffic and hydrology/water quality.

Table 6-1 Comparison of Project Alternatives

Issue	Proposed Project Impact Level	Alt 1 (No Project)	Alt 2 (Site #3)	Alt 3 (Site #4)	Alt 4 (Sites #5 and #6)			
Aesthetics								
Visual Character	III	+	+	=	=			
Public Views	III	+	+	=	=			
Scenic Resources	III	+	=	=	=			
Light and Glare	III	+	+	=	=			
Air Quality								
Construction	II	+	+	+	=			
Operation	III	+	+	+	=			

Table 6-1 Comparison of Project Alternatives

Issue	Proposed Project Impact Level	Alt 1 (No Project)	Alt 2 (Site #3)	Alt 3 (Site #4)	Alt 4 (Sites #5 and #6)
Odors	III	+	=	=	=
AQMP Consistency	III	+	+	+	=
CO Hotspots	III	+	+	+	=
Biological Resource	S	<u>l</u>		1	
Riparian and ESHA Habitat	II	+	+	=	+
Special-status Plants	II	+	+	+	=
Native Trees	III	+	=	=	+
Special-status Species	II	+	+	=	=
Cultural Resources					
Archaeological Resources (known) and (unknown)	(III) and (II)	+	=	=	=
Historical Resources	III	+	=	=	=
Geology /Soils					
Surface Rupture	II	+	+	+	+
Ground Shaking	III	+	=	=	=
Liquefaction and Settlement	II	+	=	=	+
Landslides	II	+	=	=	+
Greenhouse Gas Em	issions				
Construction	III	+	+	+	-
Operation	III	+	+	+	-
GHG Policy Consistency	III	+	=	=	=
Hazards and Hazarde	ous Materials				
Wildland Fire	III	+	=	=	=
Soil Contamination	П	+	=	+	+
Accident Hazards	III	+	=	+	+
ADL	II	+	+	+	+
Asbestos and Lead	III	+	=	=	+
Haz Mat Sites	III	+	=	=	=
Emergency and Evacuation	III	+	=	=	=

Table 6-1 Comparison of Project Alternatives

Proposed	Alt 1	Alt 2	Alt 3	Alt 4
Project Impact Level	(No Project)	(Site #3)	(Site #4)	(Sites #5 and #6)
Quality				
III	+	=	=	=
II	+	=	=	=
III	+	=	=	=
III	+	=	=	=
III	+	=	=	=
III	+	=	=	=
III	+	=	=	=
II	+	=	=	=
II	+	=	=	=
III	+	+	+	-
III	+	+	+	-
III	+	=	=	=
ing				
III	+	=	=	+
III	+	+	+	=
III	+	+	+	=
III	+	+	+	=
III	+	+	+	=
ation				
II and III	+	+	+	-
	Impact Level Quality III III III III III III III III III I	Impact Level	Impact Level	Impact Level

I = Unavoidably significant impactII = Significant but mitigable impact III = Less than significant impact IV = No Impact or Beneficial

- Superior to the proposed project
- Inferior to the proposed project
- Similar impact to the proposed project

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