V. ALTERNATIVES

Regulatory Requirements for Identifying and Analyzing Project Alternatives

The identification and analysis of alternatives is a fundamental concept of the environmental review process under CEQA. CEQA Guidelines Section 15126.6 addresses the required discussion of alternatives to proposed projects in an EIR and the intended use of such information. Section 15126.6(a) states the following:

> "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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."

The CEQA Guidelines further clarify in Section 15126.6(b):

> "Because the EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impeded to some degree the attainment of the project objectives, or would be more costly."

Thus, an EIR for any project subject to CEQA review must consider a reasonable range of alternatives to the project which: (1) substantially lessen the project's significant environmental impacts; and (2) that are feasible and may substantially accomplish the proposed project goals.

The CEQA Guidelines Section 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include:

> "…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."

The range of alternatives required within an EIR is governed by the "rule of reason". Specifically, CEQA Guidelines Section 15126.6(c) provides that:

> "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead

agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. 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."

The CEQA Guidelines also require the analysis of a "no project" alternative in addition to any other feasible alternatives identified. The No Project Alternative shall discuss the existing conditions at the time the notice of preparation is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved (CEQA Guidelines Section 15126.6(e)(2)).

The impact analysis, as detailed in Section IV: Environmental Impact Analysis of this DEIR, concluded that the Proposed Project generated no impacts that would remain significant after implementation of the project design features, standard conditions and recommended mitigation measures, except for potentially significant (but temporary) air quality impacts during the construction phase. Hence, the selection of alternatives focused on reducing construction impacts (air quality in particular) overall, as well as, those areas where a significant impact is anticipated prior to mitigation (i.e., traffic and noise). Consideration of the General Plan, Community Plan and zoning designations applicable to the project site were also a key consideration, and thus established limitations on reasonable alternative land uses.

The underlying purpose of the Proposed Project is to update, modernize and revitalize the shopping center to ensure its long-term economic viability. The underlying purpose is exemplified in the project objectives provided below. Several of the project objectives embrace many of the relevant goals, objectives and policies set forth in the Van Nuys-North Sherman Oaks Community Plan. The objectives of the project are stated as follows:

- To establish and enhance the long-term sustainability of the shopping center through a higher utilization of the commercial center site and modernization of facilities.

- To improve site access and circulation through an updated site circulation plan that reflects modern development practices.

- To enhance on-site pedestrian safety through improved internal vehicle circulation configuration.

- To develop a project consistent with the City' Urban Form Guidelines with special emphasis on creating and encouraging a greater pedestrian environment, especially along Riverside Drive and Hazeltine Avenue.

- To enhance traffic flow and safety concerns along adjacent roadways through improved site access.

- To incorporate a community-friendly design that integrates visually with adjacent uses yet simultaneously affords appropriate neighborhood protection from traffic activity.

- To provide a greater range of stores to enhance the neighborhood shopping opportunities for the Sherman Oaks area.

- To provide greater variety and improved quality of restaurants in the shopping center.

- To conform to the goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan.

- To develop a commercial project that is able to be LEED certifiable and enhance sustainability.

Potential Project Alternatives Considered but Rejected

Alternate Site(s). The CEQA Guidelines (Section 15126.6(a)) suggest that the range of reasonable alternatives to the project evaluated in an EIR consider alternate locations of the project, when feasible. However, no feasible alternative site has been identified that could reasonably fulfill the basic objectives of the Proposed Project (i.e., to revitalize the existing shopping center), and which could reasonably be acquired or controlled by the Applicant, as the site is.

One of the Proposed Project objectives is to "establish and enhance the long-term sustainability of the shopping center through a higher utilization of the commercial center site and modernization of facilities". Consequently, any alternative that analyzes development of the Proposed Project at an alternate location would be inconsistent with this stated objective. Further, as the project involves an expansion of established uses, to effectively address an alternate site location would essentially mean moving the location of the existing shopping center. Moving Fashion Square would be in substantial conflict with the Van Nuys-North Sherman Oaks Community Plan, which designates the project site as community commercial and specifically recognizes the shopping center as an identifiable and desirable anchor of the community.

Further, the feasibility to establish a consolidated parcel large enough to accommodate approximately thirty acres of shopping center/community commercial uses elsewhere in the Sherman Oaks community is remote and the potential for such a project speculative. Therefore, consideration of an alternative site location project is considered infeasible and not analyzed further in this EIR.

Alternative Land Use(s). The project site is currently developed with community commercial (i.e., retail and restaurant) uses comprised of the shopping center. As an alternative to the Proposed Project, a development concept could consider the inclusion of a mix of land uses other than or in addition to commercial retail. The subject property is designated Community Commercial by the Community Plan, which permits a range of commercial (CR, C2 and C4) and

mixed-use zones (RAS3 and RAS4). The project site is currently zoned predominantly C2, along with PB (for parking buildings).

Given the development already existing on-site, an alternative land use could include the addition of residential and/or commercial office uses, in order to create a higher intensity mixed-use project. Although mixed-use development is encouraged in areas within the community that are supported by proximate transit services, the introduction of a project of greater intensity and diversity in land uses is anticipated to result in additional adverse impacts beyond those identified for the Proposed Project. For example, an increase in the building footprint and/or height would be anticipated to accommodate the additional uses thereby exacerbating the level of adverse impacts for air quality during the construction phase, and likely increasing the degree of aesthetic and traffic impacts. Hence, a mixed-use project at this location would not meet the goal of reducing impacts beyond those anticipated with the Proposed Project.

Further, a mixed-use development project, especially one incorporating a residential component is not consistent with the Proposed Project objectives. For the reasons noted above, consideration of an alternative land use project is considered infeasible and not analyzed further in this EIR.

Project Alternatives Selected for Evaluation

Considering the factors above, seven alternatives (including the "No Project Alternative"), are evaluated in this EIR. Because alternatives that would consider an alternate site location or a mixed-use development were rejected, the alternatives considered for evaluation focus instead on a range of retail development densities and/or different site plan configurations. Alternatives selected for evaluation include the following:

- Alternative A: No Project
- Alternative B: Existing Entitlement (108,000 GLSF)
- Alternative C: Reduced Project 1 – (235,000 GLSF/Reduced Height of Parking)
- Alternative D: Reduced Project 2 – (235,000 GLSF/Maintain Macy's Parking Structure/Full Closure of Matilija Avenue)
- Alternative E: Alternate Site Plan 1 – (280,000 GLSF Proposed Project/No Tunnel/No Subterranean Parking)
- Alternative F: Alternate Site Plan 2 – (280,000 GLSF Proposed Project/Pedestrian Activation on Riverside Drive)
- Alternative G: Promenade – (190,000 GLSF Reduced Project/Pedestrian Promenade)

These seven alternatives are described in detail below and summarized in *Table 56: Summary of Alternatives*. The following sections also provide an analysis of each alternative, including an assessment of the anticipated development impacts, a comparison of the alternative's impacts relative to the Proposed Project, and a determination of the alternative's ability to meet the Project objectives. It should be noted that for the alternatives analysis, it is assumed that the same or equivalent level of mitigation measures (MM) and/or project design features (PDF) that apply to the Proposed Project would be carried forward with each potential alternative to the

extent feasible, except for those that would otherwise be in conflict with the description for that alternative. For example, MM/PDFs for the Proposed Project that relate to the tunnel access would not apply to alternatives that do not incorporate the tunnel access as part of their description.

TABLE 56
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Proposed Project	280,000	1,147,000	Two levels of retail building over one level of subterranean parking and one level of rooftop parking, located south of existing main mall.	4.25	Demo of three-level parking structure south of main mall. Construction of two new multi-level parking structures, including a new "main" six-level (one level at grade plus five levels above grade) structure south of the existing Macy's parking structure, and a new "east" four-level (one level at grade plus three levels above grade) structure adjacent to Woodman Avenue. Additional structured parking incorporated into retail building, to include one level subterranean and one level of roof-top parking. Remainder surface parking lot east of Fashion Square Lane. Existing two-level Macy's and five-level Bloomingdale's parking structures to remain with modifications to accommodate circulation.	Riverside Drive: Consolidate 2 existing driveways and create one new consolidated "east" driveway with signalized intersection at Matilija Avenue and one new "west" driveway with signal at activated tunnel entrance. Hazeltine Avenue: Restripe south driveway to include one additional ingress lane and eliminate parking along driveway Fashion Square Lane. Woodman Avenue: Restricted to right-turn ingress only. Matilija Avenue: Restricted access to/from Matilija Avenue from Riverside Drive (right-turn movement only and median barrier). Fashion Square Lane: Improve internal circulation with realignment and widening of Fashion Square Lane to establish loop road along southern edge and directly connecting to both Riverside and Woodman access drives.
Alternative A No Project	0	867,000	No change to existing.	4.5	No change to existing.	No change to existing access/circulation condition.

TABLE 56 (CONTINUED)
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Alternative B Existing Entitlement (108K)	108,000	975,000	Two levels of retail building (without integrated parking), located as extension at south end of existing mall just easterly of Bloomingdale's.	4.5	Remove portion and add two levels (for a total of five) to existing three-level (one level at grade plus two levels above grade) southern parking structure; construct new four-level (one level at grade plus three levels above grade) parking structure extension to the east; no alterations to Macy's parking structure.	No change to existing access/circulation condition.
Alternative C Reduced Project 1 (235K/Reduced Height of Parking)	235,000	1,102,000	Two levels of retail building (without integrated parking), located as extension at south end of existing mall with footprint slightly less than Proposed Project.	4.25	Demo two level Macy's structure and construct new six-level (one level at grade plus five levels above grade) structure with footprint similar to that compared to the Proposed Project and slightly increased footprint compared to Alt D, however no subterranean parking would be developed.	Only four (rather than five) project driveways to be provided: same as Proposed Project, but without additional new "west" Riverside Drive project access (or tunnel conversion) east of Bloomingdale's. Fashion Square Lane alignment and improvements similar to Proposed Project. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue would be the similar to Proposed Project (except without tunnel).
Alternative D Reduced Project 2 (235K/Retain Macy's Parking/ Matilija Avenue Closure)	235,000	1,102,000	Two levels of retail building (without integrated parking), located as extension at south end of existing mall with footprint slightly less than Proposed Project (same as Alt C).	4.25	Retain two level Macy's structure (with alterations) and construct new six-level (one level at grade plus five levels above grade); new six-level structure to have reduced footprint to the east as compared to the Proposed Project; slightly reduced footprint compared to Alt C, however no subterranean parking would be developed	Same as Alternative C with the exception of the configuration of Matilija Avenue across from Riverside Drive, for which access to/from Riverside would be fully closed off.

TABLE 56 (CONTINUED)
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Alternative E Alternate Site Plan 1 (280K/No Tunnel/ No Subterranean Parking)	280,000	1,147,000	Same as Proposed Project, including roof top parking over new retail, but without subterranean level parking.	4.25	To facilitate required parking in the absence of the subterranean level, the existing two-level Macy's parking structure would be demolished and replaced with a new consolidated six-level "main" parking structured designed to "step back" from the Riverside Drive frontage in a terraced fashion. Rooftop parking would tie into rooftop level of retail building. The "east" parking structure along Woodman Avenue would be built, however no subterranean parking would be developed.	Only four (rather than five) project driveways to be provided: same as Proposed Project, but without additional new "west" Riverside Drive project access (or tunnel conversion) east of Bloomingdale's. Fashion Square Lane internal circulation and off-site roadway improvements similar to Proposed Project (except without tunnel).
Alternative F Alternate Site Plan 2 (280K/ Pedestrian Activation)	280,000	1,147,000	Same as Proposed Project but with new public/pedestrian mall entrance at Riverside Drive (just west of Macy's), along with additional landscape/ plaza improvements to enhance pedestrian activation at new entry.	4.25	Same as Proposed Project.	Same as Proposed Project for vehicular driveway accesses. New pedestrian access to mall just west of Macy's department store, in addition to other mall , access and circulation improvements similar to Proposed Project.

TABLE 56 (CONTINUED)
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Alternative G Promenade (190K/ Promenade)	190,000	1,057,000	One level of retail oriented along new internal roadway (promenade street) along south edge of existing mall, incorporated as addition to existing mall on north side of promenade and integrated into ground level of southerly parking structures (two existing and one new) along south side of promenade.	4.25 (at build out) 4.1 (tempor-arily during con-struction phase)	Existing three parking structures (including the two-level Macy's, five-level Bloomingdale's and four-level south parking structures) to remain with modifications. Macy's structure to be modified to accommodate access/ circulation similar to Proposed Project. Bloomingdale's and adjacent "south" structure to be accommodate one level of ground-floor retail along promenade and redirect/ reorient traffic circulation. Construction of one new multi-level parking structure, including a new "main" six-level (one level at grade plus five levels above grade) structure south of the existing Macy's parking structure and stepping down to three levels (grade plus two levels) at its east extension toward Woodman Avenue. Remainder surface parking lot east of Fashion Square Lane.	Vehicular driveway access similar to Proposed Project, but without tunnel access on Riverside Drive and with alternate internal loop road (Fashion Square Lane) configuration. Hazeltine Avenue: South driveway reconfigured to incorporate ramps to second level parking, with no access to ground level parking from this driveway. Modify north driveway to function as secondary access leading to promenade and restricted ground-level parking in Bloomingdale's parking structure. Fashion Square Lane: Alternate internal loop circulation established along south portion of site and contained within parking structure (level two), and would be continually functional as primary internal access. Second, ground-level east-west segment of Fashion Square Lane to function as promenade. Promenade to serve as open-air pedestrian mall during peak mall hours and would be closed to vehicle traffic during those times. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue would be the similar to Proposed Project (except without tunnel).

GLSF = Gross leasable square feet

Alternative Analysis Format and Methodology

The CEQA Guidelines (Section 15126.6(d)) provide that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Under the standards for adequacy, the EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Hence, the analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself.

The level of analysis in the following sections of the alternatives analysis has been completed to a sufficient level of detail to determine whether the overall environmental impacts would be less, similar or greater than the corresponding impacts of the Proposed Project. In addition, each alternative is evaluated to determine whether the project objectives, identified above and in Section II: Project Description would be substantially attained by the alternative.

The evaluation of each alternative considers the anticipated net environmental impacts of the alternative after implementation of reasonable mitigation measures (similar, or equivalent, to the level of mitigation defined for the Proposed Project). Net impacts for each environmental issue area are then classified as either having no impact, a less than significant impact or a significant adverse impact. Net impacts are then compared to those of the Proposed Project for each environmental issue area. To facilitate the comparison, the analysis identifies whether the net impact would clearly be less, similar, or greater than that identified for the Proposed Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic project objectives.

V. ALTERNATIVES

A. ALTERNATIVE A: NO PROJECT

ALTERNATIVE DESCRIPTION

The No Project Alternative assumes no new construction and evaluates continuation of the existing conditions at the time the Notice of Preparation was published in July 2007. This Alternative assumes that no changes to the site or existing structures would occur. The existing structures and project site landscaping would remain in their current condition and the site would remain fully occupied. The physical and operational conditions of the shopping center would remain as they are today with no change to the existing commercial square footage totals and no modification to the on-site access, circulation and parking. This alternative satisfies a direct requirement in CEQA for a No Project Alternative comparison.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the No Project Alternative scenario, there would be no visual changes to the project site; therefore the impacts to aesthetic character, viewsheds, light/glare, and shading would be less than significant and less than those identified for the Proposed Project.

Visual Character. Without the Proposed Project, the proposed site would remain in its current condition. The project site is currently developed with two and three-story mall buildings and parking structures that were built in the early 1960's and renovated in the mid 1990's. While not visually distinctive, these structures have been a visual component of the surrounding area as they have been commercial development icon of the community for more than 40 years.

Because there would be no construction activity under the No Project scenario, aesthetic construction related impacts would be avoided. None of the existing mature trees on-site would be removed.

The No Project Alternative would arguably have a less beneficial impact than the Proposed Project. With the Proposed Project, an updated and more visually distinctive building façade, and intensified landscaped site interior and frontages would be provided. Although the development of the Proposed Project would result in the removal of 48 mature trees (that would be fully replaced), the new construction, building façade updates, and landscaping would enhance the aesthetic quality of the site. Overall, the No Project Alternative would have a lesser beneficial impact.

Alteration of Views. The No Project Alternative would not result in any change of views over current conditions. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along

Matilija Avenue would be altered. While both the Proposed Project impact and the No Project Alternative impact would be less than significant, overall the impact of the Proposed Project would be worse due to the change in views.

Lighting. In the No Project Alternative, lighting conditions would remain unchanged over existing conditions. Existing on-site sources of night lighting are the spill over of security lighting from open parking areas and at the five docking/loading areas along Riverside Drive. Vehicle lights exiting the project site at the two driveways along Riverside Drive (in the vicinity of Matilija Avenue) sweep out onto adjacent sidewalks, streets and residences to the north. In the long run, illumination impacts from the No Project Alternative would be reasonably comparable to the mitigated impacts from the Proposed Project. Both the Proposed Project impact and the No Project Alternative impact would be less than significant.

2. Air Quality

No grading or construction would be required under the No Project scenario, and no new vehicle trips would be generated due to expansion of uses at the project site. However, traffic generated by existing uses generates pollutant emissions. Gas and electricity usage for commercial operations at the shopping center also generate pollutants in the region. Operational emissions generated by the No Project Alternative would be less than those of the Proposed Project, and would remain less than significant. There would be no construction emissions from the No Project Alternative. During construction, the Proposed Project would result in a significant impact for NO_X, PM2.5 and PM10 emissions. The No Project Alternative would avoid these significant impacts. There would be no new green house gases emitted from the No Project Alternative.

3. Geology and Soils

As discussed in Section IV: Environmental Impact Analysis: C-Geology and Soils, the risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the No Project Alternative is the same as with the Proposed Project. The No Project Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction with the Proposed Project would be constructed to meet current seismic standards and not anticipated to create a significant impact. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. The potential impacts with regard to asbestos containing materials (ACMs) and lead-based paints are a concern due to demolition and construction of the Proposed Project, however, the main portion of the mall structures would be avoided during construction. Construction activities associated with the Proposed Project introduce a slightly higher risk of hazards due to materials and equipment to be used on-site during the construction activity. With no construction

proposed under the No Project scenario, these potential risks would be avoided. While both the Proposed Project impact and the No Project Alternative impact concerning hazardous materials would be less than significant, overall the impact of the No Project concerning hazardous materials would be less.

5. Water Resources

The water resources impacts from the subject property were analyzed. Runoff from the site is conveyed and adequately handled by the City's storm drain system. Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction of the Proposed Project would require that drainage and water quality conditions at the project site be improved to meet current Standard Urban Stormwater Mitigation Plan (SUSMP) requirements and therefore result in a net improvement to water resources. The No Project Alternative would arguably have a less beneficial impact than the Proposed Project since no treatment of site runoff would occur. As a result, the No Project Alternative would have a lesser beneficial impact than the Proposed Project.

The No Project Alternative's water consumption would be 59,795 gallons per day less than the Proposed Project. The No Project Alternative would create no new water supply impact (as the water usage currently exists) and, therefore, would have less impact than the Proposed Project.

6. Land Use, Planning and Urban Decay

Existing land uses are compatible with surrounding land use patterns. The No Project Alternative would be as compatible with adjacent land uses. Existing uses are consistent with zoning and planning designations and policies for the site. However, the on-site commercial uses are underutilized in their current condition. The community would benefit from the revitalizing effect of the Proposed Project, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the No Project Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. It should be noted however, that the Proposed Project affords an opportunity for compliance and implementation of the River Improvement Overlay (RIO), and regional plans and policies, which the No Project Alternative would not.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site. Existing uses currently generate traffic and noise that would continue under the No Project. No perceivable change in non-traffic related operational impacts is anticipated between the No Project (existing conditions) and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

With the No Project Alternative, construction impacts of the Proposed Project would not occur. The No Project Alternative impacts would be less than significant and would avoid the construction noise impacts otherwise associated with the Proposed Project.

8. Fire Services

The No Project Alternative would not result in an increase in fire protection demands and, therefore, would create no impact. This represents a reduction of the Proposed Project's less than significant impact in the area of fire protection.

9. Police Services

The No Project Alternative would not result in an increase in police protection demands. This represents a reduction of the Proposed Project's less than significant impact after mitigation in the area of police protection.

10. Solid Waste

No demolition or construction would be required under the No Project scenario. During construction, the Proposed Project would involve demolition of two parking structures and portions of the mall structure and surface parking lots; however because construction debris will be recycled to the extent feasible (including construction debris from both demolition and waste materials from new construction), the Proposed Project impact for solid waste would be less than significant. Even though Proposed Project construction phase impacts to solid waste are less than significant, the No Project Alternative would avoid these impacts.

The No Project Alternative would generate 1,921 pounds per day less of solid waste than the Proposed Project. As a result, the No Project Alternative would reduce the less than significant impact on solid waste generation as compared to the Proposed Project.

11. Traffic, Circulation and Access

The No Project Alternative involves no additional increase in uses at the project site and the existing Shopping center would continue to operate and generate traffic as is currently experienced. The vehicular access associated with the No Project Alternative would be consistent with the access currently provided at the project site. The parking configuration, although unchanged under the No Project Alternative, would continue to provide parking at the current approved ratio of 4.5 parking spaces per 1,000 GLSF. Improvements and enhancements to internal site circulation, driveway consolidations, pedestrian safety and access enhancements, and off-site traffic mitigations would not occur. Although the overall increase in project site related trips would not occur under the No Project scenario, other beneficial impacts to access, vehicular and pedestrian safety, and internal circulation would also not occur. The No Project Alternative's traffic and circulation impacts would be less than those impacts under the Proposed Project due primarily to an overall lower trip generation rate; however the beneficial impacts of the Proposed Project (i.e., enhanced traffic flow and safety improvements and additional parking areas) would not be realized.

12. Growth Inducing

The No Project Alternative would not result in an increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the No Project Alternative scenario would be less than significant. Because there would be no change in the current condition, the comparative growth inducing impacts of the No Project Alternative are anticipated to be less than those of the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. However, as the No Project Alternative would not contribute any change to the cumulative conditions, this alternative would have no significant cumulative impacts.

14. Relationship of Alternative to Project Objectives

The No Project Alternative would avoid most of the environmental impacts associated with the Proposed Project (including those that would be less than significant and those that would be beneficial). However, the No Project Alternative would not satisfy any of the project objectives. Specifically, the No Project Alternative would not invigorate economic activity at the project site, would not provide circulation and access improvements that promote enhanced vehicular and pedestrian safety, would not enhance on-site aesthetics treatments that could facilitate improved community linkages, and would not expand the range of services available to the community at this location.

In summary, the No Project Alternative would not attain any of the objectives established for the Proposed Project. For this reason, and although project impacts would be avoided or minimized, the No Project Alternative is not considered a feasible alternative to the Proposed Project.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) only to air quality during the short-term construction phase. For those issues addressed, the No Project scenario would not result in significant environmental impacts and would avoid any new impacts beyond the existing condition.

Implementation of the No Project Alternative would not result in new environmental impacts. Overall, the No Project Alternative would result in a reduced level of impact when compared to the Proposed Project. All of the significant and unavoidable impacts (i.e., short-term construction-related air quality) associated with the Proposed Project would be avoided under the

No Project Alternative. However, all the potential benefits of the Proposed Project (i.e., enhanced traffic flow and safety, and improved on-site access and pedestrian safety) would not be implemented either.

V. ALTERNATIVES

B. ALTERNATIVE B: EXISTING ENTITLEMENT (108,000 GLSF)

ALTERNATIVE DESCRIPTION

The Existing Entitlement (108K) Alternative would consist of build out in accordance with the existing entitlements (as approved in 1994) resulting in the construction of an additional 108,000 GLSF of new retail/restaurant commercial space in a two-story structure south of the existing mall and just southeast of the Bloomingdale's department store and west of the existing food court. A proposed site plan for this alternative is shown in *Figure 63: Existing Entitlement (108,000 GLSF) Alternative – Level 1* and *Figure 64: Existing Entitlement (108,000 GLSF) Alternative – Level 2*. All three of the existing parking structures would remain. A portion of the existing three-level (one-level at grade plus two levels above grade) parking structure would be removed to permit construction of the new two-story mall extension. A third above grade level would be added to the remaining existing three-level parking structure south of the existing mall. A new four-level parking structure (grade plus three levels) would be added to the east end of the existing three-level parking structure, just south of Macy's department store and would add approximately 490 parking spaces to the site. Surface parking would remain south of the Macy's parking structure. Because of the interim loss of on-site parking due to the demolition of the south parking structure, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is built out, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site).

Improvements to the internal circulation (i.e., realignment and widening of Fashion Square Lane) would not occur and project site driveways at Hazeltine Avenue, Riverside Drive, and Woodman Avenue would remain unchanged. As a result, physical site improvements that would enhance emergency access would not be implemented. Some landscape improvements along the street frontages would be anticipated, but the overall enhancements to the Riverside Drive and Hazeltine Avenue elevations would not be anticipated as all development would be limited to the "back" of the mall. The Existing Entitlement Alternative would not be designed to achieve LEED certification to the extent that the Proposed Project has been designed to do so.

This Alternative was selected because it provides for what has already been entitled, and because it accomplishes some of the project objectives by increasing the commercial intensity at the project site, but would not require new discretionary approvals. While additional restaurant area could be provided with this alternative, the total area of new restaurant uses would be reduced and the incorporation of higher-end, full-service restaurant facilities would most likely not be realized. Under this alternative, requests for Conditional Use Permit(s) for Alcoholic Beverages (CUBs) may still be requested under a separate action. Additionally, the Existing Entitlement Alternative is a "reduced project" alternative representing approximately 40% of the square footage proposed under the Proposed Project.

FIGURE 63
EXISTING ENTITLEMENT (108,000 GLSF) ALTERNATIVE – LEVEL 1

MAP SOURCE: WESTFIELD

FIGURE 64
EXISTING ENTITLEMENT (108,000 GLSF) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Existing Entitlement Alternative scenario, the visual changes to the project site would be less extensive (due to reduced building height of the parking structure) but otherwise similar to those identified for the Proposed Project. Therefore the impacts to aesthetic character and light/glare would be less than significant and similar to those identified for the Proposed Project, while those related to viewsheds would be somewhat less and also less than significant.

Aesthetic Character. With the Existing Entitlement Alternative, all new construction would be sited immediately south of the existing main mall buildings and modifications to the driveways at Hazeltine Avenue and Riverside Drive would not be implemented. Therefore, most of the construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive, would be minimized. Construction activity would be most visible from Woodman Avenue as the surface lot in this area will be used for construction staging and views from the street toward the project site are relatively unobstructed, hence construction-related visual character impacts from Woodman Avenue would be similar to those identified for the Proposed Project. To accommodate construction of new buildings and implementation of enhanced landscaping, approximately twenty mature trees would be removed, compared to approximately 48 trees under the Proposed Project.

Overall, and due primarily to the reduced construction phase aesthetic impacts, the Existing Entitlement Alternative would have a less than significant impact on visual character that would be slightly less impactive than the Proposed Project.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Existing Entitlement Alternative, the new construction (including the new parking structure) would be limited to a location that would not extend as far east as that with the Proposed Project, and the existing Macy's parking structure would not be modified, see *Figure 63: Existing Entitlement (108,000 GLSF) Alternative – Level 1* and *Figure 64: Existing Entitlement (108,000 GLSF) Alternative – Level 2*. For this reason, newly constructed structures would generally not be visible from the Matilija Avenue residences and thus any obstruction of viewsheds would be avoided. While both the Proposed Project impact and the Existing Entitlement Alternative impact would be less than significant, overall the impact of the Proposed Project would be greater than this alternative.

Lighting. Under the Existing Entitlement Alternative, lighting conditions would remain similar to existing conditions and lighting associated with the parking structure will be shielded from light-sensitive uses to the north by intervening structures that would obstruct the view. Existing on-site sources of night lighting are the spill over of security lighting from open parking areas and at the five docking/loading areas along Riverside Drive. Vehicle lights exiting the project site at the two driveways along Riverside Drive (in the vicinity of Matilija Avenue) sweep out

onto adjacent sidewalks, streets and residences to the north. Because the building configuration along the Riverside Drive and Hazeltine Avenue street frontages would not change, and the project site driveways along those frontages would not be altered, the illumination impacts would be similar to those described for the No Project Alternative, and would be reasonably comparable to the mitigated impacts from the Proposed Project. Both the Proposed Project impact and the Existing Entitlement Alternative impact would be less than significant. But without the introduction of night lighting of a six level parking structure south of the Macy's parking structure, this alternative would slightly reduce a less than significant impact of lighting when compared to the Proposed Project.

2. Air Quality

The Existing Entitlement Alternative would require less construction activity than assumed for the Proposed Project. In addition, the Existing Entitlement Alternative would export approximately 20,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Existing Entitlement Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). However, the daily construction intensity (e.g., construction equipment hours) for the Existing Entitlement Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Existing Entitlement Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Existing Entitlement Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 pounds per day (ppd) of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Existing Entitlement Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be less than the Proposed Project due to a shorter overall construction period.

The 108,000 GLSF associated with the Existing Entitlement Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 12 pounds per day (ppd) for VOC, 16 ppd for NO_X, 109 ppd for CO, less than one ppd for SO_X, 17 ppd for $PM_{2.5}$, and 3 ppd for PM_{10}. Weekend emissions would be approximately 15 ppd for VOC, 19 ppd for NO_X, 136 ppd for CO, less than one ppd for SO_X, 21 ppd for $PM_{2.5}$, and 4 ppd for PM_{10}. As with the Proposed Project, regional operational emissions for the Existing Entitlement Alternative would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}, and regional operational emissions for the Existing Entitlement Alternative would result in a less than significant impact.

Mobile source emissions associated with the Existing Entitlement Alternative would potentially be less than localized CO emissions for the Proposed Project. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0

and 20 ppm, respectively. Reduced traffic associated with the Existing Entitlement Alternative would result in slightly reduced levels, but would not substantially change the CO concentrations estimated for the Proposed Project. The Existing Entitlement Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Existing Entitlement Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Existing Entitlement Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Existing Entitlement Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Existing Entitlement Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. However, the Existing Entitlement Alternative is not designed to achieve LEED certification and may not be consistent with objectives under the Climate Action Team Plan and the City's Green LA Action Plan.

3. Geology and Soils

As discussed in Section IV: Environmental Impact Analysis: C-Geology and Soils, the risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Existing Entitlement Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Existing Entitlement Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. Construction activities associated with the Proposed Project would introduce a slightly higher risk of hazards due to materials and equipment to be used on-site during the construction activity for a longer duration than would be required with the Existing Entitlement scenario. With construction proposed under the Existing Entitlement Alternative, although overall reduced in building intensity, the nature of activities and construction style and materials would make the impact related to hazardous materials similar to that identified for the Proposed Project. While both the Proposed Project impact and the Existing Entitlement Alternative impact concerning hazardous materials would less than significant, overall the impact of the Existing Entitlement scenario would be slightly less due to a slightly reduced duration of construction activity. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

The operations of the Existing Entitlement Alternative, although on a slightly smaller scale would be of a similar nature of activities and impacts related to hazardous materials as those

identified for the Proposed Project. While both the Proposed Project impact and the Existing Entitlement Alternative impact concerning hazardous materials from operations would be less than significant, overall the impact of the Existing Entitlement scenario would be slightly less due to the reduced building and parking area and volume of materials consumed. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

Runoff from the site is conveyed and would be adequately handled by the City's storm drain system. Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Existing Entitlement Alternative would not result in any substantial net change in permeable surface area, except that new construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The area of improvement to drainage and water quality under this scenario could be less than the area of improvements under the Proposed Project. Specifically, the Proposed Project will be required to bring runoff to all three streets up to current SUSMP standards, but depending on the design of the storm-water drainage system for the parking structure under the Existing Entitlement project SUSMP standards may only be required for drainage to Hazeltine Avenue. However, it is possible that the Existing Entitlement Alternative could result in a slightly reduced impact compared to the Proposed Project because: (1) there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage; and (2) there would be more "undeveloped" area/opportunity available on-site to implement best management practices that are based on "green" strategies. Overall, the Existing Entitlement Alternative would have a similar and still less than significant impact on water quality when compared to the Proposed Project.

The Existing Entitlement Alternative's water consumption of approximately 25,800 gallons per day would be 28,061 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Existing Entitlement Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

Existing land uses are compatible with surrounding land use patterns. The Existing Entitlement Alternative would be a continuation, albeit intensification, of the existing community commercial use and would be similarly compatible with adjacent land uses. The Existing Entitlement Alternative is based on the permitted uses, height, development criteria and building intensity provisions of the existing entitlements approved in 1994. Since there has been no substantial change in land use patterns in the area since 1994, the Existing Entitlement Alternative would still be considered to be compatible with surrounding uses and not to have a significant impact on compatibility. As a result, this alternative would have a similar less than significant impacts on compatibility as the Proposed Project.

Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site. However, the on-site commercial uses are underutilized in

their current condition. The community could benefit from the revitalizing effect of an expansion of uses proposed under the Existing Entitlement Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Existing Entitlement Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. As with the Proposed Project, this alternative would be consistent with regional planning programs (i.e., SCAG's RCP and the AQMP). The Existing Entitlement Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site. Existing uses currently generate traffic and noise that would continue and increase slightly under the Existing Entitlement Alternative. Because traffic levels would be greater with the Proposed Project, traffic-related noise levels would be proportionately less under the Existing Entitlement scenario. However, no perceivable change in non-traffic related operational impacts is anticipated between the Existing Entitlement Alternative and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

With the Existing Entitlement Alternative, construction impacts would be less notable at noise-sensitive uses to the north because the construction activity would be obstructed primarily by existing structures. The Existing Entitlement Alternative impacts would be less than significant and would result in reduced construction noise impacts than would otherwise be associated with the Proposed Project.

8. Fire Services

The Existing Entitlement Alternative would not result in a measurable increase in fire protection demands and, therefore, would create a less than significant impact. However, this alternative would not involve any of the on-site circulation improvements associated with the Proposed Project. As a result, overall the Existing Entitlement Alternative is anticipated to result in a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Existing Entitlement Alternative would not result in a significant increase in police protection demands and the overall impact would be similar to that anticipated with the Proposed Project, and therefore less than significant.

10. Solid Waste

During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste

materials from new construction through an aggressive recycling program. Under the Existing Entitlement Alternative, only a small portion of the existing three-level parking structure would be demolished and the volume of construction waste would be less than that for the Proposed Project. Although the level of demolition or construction required under the Existing Entitlement scenario would be less, this alternative would not fully avoid impacts related to construction-generated solid waste. However with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

The Existing Entitlement Alternative would generate 305 pounds per day of solid waste, which would generate less of an impact on landfills than the 1921 pounds per day generated by the Proposed Project. Operational volumes of solid waste generated by the Existing Entitlement Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Existing Entitlement Alternative involves an increase of approximately 108,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 37 vehicle trips during the weekday A.M. peak hour and 189 vehicle trips during the weekday P.M. peak hour are anticipated.[1] During the weekend peak hours, an additional 250 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Existing Entitlement Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. The parking configuration would be somewhat enhanced with the addition of more centrally located parking, and this alternative would provide parking at the current approved ratio of 4.5 parking spaces per 1,000 GLSF. The vehicular access associated with the Existing Entitlement Alternative would be consistent with the access currently provided at the project site. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements would not occur. Although the overall increase in project site related trips would not occur to the same level as the Proposed Project under the Existing Entitlement scenario, other beneficial impacts to access, vehicular and pedestrian safety, and internal circulation would also not occur. However, the Existing Entitlement Alternative's traffic impacts would be less than the Proposed Project's impacts overall due to the reduced number of vehicle trips. As a result, with the implementation of similar traffic mitigation as the Proposed Project, the Existing Entitlement Alternative would be anticipated to reduce traffic impacts to a less than significant level.

12. Growth Inducing

The Existing Entitlement Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Existing Entitlement scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

[1] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Existing Entitlement Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the Alternative's contribution toward cumulative impacts would be less than significant.

14. Relationship of Alternative to Project Objectives

The Existing Entitlement Alternative would result in reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Existing Entitlement Alternative would not satisfy most of the project objectives to the extent possible with the Proposed Project. Specifically, the Existing Entitlement Alternative would not invigorate economic activity at the project site to the full extent of the Proposed Project, would not provide circulation and access improvements that promote enhanced vehicular and pedestrian safety, would not enhance on-site improvements that could facilitate improved community linkages, and would not expand to the fullest extent the range of services (e.g., restaurants higher end retail uses) available to the community at this location. Also, the Existing Entitlement Alternative would not be designed to achieve LEED certification to the same extent as the Proposed Project. In summary, the Existing Entitlement Alternative would not attain most of the objectives established for the Proposed Project.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Existing Entitlement scenario would reduce but not avoid this significant air quality impact, however this alternative would reduce the level of all other impacts addressed herein beyond those anticipated with the Proposed Project.

Implementation of the Existing Entitlement Alternative would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided. Overall, the Existing Entitlement Alternative would result in a reduced level of impact when compared to the Proposed Project.

V. ALTERNATIVES

C. ALTERNATIVE C: REDUCED PROJECT 1 – (235,000 GLSF/REDUCED HEIGHT OF PARKING)

ALTERNATIVE DESCRIPTION

In addition to the Existing Entitlement Alternative, two additional "reduced project" alternatives were evaluated. At an approximate 60% reduction, the Existing Entitlement Alternative offered a scenario where a substantial reduction in project scale was evaluated. Two other "reduced project" alternatives were considered that essentially address the same level of reduction (i.e., 16%), but with varied site plan configurations. A net reduction of approximately 16% was selected as it represents the next logical scaled-back project size given internal shopping circulation considerations for integration with the existing shopping center development. The Reduced Project 1 Alternative is one of two alternatives that represent an approximate 16% reduction in proposed commercial square footage. The location and configuration of the new commercial development would be similar under both of the Reduced Project Alternatives, however, the approach to parking accommodations would be addressed differently under each Alternative.

The Reduced Project 1 (235K/Reduced Height of Parking) Alternative consists of up to 235,000 GLSF of new retail/restaurant commercial space in a two-level structure (with rooftop parking) that would be constructed south of the existing mall between the Bloomingdale's and Macy's department stores. A proposed site plan for this alternative is shown in *Figure 65: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative – Level 1*, *Figure 66: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative – Level 2*, and *Figure 67: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 68: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative Cross Section*. The existing three-level "south" parking structure would be demolished to accommodate new construction and facilitate internal circulation improvements. Additional and replacement parking would be accommodated in a new five-level (one-level at grade plus four levels above grade) parking structure that would extend easterly from the new commercial segment. Similar to the Proposed Project, minor modifications to the Bloomingdale's parking structure would be required to tie in new structures and implement circulation improvements. Unlike with the Proposed Project, the existing two-level Macy's parking structures would not be retained, and instead would be completely demolished and replaced with a new consolidated terraced five-level (one-level at grade plus four-levels above grade) parking structure located east and southeast of Macy's department store. Because of the interim loss of on-site parking due to the demolition of the south and Macy's parking structure, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is buildout, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). Unlike the Proposed Project, this alternative would not provide a parking structure on the eastern most portion of the project site. As a result it would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. It is anticipated that construction of this alternative would be completed by year 2012.

FIGURE 65
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – LEVEL 1

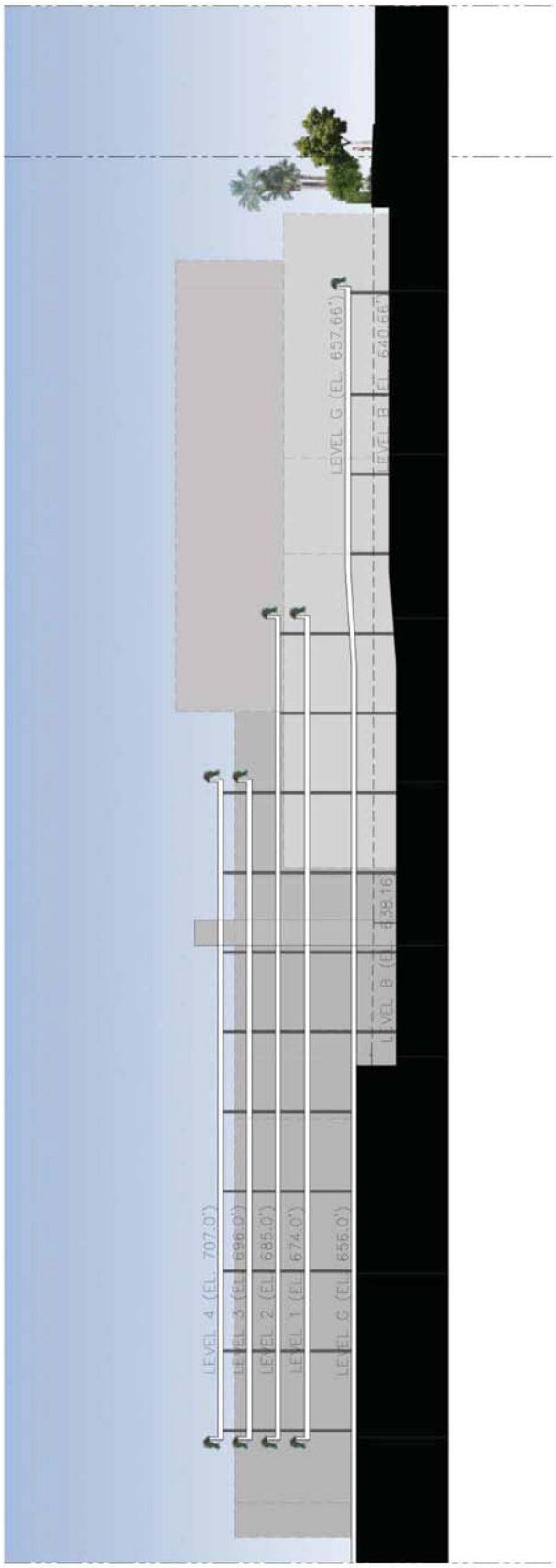
MAP SOURCE: WESTFIELD

FIGURE 66
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 67
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 68
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – CROSS SECTION

MAP SOURCE: WESTFIELD

Under the Reduced Project 1 Alternative, landscape and building facade enhancements, similar to those described for the Proposed Project, along the Riverside Drive and Hazeltine Avenue frontages would be provided. Full improvements to internal circulation and site access driveways, including realignment of the driveway at the Matilija Avenue intersection, would be implemented, including circulation improvements that would facilitate better emergency access within the project site. This Reduced Project 1 Alternative represents an approximate 16% reduction in new commercial square footage compared to the Proposed Project.

The Reduced Project 1 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 235,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 235,000 GLSF retail space within a new two-level structure, and construction of a new five-level parking structure.

- Conditional Use Permit for Commercial Corner[2] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

[2] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Reduced Project 1 Alternative.

The Reduced Project 1 Alternative would be designed to address LEED compliance to the extent feasible with the reduced scale of development proposed with this alternative, but may not achieve full LEED certification. This Reduced Project 1 Alternative was selected to provide a comparison to the Proposed Project that would potentially reduce impacts to traffic, air quality, public services and utilities.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Reduced Project 1 Alternative scenario, the visual changes to the project site from Riverside Drive would be similar to those identified for the Proposed Project, but building massing of the new east parking structure would be slightly reduced as it be limited to five-levels (one-level at grade plus four-levels above grade) compared to the six levels (1 at grade and 5 above grade) proposed with the Proposed Project. Nonetheless, visibility of the sixth level under the Proposed Project would be very limited due to an approximate 210 feet setback of the proposed parking structure from Riverside Drive. As a result, the individual levels of the parking structure are not readily discernable but rather perceived as just part of a building mass, and the sixth level of the Proposed Project is not distinguishable. Hence, elimination of the upper parking level under the Reduced Project 1 Alternative would not substantially alter (i.e., improve) the views of this portion of the project. Therefore the impacts to aesthetic character and light/glare from Riverside Drive would be similar to those identified for the Proposed Project, including those related to viewsheds, and would be less than significant. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appear as part of the background because of the large setback from

Woodman Avenue. Therefore, the impacts to aesthetics character and lights/glare would be reduced as compared to those identified for the Proposed Project., including those related to viewsheds and would be less than significant.

Aesthetic Character. With the Reduced Project 1 Alternative, all new construction would be sited to the south of the existing mall buildings and the Macy's shopping center, and the driveways at Hazeltine Avenue and Riverside Drive would be consolidated and improved with a new signalized intersection. Construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive would be similar to those identified for the Proposed Project. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appeal as part of the background because of the large setback from Woodman Avenue.

To accommodate construction of new buildings and implementation of enhanced landscaping, as with the Proposed Project, approximately 48 mature trees would be removed. Overall, the Reduced Project 1 Alternative would have a similar net impact to visual character as that identified for the Proposed Project as both scenarios would provide an updated and more visually distinctive building façade, and intensified landscaping at the site interior and frontages. Both the Reduced Project 1 Alternative and the Proposed Project would have a less than significant impact and there would be no measurable difference between the two scenarios relative to visual character.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Reduced Project 1 Alternative, the new construction (including the new parking structure) would be similarly located except that the levels of the new parking structure would not extend beyond the southern edge of the Macy's parking structure. The increased building setback may result in a perception of reduced building massing, but would not result in a change in the overall viewshed from the Matilija Avenue area relative to the Proposed Project. Both the Proposed Project impact and the Reduced Project 1 Alternative impact would be less than significant and similar.

Lighting. Under the Reduced Project 1 Alternative, lighting conditions at build out would be similar to that of the Proposed Project. Both the Proposed Project impact and the Reduced Project 1 Alternative impact would be less than significant.

2. Air Quality

The Reduced Project 1 Alternative would require slightly less construction activity than assumed for the Proposed Project as approximately 235,000 GLSF would be constructed instead of 280,000 GLSF. In addition, the Reduced Project 1 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Reduced Project 1 Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project

construction period (e.g., NO_X emissions associated with haul trucks). The daily construction intensity (e.g., construction equipment hours) for the Reduced Project 1 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Reduced Project 1 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Reduced Project 1 Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Reduced Project 1 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be slightly less than the Proposed Project given the slightly shorter construction period of this alternative.

The 235,000 GLSF associated with the Reduced Project 1 Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 25 ppd for VOC, 33 ppd for NO_X, 229 ppd for CO, less than one ppd for SO_X, 7 ppd for $PM_{2.5}$, and 35 ppd for PM_{10}. Weekend emissions would be approximately 31 ppd for VOC, 41 ppd for NO_X, 288 ppd for CO, less than one ppd for SO_X, 9 ppd for $PM_{2.5}$, and 44 ppd for PM_{10}. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Reduced Project 1 Alternative would result in a less than significant impact.

Mobile source emissions associated with the Reduced Project 1 Alternative would potentially reduce the Proposed Project's localized CO emissions. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Reduced traffic associated with the Reduced Project 1 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Reduced Project 1 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Reduced Project 1 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Reduced Project 1 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Reduced Project 1 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Reduced Project 1 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Reduced Project 1 Alternative would be designed to incorporate LEED certification element to the extent feasible to achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Reduced Project 1 Alternative would result in a less than significant global warming impact.

3. Geology and Soils

The risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Reduced Project 1 Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Reduced Project 1 Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. The potential impacts with regard to asbestos containing materials (ACMs) and lead-based paints are a concern due to demolition and construction of the Proposed Project, however, the main portion of the mall structures would be avoided during construction. Construction activities associated with the Reduced Project 1 Alternative and the Proposed Project would be similar with no measurable change in risk of hazards due to materials and equipment to be used on-site. Both the Proposed Project impact and the Reduced Project 1 Alternative impact would less than significant. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

5. Water Resources

Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Reduced Project 1 Alternative would not result in any substantial net change in permeable surface area, except that new construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The level of improvement to drainage and water quality under this scenario would be similar to the net improvement under the Proposed Project. However, it is possible that the Reduced Project 1 Alternative could result in a slightly reduced impact compared to the Proposed Project because there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage. Overall, the Reduced Project 1 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.

The Reduced Project 1 Alternative's water consumption would be 32,400 gallons per day which would be 21,461 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Reduced Project 1 Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

The Reduced Project 1 Alternative would be a continuation of the existing community commercial use and would be similarly compatible with adjacent land uses. Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site and would require similar entitlement approvals as described for the Proposed Project. The community would benefit from the revitalizing effect of an expansion of uses proposed under the Reduced Project 1 Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Reduced Project 1 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Reduced Project 1 Alternative would have similar less than significant impacts with regard to land use compatibility commensurate with the Proposed Project.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site and these levels would increase with intensification of uses at the project site. Because traffic levels would be slightly greater with the Proposed Project, traffic-related noise levels would be proportionately less under the Reduced Project 1 scenario. However, no perceivable change in non-traffic related operational impacts is anticipated between the Reduced Project 1 Alternative and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

Although construction time may not be as long as the Proposed Project the intensity of any individual day's construction activities are anticipated to be similar to that of the Proposed Project. As a result, worst case construction-related noise impacts would be similar to those described for the Proposed Project. Although there would not be the construction related noise associated with the reopening of the Riverside Drive tunnel. Overall, the Reduced Project 1 Alternative impacts are not expected to be measurably different than construction noise impacts that would otherwise be associated with the Proposed Project, and would be less than significant.

8. Fire Services

The Reduced Project 1 Alternative would not result in a measurable increase in fire protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Reduced Project 1 Alternative would not result in a significant increase in police protection demands and the overall impact would be similar to that anticipated with the Proposed Project.

10. Solid Waste

The Reduced Project 1 Alternative would involve similar materials from new construction as that for the Proposed Project. The Reduced 1 Alternative would involve similar demolition and construction activities and therefore would result in similar potential impacts as the Proposed Project. During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. The Reduced Project 1 Alternative could also avoid a significant impact from construction waste with the implementation of a similar aggressive recycling program. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

The Reduced Project 1 Alternative would generate 662 pounds per day of solid waste, which would be 1,259 pounds per day less of solid waste than the Proposed Project. Operational volumes of solid waste generated by the Reduced Project 1 Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Reduced Project 1 Alternative involves an increase of approximately 235,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 79 vehicle trips during the weekday A.M. Peak hour and 402 vehicle trips during the weekday P.M. peak hour are anticipated.[3] During the weekend peak hours, an additional 534 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Reduced Project 1 Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements would be implemented in a manner consistent with those proposed under the Proposed Project. Overall, the Reduced Project 1 Alternative impacts would be less than the Proposed Project's impacts overall.

The Reduced Project 1 Alternative would not include the construction of the four-level structure on the eastern most portion of the project site. As a result, this alternative would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. This ratio meets the anticipated demand for the shopping center. This may result in some increased inconvenience to shoppers as compared to the Proposed Project. But it would not result in a significant impact to parking.

Although the Reduced Project 1 Alternative is anticipated to result in an overall decrease in traffic impacts when compared to the Proposed Project, contribution to the City's Adaptive Traffic Control System (ATCS) installation at seven study intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, would be implemented in a manner similar to the Proposed Project with this alternative.

[3] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

12. Growth Inducing

The Reduced Project 1 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Reduced Project 1 scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Reduced Project 1 Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the Alternative's contribution toward cumulative impacts would be less than significant.

14. Relationship of Alternative to Project Objectives

The Reduced Project 1 Alternative would result in slightly reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Reduced Project 1 Alternative may not satisfy some of the project objectives to the extent possible with the Proposed Project. Specifically, the Reduced Project 1 Alternative would not expand to the fullest extent the range of services and stores available to the community at this location.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Reduced Project 1 scenario could still result in a significant air quality impact (although reduced in terms of duration), but for most other issues this alternative would reduce the level of impacts beyond those anticipated with the Proposed Project.

Implementation of the Reduced Project 1 Alternative (235K/Reduced Height of Parking) would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. However, with the reduction in parking to 4.25 spaces per 1,000 GLSF, some increased inconvenience will occur but a less than significant impact on parking is anticipated. The impacts under this alternative may have somewhat less impacts relative to the Proposed Project, however, none of the impacts are totally avoided. Additionally, the significant unavoidable

impacts from construction-related air quality, associated with the Proposed Project would still occur, because peak daily construction activity would not be substantially reduced under this alternative.

V. ALTERNATIVES

D. ALTERNATIVE D: REDUCED PROJECT 2 – (235,000 GLSF/MAINTAIN MACY'S PARKING STRUCTURE/FULL CLOSURE OF MATILIJA AVENUE)

ALTERNATIVE DESCRIPTION

The Reduced Project 2 (235K/Maintain Macy's Parking Structure/Full Closure of Matilija Avenue) Alternative represents another "reduced project" alternative offering an approximate 16% reduction in proposed commercial square footage than what is proposed with the Proposed Project. This Alternative differs from the Reduced Project 1 (235K/Reduced Height of Parking) Alternative by: (1) retaining most of the existing Macy's parking structure, (2) having all new construction occur south of this structure, (3) incorporating the full closure of Matilija Avenue at Riverside Drive, and (4) adding the new parking structure south of the retained Macy's structure which would contain six-levels (one-level at grade plus five-levels above grade) but would have a slightly reduced footprint as compared to the Reduced Project 1.

With the Reduced Project 2 Alternative, up to 235,000 GLSF of new retail/restaurant commercial space in a two-level structure (with rooftop parking) south of the existing mall between the Bloomingdale's and Macy's department stores would be constructed. A proposed site plan for this alternative is shown in *Figure 69: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative – Level 1*, *Figure 70: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative – Level 2*, and *Figure 71: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 72: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative Cross Section*. As with the Proposed Project (and the Reduced Project 1 Alternative), the existing three-level parking structure would be demolished to accommodate new construction and facilitate internal circulation improvements. Additional and replacement parking would be accommodated in a new six-level (one-level at grade plus five levels above grade) parking structure that would extend easterly from the new commercial segment. Similar to the Proposed Project, only minor modifications to the Macy's parking structure would be required to tie in new structures and implement the new signalized driveway across from Matilija Avenue. Because of the interim loss of on-site parking due to the demolition of the south parking structure, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is buildout, some project parking would be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). Unlike the Proposed Project, this alternative would not provide a parking structure on the eastern most portion of the project site. As a result it would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. It is anticipated that construction of this alternative would be completed by year 2012.

FIGURE 69
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE – LEVEL 1

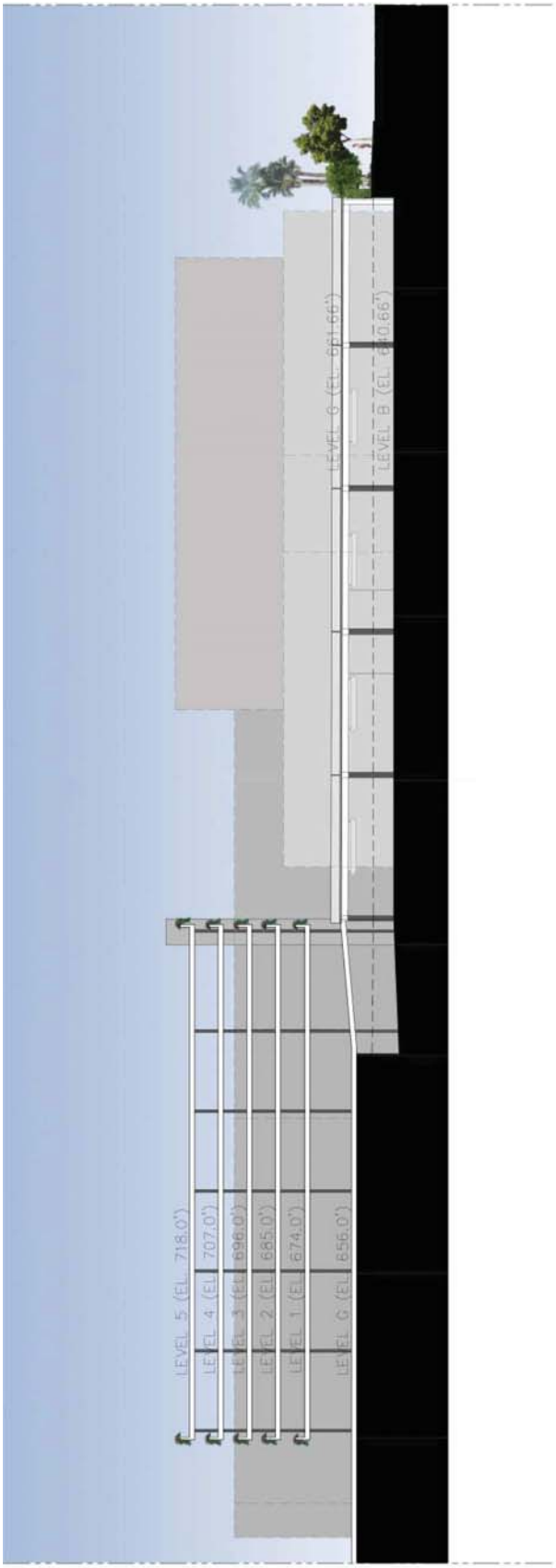
MAP SOURCE: WESTFIELD

FIGURE 70
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 71
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 72
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE CROSS SECTION

MAP SOURCE: WESTFIELD

Under the Reduced Project 2 Alternative, landscape and building facade enhancements, similar to those described for the Proposed Project, along the Riverside Drive and Hazeltine Avenue frontages would be provided. Full improvements to internal circulation and site access driveways, including realignment of the driveway at the Matilija Avenue intersection, would be implemented, and including circulation improvements that would facilitate better emergency access within the project site. However, under this alternative all vehicular access to Matilija Avenue from Riverside Drive would be eliminated. This Reduced Project 2 Alternative represents an approximate 16% reduction in new commercial square footage compared to the Proposed Project.

The Reduced Project 2 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 235,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of existing parking structures, reconfiguration of site driveways and internal circulation, construction of 235,000 GLSF retail space within a new two-level structure, and construction of a new six-level parking structure.

- Conditional Use Permit for Commercial Corner[4] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

[4] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.
- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Reduced Project 2 Alternative.

The Reduced Project 2 Alternative would be designed to address LEED compliance to the extent feasible with the reduced scale of development proposed with this alternative, but may not achieve full LEED certification. This alternative was selected to provide a comparison to the Proposed Project that would potentially reduce impacts to traffic, air quality, public services and utilities. Similar to the Reduced Project 1 Alternative, analysis of this alternative is useful in comparing traffic, land use, and aesthetic (i.e. height and building intensity) impacts resulting from additional intensification on the project site.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Reduced Project 2 Alternative scenario, the visual changes to the project site from Riverside Drive would be similar to those identified for the Proposed Project, but building massing of the new parking structure would be slightly reduced as it would be set back an additional 150 feet. Therefore the impacts to aesthetic character, light/glare, and shading would be less than significant and similar to those identified for the Proposed Project and the Reduced Project 1 Alternative, including those related to viewsheds. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appeal as part of the background because of the large setback from Woodman Avenue. Therefore, the impacts to aesthetics character and lights/glare would be reduced as compared to those identified for the Proposed Project., including those related to viewsheds and would be less than significant.

Aesthetic Character. With the Reduced Project 2 Alternative, all new construction would be sited to the south of the existing mall buildings and the Macy's shopping center, and the driveways at Hazeltine Avenue and Riverside Drive would be consolidated and improved with a new signalized intersection. Construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive would be similar to those identified for the Proposed Project. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appeal as part of the background because of the large setback from Woodman Avenue.

To accommodate construction of new buildings and implementation of enhanced landscaping, as with the Proposed Project, approximately 48 mature trees would be removed. Overall, the Reduced Project 2 Alternative would have a similar net impact to visual character as that identified for the Proposed Project as both scenarios would provide an updated and more visually distinctive building façade, and intensified landscaping at the site interior and frontages. Both the Reduced Project 2 Alternative and the Proposed Project would have a less than significant impact and there would be no measurable difference between the two scenarios relative to visual character.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Reduced Project 2 Alternative, the new construction (including the new parking structure) would be similarly located except that the levels of the new parking structure would not extend beyond the southern edge of the Macy's parking structure. The increased in building setback may result in a perception of reduced building massing, but would not result in a change in the overall viewshed from the Matilija Avenue area relative to the Proposed Project. Both the Proposed Project impact and the Reduced Project 2 Alternative impact would be less than significant.

Lighting. Under the Reduced Project 2 Alternative, lighting conditions at build out would be similar to that of the Proposed Project. Both the Proposed Project impact and the Reduced Project 2 Alternative impact would be less than significant.

2. Air Quality

Demolition, excavation, grading and construction under the Reduced Project 2 Alternative would be required and would be similar to that described for the Proposed Project. Because the level of development under Reduced Project 2 Alternative involves a slightly reduced building footprint, the overall level construction-related air quality impacts would be proportionately reduced. The Reduced Project 2 Alternative would require less construction activity than assumed for the Proposed Project as approximately 235,000 GLSF would be constructed instead of 280,000 GLSF. In addition, the Reduced Project 2 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Reduced Project 2 Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period.

The daily construction intensity (e.g., construction equipment hours) for the Reduced Project 2 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Reduced Project 2 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Reduced Project 2 Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Reduced Project 2 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be slightly less than the Proposed Project given the slightly shorter construction period of this alternative.

The 235,000 GLSF associated with the Reduced Project 2 Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 25 ppd for VOC, 33 ppd for NO_X, 229 ppd for CO, less than one ppd for SO_X, 7 ppd for $PM_{2.5}$, and 35 ppd for PM_{10}. Weekend emissions would be approximately 31 ppd for VOC, 41 ppd for NO_X, 288 ppd for CO, less than one ppd for SO_X, 9 ppd for $PM_{2.5}$, and 44 ppd for PM_{10}. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Reduced Project 2 Alternative would result in a less than significant impact.

Mobile source emissions associated with the Reduced Project 2 Alternative would potentially reduce the Proposed Project's localized CO emissions. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are expected to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Reduced traffic associated with the Reduced Project 2 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Reduced Project 2 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Reduced Project 2 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Reduced Project 2 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Reduced Project 2 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Reduced Project 2 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Reduced Project 2 Alternative would be designed to incorporate LEED certification element to the extent feasible to achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Reduced Project 2 Alternative would result in a less than significant global warming impact. As a result, this

alternative would reduce the less than significant Green House Gas emissions impact when compared to the Proposed Project.

3. Geology and Soils

The risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Reduced Project 2 Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Reduced Project 2 Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. The potential impacts with regard to asbestos containing materials (ACMs) and lead-based paints are a concern due to demolition and construction of the Proposed Project, however, the main portion of the mall structures would be avoided during construction. Construction activities associated with the Reduced Project 2 Alternative and the Proposed Project would be similar with no measurable change in risk of hazards due to materials and equipment to be used on-site. Both the Proposed Project impact and the Reduced Project 2 Alternative impact would less than significant. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Reduced Project 2 Alternative would not result in any substantial net change in permeable surface area, except that new construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The level of improvement to drainage and water quality under this scenario would be similar to the net improvement under the Proposed Project. However, it is possible that the Reduced Project 2 Alternative could result in a slightly reduced impact compared to the Proposed Project because there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage. Overall, the Reduced Project 2 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.

The Reduced Project 2 Alternative's water consumption would be 32,400 gallons per day which would be 21,461 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Reduced Project 2 Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

The Reduced Project 2 Alternative would be a continuation of the existing community commercial use and would be similarly compatible with adjacent land uses. Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site and would require similar entitlement approvals as described for the Proposed Project. The community would benefit from the revitalizing effect of an expansion of uses proposed under the Reduced Project 2 Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Reduced Project 2 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Reduced Project 2 Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site and these levels would increase with intensification of uses at the project site. Because traffic levels would be slightly greater with the Proposed Project, traffic-related noise levels would be proportionately less under the Reduced Project 2 scenario. However, no perceivable change in non-traffic related operational impacts is anticipated between the Reduced Project 2 Alternative and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

Although construction time may not be as long as the Proposed Project the intensity of any individual day's construction activities are anticipated to be similar to that of the Proposed Project. As a result, worst case construction-related noise impacts would be similar to those described for the Proposed Project. Although there would not be the construction related noise associated with the reopening of the Riverside Drive tunnel. Overall, the Reduced Project 2 Alternative impacts are not expected to be measurably different than construction noise impacts that would otherwise be associated with the Proposed Project, and would be less than significant.

8. Fire Services

The Reduced Project 2 Alternative would not result in a measurable increase in fire protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Reduced Project 2 Alternative would not result in a significant increase in police protection demands and the overall impact would be similar to that anticipated with the Proposed Project.

10. Solid Waste

The Reduced Project 2 Alternative would involve similar materials from new construction. The Reduced 2 Alternative would involve similar demolition and construction activities and therefore would result in similar potential impacts as the Proposed Project. During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. The Reduced Project 2 Alternative could also avoid a significant impact from construction waste with the implementation of a similar aggressive recycling program. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

The Reduced Project 2 Alternative would generate 662 pounds per day of solid waste, which would be 1,259 pounds per day less of an impact than the Proposed Project. Operational volumes of solid waste generated by the Reduced Project 2 Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Reduced Project 2 Alternative involves an increase of approximately 235,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 79 vehicle trips during the weekday A.M. Peak hour and 402 vehicle trips during the weekday P.M. peak hour are anticipated.[5] During the weekend peak hours, an additional 534 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Reduced Project 2 Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements would be implemented in a manner consistent with those proposed under the Proposed Project. Overall, the Reduced Project 2 Alternative impacts would be less than the Proposed Project's impacts overall.

Although the Reduced Project 2 Alternative is anticipated to result in an overall decrease in traffic impacts when compared to the Proposed Project, contribution to the City's ATCS installation at seven study intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, would be implemented in a manner similar to the Proposed Project with this alternative.

The Reduced Project 2 Alternative would not involve the construction of the four-level parking structure on the eastern most portion of the project site. As a result, this alternative would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. This ratio meets the anticipated demand for the shopping center. This may result in some increased inconvenience to shoppers as compared to the Proposed Project. But it would not result in a significant impact to parking.

[5] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

12. Growth Inducing

The Reduced Project 2 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Reduced Project 2 scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Reduced Project 2 Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the Alternative's contribution toward cumulative impacts would be less than significant.

14. Relationship of Alternative to Project Objectives

The Reduced Project 2 Alternative would result in slightly reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Reduced Project 2 Alternative would not satisfy some of the project objectives to the extent possible with the Proposed Project. Specifically, the Reduced Project 2 Alternative may not expand to the fullest extent the range of services available to the community at this location.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Reduced Project 2 scenario could still result in significant air quality impacts (although reduced in terms of duration), but for most other issues this alternative would reduce the level of impacts beyond those anticipated with the Proposed Project.

Implementation of the Reduced Project 2 Alternative (235K/Maintain Macy's Parking Structure/Full Closure of Matilija Avenue) would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. However, with the reduction in parking to 4.25 spaces per 1,000 GLSF, some increased inconvenience will occur but a less than significant impact on parking is anticipated. The impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided.

Additionally, the significant unavoidable impacts from construction-related air quality, associated with the Proposed Project would still occur, because peak daily construction activity would not be substantially reduced under this alternative.

V. ALTERNATIVES

E. ALTERNATIVE E: ALTERNATE SITE PLAN 1 – (280,000 GLSF: PROPOSED PROJECT/NO TUNNEL/NO SUBTERRANEAN PARKING)

ALTERNATIVE DESCRIPTION

Two "alternative design" to the Proposed Project alternatives were evaluated in order to compare how a functional Alternate Site Plan would perform relative the Proposed Project. Both Alternate Site Plan options assume that the project would be approved to allow the 280,000 GLSF of retail/restaurant commercial space requested with the Proposed Project, however, site plan modifications could be included to address access, traffic safety, aesthetics and pedestrian orientation. The location and configuration of the new commercial development would be similar that described for the Proposed Project under both of the Alternate Site Plan Alternatives. However, site access, internal circulation, parking configuration, and pedestrian orientation would vary.

The Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative would assume that the project would be approved to allow the 280,000 GLSF of retail/restaurant commercial space requested with the Proposed Project within a similar two-level retail structure (with rooftop parking). However, site plan modifications would eliminate the additional driveway access from Riverside Drive that would tie into the overall internal circulation configuration and a new subterranean parking level that would extend under the new retail building. The existing 2-level Macy's parking structure would be demolished and rebuilt through a consolidated new "main" six-level (1 at grade and 5 above grade) parking structure that would be terraced to step back from the Riverside Drive frontage. A new four-level (one-level at grade plus three levels above grade) parking structure would be developed on the eastern most portion of the project site. No subterranean parking would be provided with this alternative. A proposed site plan for this alternative is shown in *Figure 73: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative – Level 1*, *Figure 74: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative – Level 2*, and *Figure 75: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 76: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative Cross Section*. Because of the interim loss of on-site parking due to the demolition of the "south" and Macy's parking structures, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is completed, some project parking would be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). Proposed circulation improvements would facilitate better emergency access within the project site.

Benefits to this alternative include a reduction in the volume of required earth movement (including an overall reduction in cubic yards of earth materials to be exported off-site) and an overall reduction in the total length of time needed for project construction. The placement of parking on the area of the site at the existing Macy's parking structure would not change the use

FIGURE 73
ALTERNATE SITE PLAN 1 (PROSPOED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE – LEVEL 1

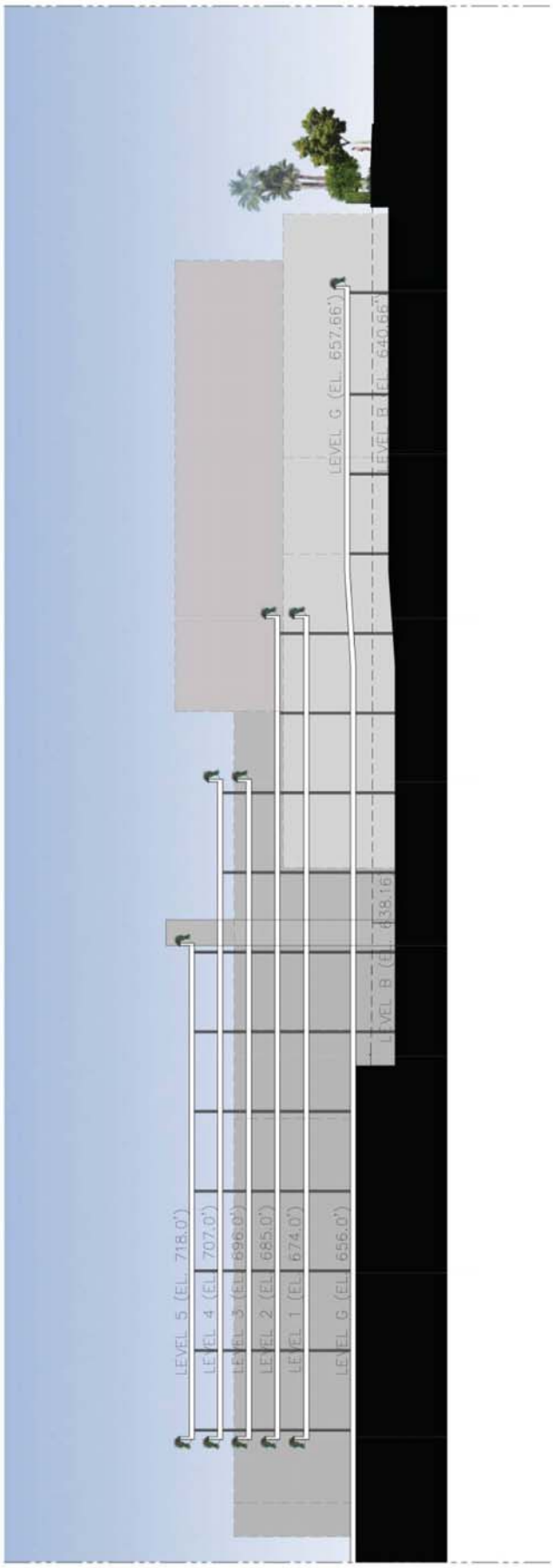
MAP SOURCE: WESTFIELD

FIGURE 74
ALTERNATE SITE PLAN 1 (PROSPOED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 75
ALTERNATE SITE PLAN 1 (PROPOSED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 76

ALTERNATE SITE PLAN 1 (PROPOSED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE CROSS SECTION

MAP SOURCE: WESTFIELD

of land in this area from what currently exists, however, the perceived encroachment of new parking south and east of the Macy's parking structure would be further setback from Riverside Drive. This alternative was selected because it is useful in comparing traffic, access and aesthetic (i.e. height/building encroachment) impacts resulting from additional intensification on the project site. It is anticipated that construction of this alternative would be completed by year 2012.

The Alternate Site Plan 1 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure, and construction of a new six-level parking structure.

- Conditional Use Permit for Commercial Corner[6] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

[6] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Alternate Site Plan 1 project.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

Because the Alternate Site Plan 1 (Tunnel/Subterranean Parking) Alternative represents the same level of development, requested entitlements, and general design as the Proposed Project, the following evaluation of environmental impacts associated with this alternative will focus primarily on those issue areas for which an additional site driveway (off Riverside Drive easterly of Hazeltine Avenue) and one level of subterranean parking would pose a change in the net level of impact. Unless otherwise noted, the impacts associated with the Alternate Site Plan 1 Alternative would be the same as those identified for the Proposed Project.

1. Aesthetics and Visual Resources

Under the Alternate Site Plan 1 Alternative scenario, the visual changes to the project site would be identical to those identified for the Proposed Project, except that an additional project site driveway along Riverside Drive would be activated and improved as a new intersection. Therefore the impacts to aesthetic character and light/glare would be similar to those identified for the Proposed Project. The location of the new driveway would require a disruption of landscaping along this segment of Riverside Drive, however, as this location already functions as a loading dock, the area would not be fully landscaped anyway. The tunnel opening would introduce new lighting at this location; however, the area already is illuminated by security lighting at the loading docks. Because of the parking structure would be similar to the height and configuration of the parking structure under the Proposed Project, even with retention and incorporation of the existing Macy's parking structure, there would be no appreciable difference between the two scenarios relative to visual character, and both the Alternate Site Plan 1 Alternative and the Proposed Project would have a less than significant impact.

2. Air Quality

Air quality impacts associated with the Alternate Site Plan 1 Alternative during the construction phase would essentially be the same as for those identified for the Proposed Project, except that the reduction in construction activity that would otherwise have been necessary to improve the tunnel and excavate for subterranean parking, would reduce the duration of the construction phase and therefore result in slightly decreased air pollutant emissions proportional to the extended duration of construction activity; however the overall decrease is anticipated to be negligible. The Alternate Site Plan 1 Alternative would require slightly less construction activity than the Proposed Project due to the elimination of the subterranean parking and tunnel access and the associated export of additional earth material. The Alternate Site Plan 1 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. However, this alternative would require the hauling of construction debris due to demolition of the Macy's parking structure.

Pollutant emissions during the entire Alternate Site Plan 1 Alternative construction period would be similar to the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). The daily construction intensity (e.g., construction equipment hours) for the Alternate Site Plan 1 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Alternate Site Plan 1 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Alternate Site Plan 1 Alternative would disturb a maximum of 4.25 acres per day. Although the construction of the subterranean parking would generate more localized emissions over the entire construction period, localized $PM_{2.5}$ and PM_{10} daily emissions would be similar to the emissions calculated for the Proposed Project as the same amount of dirt would be disturbed per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceed the SCAQMD localized significance thresholds. Therefore, the Alternate Site Plan 1 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact.

The Alternate Site Plan 1 Alternative would develop with the same amount of floor area as the Proposed Project (i.e., 280,000 GLSF) and would generate the same number of weekday and weekend daily trips. As such, regional operational emissions would be similar to the Proposed Project. Weekday emissions would be approximately 29 ppd for VOC, 39 ppd for NO_X, 271 ppd for CO, less than one ppd for SO_X, 8 ppd for $PM_{2.5}$, and 42 ppd for PM_{10}. Weekend emissions would be approximately 37 ppd for VOC, 49 ppd for NO_X, 340 ppd for CO, less than one ppd for SO_X, 10 ppd for $PM_{2.5}$, and 52 ppd for PM_{10}. However, it is possible that increased localized traffic congestion due to the elimination of the "tunnel" westerly driveway along Riverside Drive could result in slightly increased air pollutant emissions (primarily carbon monoxide levels) at intersections surrounding the project site; however, this increase would be negligible and would

not exceed threshold standards. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Alternate Site Plan 1 Alternative would result in a less than significant impact.

As described above, the Alternate Site Plan 1 Alternative would generate the same number of weekday and weekend daily trips as the Proposed Project. The inclusion of subterranean parking and tunnel access would potentially redistribute vehicle trips on local roadways. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Redistributed vehicle trips associated with the Alternate Site Plan 1 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Alternate Site Plan 1 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Alternate Site Plan 1 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Alternate Site Plan 1 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Alternate Site Plan 1 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Alternate Site Plan 1 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Alternate Site Plan 1 Alternative would be designed to achieve LEED certification and achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Alternate Site Plan 1 Alternative would result in a less than significant global warming impact.

3. Geology and Soils

Overall, the impacts related to geology, soils and seismic risks would be essentially the same for the Alternate Site Plan 1 Alternative as those described for the Proposed Project. However, as the Proposed Project would include one level of subterranean parking, additional geotechnical and structural engineering considerations would be required for the Proposed Project to ensure that the subterranean parking (and the buildings supported over the parking level) are structurally and seismically sound. Because the subterranean parking would not be included with the Alternate Site Plan 1 Alternative, the need for these additional considerations, nor the need for dewatering measures, is potentially avoided. Impacts associated with the Alternate Site Plan 1 Alternative may be slightly decreased from those with the Proposed Project, and would still be less than significant.

4. Hazardous Materials and Man-Made Hazards

Impacts related to hazardous materials would be essentially the same for the Alternate Site Plan 1 Alternative as those described for the Proposed Project. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

The level of improvement to drainage and water quality under the Alternate Site Plan 1 Alternative would be similar to the net improvement under the Proposed Project. Overall, the Alternate Site Plan 1 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.
The Alternate Site Plan 1 Alternative's water consumption would be similar to that of the Proposed Project and therefore would have a similar less than significant impact.

6. Land Use, Planning and Urban Decay

Both the Proposed Project and the Alternate Site Plan 1 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Alternate Site Plan 1 Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise conditions (both during construction and long-term operation) with the Alternate Site Plan 1 Alternative would be similar those of the Proposed Project, except for additional noise associated with implementation of the new tunnel/driveway entrance off Riverside Drive. Although the tunnel currently exists, construction improvements would be required to fully activate this entrance. As a result, residents north of the project site along this portion of Riverside Drive would experience elevated noise levels during construction.

Under operation of the Proposed Project, some of the project related traffic would be diverted to this new driveway access. This portion of Riverside Drive already experiences elevated noise levels due to traffic along the roadway and the introduction of the driveway at this location is not necessarily anticipated to increase pass-by traffic; however, noise generated by vehicles driving through the tunnel may create increased noise as the level of vehicle activity at that point would increase.

Overall, the Alternate Site Plan 1 Alternative impacts are not expected to be measurably different, or only slightly greater, than construction or operational noise impacts that would otherwise be associated with the Proposed Project, but would still be less than significant.

8. Fire and Police Services

The Alternate Site Plan 1 Alternative would not result in a measurable increase in fire or police protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Solid Waste

The Alternate Site Plan 1 Alternative's solid waste generation (during operation) would be similar to that of the Proposed Project and therefore would have a similar less than significant impact. However, during the construction phase, the Alternate Site Plan 1 Alternative may result in a slight increase in construction waste due to additional construction activity/materials used to implement the new driveway/tunnel and subterranean parking area.
During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. As the Alternate Site Plan 1 Alternative would involve similar demolition and construction activities, it would result in similar waste impacts, however with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

10. Traffic, Circulation and Access

The Alternate Site Plan 1 Alternative would generate traffic trips during weekday and weekends the same as the Proposed Project. Under this scenario, a net increase of 95 vehicle trips during the weekday A.M. Peak hour and 476 vehicle trips during the weekday P.M. peak hour are anticipated.[7] During the weekend peak hours, an additional 632 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases would result in a reduced level of service impacts at the same study intersections as the Proposed Project. However, as with the Proposed Project, implementation of ATCS at these intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, can reduce impacts to less than significant levels.

A key difference between the Proposed Project and Alternate Site Plan 1 Alternative would be the exclusion of the new access driveway along Riverside Drive easterly of Hazeltine Avenue. Although there would be no net change in the number of vehicle trips with this alternative, the Alternate Site Plan 1 Alternative is anticipated to result in a net , albeit negligible, decrease to the operational levels of service at adjacent intersections, and in particular at the Matilija Avenue intersection, because a portion of the Proposed Project site-related traffic would not be shifted to the alternate "tunnel" westerly driveway along Riverside Drive. On-site access, and internal emergency access, would be similar to the Proposed Project, but slightly less efficient with the elimination of the fifth driveway location. Ultimately, parking impacts for the Alternate Site Plan 1 Alternative would be similar to those of the Proposed Project, as an overall parking ratio of up to 4.5 spaces per 1,000 GLSF would be achieved. Overall, the Alternate Site Plan 1 Alternative impacts would be similar but slightly greater than the Proposed Project's impacts.

11. Growth Inducing

The Alternate Site Plan 1 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Alternate Site

[7] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Plan 1, the scenario would be less than significant and similar to any potential associated with the Proposed Project.

12. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Alternate Site Plan 1 Alternative would result a contribution to cumulative impacts that is similar to that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project, the Alternative's contribution toward cumulative impacts would be less than significant.

13. Relationship of Alternative to Project Objectives

The Alternate Site Plan 1 Alternative would result in similar impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant), but would also slightly exceed impacts in some areas and reduce others. The Alternate Site Plan 1 Alternative would not accomplish the same degree of "enhanced traffic flow and safety" as the Proposed Project due primarily to the added congestion at the other project site driveways with the elimination of the "tunnel" access along Riverside Drive. Further, without the additional fifth driveway/access, the internal site circulation would not be as efficient as that which would be accomplished by the Proposed Project.

14. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Alternate Site Plan 1 scenario would still result in significant air quality impacts during construction.

Implementation of the Alternate Site Plan 1 (Tunnel/Subterranean Parking) Alternative would result in similar environmental impacts for most issue areas compared to the Proposed Project. However, construction phase impacts related to air quality, geology/soils, noise, solid waste, and traffic may be slightly greater due to either the extended duration of construction and/or additional construction effort needed to implement the tunnel and subterranean parking level. Although these impacts could be slightly greater, the increase would be negligible and would be substantially comparable to the Proposed Project. During the operation of the project, traffic and air quality impacts would be slightly reduced and noise impacts slightly increased due to implementation of the new driveway. Geology/seismic risks may be slightly increased due to implementation of the subterranean parking. With the exception of air quality construction-related (daily) impacts, all impacts would remain less than significant.

V. ALTERNATIVES

F. ALTERNATIVE F: ALTERNATE SITE PLAN 2 – (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)

ALTERNATIVE DESCRIPTION

Relative to the Proposed Project, the Alternate Site Plan 2 (Pedestrian Activation on Riverside Drive) Alternative emphasizes enhanced pedestrian activation along Riverside Drive through a new mall entrance just west of the Macy's department store. Under this alternative, the Alternate Site Plan 2 would present a similar layout and building construction plan as that described for the Proposed Project (i.e., 280,000 GLSF of retail/restaurant commercial in a two-level retail structure with one level each of rooftop and subterranean parking, a new "main" six-level parking structure through which the Macy's parking structure is retained, and a new "east" four-level parking structure adjacent to Woodman Avenue). This Alternative also includes the reopening of the existing driveway/loading dock east of Bloomingdale's as a vehicular tunnel to access the existing Bloomingdale's parking structure and new subterranean parking level. A proposed site plan for this alternative is shown in *Figure 77: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Level 1*, *Figure 78: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Subterranean Parking*, *Figure 79: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Level 2*, and *Figure 80: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 81: Alternate Site Plan 2 (Pedestrian Activation) Alternative Cross Section*. However, in order to improve the pedestrian environment and walkability along Riverside Drive, a new pedestrian mall entrance would be created just west of the Macy's department store. The new pedestrian access to the mall would also include construction of a small entrance patio. Currently, all entrances to the mall are through the two anchor department stores (Macy's and Bloomingdale's) or via the parking areas on the south side of the mall. Proposed circulation improvements would facilitate better emergency access within the project site. It is anticipated that construction of this alternative would be completed by year 2012.

This alternative was selected because it is useful in comparing land use and aesthetic impacts resulting from additional intensification on the project site. Additionally, an indirect reduction in traffic and air quality impacts may be realized due to increased pedestrian activity.

The Alternate Site Plan 2 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

FIGURE 77
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE) ALTERNATIVE – LEVEL 1

MAP SOURCE: WESTFIELD

FIGURE 78
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)
ALTERNATIVE – SUBTERRANEAN PARKING

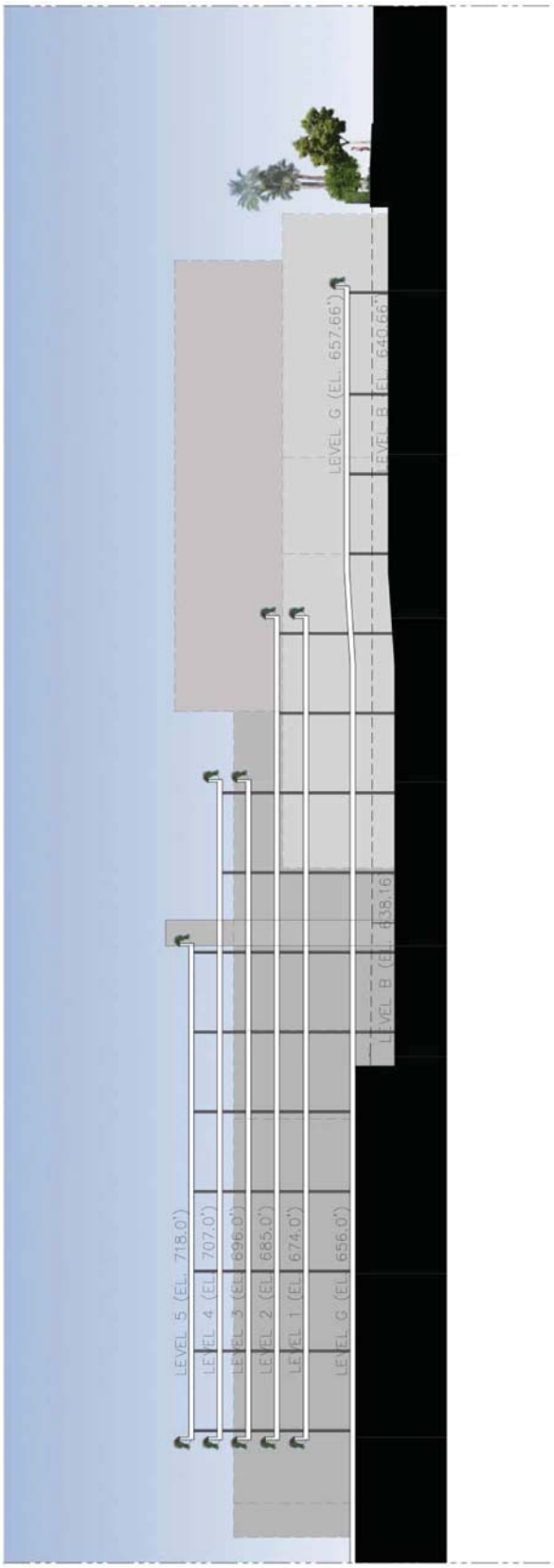
MAP SOURCE: WESTFIELD

FIGURE 79
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 80
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)
ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 81
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)
ALTERNATIVE CROSS SECTION

MAP SOURCE: WESTFIELD

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure, and construction of a new six-level and five-level parking structures.

- Conditional Use Permit for Commercial Corner[8] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits

[8] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Alternate Site Plan 2 project.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

Because the Alternate Site Plan 2 (Pedestrian Activation/Tunnel Access) Alternative represents the same level of development, requested entitlements, and general design as the Proposed Project, the following evaluation of environmental impacts associated with this alternative will focus primarily on those issue areas for which a new mall pedestrian entrance (off Riverside Drive just west of the Macy's department store) would pose a change in the net level of impact. Unless otherwise noted, the impacts associated with the Alternate Site Plan 2 Alternative would be the same as those identified for the Proposed Project.

1. Aesthetics and Visual Resources

Under the Alternate Site Plan 2 Alternative scenario, the visual changes to the project site would be identical to those identified for the Proposed Project, except that an additional mall entrance oriented toward pedestrian users would be provided along Riverside Drive, just west of the Macy's department store. Such pedestrian activation along this frontage could enhance the pedestrian friendliness and community linkage to the area, both physically and visually. Under this alternative, a small outdoor patio area with seating and interaction opportunities would be provided. Overall, impacts to aesthetic character and light/glare would be similar to those identified for the Proposed Project. However, the mall entrance at this location may introduce new light sources at a location where none currently exists and could result in a perceived adverse impact to residences on the north side of Riverside Drive. However, with implementation of mitigation measures to direct lighting in the area away for residents and the installation of shielding on the light it is anticipated that the impacts to night lighting would be reduced to a less than significant level. With regard to visual interest and connectivity, the pedestrian activation with the Alternate Site Plan 2 Alternative would be a beneficial improvement from the Proposed Project (and therefore less of an impact), however, increased illumination would be a slightly greater impact. Nonetheless, both the Alternate Site Plan 2 Alternative and the Proposed Project would have a less than significant impact.

2. Air Quality

The Alternate Site Plan 2 Alternative would require similar construction activity as the Proposed Project along Riverside Drive due to construction of the pedestrian mall entrance and the tunnel access. But because of elimination of the subterranean parking export would be less than the Proposed Project. In addition, the Alternate Site Plan 2 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Alternate Site Plan 2 Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). The daily construction intensity (e.g., construction equipment hours) for the Alternate Site Plan 2 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Alternate Site Plan 2 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$,

and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Alternate Site Plan 2 Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceed the SCAQMD localized significance thresholds. Therefore, the Alternate Site Plan 2 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact.

The Alternate Site Plan 2 Alternative would develop the same floor area as the Proposed Project (i.e., 280,000 GLSF) and would generate the same number of weekday and weekend daily trips. As such, regional operational emissions would be similar to the Proposed Project. Weekday emissions would be approximately 29 ppd for VOC, 39 ppd for NO_X, 271 ppd for CO, less than one ppd for SO_X, 8 ppd for $PM_{2.5}$, and 42 ppd for PM_{10}. Weekend emissions would be approximately 37 ppd for VOC, 49 ppd for NO_X, 340 ppd for CO, less than one ppd for SO_X, 10 ppd for $PM_{2.5}$, and 52 ppd for PM_{10}. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Alternate Site Plan 2 Alternative would result in a less than significant impact.

The Alternate Site Plan 2 Alternative would generate the same number of weekday and weekend daily trips as the Proposed Project. The inclusion of subterranean parking and tunnel access would potentially redistribute vehicle trips on local roadways but the maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be the same as the Proposed Project. Redistributed vehicle trips associated with the Alternate Site Plan 2 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Alternate Site Plan 2 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Alternate Site Plan 2 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Alternate Site Plan 2 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Alternate Site Plan 2 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Alternate Site Plan 2 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Alternate Site Plan 2 Alternative would be designed to achieve LEED certification and achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Alternate Site Plan 2 Alternative would result in a less than significant global warming impact.

3. Geology and Soils

Overall, the impacts related to geology, soils and seismic risks would be essentially the same for the Alternate Site Plan 2 Alternative as those described for the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

Impacts related to hazardous materials would be essentially the same for the Alternate Site Plan 2 Alternative as those described for the Proposed Project. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

The level of improvement to drainage and water quality under the Alternate Site Plan 2 Alternative would be similar to the net improvement under the Proposed Project. Overall, the Alternate Site Plan 2 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.

The Alternate Site Plan 2 Alternative's water consumption would be similar to that of the Proposed Project and therefore would have a similar less than significant impact.

6. Land Use, Planning and Urban Decay

Both the Proposed Project and the Alternate Site Plan 2 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. However, because of the additional pedestrian orientation with the new mall entrance, the Alternate Site Plan 2 Alternative would be perceived to be more consistent with Community Plan policies that encourage pedestrian activity. Both scenarios would afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Alternate Site Plan 2 Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise conditions (both during construction and long-term operation) with the Alternate Site Plan 2 Alternative would be similar those of the Proposed Project, except for additional noise associated with implementation of the new mall entrance along Riverside Drive. Construction improvements at this location would be relatively minor, involving cutting a new entrance through the block wall and establishing a functional secured entrance.. As a result, residents north of the project site along this portion of Riverside Drive would experience slightly elevated noise levels while construction is underway at this location.

Noise impacts during the operation may also be slightly elevated as increased pedestrian activity at a new mall entrance would be a new noise source (voices of patrons using the outdoor areas)

at this location. However, it is anticipated that ambient noise levels from existing traffic would obscure the voices of pedestrians at this entrance. Overall, the Alternate Site Plan 2 Alternative impacts are not expected to be measurably different, or only slightly greater, than construction or operational noise impacts that would otherwise be associated with the Proposed Project, but would still be less than significant.

8. Fire and Police Services

The Alternate Site Plan 2 Alternative would not result in a measurable increase in fire or police protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Solid Waste

The Alternate Site Plan 2 Alternative's solid waste generation (during operation) would be similar to that of the Proposed Project and therefore would have a similar less than significant impact. However, during the construction phase, the Alternate Site Plan 2 Alternative may result in a slight increase in construction waste due to additional construction activity/materials used to establish the new Riverside Drive pedestrian entrance and reopened tunnel/driveway access.

During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. As the Alternate Site Plan 2 Alternative would involve similar demolition and construction activities, it would result in similar waste impacts, however with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

10. Traffic, Circulation and Access

The Alternate Site Plan 2 Alternative would generate traffic trips similar to those identified for the Proposed Project and level of service impacts at the study intersections would be similar as well.[9] As with the Proposed Project, implementation of ATCS at these intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, would be implemented. Implementation of the new mall entrance along Riverside Drive is anticipated to induce greater pedestrian activity, possibly attracting more patrons from nearby residential and business uses due to the added convenience of a more proximate entrance. However, the addition of this feature is not anticipated to result in any notable trip reduction. Therefore, traffic related impacts associated with the Alternate Site Plan 2 Alternative would be similar to those of the Proposed Project, and less than significant.

11. Growth Inducing

The Alternate Site Plan 2 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Alternate Site

[9] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Plan 2 scenario, would be less than significant and similar to any potential associated with the Proposed Project.

12. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Alternate Site Plan 2 Alternative would result a contribution to cumulative impacts that is similar to that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project, the Alternative's contribution toward cumulative impacts would be less than significant.

13. Relationship of Alternative to Project Objectives

The Alternate Site Plan 2 Alternative would result in similar impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant), but would also slightly exceed impacts in some areas and reduce others. The Alternate Site Plan 2 Alternative would satisfy all of the project objectives to a similar extent as with the Proposed Project.

14. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Alternate Site Plan 2 scenario would still result in significant air quality impacts during construction.

Implementation of the Alternate Site Plan 2 (Pedestrian Activation) Alternative would result in similar environmental impacts for most issue areas compared to the Proposed Project. However, construction phase impacts related to air quality, noise, solid waste, and traffic may be slightly greater due to either the extended duration of construction and/or additional construction effort needed to implement the tunnel and Riverside Drive pedestrian entrance. Although these impacts could be slightly greater, the increase would be negligible and would be substantially comparable to the Proposed Project. During the operation of the project, land use impacts would be slightly reduced and aesthetics and noise impacts slightly increased due to implementation of the new pedestrian mall entrance. With the exception of air quality construction-related (daily) impacts, all impacts would remain less than significant.

V. ALTERNATIVES

G. ALTERNATIVE G: PROMENADE (190,000 GLSF)

ALTERNATIVE DESCRIPTION

The Promenade (190K) Alternative would consist of up to 190,000 GLSF of new retail/restaurant commercial space in a series of single-story structures oriented along an open-air "promenade" to be located along the southern edge of the existing mall and integrated within the existing parking structures in that area. A proposed site plan for this alternative is shown in *Figure 82: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Level 1, Figure 83: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Level 2*, and *Figure 84: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Level 5/6*. A cross-section of the easterly end of the mall for this alternative is shown on *Figure 85: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Cross Section*. The Promenade Alternative accomplishes the goal of several of the other alternatives considered. At only 190,000 GLSF, the Promenade Alternative would represent an approximate net reduction of 32% (e.g. 90,000 GLSF) from the Proposed Project. Further, this alternative considers an alternate site plan that integrates a major pedestrian component that would simultaneously reorient the access to the mall.

The Promenade Alternative would include the construction of 190,000 square feet of commercial retail/restaurant space to be located at the southern portion of the site between the Bloomingdale's and Macy's buildings. One level of retail of retail would be oriented along both the north and south edges of a new internal roadway (promenade street) located along south edge of existing mall. This street is intended to provide emergency vehicle access and to provide a controlled level of patron traffic. During peak weekends and holidays this roadway would be closed for pedestrian safety reasons. A portion of the new commercial retail space will be constructed as an extension to the existing mall building and the remainder will be constructed on the bottom level of the existing southern parking structure. All three of the existing parking structures (the Macy's parking structure, the Bloomingdales parking structure, and the parking structure south of the mall) would remain, but would be altered to accommodate the new development under this alternative. One additional new parking structure would be constructed in the area located generally south of the existing Macy's department store and parking structure and would extend easterly on the south portion of the existing surface parking lot on the east portion of the development site. It is anticipated that construction of this alternative would be completed by year 2011.

For the Promenade Alternative, vehicular access to the project site will be provided via four project driveways: two existing driveways on Hazeltine Avenue, one existing driveway on Woodman Avenue, and one new driveway on Riverside Drive at Matilija Avenue (i.e., no tunnel access and subterranean parking). The tunnel access is not feasible with the Promenade Alternative because the placement of the new ground-level retail conflicts with the completion of the tunnel access. Further, the tunnel would provide direct access to only the grade level of the

FIGURE 82
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – LEVEL 1

MAP SOURCE: WESTFIELD

FIGURE 83
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 84
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – LEVEL 5/6

MAP SOURCE: WESTFIELD

NORTH

FIGURE 85
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – CROSS SECTION

MAP SOURCE: WESTFIELD

Bloomingdales parking structure and to the promenade street, thus increasing the traffic level on this street at all times and preventing the closure of the street during peak shopping periods for pedestrian safety.

A portion of the lower level of the Bloomingdale's parking structure, and the entire ground-floor footprint of the existing three-level south parking structure would be modified and converted to single-story retail space. A new six-level parking structure (grade plus five levels) would be added to the east end of the existing three-level parking structure, just south of Macy's department store. This new structure would extend easterly toward Woodman Avenue and replace the southern portion of the existing surface parking lot. That portion of the new parking structure east of the Fashion Square Lane road would step down to a three-level (grade plus two) structure. The western half of this new six-level structure would also incorporate ground level retail space along the promenade. Similar to changes associated with the Proposed Project, the Macy's parking structure would remain but would be modified as needed to accommodate the reconfiguration of the internal circulation, including the consolidation/realignment of the Riverside Drive entrance across from Matilija Avenue. Surface parking would remain on the east portion of the development site not developed with the new parking structure. All three of the southerly parking structures would be interconnected to allow for vehicular travel between the east and west end of the development site. The existing Macy's parking structure would remain separate, but its access would be integrated with the other parking areas through the ground-level internal circulation.

Because of the interim loss of on-site parking during the construction, a request for a parking variance (to a ratio of 4.1 parking spaces per 1,000 GLSF) to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is built out, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site).

Improvements to the internal circulation would include reconfiguration of Fashion Square Lane to create a "loop" road south of the existing mall. Under this alternative, the internal loop circulation established along the south portion of the development site would be contained within the parking structure (level two) and would function as the primary internal access. A secondary, ground-level east-west circulation route would separate the existing mall from the new retail created in the existing parking structure. This street segment would provide controlled limited patron access and emergency vehicle access to the center. This street segment would serve the dual function as a promenade. The promenade would serve as an open-air pedestrian mall during peak mall hours (i.e., during weekends and holiday seasons) and would be closed to vehicle traffic during those times.

Improvements to the other existing driveways would be incorporated to facilitate safer access and convenience. The south driveway along Hazeltine Avenue would be reconfigured to incorporate ramps directly accessing the second level of the parking structure. There would be no access to ground-level parking from this driveway. The north Hazeltine Avenue driveway would be modified to function as a secondary access and would link directly to the promenade and limited parking (i.e., approximately 80 spaces) in the ground level of the Bloomingdale's parking structure.

Under the Promenade Alternative, landscape and building facade enhancements, similar to those described for the Proposed Project, along the Riverside Drive and Hazeltine Avenue frontages would be provided. Full improvements to internal circulation and site access driveways, including realignment of the driveway at the Matilija Avenue intersection, would be implemented, including circulation improvements that would facilitate better emergency access within the project site. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue, similar to those for the Proposed Project (except without tunnel), would also be incorporated. Similar to the Proposed Project, the Promenade Alternative would achieve LEED certification and would be consistent with objectives under the Climate Action Team Plan and the City's Green LA Action Plan.

New discretionary approvals, similar to those for the Proposed Project, would be required. The Promenade Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 190,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of three existing parking structures, reconfiguration of site driveways and internal circulation, construction of 190,000 GLSF retail space within a series of one-level structures, and construction of one new multi-level parking structure.

- Conditional Use Permit for Commercial Corner[10] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

[10] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

  - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

  - the restriction on tandem parking by providing tandem parking spaces.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Promenade Alternative project.

It should be noted that for the alternatives analysis, it is assumed that the same or equivalent level of mitigation measures (MM) and/or project design features (PDF) that apply to the Proposed Project would be carried forward with each potential alternative to the extent feasible, except for those that would otherwise be in conflict with the description for that alternative. For example, MM/PDFs for the Proposed Project that relate to the tunnel access would not apply to alternatives that do not incorporate the tunnel access as part of their description.

This Alternative was selected because it accomplishes the project objectives by increasing the commercial intensity at the project site beyond current or entitled levels, although to a somewhat reduced extent than would the Proposed Project. While additional restaurant area would be provided with this alternative, the total area of new restaurant uses would be proportionately reduced. The Promenade Alternative is both a "reduced project" and an "alternate site plan" alternative that represents an approximate 32% reduction of square footage of the Proposed Project and incorporates a stronger pedestrian orientation through the promenade. Further, the Promenade Alternative was selected to provide a comparison to the Proposed Project that would potentially reduce impacts to traffic, air quality, public services and utilities and provide beneficial land use policy compliance attributes.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Promenade Alternative scenario, the visual changes to the project site would be similar, but somewhat reduced, to those identified for the Proposed Project. Therefore the impacts to aesthetic character and light/glare would be less than significant and similar to those identified for the Proposed Project, while those related to viewsheds would be somewhat less and also less than significant.

Under the Promenade Alternative scenario, the visual changes to the project site from Riverside Drive would be similar to those identified for the Proposed Project. As with the Proposed Project, visibility of the sixth level of the south parking structure under the Promenade Alternative would be very limited due to an approximate 210 feet setback of the proposed parking structure from Riverside Drive. As a result, the individual levels of the parking structure are not readily discernable but rather perceived as just part of a building mass. Impacts to aesthetic character and light/glare from Riverside Drive would be similar to those identified for the Proposed Project, including those related to viewsheds, and would be less than significant. Under this alternative, there would not be a new parking structure adjacent to the Woodman Avenue frontage. The easterly three-level portion of the new parking structure not be highly visible from Woodman Avenue due to its location along the south edge and because intervening landscaping would breakup the view to this segment of the structure. Therefore, the impacts to aesthetics character and lights/glare would be somewhat reduced as compared to those identified for the Proposed Project, including those related to viewsheds and would be less than significant.

Aesthetic Character. With the Promenade Alternative, all new construction would be sited immediately south of the existing main mall buildings; however, modifications to the driveways at Hazeltine Avenue and Riverside Drive would be implemented. Therefore, most of the construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive, would be minimized, and similar to that for the Proposed Project. Construction activity would be most visible from Woodman Avenue as the surface lot in this area will be used for construction staging and views from the street toward the project site are relatively unobstructed, hence construction-related visual character impacts from Woodman Avenue would be similar to those identified for the Proposed Project. To accommodate construction of new buildings and implementation of enhanced landscaping, approximately 48 mature trees, similar to that under the Proposed Project, would be removed.

Overall, and due primarily to the reduced length of the construction phase, aesthetic impacts of the Promenade Alternative would have a less than significant impact on visual character that would be slightly less impactive than the Proposed Project.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Promenade Alternative, the new construction (including the new parking structure) as viewed from Matilija

Avenue would be similar that with the Proposed Project. The newly constructed retail/restaurant structures would generally not be visible from the Matilija Avenue residences. With the Proposed Project, views while traveling along Woodman Avenue would be partially obstructed by the proposed five-level east parking structure. With the Promenade Alternative, the east parking structure would be reduced in scale to two levels above grade and set back farther from Woodman Avenue, thereby resulting negligible changes to the views from Woodman Avenue. In addition, the Promenade Alternative would retain an open view of the promenade corridor, offering a greater sense of "openness" to travelers along adjacent north-south streets (i.e., Woodman Avenue and Hazeltine Avenue) as they pass the project site. Both the Proposed Project impact and the Promenade Alternative impact would be less than significant; however, the overall the impact of the Promenade Alternative would be slightly less than with the Proposed Project.

Lighting. Under the Promenade Alternative, lighting conditions would be similar to those anticipated with the Proposed Project, and for the most part, similar to existing conditions. Although the Promenade Alternative establishes an open-air portion of the mall that would be lighted during the normal operational evening hours with street lighting and signage for new retail/restaurant buildings, the illumination generated by the open-air component by light-sensitive receptors to the north would be shielded by the existing mall building. Lighting associated with the parking structures will be shielded from light-sensitive uses to the north by intervening structures that would obstruct the illumination. Existing on-site sources of night lighting are the spill over of security lighting from open parking areas and at the five docking/loading areas along Riverside Drive. Vehicle lights exiting the project site at the two driveways along Riverside Drive (in the vicinity of Matilija Avenue) sweep out onto adjacent sidewalks, streets and residences to the north. Because the building configuration along the Riverside Drive and Hazeltine Avenue street frontages would not change, and the location of project site driveways along those frontages would not be altered, the illumination impacts would be similar to those described for the Proposed Project. Both the Proposed Project impact and the Promenade Alternative impact would be less than significant.

2. Air Quality

The Promenade Alternative would require less construction activity than assumed for the Proposed Project. In addition, the Promenade Alternative would export approximately 40,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Promenade Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). However, the daily construction intensity (e.g., construction equipment hours) for the Promenade Alternative would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Promenade Alternative daily regional construction emissions of VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Promenade

Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 pounds per day (ppd) of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Promenade Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be less than the Proposed Project due to a shorter overall construction period.

The 190,000 GLSF associated with the Promenade Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 20 pounds per day (ppd) for VOC, 27 ppd for NO_X, 187 ppd for CO, less than one ppd for SO_X, 6 ppd for $PM_{2.5}$, and 29 ppd for PM_{10}. Weekend emissions would be approximately 25 ppd for VOC, 33 ppd for NO_X, 235 ppd for CO, less than one ppd for SO_X, 7 ppd for $PM_{2.5}$, and 36 ppd for PM_{10}. As with the Proposed Project, regional operational emissions for the Promenade Alternative would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}, and regional operational emissions for the Promenade Alternative would result in a less than significant impact.

Mobile source emissions associated with the Promenade Alternative would potentially be less than localized CO emissions for the Proposed Project. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Reduced traffic associated with the Promenade Alternative would not be substantially changed from the CO concentrations estimated for the Proposed Project. The Promenade Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Promenade Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Promenade Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Promenade Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Promenade Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. Similar to the Proposed Project, the Promenade Alternative would achieve LEED certification and would be consistent with objectives under the Climate Action Team Plan and the City's Green LA Action Plan. Introduction of the pedestrian promenade, which would parallel the Los Angeles River and connect two designated green street corridors, would better achieve compliance with the intent of the RIO than would the Proposed Project. Similar to the Proposed Project, the Promenade Alternative would result in a less than significant global warming impact.

Overall, the Promenade Alternative emissions would be less than the Proposed Project emissions but the air quality impact would be significant during the construction phase on a daily basis.

3. Geology and Soils

As discussed in Section IV: Environmental Impact Analysis: C-Geology and Soils, the risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for

a seismic occurrence on the site with the Promenade Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Promenade Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. Construction activities associated with the Proposed Project would introduce a slightly higher risk of hazards due to materials and equipment to be used on-site during the construction activity for a longer duration than would be required with the Promenade scenario. With construction proposed under the Promenade Alternative, although overall reduced in building intensity, the nature of activities and construction style and materials would make the impact related to hazardous materials similar to that identified for the Proposed Project. While both the Proposed Project impact and the Promenade Alternative impact concerning hazardous materials would less than significant, overall the impact of the Promenade scenario would be slightly less due to a slightly reduced duration of construction activity. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

The operations of the Promenade Alternative, although on a slightly smaller scale would be of a similar nature of activities and impacts related to hazardous materials as those identified for the Proposed Project. While both the Proposed Project impact and the Promenade Alternative impact concerning hazardous materials from operations would be less than significant, overall the impact of the Promenade scenario would be slightly less due to the reduced building and parking area and volume of materials consumed. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

Runoff from the project site is conveyed and would be adequately handled by the City's storm drain system. Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Promenade Alternative would not result in any substantial net change in permeable surface area. New construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The area of improvement to drainage and water quality under this scenario could be less than the area of improvements under the Proposed Project. Specifically, the Proposed Project will be required to bring runoff to all three streets up to current SUSMP standards, but depending on the design of the storm-water drainage system for the parking structure under the Promenade Alternative project, SUSMP standards may only be required for drainage to Hazeltine Avenue. However, it is possible that the Promenade Alternative could result in a slightly reduced impact compared to the Proposed Project because:

(1) there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage; and (2) there would be more "undeveloped" area/opportunity available on-site to implement best management practices that are based on "green" strategies. Overall, the Promenade Alternative would have a similar and still less than significant impact on water quality when compared to the Proposed Project.

The Promenade Alternative's water consumption of approximately 36,625 gallons per day would be approximately 17,235 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Promenade Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

Existing land uses are compatible with surrounding land use patterns. The Promenade Alternative would be a continuation, albeit intensification, of the existing community commercial use and would be similarly compatible with adjacent land uses. The Promenade Alternative is based on the permitted uses, height, development criteria and building intensity provisions of the existing entitlements approved in 1994, plus an intensification of commercial uses and introduction of pedestrian orientation to reflect a higher and more efficient use of the property and address current land use policy to create stronger pedestrian linkages. Because the Promenade Alternative does not propose a substantial change in land use patterns in the area, this alternative would be considered to be compatible with surrounding uses and not to have a significant impact on compatibility. As a result, the Promenade Alternative would have a similar less than significant impacts on compatibility as the Proposed Project.

Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site. However, the on-site commercial uses are underutilized in their current condition. The community could benefit from the revitalizing effect of an expansion of uses proposed under the Promenade Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Promenade Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. In fact, introduction of the pedestrian promenade, which would parallel the Los Angeles River and connect two designated green street corridors, would better achieve compliance with the intent of the RIO than would the Proposed Project. As with the Proposed Project, this alternative would be consistent with regional planning programs (i.e., SCAG's RCP and the AQMP). The Promenade Alternative would have similar less than significant impacts with regard to land use compatibility and consistency as the Proposed Project.

7. Noise

Construction activity associated with the Promenade Alternative would generally result in similar noise levels than as discussed for the Proposed Project. Daily noise levels would be similar to noise levels presented for the Proposed Project; however, construction-related noise exposure would be expected to be shorter in duration due to decreased development schedule.

Noise level increases from construction would occur in proximity to noise sensitive uses and mitigation measures, similar to those for the Proposed Project, would be recommended to reduce noise levels, and construction activity associated with this alternative would comply with the standards established in the Noise Ordinance. As such, construction noise impacts associated with Promenade Alternative would be similar to those presented for the Proposed Project and would result in a less than significant impact with mitigation.

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site. Existing uses currently generate traffic and noise that would continue and increase under the Promenade Alternative. However, the Promenade Alternative would result in less daily vehicle trips than the Proposed Project and, as such, would result in lower off-site mobile noise levels. Off-site mobile noise is not anticipated to be increased by more than 3 dBA CNEL thereby resulting in a less than significant impact on the ambient noise environment.

Perceivable changes in non-traffic related operational impacts may be anticipated due to the open-air style of the additional retail component. The Promenade Alternative would include retail uses along the promenade. The promenade would possibly have multiple outdoor uses, including a farmer's market, small-scale musical groups, and street performances. The promenade would be located on the southern portion of the project site and would be separated from sensitive receptors by multi-story retail buildings, which would serve as a noise barrier (because they would block the line-of-sight) of noise generated at the promenade to noise-sensitive receptors located north and south of the project site. Mobile noise from traffic along the promenade would be inaudible at these off-site noise-sensitive receptors. The nearest sensitive receptor with the potential to be impacted by on-site mobile noise would be located approximately 1,000 feet west of the project site. The ambient noise level at this sensitive receptor as a result of on-site mobile noise would increase by less than 0.1 dBA L_{eq}. Because the noise level increase would be less than the 5-dBA significance threshold, the noise impact would be less than significant.

Aside from noise associated with activity on the Promenade, the Promenade Alternative would include stationary noise sources (i.e., mechanical equipment) comparable to those discussed for the Proposed Project. Similar to the Proposed Project, the Promenade Alterative would result in a less than significant stationary source operational noise impact.

Noise sources associated with the parking structure include vehicle movement, slamming doors, and car alarms. Parking activity typically generates a noise level of 63 dBA L_{eq} at 50 feet, including rooftop noise. The Promenade Alternative would include multi-story parking structures on the southern portion of the project site. The nearest sensitive receptor with the potential to be impacted by parking on the project site is located approximately 850 feet to the west on Calhoun Avenue. Based on distance attenuation, the parking-related noise levels would be approximately 52.5 dBA L_{eq}. Mobile-source related noise levels are approximately 38.4 dBA L_{eq} along Calhoun Avenue. When added to this noise level, parking-related noise would increase the ambient noise level by less than 0.1 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact.

Overall, the Promenade Alternative would result in similar construction noise levels, less stationary source operational noise, and less mobile source noise as the Proposed Project.

8. Fire Services

The Promenade Alternative would not result in a measurable increase in fire protection demands for same reasons attributable to the Project and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Promenade Alternative would not result in a significant increase in police protection demands for same reasons attributable to the Project, and the overall impact would be similar to that anticipated with the Proposed Project, and therefore less than significant.

10. Solid Waste

During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. Under the Promenade Alternative, only a portion (the lower two levels) of the existing three-level parking structure, along with a portion of the lower levels of the Bloomingdale's parking structure, would be partially demolished, resulting in a volume of construction waste that would be less than that for the Proposed Project. Although the level of demolition or construction required under the Promenade scenario would be less, this alternative would not fully avoid impacts related to construction-generated solid waste. However with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

The Promenade Alternative would generate approximately 1,306 pounds per day of solid waste, which would generate less of an impact on landfills than the approximate 1,921 pounds per day generated by the Proposed Project. Operational volumes of solid waste generated by the Promenade Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Promenade Alternative involves an increase of approximately 190,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 61 vehicle trips during the weekday A.M. peak hour and 311 vehicle trips during the weekday P.M. peak hour are anticipated.[11] During the weekend peak hours, an additional 413 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Promenade Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. However, two of the 17 study intersections

[11] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

are anticipated to be significantly impacted by the Promenade Alternative during the A.M. and P.M. peak hours. Incremental but not significant impacts are noted at the remaining 15 study intersections due to the Promenade Alternative. Under weekend peak hours, three of the six study intersections are anticipated to be significantly impacted by the Promenade Alternative. However, the Promenade Alternative is anticipated to contribute to the City of Los Angeles ACTC installation at these intersections, as well as provide for the redesignation of the southbound Woodman Avenue right-turn only lane to an operational through/right-turn lane at the intersection of Woodman Avenue/Riverside Drive, similar to the Proposed Project. As a result, the anticipated traffic impacts of the Promenade Alternative would be reduced to less than significant levels.

The parking configuration would be somewhat enhanced with the addition of more centrally located parking, which is more conveniently accessible by the promenade configuration, and this alternative would provide parking at the current Proposed Project ratio of 4.25 parking spaces per 1,000 GLSF. However, unlike the Proposed Project, on-site parking levels during the construction phase of the Promenade Alternative would be temporarily reduced to a ratio of 4.1 parking spaces per 1,000 GLSF for an approximate one-year period. During that time, a parking management plan would be implemented to ensure that adequate parking can be provided for the Promenade Alternative and minimize potential impacts to surrounding areas.

The vehicular access associated with the Promenade Alternative would enhance pedestrian access at the project site. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements from off-site would be incorporated, although configured differently than the Proposed Project. These improvements and enhancements would reduce vehicle/pedestrian conflicts because it would locate the primary vehicular circulation away from the retail stores, thus eliminating the need for the majority of pedestrian movements having to cross an active vehicular circulation route. The Promenade Alternative's traffic impacts would be less than the Proposed Project's impacts overall due to the reduced number of vehicle trips. As a result, with the implementation of similar traffic mitigation as the Proposed Project, the Promenade Alternative would be anticipated to reduce traffic impacts to a less than significant level.

12. Growth Inducing

The Promenade Alternative would not result in a measurable increased potential for new growth for same reasons attributable to the Project. As with the Proposed Project, the net growth-inducing effect of the Promenade scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Promenade Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the

Alternative's contribution toward cumulative impacts would be less than significant for same reasons attributable to the Project.

14. Relationship of Alternative to Project Objectives

The Promenade Alternative would satisfy most of the project objectives, but not to the extent possible with the Proposed Project. Specifically, the Promenade Alternative would invigorate economic activity at the project site, including the addition of a greater variety of retail and restaurant uses, but not to the full extent possible under the Proposed Project as total commercial area would be reduced by approximately 32%. However, the Promenade Alternative would provide circulation and access improvements that promote enhanced vehicular and pedestrian safety. Further, this alternative would enhance on-site improvements that could facilitate improved community linkages and achieve greater compliance with the intent of the RIO. Also, the Promenade Alternative would be designed to achieve LEED certification offering comparable "green" enhancements similar to the Proposed Project. In summary, the Promenade Alternative would generally satisfy the project objectives to a similar extent than the Proposed Project.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. The Promenade Alternative would result in reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). One exception would be a slightly greater parking/traffic impact for the Promenade Alternative for an approximate one-year period during the initial construction phase. Also, as illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Promenade scenario would reduce but not avoid this significant air quality impact, however this alternative would reduce the level of all other impacts addressed herein beyond those anticipated with the Proposed Project, with the exception of a temporary increase in traffic impacts during the construction phase due to a reduction in the available parking ratio to 4.1 parking spaces per 1,000 GLSF.

Implementation of the Promenade Alternative would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided. Overall, the Promenade Alternative would result in a reduced level of impact when compared to the Proposed Project.

V. ALTERNATIVES

H. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify the environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the EIR must identify an environmentally superior alternative among the remaining alternatives.

Based on the analysis of the DEIR, the Proposed Project is anticipated to result in significant unavoidable impacts related to:

- Air Quality – Construction Phase (due to exceedences of daily emission thresholds for $PM_{2.5}$ and PM_{10})

Table 58: Alternatives Comparison to the Proposed Project, provides a matrix that compares the impacts of each alternative relative to the level of impact anticipated with the Proposed Project. A more detailed description of each alternative and the potential impacts associated with each is provided above.

Of the Alternatives analyzed in the EIR, the No Project is considered the overall environmentally superior alternative as it would reduce and/or avoid the majority of the impacts (even those that would be less than significant) that would occur with implementation of the Proposed Project. However, as noted above, the No Project Alternative would not meet the project objectives as it would offer no enhancements to the project site that would attain economic vitalization, circulation improvements, and aesthetic upgrades.

In accordance with the CEQA Guidelines, a second alternative must be established as environmentally superior when the No Project Alternative is the primary environmentally superior alternative. The comparative evaluation indicates that the Existing Entitlement (with proposed buildout limited to 108,000 GLSF of retail/restaurant uses) would also be environmentally superior. The Existing Entitlement Alternative would result in the reduction of more project impacts than any of the other remaining alternatives. Further, the Existing Entitlement Alternative would reduce but not eliminate the only significant impact identified for the Proposed Project (i.e., construction phase air quality). Other impacts, though already less than significant with the Proposed Project, would be to a lesser extent. For example, visual impacts related to changes of the existing viewsheds as seen from residential properties along Matilija Avenue would be reduced as the new parking structure would be limited to only four levels, thereby reducing the degree to which views could be blocked.

The Existing Entitlement Alternative would not meet most of the project objectives primarily because this alternative would not accomplish the modernization and revitalization of the shopping center in a manner that achieves long-term economic viability to the extent anticipated through the Proposed Project. Further, under this alternative, internal and external site access improvements would not be implemented. Fashion Square Lane would not be realigned, thus

improved emergency access and a more efficient access for project site users would not be incorporated. Under this scenario, existing site access and circulation problems would remain.

Table 57: Summary of Alternatives Impacts, provides a summary of the net impacts by environmental issue for each of the proposed alternatives. Comparison to the impact of the project is presented in *Table 58: Alternatives Comparison to the Proposed Project*.

TABLE 57
SUMMARY OF ALTERNATIVE IMPACTS

PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
AESTHETICS AND VISUAL RESOURCES								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
AIR QUALITY								
Construction (Short-Term)	Significant	No impact	Significant	Significant	Significant	Significant	Significant	Significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
GEOLOGY AND SOILS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
HAZARDOUS MATERIALS AND MAN-MADE HAZARDS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
WATER RESOURCES – WATER QUALITY								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant

TABLE 57 (CONTINUED)
SUMMARY OF ALTERNATIVE IMPACTS

PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
WATER RESOURCES – WATER SUPPLY								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
LAND USE, PLANNING AND URBAN DECAY								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
NOISE								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
PUBLIC SERVICES – FIRE PROTECTION								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
PUBLIC SERVICES - POLICE								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
PUBLIC UTILITIES – SOLID WASTE								
Construction (Short-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant

TABLE 57 (CONTINUED)
SUMMARY OF ALTERNATIVE IMPACTS

PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
TRAFFIC, CIRCULATION AND ACCESS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
GROWTH INDUCING								
Construction (Short-Term)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
OTHER IMPACTS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) only to air quality during the short-term construction phase. The No Project scenario would not result in any significant environmental impacts and would reduce and/or avoid any new impacts beyond the existing condition.

TABLE 58
ALTERNATIVES COMPARISON TO THE PROPOSED PROJECT

ALTERNATIVE ID	ALTERNATIVE TITLE	AESTHETICS/ VISUAL\RESOURCES	AIR QUALITY	GEOLOGY/SOILS	HAZARDOUS MATERIALS	WATER RESOURCES	LAND USE/PLANNING/ URBAN DECAY	NOISE	FIRE	POLICE	WATER SUPPLY	SOLID WASTE	TRAFFIC/ CIRCULATION/ACCESS	GROWTH INDUCING	OTHER IMPACTS
CONSTRUCTION PHASE (SHORT-TERM)															
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	N/A	—
B	Existing Entitlement (108 K)	—	—	¤	¤	¤	¤	—	¤	¤	¤	—	—	N/A	¤
C	Reduced Project 1 (235 K/Height)	¤	—	¤	¤	¤	¤	—	¤	¤	¤	—	¤	N/A	¤
D	Reduced Project 2 (235 K/Matilija)	¤	—	¤	¤	¤	¤	—	¤	¤	¤	—	¤	N/A	¤
E	Alternate Plan 1 (280 K/No Tunnel)	¤	—	—	¤	¤	¤	—	¤	¤	¤	—	¤	N/A	¤
F	Alternate Plan 2 (280 K/Pedestrian Activation)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	N/A	¤
G	Promenade (190 K/Promenade)	¤	—	¤	¤	¤	¤	—	¤	¤	¤	—	▲	N/A	¤
OPERATIONAL PHASE (LONG-TERM)															
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B	Existing Entitlement (108 K)	—	—	¤	¤	—	—	—	¤	¤	—	—	—	¤	¤
C	Reduced Project 1 (235 K/Height)	¤	—	¤	¤	¤	¤	¤	¤	¤	—	—	—	¤	¤
D	Reduced Project 2 (235 K/Matilija)	¤	—	¤	¤	¤	¤	¤	¤	¤	—	—	—	¤	¤
E	Alternate Plan 1 (280 K/No Tunnel)	¤	—	—	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
F	Alternate Plan 2 (280 K/Pedestrian Activation)	▲	¤	¤	¤	¤	¤	▲	¤	¤	¤	¤	¤	¤	¤
G	Promenade (190 K/Promenade)	—	—	¤	¤	¤	—	¤	¤	¤	—	—	¤	¤	¤

TABLE 58 (CONTINUED)
ALTERNATIVES COMPARISON TO THE PROPOSED PROJECT

ALTERNATIVE ID	ALTERNATIVE TITLE	AESTHETICS/ VISUAL\RESOURCES	AIR QUALITY	GEOLOGY/SOILS	HAZARDOUS MATERIALS	WATER RESOURCES	LAND USE/PLANNING/ URBAN DECAY	NOISE	FIRE	POLICE	WATER SUPPLY	SOLID WASTE	TRAFFIC/ CIRCULATION/ACCESS	GROWTH INDUCING	OTHER IMPACTS
CUMULATIVE (LONG-TERM/OPERATIONAL)															
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B	Existing Entitlement (108 K)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
C	Reduced Project 1 (235 K/Height)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
D	Reduced Project 2 (235 K/Matilija)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
E	Alternate Plan 1 (Tunnel/Subterranean Parking)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
F	Alternate Plan 2 (Pedestrian Activation/Tunnel)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
G	Promenade (190 K/Promenade)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤

Key: ¤ = Net Alternative impact is generally equivalent to that identified for the Proposed Project
▲ = Net Alternative impact is considered to be greater than that identified for the Proposed Project
— = Net Alternative impact is considered to be less than that identified for the Proposed Project