8.0 ALTERNATIVES

As required by Section 15126.6 of the CEQA Guidelines, this EIR examines a range of reasonable alternatives to the proposed Plan. The analysis of project alternatives in this EIR focuses on a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6(a). Accordingly, Section 15126.6(a) states:

> *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. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

The alternatives evaluated below address this reasonable range of alternatives that strive to minimize potentially significant environmental impacts associated with the proposed Plan improvements. In addition to the required No Project Alternative, two other alternatives, including the 2002 LCP Alternative and a Redesign Alternative, are evaluated to minimize potentially significant environmental effects associated with the proposed Plan's projects, while achieving most of the Plan's objectives (see Section 8.1.2 below). A discussion of other Alternatives considered, but rejected is located within Section 8.1.3 below. All Figures referenced within this Section are located at the rear of the narrative text.

8.1 Description of Alternatives

The State CEQA Guidelines require that an EIR contain an analysis of alternatives to the Proposed Plan. Alternatives are to be developed based upon their ability to satisfy basic project goals and objectives, and to identify opportunities to reduce or eliminate environmental impacts. The State CEQA Guidelines provide the following guidance for discussing alternatives to a proposed Plan:

- The EIR must identify ways to mitigate or avoid significant effects of the project 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 impede to some degree the attainment of the project objectives, or would be more costly."* [CEQA Guidelines Section 15126.6(b)];

- The range of potential alternatives to the proposed Plan 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 adverse effects. If there is a specific proposed Plan or a preferred alternative, the EIR must explain why other alternatives considered in developing the proposed Plan were rejected in favor of the proposal. *"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."* [CEQA Guidelines Section 15126.6(c)];

- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Plan. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. [CEQA Guidelines Section 15126.6(d)];

- The specific alternative of "no project" *"shall be evaluated along with its impact."* The purpose of describing and analyzing a 'no project' alternative is to allow *"decisionmakers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project."* The CEQA Guidelines also stipulate that the "no project" analysis "*shall discuss the existing conditions at the time the (EIR) Notice of Preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans..."* [CEQA Guidelines Section 15126.6(e) (1)];

- If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify the environmentally superior alternative among the other alternatives. [CEQA Guidelines Section 15126.6(e) (2)];

- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed;

- Under the CEQA Guidelines Section 15126.6(c), the range of alternatives required in an EIR is governed by a "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. *"The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the*

project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making." [CEQA Guidelines Section 15126.6(f)].

8.1.1 Overview of the Alternative Selection Process

The alternative selection process involved the following sequence of steps:

1. Plan scoping;
2. Identification of Plan objectives;
3. Identification of potentially significant impacts of the Plan;
4. Development of a range of Plan alternatives;
5. Development of evaluation criteria (land tenure, proximity to coastal resources, consistency with Coastal Act and Local Coastal Program policies, consistency with Plan objectives, and environmental impacts) for feasibility[1];
6. Evaluation of alternatives; and,
7. Identification of those alternatives that met the criteria and explanation of the alternatives that were rejected as infeasible.

8.1.2 Objectives of the Proposed Plan

CEQA Guidelines Section 15124(b) requires that an EIR define the project's objectives to be used by the lead agency in developing a reasonable range of project alternatives, and to aid decision-makers in preparing findings and statements of overriding considerations, if necessary. The objectives should include the underlying purpose of the project. As indicated in Section 2.2 within Section 2.0, *Project Description*, the project objectives include the following:

- Enhance public access and recreation opportunities to park facilities in the Plan area to the maximum extent feasible for both local and non-local visitors, and for visitors with diverse backgrounds, interests, ages, and abilities.

[1] "Feasible" is defined by CEQA as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Sec. 15364).

- Plan, design and develop trail connections throughout the Plan area and new overnight camping opportunities, and ensure that sufficient support facilities are provided, to readily serve the existing and growing demand for public access and recreation in the Santa Monica Mountains and Malibu coastal area, and to increase accessibility to parklands for all people.

- Develop a continuous inland public access trail system that provides unique and spectacular views of the coast and ocean and, wherever feasible, complete linkages for the Coastal Slope Trail, the Beach to Backbone Trail, from the beach to Malibu Bluffs, and other connector trails to access the coastal mountains and the shoreline.

- Facilitate the California Coastal Trail vision to "Create linkages to other trail systems and to units of the State Park system, and use the Coastal Trail system to increase accessibility to coastal resources from urban population centers." (Completing the California Coastal Trail, Coastal Conservancy 2003.)

- Secure trail easements and land purchases where necessary and feasible to connect Conservancy/MRCA-owned coastal parks and link with the regionally significant Coastal Slope Trail and Backbone Trail in the City of Malibu and unincorporated County of Los Angeles, and across National Park Service and State Park lands.

- Implement a Beach to Bluffs Trail plan, connecting Malibu Bluffs with existing shoreline access facilities.

- Provide public access to, and promote use of, coastal parks and trails by visitors outside of the City of Malibu, consistent with Coastal Act section 30223: "Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible."

- Provide low-impact and low-cost camping and trail facilities for all persons in the coastal zone, and specifically the Malibu coastal zone.

- Provide for public access and recreation uses and support facilities approved by the Coastal Commission (No. 4-98-334) at Ramirez Canyon Park.

- Provide public outreach at coastal parks and trails, including educational/interpretive/recreational programs, for visitors with diverse backgrounds, interests, ages, and abilities.

- Encourage non-vehicular circulation between park areas over vehicular use and emphasize pedestrian circulation between park areas and the shoreline as a primary form of circulation.

- Protect and enhance, wherever feasible, sensitive habitats and water quality when developing park facility improvements and when establishing park uses and programs.

- Establish park uses consistent with resource protection policies applicable to specific park areas taking into consideration available support facilities, opportunities to develop new support facilities, accessibility, and protection of natural resources, public safety issues, and neighborhood compatibility.

8.1.3 Alternatives Considered and Rejected

In support of the Conservancy/MRCA LCP amendment submitted to and certified by the Coastal Commission in 2009, Dudek prepared The Malibu Parks Public Access Enhancement Plan Overlay Alternatives Analysis (2009), which is herby incorporated by reference (see *Appendix R*). The Dudek alternatives analysis rejected a number of early project alternatives offered by a SAIC and Ramirez Canyon Preservation Fund (RCPF), which identified no alternative locations for the proposed parkland improvements within the City of Malibu and only one that was located within the Coastal Zone at the inland/coastal zone boundary.

The Dudek analysis did identify and discuss a range of alternatives that would meet, at least in part, the public's coastal recreation needs within the local region, and thus, the purpose and intent of the proposed (and now certified) LCP amendment. This section summarizes and discusses some of the findings of the original Dudek analysis.

King Gillette Ranch: While located, in part, in the Coastal Zone, King Gillette Ranch (KGR) is located beyond the first major ridgeline paralleling sea, at the inland edge of the Coastal Zone boundary, and involves a different microclimate and associated resources than do the parklands addressed in the Plan. The site is under public ownership and could accomplish some of the objectives of the Plan, including camping, trails, programs, and events. It would not, however, provide any camping or hiking opportunities in the Malibu front country, nor would it make use of several land assets within the Malibu area which are currently under public ownership. In addition, no "blue water" views are available from KGR and the site would not provide any of the trail connectivity (associated with the Plan) along the Malibu coast. Accessibility to KGR

via public transit is also non-existent. In summary, because KGR fails to fulfill many of the basic project objectives and its lack of providing a true blue-water coastal experience (where recreational demand is the greatest), this alternative was considered and rejected.

Charmlee Park: This 532-acre park is owned by the City of Malibu and is located along the coast at 2577 Encinal Canyon Road in Malibu. It has many of the same qualities as the parklands included in the Plan. However, Charmlee Park is not a feasible alternative location because, in consultation with the Conservancy/ MRCA, the City has refused to entertain any camping uses within in the Park and only limited parking. City restrictions would not satisfy project objectives for low-impact and low-cost camping and would limit coastal access to potential trail facilities to only a select few persons; it would, therefore, not be regionally serving. Based upon the above summary discussion, this alternative was considered and rejected.

Tuna Canyon Park: This 1,256-acre park is owned by the Conservancy and is located between Las Flores Canyon on the west and Tuna Canyon on the east. This park is not a feasible alternative because of its limited accessibility. Tuna Canyon Road at PCH is a windy, single-lane, one-way road that outlets at PCH. Access to Tuna Canyon Park is several miles inland at the juncture of Saddle Peak Road and Ferndale Pacific Road, a couple of miles from Topanga Canyon Boulevard, and therefore, could not provide similar connectivity between the five coastal parks included in the Plan, nor the proposed trail system that would link the parks. In addition, the site has no potential for direct access to the shoreline. Thus, Tuna Canyon Park would not meet the project objectives. Based upon the above summary discussion, this alternative was considered and rejected.

Solstice Canyon Park and the Zuma/Trancas Canyons Site of the Santa Monica Mountains National Recreation Area (SMMNRA): These coastal parklands are owned by the National Park Service (NPS) and have many of the same qualities as the parklands included in the Plan, and portions of the planned trail system extend through the federal property at Solstice Canyon Park and extend towards Zuma/Trancas Canyons site at the westernmost end of the Plan (Plan-implemented trails would terminate at the eastern edge of Kanan Dume Road. The NPS SMMNRA General Management Plan does not specifically identify camping as a proposed use at Solstice Canyon Park and Zuma/Trancas Canyons. The feasibility of camping at these locations cannot be ascertained at this time. This would require extensive Federal review that would include adoption of a development concept plan and National Environmental Policy Act review, and may require an amendment to the General

Management Plan. NPS is a different landowner than the Conservancy and MRCA and there is no level of certainty at this time that NPS would ever entertain the possibility of creating campsites at these locations. Based upon the above summary discussion, this alternative was considered and rejected.

8.1.4 Alternatives Considered

In addition to the CEQA-mandated consideration of the No Project Alternative, two additional on-site alternatives were developed which 1) satisfy many of the identified project objectives, 2) are comprised of land primarily under ownership the Conservancy/ MRCA, and 3) attempt to avoid or substantially lessen the identified significant effects of the Proposed Plan. The three alternatives considered further within this analysis are further described below.

Alternative 1: No Project Alternative

CEQA Guidelines Section 15126.6(e) states that the No Project Alternative should examine what would be reasonably expected to occur in the foreseeable future if the Malibu Parks Public Access Enhancement Plan – Public Works Plan were not approved, based on current plans and consistent with available infrastructure and community services. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the "no project" alternative would be the continuation of the existing plan, policy, or operation into the future.

The No Project Alternative assumes continuation of the existing park operations at Escondido Canyon Park, Corral Canyon Park and the Malibu Bluffs Conservancy Property. With respect to Latigo Trailhead, the No Project Alternative assumes that the property would remain vacant open space for the foreseeable future. With respect to Ramirez Canyon Park, the No Project Alternative assumes that the park property would be closed and all existing uses discontinued, including public outreach and recreation programs, park administration, planning and maintenance, the MRCA Western Area Emergency Operations Center, and the Ranger/Maintenance Supervisor residence. No new development would occur at any of the parklands other than the proposed Ramirez Canyon Creek Enhancement/Restoration Plan, which would be implemented according to proposed project plans, and continued fuel modification activities as mandated by fire agencies. The Plan's proposed Fire Protection Plan would not be implemented at any of the park sites and road improvements to facilitate emergency ingress/egress on Delaplane, Ramirez Canyon Road, and Via Acero would not be constructed.

Although trails, camping, public parking areas and other parkland support facilities (including park offices), and public gatherings/programs are primary permitted uses at the parklands included in the Plan, given the extraordinary history of debate and contention over development of the proposed parkland uses and facilities, and to provide a very conservative basis for comparative impact analysis, the No Project Alternative assumes no new implementation of additional recreational amenities within the Plan area.

Alternative 2: 2002 LCP Alternative Plan (Reduced Project)

The 2002 LCP "Reduced" Plan Alternative would maintain many of the goals, policies, and objectives of the proposed Plan, but has been designed to be generally consistent with original 2002 LCP, which was in effect prior to the Malibu Parks Public Access Enhancement Plan Overlay being certified by the Coastal Commission in June 2009. The 2002 LCP Project would have a total of 49 campsites and 96 parking spaces, which would be an approximate 30% reduction in the camp sites and a 28% reduction in the parking spaces when compared to the proposed Plan. Table 8.1 identifies the number of campsites at each Park facility, while Table 8.2 identified the number of proposed new parking spaces at each Park facility.

Figures 8.1-1 through 8.1-15 are located at the rear of this section and serve to illustrate and provide an overview of the 2002 LCP Alternative; Figures 8.1.1-1 through 8.1.1-11 provide visual simulations of the 2002 LCP Alternative and are also located at the rear of the section; detailed Concept - 2002 LCP Alternative plans (preliminary grading & drainage plans) are located within *Appendix D-2*, and are hereby incorporated by reference.

Under this alternative, the secondary access to Ramirez Canyon Park associated with the proposed Plan would no longer be facilitated by an extension of Via Acero to Kanan Dume, but would instead utilize the Lauber property (AIN 4467002068 and 4467002067), which the Conservancy/ MRCA has determined may be available for purchase and which has already been largely graded and re-contoured in preparation for residential development. A 20-foot wide access road/ trail would be installed/ improved from its western-most extent at Kanan Dume Road to its eastern connection down in the canyon below at Ramirez Canyon Road. Visual simulations of the proposed secondary access to Ramirez Canyon Park on the Lauber property, from Ramirez Canyon Road and Kanan Dume Road, respectively are provided in the Section 8.2 alternatives impact discussion below.

Parking previously located along the roadside at Kanan Dume, which required the construction of fairly substantial retaining walls (and related biological impacts) would be substantially reduced under this alternative, with most parking (18 spaces) relocated to parking areas located on the Lauber property (see Figure 8.1-1.1 and 8.1-1.2); an additional 9 parallel parking spaces would be located along Kanan Dume Road. Immediately east of the last parking area at the Lauber property, the access road/trail would have a security gate installed; the gate would allow for passage by pedestrian, equestrians, and bicyclists. Vehicle access from the Lauber parking lots to Ramirez Canyon Park would be for (1) emergency ingress/ egress to Ramirez Canyon Park, (2) park staff, and under limited circumstance, (3) members of the public only (e.g., reservations or other pre-arranged visits only). Members of the public would not be able to drive anytime into Ramirez Canyon Park. The Conservancy/ MRCA would continue to adhere to a total 40 round trips/day standard for vehicles entering from both Ramirez Canyon Road and the Lauber property security gate.

The amount of new pavement required to implement the Lauber property access road and parking would be approximately 41,220 SF and 7,500 SF respectively (a total of 58,465 SF with a 20% contingency); paving for the Kanan Dume parallel parking areas would not be required under this alternative. Although paving for the proposed Plan's Via Acero would be slightly less at 40,728 SF, when the Kanan Parking improvements are added in (20,700 SF), the proposed Plan's Via Acero/ Kanan paving would be 61,428 SF. The paving associated with the 2002 LCP Alternative at Lauber/ Kanan Dume would, therefore, be slightly less than the paving improvements associated with the proposed Plan at Via Acero/ Kanan Dume.

With respect to camping and related facilities, because the 2002 LCP did not originally allow for ESHA impacts for these activities/ structures, camping sites and restroom facilities have been eliminated from a number of locations when compared to the proposed Plan. Campsites have largely been replaced with picnic tables at these locations. These changes are further discussed within the impact discussion contained within Section 8.2 below.

Alternative 3: Redesign Alternative Plan

The Redesign Alternative Plan would maintain all of the goals, policies, and objectives of the proposed Plan, but has been designed to minimize Class I and Class II environmental impacts associated with the proposed Plan. The Redesign Alternative Project would have a total of 54 campsites and 106 parking spaces, which would be an approximate 24% reduction in the camp sites and a 21% reduction in the parking spaces when compared to the proposed Plan. Table 8.1 identifies the number of campsites at each Park facility, while Table 8.2 identified the number of proposed new parking spaces at each Park facility.

Figures 8.1-16 through 8.1-30 are located at the rear of this section and serve to illustrate and provide an overview of the Redesign Alternative; Figures 8.1.2-1 through 8.2.1-11 provide visual simulations of the Redesign Alternative and are also located at the rear of the section; detailed Concept - Redesign Alternative plans (preliminary grading & drainage plans) are located within *Appendix D-3*, and are hereby incorporated by reference.

Similar to the 2002 LCP Alternative, the Redesign Alternative would utilize the Lauber property (AIN 4467002068 and 4467002067), for secondary access to Ramirez Canyon Park; secondary access associated with the proposed Plan by an extension of Via Acero to Kanan Dume would no longer be facilitated, but would instead utilize the Lauber property. A 20-foot wide access road/ trail would be installed/ improved from the Lauber property's western-most extent at Kanan Dume Road to its eastern connection down in the canyon below at Ramirez Canyon Road.

Parking previously located along the roadside at Kanan Dume, which required the construction of fairly substantial retaining walls (and related biological impacts) would be substantially reduced under this alternative, with most parking (18 spaces) located in parking areas located on the Lauber property; an additional 9 parallel parking spaces would be located along Kanan Dume Road. Immediately east of the last parking area at the Lauber property, the access road/trail would have a security gate installed; the gate would allow for passage by pedestrian, equestrians, and bicyclists. Vehicle access from the Lauber parking lots to Ramirez Canyon Park would be for (1) emergency ingress/ egress to Ramirez Canyon Park, (2) park staff, and under limited circumstance, (3) members of the public only (e.g., reservations or other pre-arranged visits only). Members of the public would not be able to drive anytime into Ramirez Canyon Park. The Conservancy/ MRCA would continue to adhere to a total 40 round trips/day

standard for vehicles entering from both Ramirez Canyon Road and the Lauber property security gate.

The amount of new pavement required to implement the Lauber property access road and parking would be approximately 41,220 SF and 7,500 SF respectively (a total of 58,465 SF with a 20% contingency); paving for the Kanan Dume parallel parking areas would not be required under this alternative. Although paving for the proposed Plan's Via Acero would be slightly less at 40,728 SF, when the Kanan Parking improvements are added in (20,700 SF), the proposed Plan's Via Acero/ Kanan paving would be 61,428 SF. The paving associated with the Redesign Alternative at Lauber/ Kanan Dume would, therefore, be slightly less than the paving improvements associated with the proposed Plan at Via Acero/ Kanan Dume.

With respect to camping and related facilities, to avoid and/or minimize geologic and ESHA impacts related to the proposed Plan, camping sites and restroom facilities have either been eliminated or re-located at a number of locations when compared to the proposed Plan. Similar to the 2002 LCP Alternative, the Redesign Alternative would reduce the number of camp sites and restroom facilities at specific Parks. Campsites, in some cases, have been replaced with picnic tables. These changes are further discussed within the impact discussion contained within Section 8.2 below.

Table 8-1
Proposed Plan vs. Alternatives
Number of Campsites Comparison on a Per Park Basis

Park Name	Ramirez		Escondido			Latigo	Corral		Malibu Bluffs					*Sub-Total*
Camp Area	**1**	**2**	**1**	**2**	**3**	**1**	**1**	**2**	**1**	**2**	**3**	**4**	**5**	
PROPOSED PROJECT/ PLAN														
Small Type 1	-	3	-	2	3	4	9	5	3	6	-	12	3	**50**
Small Type 2	-	-	3	-	4	-	-	-	-	-	-	-	-	**7**
Large	2	-	-	-	1	1	2	-	-	-	4	-	-	**10**
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	**4**
Sub-Total per Area	*5*		*13*			*5*	*16*		*32*					**71**
2002 LCP ALTERNATIVE														
Small Type 1	-	-	-	-	-	-	3	-	3	6	-	12	-	**24**
Small Type 2	1	-	3	1	-	-	-	-	-	-	-	-	-	**5**
Large	-	-	-	-	-	-	8	-	-	4	4	-	-	**16**
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	**4**
Sub-Total per Area	*1*		*4*			*0*	*11*		*33*					**49**
REDESIGN ALTERNATIVE														
Small Type 1	-	-	-	-	-	2	3	-	3	6	-	12	-	**26**
Small Type 2	1	-	3	1	-	-	-	-	-	-	-	-	-	**5**
Large	2	-	-	-	-	1	8	-	-	4	4	-	-	**19**
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	**4**
Sub-Total per Area	*3*		*4*			*3*	*11*		*33*					**54**

Table 8-2
Proposed Plan vs. Alternatives
Comparison of New Parking Spaces Provided

Parking Quantities (Number of New Spaces)						
Park Name	**Ramirez**	**Escondido**	**Latigo**	**Corral**	**Malibu Bluffs**	***Sub-Total***
Proposed Project/ Plan	36	16	9	21	52	**134**
2002 LCP Alternative	27	16	2	21	30	**96**
Redesign Alternative	37	16	2	21	30	**106**

8.2 Alternative Environmental Impact Summary

A summary discussion of the potential environmental impacts associated with each project alternative and is identified below. An environmental impact comparison statement (in ***bold italics***) appears after the discussion of each environmental impact issue area.

8.2.1 Alternative 1—No Project

Aesthetic/Visual Resources

Under the No Project Alternative, no new park uses and/or recreation improvements would occur. As a result, parkland topography would be less altered and grading on visible slopes and bluffs would be reduced. Therefore, the No Project Alternative would not result in any change in the visual setting or views of the undeveloped parklands. Impacts would be considered *less than significant (Class III)*. ***Impacts related to public views and change in the visual character of the parklands would be reduced in comparison to the proposed Plan.***

Agricultural Resources

The No Project Alternative presumes persistence of the existing conditions. With the exception of fuels modification and restoration to Ramirez Canyon Creek, no improvements to trails or existing parking and no campgrounds or appurtenances would be developed. No lands within the Plan area are currently in agricultural production. However, a portion of one of the habitat mitigation sites, King Gillette Ranch does contain some prime soils. While the utilization of this site would constitute a less than significant impact upon agricultural resources, under the No Project Alternative, no habitat restoration would need to occur. As such, there would be *no impact* on agricultural resources *(Class III)* under this Alternative. ***In comparison to the proposed Plan, there would be a slightly reduced impact to agricultural resources.***

Air Quality

Under the No Project Alternative, no new camping, trails, parking or roadway improvements would occur. As such, it is reasonable to assume that no construction-related air pollutant emissions would be generated other than the occasional fugitive dust during trail maintenance or fuel modification. Construction-related air quality impacts would be *less than significant* (Class III). Since existing facilities would not be increased or improved, it is reasonable to assume that no additional vehicular trips

would result from Plan area operation under the No Project Alternative. Impacts to air quality associated with long-term operational emissions would be *less than significant (Class III).* ***Short-term construction emissions and long-term operational vehicular air pollutant emissions would be reduced in comparison to the proposed Plan.***

Biological Resources

The No Project Alternative presumes that conditions that presently exist would persist; no improvements to trails or existing parking and no campgrounds or appurtenances would be developed. The No Project Alternative does, however, presume existing fuel modification activities occurring at all sites (for fire protection purposes) and restoration of Ramirez Canyon Creek. While fuel modification would impact vegetation communities, these impacts are an existing part of the Plan baselines; no new impacts to sensitive, riparian or special status vegetation or trees would occur. Under this Alternative, impacts to biological resources from creek restoration would impact 0.07 acres of California sycamore/coast live oak, 0.02 acres of developed land and 0.03 acres of ornamental vegetation. As such, mitigation on a 3:1 ratio (3 acres of mitigation for every 1 acre impacted) would be required for the 0.07 acres of impacted California sycamore/coast live oak requiring 0.21 acres of habitat restoration. In comparison to the proposed project which would require 57.03, there is a greatly reduced impact to biological resources. Therefore, impacts to biological resources would be *less than* significant (Class II). ***Impacts to biological resources under the No Project Alternative would be reduced by 56.82 acres in comparison to the proposed Plan.***

Cultural Resources

The No Project Alternative assumes continued use of existing trails and facilities. However, no new trails or camping and parking facilities are assumed. Impacts would be *less than significant (Class III).* ***The No Project Alternative impact on cultural resources would be reduced in comparison to the proposed Plan.***

Fire Hazards

Under the No Project Alternative, no new camping, trails, parking or roadway improvements would occur. As such, it is reasonable to assume that park visitation would be less under this alternative, resulting in fewer people visiting the park areas and potentially being exposed to the risk from wildfire hazards. Fire Protection Plans, however, would not be in place associated with No Project Alternative. With implementation of FPPs as mitigation, associated fire hazard Impacts would be

considered *less than significant (Class II)*. ***As a result, impacts from wildfire hazards would be slightly greater in comparison to the proposed Plan.***

Geology, Soils, and Seismic Hazards

Under the No Project Alternative, status quo conditions regarding development/park improvements would prevail; in other words, there would be no new camp sites, no new trails, no new parking spaces, and no improvement to Ramirez Canyon Road or Via Acero Road. Because no structural development would take place, potential impacts to such improvements from geologic hazards (such as foundation damage or collapse) would be avoided under the No Project Alternative. Consequently, geologic hazards impacts under the No Project Alternative would be *less than significant (Class III)*. ***In comparison to the proposed Plan, the No Project Alternative would result in decreased impacts associated with geology, soils, and seismic hazards.***

Global Climate Change

Similar to the Air Quality No Project Alternative analysis above, the No Project alternative would not result in additional greenhouse gas emissions contributing to global climate as there would be no increase in vehicular trips or other anthropogenic uses of the Plan sites. As indicated in Section 5.8, *Global Climate Change*, the primary source of greenhouse gas emissions associated with use of the park sites is vehicles traveling to and from the site. Impacts would be *less than significant (Class III)*. Since the No Project Alternative would not include park improvements, such as camping and parking, which would facilitate increased visitor use, it is reasonable to assume that operational vehicular GHG emissions resulting from use of the Plan area under the No Project Alternative would be less than under the proposed Plan. ***The No Project Alternative would, thus, result in a decrease in contributions to global climate change in comparison to the proposed Plan.***

Hazardous Materials

The potential for hazardous materials contamination to affect MRCA park properties was found to be very low. Only the Latigo Trailhead includes evidence of debris piles, which could potentially contain contamination. Because no structural development would take place under the No Project Alternative, there would be no potential to displace or disturb contamination which could be present in debris piles in Latigo Canyon Trailhead. Consequently, potential impacts associated with hazardous materials contamination would be avoided under the No Project Alternative; impacts would be

less than significant (Class III). ***As a result, hazardous materials impacts under the No Project Alternative would be reduced in comparison to the proposed Plan***.

Hydrology, Drainage, and Water Quality

The No Project Alternative presumes a "status quo" scenario in which only fuels modification and restoration to Ramirez Creek would occur. Restoration efforts of Ramirez Creek would entail the use a variety of temporary sediment control structures, silt fencing and vegetating areas of bare soils to mitigate any potential impacts to water quality. Otherwise, since there would be no other improvements proposed, there would be no other mitigation required. There would be no increase in impervious surface or structures such as fire sheds, self-contained restrooms and water tanks, pedestrian creek crossings plan area wide or improvements to the bridge at the entry area of Ramirez Canyon Creek, which would be a beneficial impact. Further, with less new trails, there would be a reduced potential for pet waste from dogs and/or horses to impact surface waters or for water quality to be impacted by self-contained restrooms or campers. As such, impacts to hydrology, drainage and water quality would be *less than significant (Class III).* ***The No Project Alternative would have slightly reduced impacts to hydrology, drainage and water quality in comparison to the proposed Plan.***

Land Use and Planning

As no new park uses and/or improvements would occur under the No Project Alternative, it is anticipated that no new non-restoration activities would impact ESHA or be developed on potential landslide areas, which create inconsistencies with Coastal Act/ LCP policies. As a result, impacts would be considered *less than significant (Class III).* ***Therefore, the potential for land use policy inconsistencies would be reduced in comparison to the proposed Plan.***

Noise

The No Project would not increase the number of the proposed camping sites and parking spaces, as compared to the proposed Plan, which would result in a decrease in the intensity level of park activity; on the other hand, the Plan contains policies and implementing strategies which address the control or management of activities to minimize associated noise generation. The Policies of the proposed Plan would not be in force under the No Project Alternative. Consequently, the reduction in noise generation potential associated with a lower Park capacity represented by the No

Project Alternative would likely be offset by the absence of explicit noise controls governing those activities; impacts would be *less than significant (Class III)*. ***Consequently, the No Project Alternative is considered to have equivalent noise impacts to the proposed Plan.***

Public Services

Similar to the proposed Plan, the No Project Alternative would not result in an increase in demand for fire or police protection services. This Alternative would not provide additional camping or parking facilities; therefore, increased visitation associated with those facilities under the proposed Plan, would not occur under the No Project Alternative. With an anticipated reduction in park visitation under the No Project Alternative, it is likely that there would be a corresponding decrease in the number of service calls. Impacts would be considered *less than significant (Class III)*. ***Therefore, impacts on public services would remain similar to the proposed Plan, however, at a reduced level.***

Recreation

Under the No Project Alternative, no new camping, trails, parking or roadway improvements would occur. As such, it is reasonable to assume that an increase in existing recreational facilities and regional parks would occur, possibly causing physical deterioration of existing park and recreational facilities in the immediate and surrounding area. The impact would be considered *potentially significant (Class II)*. ***As a result, impacts on recreation would be increased in comparison to the proposed Plan.***

Transportation and Parking

The No Project Alternative assumes no implementation of campsites or provision of parking spaces in addition to what is currently available. Since no improvements would be made to accommodate an increase in visitor use of the parks within the Plan area, it is reasonable to assume that traffic volumes would remain consistent with what is currently generated at the subject properties. Accordingly, the No Project alternative would neither contribute additional trips to the surrounding street network nor would it have the potential to impact capacity at intersections within the vicinity. Impacts would be *less than significant (Class III)*. ***Potential impacts to transportation and parking would be reduced compared to the proposed Plan.***

Utilities/Service Systems

Under the No Project Alternative, no park and recreational facilities would be developed. This would result in reduced energy and water use, as well as a reduction in solid waste generation from fewer people visiting the parks. Storm water drainage would be reduced from a decrease in impervious services associated with no new parking areas, and wastewater generation would be less due to fewer people expected at the parks. Impacts would be considered *less than significant (Class III).* ***Therefore, impacts on utilities and service systems would be reduced in comparison to the proposed Plan.***

8.2.2 Alternative 2—2002 LCP Alternative (Reduced Project)

Aesthetic/Visual Resources

The 2002 LCP Alternative (Reduced Project) would result in an approximate 30% reduction in camp sites and a 28% reduction in parking spaces. This reduction would also include a corresponding decrease in the number of restroom facilities at the parks. A 20-foot wide secondary access road to Ramirez Canyon Park utilizing the Lauber property would be pursued rather than along Via Acero as proposed under the proposed Plan. The reduction in proposed camping sites, parking spaces, and restroom facilities would result in less grading and altering of the natural environment. Figures 8.1.1-1 through 8.1.1-11 provide visual simulations of the 2002 LCP Alternative. As a result of a reduction in park facilities, potential impacts on visual resources would be reduced. The proposed secondary access road on the Lauber property could result in potentially significant impacts on visual resources. Although the secondary access road from Ramirez Canyon Park and Kanan Dume Road would be visible from certain viewpoints in the Plan area, all park and recreation improvements, including the secondary access developed under the Reduced Project would be guided by the Public Works Plan that would provide for critical planning, design, and siting of the park improvements to minimize potential visual impacts from public viewpoints. Consequently, the overall impact level of the Reduced Project on visual resources would be considered *less than significant (Class II),* similar to the proposed Plan, although to a somewhat lesser degree due to the overall reduction in park and recreation improvements. ***Therefore, impacts on Aesthetics/Visual Resources would be slightly reduced in comparison to the proposed Plan.***

Agricultural Resources

Under the 2002 LCP Alternative, approximately 70% of the improvements under the proposed Plan would be implemented. There are no agricultural uses on any park lands or within the vicinity, therefore no improvements would occur on or adjacent to any agriculturally productive lands, prime soils, farmland of local or statewide importance or unique farmland. A portion of one of the proposed mitigation sites for the proposed project, the King Gillette Ranch site does contain soils categorized as Prime under the DOC's FMMP. However, because there would be reduced impacts to biological resources under the 2002 LCP Alternative, and in turn, a reduction in the required mitigation acreage, habitat restoration would at KGR would be reduced, but would still be required to be implemented at this site for riparian habitat mitigation. Impacts to Agricultural Resources under the 2002 LCP Alternative would be *less than significant (Class III).* ***The 2002 LCP Alternative would have a slightly reduced impact on agricultural resources in comparison to the proposed Plan.***

Air Quality

In regards to potential construction emissions, the 2002 LCP Alternative would include improvements similar to the proposed Plan, but not as extensive as it would develop fewer campsite and parking spaces; as such construction emissions generated by this Alternative would be reduced relative to the proposed Plan. It is reasonable to assume that although this Alternative would result in reduced construction emissions in comparison to the proposed Plan, the maximum-worst case scenario that assumes concurrent construction activity at all park sites would result in emissions that would potentially exceed SCAQMD thresholds. Mitigation measure AQ-1a that prohibits simultaneous construction of Park improvements would be required. Incorporation of mitigation measures identified in AQ-1b and AQ-1c that address exhaust emissions and fugitive dust generated during earthmoving activities and equipment operation would also be required. In additional, Mitigation measure AQ-2 developed to reduce potential impacts to sensitive receptors in the immediate vicinity of the project as a result of construction activities would be required (SCAQMD 2008). This mitigation would ensure that emissions of PM_{10} and $PM_{2.5}$ would not exceed thresholds established for a construction activity area of 1 acre or less located within 25 meters of a sensitive receptor. Impacts would be *less than significant (Class II).*

Given that the 2002 LCP Alternative would reduce the total amount of campsites (from 71 to 49) and new parking spaces (from 134 to 96) developed, resulting in a reduction in associated vehicular trips generated, operational air quality emission impacts generated by the 2002 LCP Alternative would similarly be reduced relative to the proposed Plan.

Table 8-3 presents the estimated emissions associated with operation of the Plan site under the 2002 LCP Alternative. Maximum daily operational emissions are based on estimated Alternative-generated ADT for the Plan site, which would be 323 trips during the weekdays and 394 trips during the weekend days (based on trip generation rates provide by ATE, 2010). For the purposes of this analysis, the Ramirez Canyon Park Vacant Residential Baseline scenario, which assumes no existing trips at Ramirez Canyon Park, is utilized to represent the maximum daily emissions. See Section 5.3, *Air Quality*, for a description of the Ramirez Canyon Park baseline scenario.

Table 8-3
2002 LCP Alternative
Estimated Maximum Plan Site Operational Emissions (*lbs/day*)*

	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Weekday						
Summer	10.10	16.51	145.06	0.17	26.91	5.22
Winter	12.87	19.99	134.30	0.14	26.91	5.22
Weekend						
Summer	11.80	19.48	171.02	0.20	31.73	6.15
Winter	15.13	23.57	158.38	0.17	31.73	6.15
Maximum Daily Scenario						
Max	**15.13**	**23.57**	**171.02**	**0.20**	**31.73**	**6.15**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Source: URBEMIS 2007 version 9.2.4. See Appendix E for calculations.
*Under the Ramirez Canyon Park Vacant Residential Baseline scenario, which assumes no existing traffic at Ramirez Canyon Park; instead, future traffic for Ramirez Canyon Park is based on total allowable trips (80 total ADT).

As indicated in Table 8-3, the 2002 LCP Alternative would not exceed significant thresholds established by the SCAQMD. In comparison to the proposed Plan estimated operational emissions, this Alternative would result in a decrease in emissions for each criteria pollutant analyzed above. Impacts would be *less than significant*.

Impacts to air quality generated by implementation of the 2002 LCP Alternative would be *less than significant with the incorporation of mitigation measures (Class II)*. ***Due to the reduction in total development, the 2002 LCP Alternative would have a reduced impact on air quality in comparison to the proposed Plan.***

Biological Resources

The 2002 LCP Alternative would have a positive impact on biological resources in the long term by reducing the number of campsites and related facilities. The series of 8.2-1 Figures depict the biological resource impacts anticipated under the 2002 LCP alternative, and the sections below detail impacts per park.

Ramirez Canyon. There are various types of improvements at Ramirez Canyon Park and associated impacts (Table 8-4) including creek restoration, roadway improvements, parking, camping and recreational support. In relation to park and recreational support facilities, there would be a 1.74 acres reduction in direct impacts to vegetation communities, including a 0.11acre reduction in California sagebrush scrub and a 0.17 acre reduction in chaparral, both of which are ESHA (Table 8-5), and a reduction in direct impacts to native trees by 33 trees as compared to the proposed project (Table 8-6). However, there would be a 0.01 acre increase over the proposed project associated with roadway improvements. There would be no change in impacts related to restoration of the creek, nor would sensitive upland scrub and chaparral communities would be impacted. Impacts to special-status plants would remain the same as the proposed project. Mitigation would be required for impacted sensitive and riparian habitats. In summary of this component of Ramirez, there would reduction of 1.73 acres in direct impacts and would require mitigation. Impacts would therefore be *less than significant (Class II).*

Table 8-4
Ramirez Canyon Park Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts (acres)			
	Park and Recreation Support Facilities	Road Widening/ Improvements	Creek Restoration	TOTAL
California Sagebrush Scrub	0.25	0	0	0.25
Disturbed California Sagebrush Scrub	0.05	0	0	0.05
Chaparral	0.07	0	0	0.07
Coast Live Oak	0	0.01	0	0.01
California Sycamore-Coast Live Oak	0.09	0.02	0.07	0.18
TOTAL	**0.46**	**0.03**	**0.07**	**0.56**

Table 8-5
Comparison of Reduced Impacts to ESHA under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	Reduction in Impacts
California Sagebrush Scrub	0.36	0.25	0.11
Chaparral	0.24	0.07	0.17
TOTAL	**0.6**	**0.32**	**0.28**

Table 8-6
Summary of Direct Impacts to Native Trees under the 2002 LCP Alternative

Project Area	Native Tree Species				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	Toyon (*Heteromeles arbutifolia*)
Ramirez Canyon Park					
Park and Recreation Support Facilities Impacts	11	2	1	0	0
Creek Restoration Impacts	11	2	11	2	0
Ramirez Canyon Road Improvements					
Facilities Impacts	21	2	11	0	0
TOTAL	**43**	**6**	**23**	**2**	**0**

Lauber Property Improvements. While not incorporated into the original proposed project, under the 2002 LCP Project Alternative, the construction of trails, trail connectors, and a parking facility at the Lauber Property/West Ramirez Canyon site would result in direct impacts to vegetation communities totaling 2.78 acres (Table 8-7), which is a 2.78 acres increase in impacts and would require mitigation. No trees would be directly impacted at the Lauber property/West Ramirez Canyon site, and impacts to special-status plants would remain the same as the proposed project. With the implementation of mitigation measures, impacts would be *less than significant (Class II)*.

Table 8-7
Lauber Property/West Ramirez Canyon
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Vegetation Community/Land Cover	Permanent Impacts (acres)	
	Trail	Parking
Ruderal	0	0.22
Developed	0	0.26
California Sagebrush Scrub	0.05	1.48
Disturbed California Sagebrush Scrub	0	0.09
Chaparral	0.01	0
California Annual Grassland	0	0.62
Coast Live Oak / Toyon – Poison Oak	0.03	0
Coast Live Oak	0	0.02
TOTAL	**0.09**	**2.69**

Via Acero Road Improvements. Improvements to Via Acero Road, which under the proposed project would result in direct impacts to 1.01 acres of vegetation communities/land covers, would not occur. Therefore, this represents an overall decrease in impacts by 1.01 acres. No trees would be directly impacted at this location.

In summary, while the addition of 2.78 acres resulting from the Lauber Property/ West Ramirez Canyon component of this alternative increases impacts, overall impacts are offset by the reduction of impacts associated with reduced parking, reduced, camping and recreational support facilities and the deletion of the Via Acero project component. With the incorporation of all mitigation measures including habitat mitigation, all impacts would be *less than significant (Class II)*. ***As a result of the reduction in facilities and improvements, impacts at Ramirez Canyon Park would be slightly reduced in comparison to the proposed project.***

Escondido Canyon Park. Table 8-8 below identifies impact on vegetation communities under the 2002 LCP Alternative**.** Under this alternative, there would be a significant reduction in the number of campsites proposed, which would result in a decrease in direct impacts to vegetation in comparison to the proposed project, including 0.10 acres of California sagebrush scrub, and 0.17 acres of coast live oak, which are ESHA (Table 8-9). Impacts to special-status plants would remain the same. Five native trees would be directly impacted representing a decrease in direct impacts by 4 trees as compared to the proposed project (Table 8-10).

Table 8-8 Escondido Canyon Park
Summary of Impacts Vegetation Communities under the 2002 LCP Alternative

Vegetation Community Alliance	Direct, Permanent Impacts Park and Recreation Support Facilities (acres)
Developed	0.08
Ornamental	0.08
Ruderal	0
Disturbed Lands	0.23
Geraldton Carnation Weed	0
California Sagebrush Scrub	0.02
Disturbed California Sagebrush Scrub	0.75
Chaparral	0
Native Grassland	0
California Annual Grassland	0.29
Poison Oak Scrub	0
Coast Live Oak	0.05
California Sycamore-Coast Live Oak	0
Southern Willow Scrub/Red Willow-Arroyo Willow	0
Eucalyptus	0
TOTAL	**1.50**

Table 8-9 Comparison of Reduced Impacts to ESHA under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	Reduction in Impacts
California Sagebrush Scrub	0.12	0.02	0.10
Coast Live Oak	0.22	0.05	0.17
Total	**0.34**	**0.07**	**0.27**

Table 8-10 Escondido Canyon Park
Summary of Impacts to Native Trees under the 2002 LCP Alternative

Project Area	*Native Tree Species*				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
Escondido Canyon Park					
Park and Recreation Support Facilities Impacts	1	2	3	0	2

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in facilities and improvements, impacts at Escondido Canyon Park would be reduced in comparison to the proposed project.***

Latigo Trailhead. Table 8-11 below identifies impact on vegetation communities under the 2002 LCP Alternative. Under the 2002 LCP Alternative there would be no campsites at Latigo and there would only be a parking lot and a day use/picnic area. In comparison to the proposed project, there would be a 1.17 acre decrease in direct impacts to vegetation communities, including and 0.0374 reduction in impacts to California sycamore/coast live oak, which is ESHA (Table 8-12), and a decrease in direct impacts to native trees by 14 (Table 8-13).

Table 8-11 Latigo Trailhead
Summary of Impacts to Vegetation Communities
Under the 2002 LCP Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Developed	*0.01*
Ornamental	*0*
Ruderal	*0*
Disturbed Lands	*0*
Geraldton Carnation Weed	*0*
California Sagebrush Scrub	*0*
Disturbed California Sagebrush Scrub	*0*
Chaparral	*0*
Native Grassland	*0*
California Annual Grassland	*0.01*
Poison Oak Scrub	*0*
Coast Live Oak	*0*
California Sycamore-Coast Live Oak	*0.006*
Southern Willow Scrub/Red Willow-Arroyo Willow	*0*
Eucalyptus	*0.07*
TOTAL	**0.10**

Table 8-12
Comparison of Reduced Impacts to ESHA under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	*Reduction in Impacts*
California Sycamore-Coast Live Oak	0.38	0.006	0.374

Table 8-13
Summary of Impacts Native Trees under the 2002 LCP Alternative

Project Area	*Native Tree Species*				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
Latigo Trailhead					
Park and Recreation Support Facilities Impacts	1	0	0	0	0

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in facilities and improvements, impacts at Latigo Trailhead would be reduced in comparison to the proposed project.***

Corral Canyon. Table 8-14 below identifies impact on vegetation communities under the 2002 LCP Alternative. A reduction in 6 campsites and the deletion of a water tank under the 2002 LCP Alternative would result in a 0.70 acre decrease in direct impacts to vegetation communities, including in a 0.15 reduction in California sagebrush scrub, 0.43 acres of disturbed California sagebrush scrub and 0.66 acres of coast live oak (Table 8-15), which are all ESHA in comparison to the from the proposed project, and impacts to native trees would decrease by 10 trees (Table 8-16). Impacts to special-status plants will remain the same as the proposed project.

Table 8-14 Corral Canyon Park
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Vegetation Community Alliance	Direct, Permanent Impacts Park and Recreation Support Facilities (acres)
Developed	0.77
Ornamental	0.24
Ruderal	0
Disturbed Lands	0.11
Geraldton Carnation Weed	1.36
California Sagebrush Scrub	1.01
Disturbed California Sagebrush Scrub	0.31
Chaparral	0.02
Native Grassland	0
California Annual Grassland	0.51
Poison Oak Scrub	0
Coast Live Oak	0.04
California Sycamore-Coast Live Oak	0
Southern Willow Scrub/Red Willow-Arroyo Willow	0
Eucalyptus	0
TOTAL	**4.37**

Table 8-15
Comparison of Reduced Impacts to ESHA under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	Reduction in Impacts
California sagebrush scrub	1.16	1.01	0.15
Disturbed California sagebrush scrub	0.74	0.31	0.43
Coast live oak	0.12	0.04	0.08
Total	**2.02**	**1.36**	**0.66**

Table 8-16
Corral Canyon Park Summary of Impacts to Native Trees

Project Area	Native Tree Species				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	Toyon (*Heteromeles arbutifolia*)
Corral Canyon Park					
Park and Recreation Support Facilities Impacts	0	0	10	2	0

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in facilities and improvements, impacts at Corral Canyon would be reduced in comparison to the proposed project.***

Malibu Bluffs. Table 8-17 below identifies impact on vegetation communities under the 2002 LCP Alternative. Under the 2002 LCP Alternative, there is not a great material difference between the improvements under the proposed project, however, reduced parking would generally account for a 0.46 acre decrease in direct impacts, including 0.28 acres of California sagebrush scrub and 0.01 acres of southern willow scrub/red-willow/arroyo willow (Table 8-18). No trees will be directly impacted at Malibu Bluffs, as is the case with the proposed project and impacts to special-status plants will remain the same as the proposed project.

Table 8-17 Malibu Bluffs
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Vegetation Community Alliance	Direct, Permanent Impacts Park and Recreation Support Facilities (acres)
Developed	0.44
Ornamental	0
Ruderal	0.21
Disturbed Lands	0.11

Table 8-17 Malibu Bluffs
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Vegetation Community Alliance	Direct, Permanent Impacts Park and Recreation Support Facilities (acres)
Geraldton Carnation Weed	0
California Sagebrush Scrub	0.03
Disturbed California Sagebrush Scrub	0
Chaparral	0.07
Native Grassland	0
California Annual Grassland	6.02
Poison Oak Scrub	0
Coast Live Oak	0
California Sycamore-Coast Live Oak	0
Southern Willow Scrub/Red Willow-Arroyo Willow	0
Eucalyptus	0
TOTAL	**6.88**

Table 8-18 Comparison of Reduced Impacts to ESHA under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	Reduction in Impacts
California sagebrush scrub	0.31	0.03	0.28
Southern Willow Scrub/Red Willow-Arroyo Willow	0.01	0	0.01
Total	**0.32**		**0.29**

Very minimal habitat restoration would be required and all other mitigation measures would still be implemented. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in improvements, impacts at Malibu Bluffs would be reduced in comparison to the proposed project.***

Primary Trail System. Table 8-19 below identifies impact on vegetation communities under the 2002 LCP Alternative. Under the 2002 LCP Alternative, there would be a 0.61 acre decrease in direct impacts in comparison to the proposed project, which includes reductions in impacts to in ESHA and sensitive riparian habitats. Forty trees would be directly impacted by trail construction including 38 coast live oaks and 2 California walnuts (Table 8-20). There is no difference in direct impacts to trees between the proposed project and the 2002 LCP Alternative.

Table 8-19 Primary Trail System
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	Trail Improvement Impacts (Acres)
Kanan Dume to Ramirez Canyon Park	**Trail Segment 1a**	Ornamental	0.04
		California Sagebrush Scrub	0.37
		Chaparral	0.32
		Coast Live Oak/Toyon-Poison Oak	0.13
		California Sycamore–Coast Live Oak	0.11
		Subtotal	**0.97**
Ramirez Canyon Park to Murphy Way	**Trail Segment 2a3**	Developed	0.01
		Ornamental	0.05
		California Sagebrush Scrub	0.99
		Disturbed California Sagebrush Scrub	0.10
		Chaparral	0.05
		Subtotal	**1.20**
	Trail Segment 2a6	Developed	0.01
		California Annual Grassland	0.16
		California Sagebrush Scrub	0.20
		Disturbed California Sagebrush Scrub	0.09
		Subtotal	**0.46**

Table 8-19 Primary Trail System
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	Trail Improvement Impacts (Acres)
Escondido Canyon Park to Solstice Canyon Park	**Trail Segment 4**	California Sagebrush Scrub	0.20
		Poison Oak Scrub	0.05
		Coast Live Oak	0.13
		Coast Live Oak/Toyon-Poison Oak	0.22
		Subtotal	**0.60**
	Trail Segment 4b	California Sagebrush Scrub	0.31
		California Annual Grassland	0.02
		Coast Live Oak	0.01
		Coast Live Oak/Toyon-Poison Oak	0.01
		Subtotal	**0.35**
Latigo Canyon Road	**Trail Segment 9**	Developed	0.03
		Ornamental	0.01
		California Sagebrush Scrub	1.25
		Chaparral	0.02
		Giant Wild Rye	0.03
		Coast Live Oak/Toyon-Poison Oak	0.15
		Subtotal	**1.49**
	Trail Segment 9a	California Sagebrush Scrub	0.07
	Subtotal		**0.07**
	Trail Segment 9b	Developed	0.03
		California sagebrush scrub	0.07
		Subtotal	**0.10**
	Trail LS	California Sagebrush Scrub	0.05

Table 8-19 Primary Trail System
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	Trail Improvement Impacts (Acres)
		Chaparral	0.01
		Coast Live Oak/Toyon-Poison Oak	0.03
		Subtotal	**0.09**
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 10b**	California Sagebrush Scrub	0.31
		Disturbed California Sagebrush Scrub	0.21
		Chaparral	0.06
		Disturbed Chaparral	0.01
		California Annual Grassland	0.16
		California Sycamore-Coast Live Oak	0.12
		Geraldton Carnation Weed	0.02
		Subtotal	**1.24**
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 11a**	Geraldton Carnation Weed	0.02
		California Sagebrush Scrub	0.54
		Disturbed California Sagebrush Scrub	0.07
		Native Grassland	0.04
		California Annual Grassland	0.40
		Poison Oak Scrub	0.04
		Coast Live Oak	0.04
		California Sycamore-Coast Live Oak	0.02
		California Walnut Woodland	0.03
		Subtotal	**1.20**
	Trail Segment 11c	Developed	0.06

Table 8-19 Primary Trail System
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	Trail Improvement Impacts (Acres)
		California Sagebrush Scrub	0.21
		Disturbed California Sagebrush Scrub	0.07
		California Annual Grassland	0.22
		Subtotal	**0.56**
	Trail Segment 11d	Developed	0.01
		Disturbed California Sagebrush Scrub	0.27
		California Annual Grassland	0.06
		Subtotal	**0.34**
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 12**	Developed	0.01
		California Sagebrush Scrub	0.21
		Chaparral	0.58
		Eucalyptus	0.01
		Subtotal	**0.81**
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 13a**	California Sagebrush Scrub	0.06
		Chaparral	0.18
		California Annual Grassland	0.03
		Subtotal	**0.27**
	Trail Segment 13b	California Sagebrush Scrub	0.07
		Chaparral	0.17
		California Annual Grassland	0.08
		Subtotal	**0.32**
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 14**	California Sagebrush Scrub	0.46
		Disturbed California	0.11

Table 8-19 Primary Trail System
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	Trail Improvement Impacts (Acres)
		Sagebrush Scrub	
		Chaparral	0.39
		Disturbed Chaparral	0.76
		California Annual Grassland	0.66
		Coast Live Oak	0.24
		California Sycamore-Coast Live Oak	0.05
		Subtotal	**2.67**
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 15**	California Sagebrush Scrub	0.31
		Disturbed California Sagebrush Scrub	0.86
		Chaparral	1.02
		Disturbed Chaparral	1.37
		Poison Oak Scrub	0.02
		Coast Live Oak	0.42
		Disturbed Coast Live Oak	0.08
		Subtotal	**4.08**
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 16**	Disturbed Lands	0.03
		California Annual Grassland	0.17
		Southern Willow Scrub	0.01
		Subtotal	**0.21**
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 17**	Disturbed Lands	0.03
		California Sagebrush Scrub	0.24
		California Annual Grassland	0.01
		Southern Willow Scrub	0.05

Table 8-19 Primary Trail System
Summary of Impacts to Vegetation Communities under the 2002 LCP Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	Trail Improvement Impacts (Acres)
		Subtotal	**0.33**
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 18**	California Annual Grassland	0.15
		Subtotal	**0.15**
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 19**	California Sagebrush Scrub	0.09
		Subtota	**0.09**
		Total Primary Trail System Improvement Impacts	**17.60**

Table 8-20 Primary Trail System
Summary of Impacts to Native Trees

Project Area	Native Tree Species				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	Toyon (*Heteromeles arbutifolia*)
Trail Segments					
1a – Kanan Dume to Ramirez Cyn. Park	0	0	0	0	0
2a3 - Ramirez Cyn. Park to Murphy Way	1	2	0	0	0
4 - Escondido Cyn. Park to Solstice Cyn. Park	28	0	0	0	0
11a - Corral Cyn. Park (Beach - Backbone Trail)	2	0	0	0	0
14 - Corral Cyn. Park (Beach - Backbone Trail)	7	0	0	0	0
TOTAL	**38**	**2**	**0**	**0**	**0**

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in trail improvements, impacts would be slightly reduced in comparison to the proposed project.***

Summary of Impacts Under the 2002 LCP Alternative. In summary, implementation of the 2002 LCP Alternative would result in 34.75 acres of direct impacts to all vegetation communities/land covers including 16.17 acres of sensitive scrub and chaparral communities, including disturbed forms; 10.34 acres of grass and herb dominated communities; 1.64 acre of broad leafed upland tree dominated habitat; 0.55 acre riparian and bottomland habitat; 0.08 acre eucalyptus; and 5.83 acres developed/disturbed land covers. This represents an overall 4.74 acre decrease in direct impacts to all vegetation communities/land from the proposed project (Table 8-21). While impacts under the 2002 LCP Alternative would be reduced in comparison to the project description, mitigation would still be required on a 3:1 ratio (3 acres for every 1 acre of impact) and tree protection and mitigation would be required to be adhered to under the LCP and Tree Protection Policies. Under the proposed project, 57.03 acres would be required in habitat restoration in comparison to 50.28 acres of habitat restoration under the 2002 LCP Alternative. With the implementation of mitigation, impacts would be *less than significant (Class II)*. ***Because of the reduction in total development, the 2002 LCP Alternative would have a reduced impact on biological resources in comparison to the proposed Plan.***

Table 8-21
Summary of Impacts to Vegetation Community/Land Cover
Per the 2002 LCP Alternative

Vegetation Communities	Proposed Project	*2002 LCP Alternative*
California Sagebrush Scrub	8.87	*8.85*
Disturbed California Sagebrush Scrub	3.32	*2.98*
Chaparral	3.71	*2.97*
Disturbed Chaparral	2.14	*1.37*
Native Grassland	0.04	*0.04*
California Annual Grassland	10.30	*10.30*
Giant Wild Rye	0.03	*0.03*
Coast Live Oak	1.20	*0.96*
Disturbed Coast Live Oak	0.08	*0.08*
Coast Live Oak/Toyon-Poison Oak	0.59	*0.57*
California Sycamore-Coast Live Oak	0.85	*0.49*
California Walnut Woodland	0.03	*0.03*
Southern Willow Scrub/Red Willow-Arroyo Willow	0.08	*0.06*

Table 8-21
Summary of Impacts to Vegetation Community/Land Cover
Per the 2002 LCP Alternative

Vegetation Communities	Proposed Project	*2002 LCP Alternative*
Eucalyptus	0.08	*0.08*
Poison Oak Scrub	0.11	*0.11*
Developed	4.75	*2.86*
Disturbed Lands	0.69	*0.65*
Ruderal	0.31	*0.43*
Ornamental	0.98	*0.49*
Geraldton Carnation Weed	1.33	*1.40*
TOTAL	**39.49**	**34.75**

Cultural Resources

The Reduced Project would reduce the number of the proposed camping and parking facilities that would potentially impact unknown cultural resources within the proposed Plan site area. However, as the location of remaining camping and parking facilities would still occur within the vicinity of areas with high archaeological sensitivity in Corral Canyon Park and the Malibu Bluffs, impacts would still be *less than significant (Class II)*. ***The Reduced Project Alternative would have the same impacts on cultural resources relative to the proposed Plan.***

Fire Hazards

The Reduced Project would reduce the number of the proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity, resulting in fewer people potentially being exposed to risks from wildfire hazards. Impacts from wildfire hazards would remain *less than significant (Class III)* under the Reduced Project Alternative; however, the level of the impact would be reduced slightly from the proposed Plan due to an overall reduction in park and recreation improvements, resulting in an anticipated decrease in park visitation. ***Therefore, impacts from wildfire hazards would be slightly reduced in comparison to the proposed Plan.***

Geology, Soils, and Seismic Hazards

The Reduced Project would reduce the number of the proposed camping sites and parking spaces, as compared to the proposed Plan; however, overall area of new pavement would be slightly greater under the Reduced Project. The Latigo Canyon Trailhead property under the Reduced Plan would include only parking spaces and picnic tables, which have been sited to avoid the landslide area on this property. Therefore, development of the Reduced Project could result in *potentially significant impacts* in the remaining park properties *(Class II)*. ***Consequently, due to the potential avoidance of Class I impacts associated with development of the Latigo Canyon Trailhead property, the overall impact level of the 2002 LCP Alternative from geologic hazards would be considered less than the proposed Plan.***

Global Climate Change

The 2002 LCP Alternative air emissions contributing to global climate change would be directly reduced relative to decreased vehicular trips associated with fewer campsites and parking spaces, as described under the Air Quality alternative analysis. Table 8-22 presents estimated operational GHG emissions generated under implementation of the 2002 LCP Alternative.

Table 8-22
2002 LCP Alternative Estimated Operational GHG Emissions

CO_2 lbs/year	CO_2E MTons/year
5,767,178	2,754

Source: URBEMIS 2007. See Appendix E for complete results.
Lbs/year = pounds per year; Mtons/year = metric tons per year
1 metric ton = 2,204.623 lbs

While all sources of GHG emissions contribute to some extent to global climate change, similar to the proposed Plan, the 2002 LCP Alternative would not likely impede or conflict with the State's ability to achieve the goals of AB 32 for the reasons discussed within Section 5.8 Global Climate Change. Therefore, the 2002 LCP Alternative would not result in a cumulatively considerable contribution to global climate change; associated impacts would be *less than significant (Class III)*. This Alternative would result in a reduction of approximately 966 CO_2E MTons/year compared to the proposed Plan. ***As such, the 2002 LCP Alternative contributions to global climate change would be 26 percent less than the 2010 Plan Update.***

Hazardous Materials

Other than the Latigo Canyon Trailhead property, the potential for hazardous materials contamination to affect MRCA park properties in the Plan was found to be very low. For these parks, a reduction in the number of parking spaces and camp sites would not decrease the already very low potential for exposure of park visitors to environmental contamination from hazardous materials. The Latigo Canyon Trailhead includes evidence of debris piles, which could potentially contain contamination. Under the Reduced Project, the Latigo Canyon property would be developed with parking spaces, and would continue to accommodate trail users. Therefore, the Reduced Project would not result in a substantial difference in the potential for park users to be exposed to environmental contamination; impacts would *be less than significant (Class II).* ***Consequently, the Reduced Project is considered have equivalent hazardous materials impacts to the proposed Plan.***

Hydrology, Drainage, and Water Quality

No significant impacts were identified under the proposed project; all impacts would be less than significant with mitigation (Class II). Under the 2002 LCP Alternative, improvements would generally be reduced 30% and therefore the reduction in impacts would be commensurate due to the low-impact nature of improvements proposed. Reduction in the overall construction would reduce short-term construction related impacts such as potential sedimentation plan area wide, however, would still require mitigation. The decrease in the number of campsites, trails and pedestrian crossings would also decrease potential impacts to water quality associated with restrooms, campers and pet/horse waste; nonetheless, mitigation would still be required. Finally, impervious surfaces associated with parking, water tank placement and fire sheds would decrease, however, mitigation by means of bio-filters and direction of flow to vegetated areas would still be required. Therefore, under the 2002 LCP impacts to hydrology, drainage and water quality would be *less than significant (Class II).* ***The 2002 LCP Alternative would result in a decreased impact to hydrology, drainage and water quality.***

Land Use and Planning

The Reduced Project would reduce the number of proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity at each park area. Under this alternative, although policy inconsistencies associated with locating new non-restoration improvements on a potential landslide area would be resolved, policy inconsistencies relative to non-

restoration improvements to ESHA would remain; the level of inconsistency/ impacts to ESHA would, however, be substantially reduced compared to the proposed project. As a result, impacts would be considered *significant and unavoidable (Class I)*. ***Therefore, the potential for land use policy inconsistencies would be reduced in comparison to the proposed Plan.***

Noise

The Reduced Project would reduce the number of the proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity; on the other hand, the Plan contains policies and implementing strategies which address the control or management of activities to minimize associated noise generation. The Policies of the proposed Plan would be in force under the 2002 LCP. Consequently, the reduction in noise generation potential associated with a 30% lower Park capacity would not likely result in any discernible change in typical recreation noise occurring throughout the Plan sites be; impacts would be *less than significant (Class II)*. ***Consequently, the Reduced Project is considered have equivalent noise impacts to the proposed Plan.***

Public Services

Similar to the proposed Plan, the Reduced Project Alternative would not result in an increase in demand for fire or police protection services; however, with a reduction in camp sites and parking spaces, park visitation under the Reduced Project Alternative would likely be reduced, resulting in a corresponding decrease in the number of service calls. Impacts would remain *less than significant (Class III)*. ***Therefore, impacts on public services would be slightly reduced in comparison to the proposed Plan.***

Recreation

Under the Reduced Project Alternative, much needed park and recreational facilities, particularly accessible camp, trail and day-use areas would not be developed to the full extent as that under the Proposed Plan. However, the Reduced Project Alternative would provide some level of much needed park and recreational improvements that would help alleviate the existing deficit in recreational facilities in the immediate and surrounding areas available to meet the recreational needs of the local and regional populace. As a result, impacts would be considered *less than significant (Class III)*. ***Therefore, impacts on recreation would remain similar to the proposed Plan; however, the level of significance would be increased.***

Transportation and Parking

Given that the 2002 LCP Alternative would reduce both campsites and parking spaces by approximately 30%, it would generate less average daily traffic compared to the proposed Plan. Tables 8-23 and 8-24 present estimated weekday and weekend trips resulting from operation of the Plan site under the 2002 LCP Alternative. Trips were estimated based on the same generation rate used for campsites and day-use areas (parking spaces) during weekdays and weekends, as with the proposed Plan under the Ramirez Canyon Park Vacant Residential Baseline scenario.

Table 8-23
2002 LCP Alternative Weekday Plan Trip Generation

Land Use	Size	ADT	
		Rate	Trips
Ramirez Canyon Park – Kanan Dume Road			
Day-Use Area	17 paved spaces	3.6	61
Ramirez Canyon Park			
Baseline Traffic	N/A	N/A	0
Future Traffic	N/A	N/A	80
Net Traffic Increase	N/A	N/A	80
		Subtotal	**141**
Escondido Canyon Park			
Campsites	4 campsites	2.0	8
Day-Use Area	12 paved spaces	3.6	43
		Subtotal	**51**
Latigo Trailhead			
Campsites	0 campsites	2.0	0
Day-Use Area	2 paved spaces	3.6	7
		Subtotal	**7**
Corral Canyon Park			
Campsites	11 campsites	2.0	22
Day-Use Area	10 paved spaces	3.6	36
		Subtotal	**58**
Malibu Bluffs			
Campsites	33 campsites	2.0	66
Day-Use Area	0 paved spaces	3.6	00

Table 8-23
2002 LCP Alternative Weekday Plan Trip Generation

Land Use	Size	ADT	
		Rate	Trips
		Subtotal	**66**
		TOTAL	**323**

Table 8-24
2002 LCP Alternative Weekend Plan Trip Generation

Land Use	Size	ADT	
		Rate	Trips
Ramirez Canyon Park – Kanan Dume Road			
Day-Use Area	17 paved spaces	5.3	90
Ramirez Canyon Park			
Baseline Traffic	N/A	N/A	0
Future Traffic	N/A	N/A	80
Net Traffic Increase	N/A	N/A	80
		Subtotal	**170**
Escondido Canyon Park			
Campsites	4 campsites	2.0	8
Day-Use Area	12 paved spaces	5.3	64
		Subtotal	**72**
Latigo Trailhead			
Campsites	0 campsites	2.0	0
Day-Use Area	2 paved spaces	5.3	11
		Subtotal	**11**
Corral Canyon Park			
Campsites	11 campsites	2.0	22
Day-Use Area	10 paved spaces	5.3	53
		Subtotal	**75**
Malibu Bluffs			
Campsites	33 campsites	2.0	66
Day-Use Area	0 paved spaces	5.3	00
		Subtotal	**66**
		TOTAL	**394**

The 2002 LCP Alternative would result in 44 fewer weekday trips and 110 fewer weekend day trips compared to the proposed Plan. As the Alternative would contribute less vehicle traffic on surrounding roadways than the proposed Plan it would not increase the V/C ratios at the key study-area intersections by 1% or 2% during the weekday peak hour period, and thus would not generate significant Plan-specific or cumulative impacts based on the thresholds adopted by the City of Malibu and the County of Los Angeles. Potential impacts to intersection operation during weekdays would be *less than significant (Class III)*.

The 2002 LCP Alternative would provide a total of 32 (existing + proposed) parking spaces at Corral Canyon Park. Incorporation of Mitigation Measures TP-3, requiring preparation and implementation of a Corral Canyon Park Parking Management Plan, would reduce any potential parking impacts associated with development at Corral Canyon Park *to less than significant (Class II)*.

Parking impacts associated with the 2002 LCP Alternative would be equivalent to impacts anticipated under the proposed Plan and would be similarly reduced to less than significant with mitigation. ***As the Alternative would involve a decrease in weekday and weekend travel trips by 14 percent and 22 percent, respectively, it would result in a lesser degree of impact compared to the proposed Plan.***

Utilities/Service Systems

The Reduced Project would reduce the number of the proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity. This would result in reduced energy and water use, as well as a reduction in solid waste generation from fewer people visiting the parks. Storm water drainage would be reduced from a decrease in impervious services associated with fewer parking spaces, and wastewater generation would be less due to fewer people expected at the parks. Impacts would be considered *less than significant (Class II)*. ***Therefore, impacts on utilities and service systems would remain similar to the proposed Plan; however at a reduced level.***

Alternative 3: Redesign Project

Aesthetic/Visual Resources

The *Redesign Project Alternative* would similarly reduce the number of proposed camping, parking, and restroom facilities, thereby lowering the potential impacts on visual resources. The reduction in proposed camping sites, parking spaces, and restroom facilities would result in less grading and altering of the natural environment. Figures 8.1.2-1 thru 8.1.2-11 provide visual simulations of the Redesign Alternative. Potential impacts on visual resources would be reduced through a reduction in new recreation and support facilities located at several of the parks. The proposed secondary access road on the Lauber property could result in potentially significant impacts on visual resources. Although the secondary access road from Ramirez Canyon Park and Kanan Dume Road would be visible from certain viewpoints in the Plan area, all park and recreation improvements, including the secondary access road developed under the Redesign Project Alternative would be guided by the Public Works Plan that would provide for critical planning, design, and siting of the park improvements to minimize potential visual impacts from public viewpoints. Consequently, the overall impact level of the Redesign Project Alternative on visual resources would be considered *Class II* (similar to the proposed Plan), although to a somewhat lesser degree due to the overall reduction in park and recreation improvements. ***Therefore, impacts on Aesthetics/Visual Resources would be slightly reduced in comparison to the proposed Plan.***

Agricultural Resources

Under the Redesign Alternative, approximately 80% of the improvements under the proposed Plan would be implemented. There are no agricultural uses on any park lands or within the vicinity, therefore no improvements would occur on or adjacent to any agriculturally productive lands, prime soils, farmland of local or statewide importance or unique farmland. A portion of one of the proposed mitigation sites for the proposed project, the King Gillette Ranch site does contain soils categorized as Prime under the DOC's FMMP. However, because there would be reduced impacts to biological resources under the Redesign Alternative, and in turn, a reduction in the required mitigation acreage, habitat restoration would at KGR would be reduced, but would still be required to be implemented at this site for riparian habitat mitigation. Impacts to Agricultural Resources under the Redesign Alternative would be *less than significant (Class III).* ***The Redesign Alternative would have a reduced impact on Agricultural Resources in comparison to the proposed Plan.***

Air Quality

In regards to potential construction emissions, the Redesign Alternative would include improvements similar to the proposed Plan, but not as extensive as it would develop fewer campsite and parking spaces; as such construction emissions generated by this Alternative would be reduced relative to the proposed Plan. It is reasonable to assume that although this Alternative would result in reduced construction emissions in comparison to the proposed Plan, the maximum-worst case scenario that assumes concurrent construction activity at all park sites would result in emissions that would potentially exceed SCAQMD thresholds. Mitigation measure AQ-1a that prohibits simultaneous construction of Park improvements would be required. Incorporation of mitigation measures identified in AQ-1b and AQ-1c that address exhaust emissions and fugitive dust generated during earthmoving activities and equipment operation would also be required. Mitigation measure AQ-2 developed to reduce potential impacts to sensitive receptors in the immediate vicinity of the project as a result of construction activities would be required (SCAQMD 2008). This mitigation would ensure that emissions of PM_{10} and $PM_{2.5}$ would not exceed thresholds established for a construction activity area of 1 acre or less located within 25 meters of a sensitive receptor. Impacts would be *potentially significant, but mitigable (Class II)*.

Given that the Redesign Alternative would reduce the total amount of campsites (from 54 to 49) and parking spaces (from 134 to 106) developed, resulting in a reduction in associated vehicular trips generated, operational air quality emission impacts generated by the Redesign Alternative would similarly be reduced relative to the proposed Plan. Table 8-25 presents the estimated emissions associated with operation of the Plan site under the Redesign Alternative. Maximum daily operational emissions are based on estimated Alternative-generated ADT for the Plan site, which would be 358 trips during the weekdays and 442 trips during the weekend days (based on trip generation rates provide by ATE 2010). For the purposes of this analysis, the Ramirez Canyon Park Vacant Residential Scenario, which assumes no existing trips at Ramirez Canyon Park, is utilized to represent the maximum daily emissions. See Section 5.3 for a description of the Ramirez Canyon Park baseline scenario.

Table 8-25
Redesign Alternative
Estimated Maximum Plan Site Operational Emissions (*lbs/day*)*

	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Weekday						
Summer	11.09	18.09	158.86	0.18	29.47	5.71
Winter	14.10	21.89	147.09	0.15	29.47	5.71
Weekend						
Summer	13.12	21.63	189.88	0.22	35.22	6.83
Winter	16.80	26.17	175.87	0.18	35.22	6.83
Maximum Daily Scenario						
Max	**16.80**	**26.17**	**189.88**	**0.22**	**35.22**	**6.83**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Source: URBEMIS 2007 version 9.2.4. See Appendix E for calculations.
*Under the Ramirez Canyon Vacant Residential Baseline scenario, which assumes no existing traffic at Ramirez Canyon Park; instead, future traffic for Ramirez Canyon Park is based on total allowable trips (80 total ADT).

As indicated in Table 8-25, the Redesign Alternative would not exceed significant thresholds established by the SCAQMD. In comparison to the proposed Plan estimated operational emissions, this Alternative would result in a decrease in emissions for each criteria pollutant analyzed above. Impacts would be *less than significant*.

Impacts to air quality generated by implementation of the Redesign Alternative would be *less than significant with the incorporation of mitigation measures (Class II)*. ***Due to the reduction in total development, the Redesign Alternative would have a reduced impact on air quality in comparison to the proposed Plan.***

Biological Resources

Proposed improvements under the Redesign Alternative would be quite similar to the proposed project, with slight reductions in campsites and trails. The series of 8.2-2 Figures depict the biological resource impacts anticipated under the Redesign Alternative, and the sections below detail impacts per park.

Ramirez Canyon Park. Table 8-26 below identifies impact on vegetation communities under the Redesign Alternative. Proposed improvements associated with park and recreational support facilities at Ramirez under the Redesign Alternative would decrease impacted acreage by 1.74 acre through deletion of two campsites and two parking pockets, in addition to selected trails, including 0.11 acres of California sagebrush scrub, 0.71 disturbed California sagebrush scrub and 0.15 acres of chaparral, all of which are ESHA (Table 8-27). A total of 51 native trees would be impacted, which represents an increase in direct impacts by 4 trees as compared to the proposed project (Table 8-28).

In relation to road widening, a 0.01 acre increase in direct impacts to vegetation communities in comparison to the proposed project would result, however, no sensitive upland scrub and chaparral communities would be impacted and impacts to special-status plants would remain the same as the proposed project. A total of 36 native trees would be impacted by the proposed roadway improvements, representing an increase in direct impacts by 2 trees as compared to the proposed project.

There would be no change in impacts under the Redesign Alternative in comparison to the proposed project's creek restoration. No sensitive upland scrub and chaparral communities will be impacted by the proposed creek restoration under this alternative. A total of 20 trees would be impacted by the proposed creek restoration including 9 coast live oaks, 9 California sycamores, and 2 alders, which represents an increase in direct impacts by 6 trees as compared to the proposed project.

Table 8-26 Ramirez Canyon Park
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Vegetation Community	*Permanent, Direct Impacts (acres)*			
	Park and Recreation Support Facilities	Road Widening/ Improvements	Creek Restoration	*TOTAL*
Developed	1.68	0.10	0.20	*1.98*
Ornamental	0.08	0.03	0.03	*0.14*
Ruderal	0.05	0	0	*0.05*
Disturbed Lands	0.13	0.01	0	*0.14*
Geraldton Carnation Weed	0	0	0	*0*
California Sagebrush Scrub	0.25	0	0	*0.25*

Table 8-26 Ramirez Canyon Park
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Vegetation Community	*Permanent, Direct Impacts (acres)*			
	Park and Recreation Support Facilities	Road Widening/ Improvements	Creek Restoration	*TOTAL*
Disturbed California Sagebrush Scrub	0.04	0	0	*0.04*
Chaparral	0.07	0	0	*0.07*
Native Grassland	0	0	0	*0*
California Annual Grassland	0.87	0	0	*0.87*
Poison Oak Scrub	0	0	0	*0*
Coast Live Oak	0	0.01	0	*0.01*
Coast Live Oak/Toyon-Poison Oak	0	0	0	*0*
California Sycamore-Coast Live Oak	0.08	0.02	0.07	*0.17*
Southern Willow Scrub/Red Willow-Arroyo Willow	0	0	0	*0*
Eucalyptus	0	0	0	*0*
TOTAL	**3.25**	**0.17**	**0.30**	**3.72**

Table 8-27 Comparison of Reduced Impacts to ESHA under the Redesign Alternative

Vegetation Community	Permanent, Direct Impacts; proposed Plan (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	*Reduction in Impacts*
California sagebrush scrub	0.36	0.25	*0.11*
Disturbed California Sagebrush Scrub	0.75	0.04	*0.71*
Chaparral	0.22	0.07	*0.15*
Total	**1.33**	**0.36**	**0.97**

Table 8-28
Summary of Direct Impacts to Native Trees

Project Area	*Native Tree Species*				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
Ramirez Canyon Park					
Park and Recreation Support Facilities Impacts	19	4	22	6	*0*
Creek Restoration Impacts	9	0	9	2	*0*
Ramirez Canyon Road Improvements					
Facilities Impacts	21	2	13	0	0

In summary, direct impacts to vegetation communities would be reduced by 1.73 acres, however, there would be a direct increase in impacts to native trees by 14 trees.

Lauber Property/West Ramirez Canyon Site. Table 8-29 below identifies impact on vegetation communities under the Redesign Alternative. While not incorporated into the original proposed project, under the Redesign Project Alternative, the construction of trails, trail connectors, and a parking facility at the Lauber Property/West Ramirez Canyon site would result in direct impacts to vegetation communities totaling 2.78 acres, which is a 2.78 acres increase in impacts and would require mitigation. No trees would be directly impacted at the Lauber property/West Ramirez Canyon site, and impacts to special-status plants would remain the same as the proposed project. With the implementation of mitigation measures, impacts would be *less than significant* (Class II).

Table 8-29 Lauber Property/West Ramirez Canyon
Summary of Impacts to Vegetation Communities
Under the Redesign Alternative

Vegetation Community/Land Cover	*Permanent Impacts (acres)*	
	Trail	***Parking***
Ruderal	0	*0.22*
Developed	0	*0.26*

Table 8-29 Lauber Property/West Ramirez Canyon
Summary of Impacts to Vegetation Communities
Under the Redesign Alternative

Vegetation Community/Land Cover	*Permanent Impacts (acres)*	
	Trail	*Parking*
California Sagebrush Scrub	0.05	*1.48*
Disturbed California Sagebrush Scrub	0	*0.09*
Chaparral	0.01	*0*
California Annual Grassland	0	*0.62*
Coast Live Oak / Toyon – Poison Oak	0.03	*0*
Coast Live Oak	0	*0.02*
TOTAL	0.09	2.69

Via Acero Road Improvements. Improvements to Via Acero Road, resulting in direct impacts to 1.01 acres of vegetation communities/land covers, would not occur under the redesign scenario. Therefore, there would be a decrease in impacts by 1.01 acres from the proposed project, and no trees would be directly impacted at this location.

In summary, impacts to vegetation communities at Ramirez Canyon Park would be reduced by 2.74 acres as a result of the deletion of improvements to Via Acero and those associated with parking, camping and support structure, however, with the addition of 2.78 acres resulting from the Lauber Property/ West Ramirez Canyon component, 0.04 acres of vegetation would be impacted. Further, direct impacts to native trees would increase by 14 trees over the proposed project. Therefore, impacts under this alternative would be greater than under the proposed project. With the incorporation of all mitigation measures including habitat mitigation, all impacts would be *less than significant* (Class II). ***Impacts at Ramirez Canyon Park would be slightly greater to biological resources in comparison to the proposed project.***

Escondido Canyon Park. Table 8-30 below identifies impact on vegetation communities under the Redesign Alternative. As a result of a significant reduction in the number of campsites discussed under the proposed project, a 0.71 acre decrease in direct impacts to would result in comparison with the Redesign. This includes reductions in ESHA, specifically, including 0.10 acres of California sagebrush scrub, and 0.17 acres of coast live oak (Table 8-31). Impacts to special-status plants would remain

the same as the proposed project. In addition, 4 native trees would be directly impacted under this Alternative, which represents a reduction in direct impacts by 5 trees as compared to the proposed project.

Table 8-30 Escondido Canyon Park
Summary of Impacts to Vegetation Communities Under the Redesign Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Developed	*0.09*
Ornamental	*0.09*
Ruderal	*0*
Disturbed Lands	*0.21*
Geraldton Carnation Weed	*0*
California Sagebrush Scrub	*0.02*
Disturbed California Sagebrush Scrub	*0.75*
Chaparral	*0*
Native Grassland	*0*
California Annual Grassland	*0.37*
Poison Oak Scrub	*0*
Coast Live Oak	*0.05*
California Sycamore-Coast Live Oak	*0*
Southern Willow Scrub/Red Willow-Arroyo Willow	*0*
Eucalyptus	*0*
TOTAL	**1.58**

Table 8-31 Comparison of Reduced Impacts to ESHA under the 2002 LCP Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	*Reduction in Impacts*
California Sagebrush Scrub	0.12	0.02	*0.10*
Coast Live Oak	0.22	0.05	*0.17*
Total	**0.34**	**0.07**	**0.27**

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant* (Class II). ***As a result of the reduction in facilities and improvements, impacts at Escondido Canyon Park would be reduced in comparison to the proposed project.***

Latigo Trailhead. Table 8-32 below identifies impact on vegetation communities under the Redesign Alternative. Impacts under the Redesign Alternative represent a 0.77 acre decrease in direct impacts, including impacts to ESHA (Table 8-33), specifically a 0.05 acre reduction in California sagebrush scrub, 0.07 acres reduction in chaparral, a 0.28 acre reduction in California sycamore/coast live oak and a 0.001 acre reduction in Southern Willow Scrub/Red Willow-Arroyo Willow as compared to the proposed project due to deletion of 2 campsites. Impacts to special-status plants would remain the same as the proposed project. Five coast live oaks (Table 8-34) would be directly impacted, which represents a decrease of 10 trees in comparison to the proposed project.

Table 8-32 Latigo Trailhead
Summary of Impacts to Vegetation Communities
Under the Redesign Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Developed	*0.14*
Ornamental	*0.01*
Ruderal	*0*
Disturbed Lands	*0*

Table 8-32 Latigo Trailhead
Summary of Impacts to Vegetation Communities
Under the Redesign Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Geraldton Carnation Weed	*0*
California Sagebrush Scrub	*0.07*
Disturbed California Sagebrush Scrub	*0*
Chaparral	*0.03*
Native Grassland	*0*
California Annual Grassland	*0.06*
Poison Oak Scrub	*0*
Coast Live Oak	*0*
California Sycamore-Coast Live Oak	*0.10*
Southern Willow Scrub/Red Willow-Arroyo Willow	*0.005*
Eucalyptus	***0.08***
TOTAL	**0.50**

Table 8-33 Comparison of Reduced Impacts to ESHA under the Redesign Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	*Reduction in Impacts*
California Sagebrush Scrub	0.12	0.07	*0.05*
Chaparral	0.10	0.03	*0.07*
California Sycamore-Coast Live Oak	0.38	0.10	*0.28*
Southern Willow Scrub/Red Willow-Arroyo Willow	0.005	0.005	*0.001*
Total	**0.605**	**0.205**	**0.401**

Table 8-34 Latigo Trailhead
Summary of Direct Impacts to Native Trees

Project Area	*Native Tree Species*				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
Latigo Trailhead					
Park and Recreation Support Facilities Impacts	5	0	0	0	0

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant* (Class II). ***As a result of the reduction in facilities and improvements, impacts at Latigo Trailhead would be reduced in comparison to the proposed project.***

Corral Canyon Park. Table 8-35 below identifies impact on vegetation communities under the Redesign Alternative In comparison to the proposed project, a 0.70 acre decrease in direct impacts would result from reduction in campsites and shifting trails and deletion of a restroom, including 0.15 acres of California sagebrush scrub, 0.09 acres of disturbed California sagebrush scrub and 0.08 acres of coast live oak (Table 8-36). No riparian communities and/or wetlands will be directly impacted under this alternative, and impacts to special-status plants would remain the same as the proposed project area. One California sycamore would be directly impacted (Table 8-37), which represents a 10 tree decrease in comparison to the proposed project.

Table 8-35 Corral Canyon Park
Summary of Impacts to Vegetation Communities
under the Redesign Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Developed	*0.77*
Ornamental	*0.24*
Ruderal	*0*
Disturbed Lands	*0.11*

Geraldton Carnation Weed	*1.40*
California Sagebrush Scrub	*1.01*
Disturbed California Sagebrush Scrub	*0.65*
Chaparral	*0.02*
Native Grassland	*0*
California Annual Grassland	*0.51*
Poison Oak Scrub	*0*
Coast Live Oak	*0.04*
California Sycamore-Coast Live Oak	*0*
Southern Willow Scrub/Red Willow-Arroyo Willow	*0*
Eucalyptus	*0*
TOTAL	**4.75**

Table 8-36 Comparison of Reduced Impacts to ESHA under the Redesign Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	*Reduction in Impacts*
California sagebrush scrub	1.16	1.01	*0.15*
Disturbed California sagebrush scrub	0.74	0.65	*0.09*
Coast live oak	0.12	0.04	*0.08*
Total	**2.02**	**1.7**	**0.32**

Table 8-37 Corral Canyon
Summary of Impacts to Native Trees under the Redesign Alternative

Project Area	*Native Tree Species*				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
Corral Canyon Park					
Park and Recreation Support Facilities Impacts	0	0	1	0	0

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in facilities and improvements, impacts at Corral Canyon Park would be reduced in comparison to the proposed project.***

Malibu Bluffs. Table 8-38 below identifies impact on vegetation communities under the Redesign Alternative Proposed park and recreation support facilities at Malibu Bluffs property under the Redesign would result in a 0.46 acre decrease in direct impacts from the proposed project, including 0.28 acres of California sagebrush scrub and 0.01 acres of southern willow scrub/red-willow/arroyo willow which are ESHA (Table 8-39).

Table 8-38 Malibu Bluffs
Summary of Impacts to ESHA under the Redesign Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Developed	*0.44*
Ornamental	*0*
Ruderal	*0.21*
Disturbed Lands	*0.11*
Geraldton Carnation Weed	*0*
California Sagebrush Scrub	*0.03*
Disturbed California Sagebrush Scrub	*0*
Chaparral	*0.07*

Table 8-38 Malibu Bluffs
Summary of Impacts to ESHA under the Redesign Alternative

Vegetation Community Alliance	*Direct, Permanent Impacts Park and Recreation Support Facilities (acres)*
Native Grassland	*0*
California Annual Grassland	*6.02*
Poison Oak Scrub	*0*
Coast Live Oak	*0*
California Sycamore-Coast Live Oak	*0*
Southern Willow Scrub/Red Willow-Arroyo Willow	*0*
Eucalyptus	*0*
TOTAL	**6.88**

Table 8-39 Comparison of Reduced Impacts to ESHA
under the Redesign Alternative

Vegetation Community	Permanent, Direct Impacts; Proposed Project (acres)	Permanent, Direct Impacts; 2002 LCP Alternative	*Reduction in Impacts*
California sagebrush scrub	0.31	0.03	*0.28*
Southern Willow Scrub/Red Willow-Arroyo Willow	0.01	0	*0.01*
Total	**0.32**		**0.29**

Very minimal habitat restoration would be required and all other mitigation measures would still be implemented. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in improvements, impacts at Malibu Bluffs would be reduced in comparison to the proposed project.***

Primary Trail System. Table 8-40 below identifies impact on vegetation communities under the Redesign Alternative. In comparison to the proposed project, a 0.61 acre decrease in direct impacts to vegetation communities would result including ESHA and riparian habitat. Forty native trees would be directly impacted by construction of the trails and trail connectors including 38 coast live oaks and 2 California walnuts, and this represents a decrease in direct impacts by 1 tree as compared to the proposed project (Table 8-40).

Table 8-40 Primary Trail System
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
Kanan Dume to Ramirez Canyon Park	**Trail Segment 1a**	Ornamental	*0.04*
		California Sagebrush Scrub	*0.37*
		Chaparral	*0.32*
		Coast Live Oak/Toyon-Poison Oak	*0.13*
		California Sycamore–Coast Live Oak	*0.11*
		Subtotal	***0.97***
Ramirez Canyon Park to Murphy Way	**Trail Segment 2a3**	Developed	*0.01*
		Ornamental	*0.05*
		California Sagebrush Scrub	*0.99*
		Disturbed California Sagebrush Scrub	*0.10*
		Chaparral	*0.05*
		Subtotal	***1.20***
	Trail Segment 2a6	Developed	*0.01*
		California Annual Grassland	*0.16*
		California Sagebrush Scrub	*0.20*
		Disturbed California Sagebrush Scrub	*0.09*
		Subtotal	***0.46***
Escondido Canyon Park to Solstice Canyon Park	**Trail Segment 4**	California Sagebrush Scrub	*0.20*
		Poison Oak Scrub	*0.05*
		Coast Live Oak	*0.13*
		Coast Live Oak/Toyon-Poison Oak	*0.22*
		Subtotal	***0.60***
	Trail Segment 4b	California Sagebrush Scrub	*0.31*
		California Annual Grassland	*0.02*

Table 8-40 Primary Trail System
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
		Coast Live Oak	*0.01*
		Coast Live Oak/Toyon-Poison Oak	*0.01*
		Subtotal	***0.35***
Latigo Canyon Road	**Trail Segment 9**	Developed	*0.03*
		Ornamental	*0.01*
		California Sagebrush Scrub	*1.25*
		Chaparral	*0.02*
		Giant Wild Rye	*0.03*
		Coast Live Oak/Toyon-Poison Oak	*0.15*
		Subtotal	***1.49***
	Trail Segment 9a	California Sagebrush Scrub	*0.07*
	Subtotal		***0.07***
	Trail Segment 9b	Developed	*0.03*
		California sagebrush scrub	*0.07*
		Subtotal	***0.10***
	Trail LS	California Sagebrush Scrub	*0.05*
		Chaparral	*0.01*
		Coast Live Oak/Toyon-Poison Oak	*0.03*
		Subtotal	***0.09***
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 10b**	California Sagebrush Scrub	*0.31*
		Disturbed California Sagebrush Scrub	*0.21*
		Chaparral	*0.06*
		Disturbed Chaparral	*0.01*
		California Annual Grassland	*0.16*
		California Sycamore-Coast	*0.12*

Table 8-40 Primary Trail System
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
		Live Oak	
		Geraldton Carnation Weed	*0.02*
		Subtotal	***1.24***
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 11a**	Geraldton Carnation Weed	*0.02*
		California Sagebrush Scrub	*0.54*
		Disturbed California Sagebrush Scrub	*0.07*
		Native Grassland	*0.04*
		California Annual Grassland	*0.40*
		Poison Oak Scrub	*0.04*
		Coast Live Oak	*0.04*
		California Sycamore-Coast Live Oak	*0.02*
		California Walnut Woodland	*0.03*
		Subtotal	***1.20***
	Trail Segment 11c	Developed	*0.06*
		California Sagebrush Scrub	*0.21*
		Disturbed California Sagebrush Scrub	*0.07*
		California Annual Grassland	*0.22*
		Subtotal	***0.56***
	Trail Segment 11d	Developed	*0.01*
		Disturbed California Sagebrush Scrub	*0.27*
		California Annual Grassland	*0.06*
		Subtotal	***0.34***
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 12**	Developed	*0.01*
		California Sagebrush Scrub	*0.21*
		Chaparral	*0.58*
		Eucalyptus	*0.01*

Table 8-40 Primary Trail System
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
		Subtotal	***0.81***
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 13a**	California Sagebrush Scrub	*0.06*
		Chaparral	*0.18*
		California Annual Grassland	*0.03*
		Subtotal	***0.27***
	Trail Segment 13b	California Sagebrush Scrub	*0.07*
		Chaparral	*0.17*
		California Annual Grassland	*0.08*
		Subtotal	***0.32***
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 14**	California Sagebrush Scrub	*0.46*
		Disturbed California Sagebrush Scrub	*0.11*
		Chaparral	*0.39*
		Disturbed Chaparral	*0.76*
		California Annual Grassland	*0.66*
		Coast Live Oak	*0.24*
		California Sycamore-Coast Live Oak	*0.05*
		Subtotal	***2.67***
Corral Canyon Park (Beach to Backbone Trail)	**Trail Segment 15**	California Sagebrush Scrub	*0.31*
		Disturbed California Sagebrush Scrub	*0.86*
		Chaparral	*1.02*
		Disturbed Chaparral	*1.37*
		Poison Oak Scrub	*0.02*
		Coast Live Oak	*0.42*
		Disturbed Coast Live Oak	*0.08*
		Subtotal	***4.08***

Table 8-40 Primary Trail System
Summary of Impacts to Vegetation Communities under the Redesign Alternative

Primary Trail System	Alternative Trail Segments	Vegetation Community Alliance	*Trail Improvement Impacts (Acres)*
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 16**	Disturbed Lands	*0.03*
		California Annual Grassland	*0.17*
		Southern Willow Scrub	*0.01*
		Subtotal	***0.21***
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 17**	Disturbed Lands	*0.03*
		California Sagebrush Scrub	*0.24*
		California Annual Grassland	*0.01*
		Southern Willow Scrub	*0.05*
		Subtotal	***0.33***
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 18**	California Annual Grassland	*0.15*
		Subtotal	***0.15***
Conservancy-Owned Malibu Bluffs (Beach to Bluffs)	**Trail Segment 19**	California Sagebrush Scrub	*0.09*
		Subtota	***0.09***
Total Primary Trail System Improvement Impacts			**17.60**

Table 8-41 Trails
Summary of Direct Impacts to Native Trees

Project Area	***Native Tree Species***				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
Trail Segments					
1a – Kanan Dume to Ramirez Cyn. Park	0	0	0	0	*0*
2a3 - Ramirez Cyn. Park to Murphy Way	1	2	0	0	*0*

Table 8-41 Trails
Summary of Direct Impacts to Native Trees

Project Area	*Native Tree Species*				
	Coast live oak (*Quercus agrifolia*)	California walnut (*Juglans californica*)	California sycamore (*Platanus racemosa*)	Alder (*Alnus rhombifolia*)	*Toyon (Heteromeles arbutifolia)*
4 - Escondido Cyn. Park to Solstice Cyn. Park	28	0	0	0	*0*
11a - Corral Cyn. Park (Beach - Backbone Trail)	2	0	0	0	*0*
14 - Corral Cyn. Park (Beach - Backbone Trail)	7	0	0	0	*0*
TOTAL	**93**	**9**	**45**	**8**	**2**

Habitat restoration and all other mitigation measures would still be required. Impacts would be *less than significant (Class II)*. ***As a result of the reduction in trail improvements, impacts would be slightly reduced in comparison to the proposed project.***

Summary of Impacts Under the Redesign Alternative. Implementation of the Redesign Alternative would result in 36.68 acres of direct impacts to vegetation communities/land covers including 16.60 acres of sensitive scrub and chaparral communities, including disturbed forms; 10.61 acres of grass and herb dominated communities including 0.04 acre native grassland and 10.57 acres California annual grassland; 1.64 acres of broad leafed upland tree dominated habitat, including disturbed forms; 0.64 acre riparian and bottomland habitat; 0.09 acre eucalyptus; 0.03 acre giant wild rye; 0.11 acre poison oak scrub; and 6.96 acres developed/disturbed land covers. This represents an overall 2.81 acre decrease in direct impacts to vegetation communities/land covers from the proposed project (Table 8-42).

While impacts under the Redesign Alternative would be reduced in comparison to the project description, mitigation would still be required on a 3:1 ratio (3 acres for every 1 acre of impact) and tree protection and mitigation would be required to be adhered to under the LCP and Tree Protection Policies. Under the proposed project, 57.03 acres would be required in habitat restoration in comparison to 51.84 acres of habitat restoration under the Redesign Alternative. With the implementation of mitigation, impacts would be *less than significant (Class II)*. ***Because of the reduction in total improvements, the Redesign Alternative would have a reduced impact on biological resources in comparison to the proposed Plan.***

Table 8-42
Summary of Impacts to Vegetation Community/
Land Cover Per Alternative

Vegetation Communities	Proposed Project	Redesign Alternative
California Sagebrush Scrub	8.87	8.92
Disturbed California Sagebrush Scrub	3.32	3.31
Chaparral	3.71	3.0
Disturbed Chaparral	2.14	1.37
Native Grassland	0.04	0.04
California Annual Grassland	10.30	10.57
Giant Wild Rye	0.03	0.03
Coast Live Oak	1.20	0.96
Disturbed Coast Live Oak	0.08	0.08
Coast Live Oak/Toyon-Poison Oak	0.59	0.57
California Sycamore-Coast Live Oak	0.85	0.57
California Walnut Woodland	0.03	0.03
Southern Willow Scrub/Red Willow-Arroyo Willow	0.08	0.07
Eucalyptus	0.08	0.09
Poison Oak Scrub	0.11	0.11
Developed	4.75	3.83
Disturbed Lands	0.69	0.63
Ruderal	0.31	0.48
Ornamental	0.98	0.58
Geraldton Carnation Weed	1.33	1.44
TOTAL	**39.49**	**36.68**

Cultural Resources

The Redesigned Project Alternative would reduce the number of the proposed camping and parking facilities that would potentially impact unknown cultural resources within the proposed Plan site area. However, as the location of remaining camping and parking facilities would still occur within the vicinity of areas with the high archaeological

sensitivity in Corral Canyon Park and the Malibu Bluffs, impacts would still be *less than significant (Class II).* ***The Redesigned Project Alternative would have the same impacts on cultural resources relative to the proposed Plan.***

Fire Hazards

The Redesigned Project Alternative would reduce the number of proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity, resulting in fewer people potentially being exposed to risks from wildfire hazards. Impacts from wildfire hazards would remain *less than significant (Class III)* under the Redesign Project Alternative; however, the level of the impact would be reduced slightly from the proposed Plan due to an overall reduction in park and recreation improvements, resulting in an anticipated decrease in park visitation. ***Therefore, impacts from wildfire hazards would be slightly reduced in comparison to the proposed Plan.***

Geology, Soils, and Seismic Hazards

The Redesign Alternative Project would reduce the number of the proposed camping and parking facilities, thereby lowering the potential for conflicts of proposed improvements with the location of geologic hazards. In particular, proposed development of the Latigo Canyon Trailhead property under the Redesign Alternative Project would avoid the landslide area on this property. In Escondido Canyon Park, no proposed improvements would be sited over or near the Malibu Coast Fault tract. The location of camping and parking facilities under the Redesign Alternative Project for the remainder of the Parks within the Plan would still need to take into account the presence of geologic hazards. Therefore, as with the proposed Plan, all of the identified mitigation measures would be appropriate under the Redesign Alternative Project; however, such mitigations would be capable of reducing all potential impacts to *less than significant levels (Class II).* ***Consequently, the overall impact level of the Redesign Alternative Project from geologic hazards would be considered less than the proposed Plan.***

Global Climate Change

The Redesign Alternative air emissions contributing to global climate change would be directly reduced relative to decreased vehicular trips associated with fewer campsites and parking spaces, as described under the Air Quality alternative analysis. Table 8-43

presents estimated operational GHG emissions generated under implementation of the Redesign Alternative.

Table 8-43
Redesign Alternative Estimated Operational GHG Emissions

CO_2 lbs/year	CO_2E MTons/year
6,343,612	3,029

Source: URBEMIS 2007. See Appendix E for complete results.
Lbs/year = pounds per year; Mtons/year = metric tons per year
1 metric ton = 2,204.623 lbs

While all sources of GHG emissions contribute to some extent to global climate change, similar to the proposed Plan, the Redesign Alternative would not likely impede or conflict with the State's ability to achieve the goals of AB 32 for the reasons discussed within Section 5.8, *Global Climate Change*. Therefore, the Redesign Alternative would not result in a cumulatively considerable contribution to global climate change; associated impacts would be *less than significant (Class III)*. This Alternative would result in a reduction of approximately 691 CO_2E MTons/year compared to the proposed Plan. ***As such, the Redesign Alternative contributions to global climate change would be 19 percent less than the Proposed Plan.***

Hazardous Materials

Other than the Latigo Canyon Trailhead property, the potential for hazardous materials contamination to affect MRCA park properties in the Plan was found to be very low. For these parks, a reduction in the number of parking spaces and camp sites would not decrease the already very low potential for exposure of park visitors to environmental contamination from hazardous materials. The Latigo Canyon Trailhead includes evidence of debris piles, which could potentially contain contamination. Under the Redesign Alternative Project, the Latigo Canyon property would still be developed with some camp sites, parking spaces, and restroom, which would require grading and disturbance of the debris piles. Impacts would be *potentially significant, but mitigable (Class II)*. Therefore, the Redesign Alternative Project would not result in a substantial difference in the potential for park users to be exposed to environmental contamination; in addition, all of the required mitigation measures for the proposed Plan would continue to be applicable to the Redesign Alternative Project. ***Consequently, the Reduced Project is considered have equivalent hazardous materials impacts to the proposed Plan.***

Hydrology, Drainage, and Water Quality

No significant impacts were identified under the proposed project; all impacts would be less than significant with mitigation (Class II). Under the Redesign Alternative, improvements would generally be reduced by 20% and therefore the reduction in impacts would be commensurate due to the low-impact nature of improvements proposed. Reduction in the overall construction would reduce short-term construction related impacts such as potential sedimentation plan area wide, however, would still require mitigation. The decrease in the number of campsites, trails and pedestrian crossings would also decrease potential impacts to water quality associated with restrooms, campers and pet/horse waste; nonetheless, mitigation would still be required. Finally, impervious surfaces associated with parking, water tank placement and fire sheds would decrease, however, mitigation by means of bio-filters and direction of flow to vegetated areas would still be required. Therefore, under the Redesign Alternative impacts to hydrology, drainage and water quality would be *less than significant (Class II).* ***The Redesign Alternative would result in a decreased impact to hydrology, drainage and water quality.***

Land Use and Planning

The Redesign Project Alternative would reduce the number of proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity at each park area. Under this alternative, although policy inconsistencies associated with locating new non-restoration improvements on a potential landslide area would be resolved, policy inconsistencies relative to non-restoration improvements to ESHA would remain; the level of inconsistency/ impacts to ESHA would, however, be substantially reduced compared to the proposed project. As a result, impacts would be considered *significant and unavoidable (Class I).* ***Therefore, the potential for land use policy inconsistencies would be reduced in comparison to the proposed Plan.***

Noise

The Redesign Alternative Project would reduce the number of the proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity; at the same time, the policies and implementing strategies of the proposed Plan which address the control or management of activities to minimize associated noise generation would be a part of the Redesign Alternative Project. Consequently, given the relative the reduction in noise generation potential associated with a lower Park capacity represented by the Redesign Alternative

Project, coupled with the Plan policies which provide controls governing those activities, noise impacts would be marginally lower. Impacts would be *potentially significant, but mitigable (Class II).* All of the mitigation measures required for the proposed Plan would continue to be applicable to the Redesign Alternative Project. ***As a result, the Reduced Project would still be considered to have Class II impacts, although marginally lower when compared to the proposed project.***

Public Services

Similar to the proposed Plan, the Redesign Project Alternative would not result in an increase in demand for fire or police protection services; however, with a reduction in camp sites and parking spaces, park visitation under the Redesign Project Alternative would likely be reduced, resulting in a corresponding decrease in the number of service calls. Impacts would remain *less than significant (Class II).* ***Therefore, impacts on public services would be slightly reduced in comparison to the proposed Plan.***

Recreation

Under the Redesign Project Alternative, many and much needed park and recreational facilities, particularly accessible camp, trail and day-use areas would not be developed. However, the Redesign Project Alternative would provide a reduced amount of much needed park and recreational improvements that would help alleviate the existing deficit in recreational facilities in the immediate and surrounding areas available to meet the recreational needs of the local and regional populace. As a result, impacts would be considered *less than significant (Class III).* ***Therefore, impacts on recreation would remain similar to the proposed Plan; however, the level of significance would be increased.***

Transportation and Parking

Given that the Redesign Alternative would reduce both campsites and parking spaces by approximately 22% it would generate less average daily traffic compared to the proposed Plan. Tables 8-44 and 8-45 present estimated weekday and weekend trips resulting from operation of the Plan site under the Redesign Alternative. Trips were estimated based on the same generation rate used for campsites and day-use areas (parking spaces) during weekdays and weekends, as with the proposed Plan under the Ramirez Canyon Park Vacant Residential Baseline scenario.

Table 8-44
Redesign Alternative Weekday Plan Trip Generation

Land Use	Size	ADT	
		Rate	Trips
Ramirez Canyon Park – Kanan Dume Road			
Day-Use Area	27 paved spaces	3.6	97
Ramirez Canyon Park			
Baseline Traffic	N/A	N/A	0
Future Traffic	N/A	N/A	80
Net Traffic Increase	N/A	N/A	80
		Subtotal	**177**
Escondido Canyon Park			
Campsites	4 campsites	2.0	8
Day-Use Area	12 paved spaces	3.6	43
		Subtotal	**51**
Latigo Trailhead			
Campsites	3 campsites	2.0	6
Day-Use Area	0 paved spaces	3.6	0
		Subtotal	**6**
Corral Canyon Park			
Campsites	11 campsites	2.0	22
Day-Use Area	10 paved spaces	3.6	36
		Subtotal	**58**
Malibu Bluffs			
Campsites	33 campsites	2.0	66
Day-Use Area	0 paved spaces	3.6	00
		Subtotal	**66**
		TOTAL	**358**

Table 8-45
Redesign Alternative Weekend Plan Trip Generation

Land Use	Size	ADT	
		Rate	Trips
Ramirez Canyon Park – Kanan Dume Road			
Day-Use Area	27 paved spaces	5.3	143
Ramirez Canyon Park			
Baseline Traffic	N/A	N/A	0
Future Traffic	N/A	N/A	80
Net Traffic Increase	N/A	N/A	80
		Subtotal	**223**
Escondido Canyon Park			
Campsites	4 campsites	2.0	8
Day-Use Area	12 paved spaces	5.3	64
		Subtotal	**72**
Latigo Trailhead			
Campsites	3 campsites	2.0	6
Day-Use Area	0 paved spaces	5.3	0
		Subtotal	**6**
Corral Canyon Park			
Campsites	11 campsites	2.0	22
Day-Use Area	10 paved spaces	5.3	53
		Subtotal	**75**
Malibu Bluffs			
Campsites	33 campsites	2.0	66
Day-Use Area	0 paved spaces	5.3	00
		Subtotal	**66**
		TOTAL	**442**

The Redesign Alternative would result in 9 fewer weekday trips and 62 fewer weekend day trips compared to the proposed Plan. As the Alternative would contribute less vehicle traffic on surrounding roadways than the proposed Plan it would not increase the V/C ratios at the key study-area intersections by 1% or 2% during the weekday peak

hour period, and thus would not generate significant Plan-specific or cumulative impacts based on the thresholds adopted by the City of Malibu and the County of Los Angeles. Potential impacts to intersection operation during weekdays would be *less than significant (Class III).*

The 2002 LCP Alternative would provide a total of 32 (existing + proposed) parking spaces at Corral Canyon Park. Incorporation of Mitigation Measures TP-3, requiring preparation and implementation of a Corral Canyon Park Parking Management Plan, would reduce any potential parking impacts associated with development at Corral Canyon Park *to less than significant (Class II).*

Parking impacts associated with the Redesign Alternative would be similar to impacts anticipated under the proposed Plan and would be similarly reduced to less than significant with mitigation. ***As the Alternative would involve a decrease in weekday and weekend travel trips by 2 percent and 12 percent, respectively, it would result in a lesser degree of impact compared to the proposed Plan.***

Utilities/Service Systems

The Redesign Project Alternative would reduce the number of the proposed camping sites and parking spaces, as compared to the proposed Plan, which would tend to decrease the intensity level of park activity. This would result in reduced energy and water use, as well as a reduction in solid waste generation from fewer people visiting the parks. Storm water drainage would be reduced from a decrease in impervious services associated with fewer parking spaces, and wastewater generation would be less due to fewer people expected at the parks. Impacts would be considered *less than significant (Class II).* ***Therefore, impacts on utilities and service systems would remain similar to the proposed Plan; however at a reduced level.***

Table 8-46: Proposed Plan and Alternatives Environmental Impact Comparison

Environmental Resource	*Proposed Plan*	*No Project Alternative*	*2002 LCP Alternative*	*Redesign Alternative*
Aesthetics/ Visual Resources	Class II	III: Decreased	II: Decreased	II: Decreased
Agricultural Resources	Class III	III: Decreased	III: Decreased	III: Decreased
Air Quality	Class II	III: Decreased	II: Decreased	II: Decreased
Biological Resources	Class II	II: Decreased	II: Decreased	II: Decreased
Cultural Resources	Class II	III: Decreased	II: Equivalent	II: Equivalent
Fire Hazards	Class III	II: Increased	III: Decreased	III: Decreased
Geology, Soils, and Seismic Hazards	Class I	III: Decreased	I: Decreased	I: Decreased
Global Climate Change	Class III	III: Decreased	III: Decreased	III: Decreased
Hazardous Materials	Class II	III: Decreased	II: Equivalent	II: Equivalent
Hydrology, Drainage, and Water Quality	Class II	III: Decreased	II: Decreased	II: Decreased
Land Use and Planning	Class I	III: Decreased	I: Decreased	I: Decreased
Noise	Class II	III: Increased	II: Equivalent	III: Decreased
Public Services	Class III	III: Decreased	II: Decreased	II: Decreased
Recreation	Class II	II: Increased	II: Increased	II: Increased
Transportation & Parking	Class II	III: Decreased	II: Decreased	II: Decreased
Utilities/Service Systems	Class II	III: Decreased	II: Decreased	II: Decreased

8.3 Discussion of Environmentally Superior Alternative

Implementation of the 2002 LCP Reduced Plan Alternative or the Redesign Alternative would result in a Plan which substantially meets the Plan/ Project objectives. Each of these alternatives, while equal in many respects, has tradeoffs related to the amount and quality of recreational resources. The No Project Alternative, on the other hand, did not substantially meet any of the project's objectives. The No Project Alternative should, therefore, be ruled out.

The 2002 LCP Reduced Project Alternative would provide for approximately 70% of the proposed Plan's park and recreational facility improvements. This Alternative was designed to meet most of the Plans' objectives to enhance public access and accessibility. This reduction would minimize potential impacts on land use, noise, transportation/circulation, and biological resources relative to the proposed Plan. The provision of park and recreational opportunities and a camping component would satisfy some of the goals of the proposed Plan, but it would fall short in providing adequate facilities to meet current and growing demands for park and recreational facilities, particularly accessible facilities. All potentially significant impacts associated with the Reduced Project Alternative would be reduced to less-than-significant levels, short of Land Use & Planning's Class I impact related to inconsistency with Coastal Act and LCP policies for impacts to ESHA for non-restoration activities. This impact, however, has been reduced substantially when compared to both the Proposed Plan and the Redesign Alternative. Although this alternative would attain many of the Plan's goals, including the development of accessible trails and overnight campsites and the creation of a long-term management plan for the five parks, it would fall short in providing adequate facilities to meet not only current, but future demand.

Similar to 2002 LCP Reduced Project Alternative, the Redesign Alternative would develop approximately 80% of the total proposed Plan's park and recreational improvements. This Alternative would be capable of providing much needed camping facilities and ADA accessible areas. All potentially significant impacts associated with the Reduced Project Alternative would be reduced to less-than-significant levels, short of Land Use & Planning's Class I impact related to inconsistency with Coastal Act and LCP policies for impacts to ESHA for non-restoration activities. This impact, however, has been reduced substantially when compared to both the Proposed Plan and the Redesign Alternative. The provision of park and recreational opportunities and a camping component would satisfy some of the goals of the proposed Plan, but it would fall short in providing adequate facilities to meet current and growing demands for park and recreational facilities, particularly accessible facilities, when compared to the Proposed

Plan, but would provide greater recreational amenities than the 2002 LCP Reduced Plan Alternative.

Section 15126.6 (e)(2) of the State CEQA Guidelines requires that an environmentally superior alternative be identified among the selected alternatives (excluding the No Project alternative). This analysis finds that the 2002 LCP Alternative is environmentally superior to the Redesign alternative as it would reduce potential impacts to Land Use & Planning (Class I), which would be similar to the Redesign Alternative, but would also further reduce impacts to other impact issue areas, with biological resources being a primary consideration. Furthermore, although the Reduced Project Alternative would not provide as many camping and recreational amenities as that of either the Proposed Plan or the Redesign Alternative, it would achieve most of the goals and objectives of the proposed Plan. ***Based upon the discussion above, the 2002 LCP Reduced Plan Alternative should be considered the environmentally superior alternative.***