6. Alternatives Analysis

6.1 Introduction

CEQA has long recognized that a rigorous evaluation of Project alternatives is key to ascertaining whether major environmental impacts brought about by a proposed Project can be avoided or significantly lessened. CEQA and its associated case law require that alternatives be evaluated that are capable of feasibly attaining most of the basic Project objectives and offering substantial environmental advantages over the Project proposed. CEQA does not require that an agency speculate unnecessarily or re-evaluate previously analyzed alternatives where no new significant information – i.e., in an earlier CEQA document – shows that such alternatives will now be feasible. Additionally, CEQA does not require that the agency evaluate ostensibly infeasible alternatives, or address alternatives that are independent of the goal of reducing environmental impacts.

Therefore, an adequate alternatives analysis is focused on avoiding or substantially lessening the significant environmental impacts brought on by the Project as proposed in the context of previous environmental and policy evaluations. CEQA is not intended to be used as a means of studying alternative dispositions of a project independent of the environmental impacts that attend it. In other words, CEQA does not require the EIR to address alternatives that are unrelated to the reduction of impacts.

The Project site is designated as Regional Commercial in the City of San Clemente General Plan and MHC SP-RC 1 in the Marblehead Specific Plan, which provides regulatory guidance for the development of the Marblehead community of which the Project site is a part. RC1 designates Regional Serving Commercial including general retail commercial, factory outlet stores, restaurants, offices, financial institutions, lodging and similar regional serving uses. The Project is within the Marblehead Specific Plan area subject to the Marblehead Coastal Development Agreement and is consistent with the General Plan and Specific Plan land use designations. The proposed Project includes additional signs that were not analyzed as part of the Marblehead EIR. Analysis herein is based, in part, on the zoning code regulations in effect at the time the Development Agreement was approved.

- To allow an appropriate context for evaluating alternatives, CEQA requires that the Lead Agency enumerate the basic Project objectives. This disclosure assists in developing the range of Project alternatives to be investigated in this section, as well as providing a rationale for the adoption of a Statement of Overriding Considerations, if one is adopted. Listed below are the main goals and objectives
Alternatives Analysis

6.2 – Feasibility

as stated in Section 6.2, Certification of the Final Supplemental Environmental Impact Report

- Approval of Amendment to Discretionary Sign Permit 05-176 for Master Sign Program for freeway oriented signs
- Approval of Sign Exception Permit 15-428 to allow freeway-oriented signs, signs in excess of the City Sign Ordinance standard of 64 square feet in area, and sign areas in excess of the City Sign Ordinance standard of 1 square foot per 1 lineal foot of building frontage

Project Objectives (page 55).

- Comply with the Court-mandated environmental review of proposed signage
- Provide adequate signage for Project identification
- Ensure signage is consistent with California Department of Transportation criteria related to the I-5 Freeway
- Provide a wayfinding means to ensure safe egress from the I-5 Freeway and adequate path-finding information for vehicular access to the Project
- Provide consistency with the Development Agreement in terms of compliance with appropriate sign ordinances and regulations while identifying exceptions through approval of a sign program

Although CEQA calls for the evaluation of alternatives that could feasibly attain most of the basic purposes of the Project, the central goal of the EIR alternatives analysis is to reduce or eliminate environmental effects of the proposed Project that have been identified in the analytical portions of the EIR (CEQA Guidelines §15126.6), not to evaluate Project alternatives that are not capable of reducing impacts, or that merely are variations on a theme.

It is the intent of this section to describe, or reference the description of, reasonable and feasible alternatives to the proposed Project that could attain most of the basic Project objectives and avoid or substantially lessen any significant effects of the Project. Due to the very limited scope of the Project analyzed herein, Alternatives are analyzed based on the environmental topics discussed in this SEIR. All remaining environmental topics per the CEQA Guidelines checklist have been analyzed and mitigated in the original Marblehead EIR and no additional analysis is required because there is no possibility that the proposed Project will have impacts in those areas.

6.2 Feasibility

Section 15126.6(f)(1) of the CEQA Guidelines explains how feasibility is to be considered for alternatives capable of otherwise resolving environmental impacts resulting from the Project as proposed. This section states that among the factors that may be taken into account in determining feasibility are:

- Site suitability
- Economic viability
Alternatives Considered But Not Advanced

CEQA does not require that the discussion of alternatives be exhaustive, or demand evaluation of alternatives that are not realistically possible, given the failure to meet the basic Project objectives and limitation of time, energy, and funds. The SEIR does not consider alternatives that are infeasible, and the alternative discussed in this section was rejected for the following reasons:

- The project alternative is considered infeasible due to failure to carry out the basic goals and objectives of the proposed Project.
- The project alternative would not avoid or substantially lessen significant effects of the Project.

The following Project alternatives were considered but not advanced for future review. The alternative fails to carry out the goals and objectives of the proposed Project.

- **Alternative Sign Locations** – The Project site is consistent with the City’s General Plan and the Marblehead Specific Plan for development of a regional shopping center. Due to the location of the outlet center, directly adjacent to the I-5 Freeway, signage must be placed where it is fully visible to motorists seeking to access the shopping center. Loss of customers due to lack of or inadequate signage does not fulfill the intent of establishing a fully operational and successful regional shopping center. If the signs were placed at ground level or on smaller monuments, they would not be visible to passing motorists on the freeway. The signage locations depicted in the proposed sign plan provide the most effective display of informational and wayfinding devices to accomplish the Project goals. Therefore, the alternative sign location alternative is not considered feasible because there are no alternative locations for signage along the I-5 Freeway that will adequately identify the outlet center and its tenants.

- **Design Review Subcommittee Alternative** – This Alternative would revise the sign program to strictly comply with recommendations presented by the Design Review Committee (DRSC) on August 24, 2016 during their review of the Sign Exception Permit (05-176). The DRSC recommended revisions including a reduced metallic color palette, and elimination or size reduction of signs that were viewed as incompatible with building architecture. Since the DRSC recommendations were made, the Project has been revised and now meets many
of the recommendations. Therefore, this Alternative is not considered because nearly all of the DRSC comments have substantially been addressed and their suggestions have been implemented in the revised Project designs.

6.4 Alternatives Presentation

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines §15126.6(f)). With the historical and regulatory context as a backdrop, a review can proceed for alternatives to the Project that minimize impacts brought about by the Project and are not addressed in other CEQA documents. The reader will find five alternatives in this section.

- **No Project Alternative** – This alternative allows decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project, which would result in no freeway-oriented signage.

- **Reduced Size/Reduced Number Alternative** – This alternative would analyze a reduced number of signs and would limit sign area to 64 square feet without an SEP to increase size. The maximum allowable size for Project ID would remain at 200 square feet; however, tenant signs would be limited to 64 square feet and the maximum number of signs would be 17, consistent with the 2004 Site Plan approval. Color exceptions would not be permitted by this alternative. The Icon Tower would be limited to Project ID signs only and would have an allowable area of 100 square feet. Hotel signage would remain as proposed.

- **Project Identification Alternative** – This alternative would analyze the sign program with Project identification signs only and without tenant identification signs. Wall mounted outlet center Project ID and Icon Tower Project ID signs would have an allowable area of 200 square feet. No tenant ID signs or color exceptions would be permitted by this alternative. Hotel signage would remain as proposed.

- **No Color Exceptions Alternative** – This Alternative would be similar to the proposed Project. However, all outlet and hotel signage would be only in the metallic and neutral color palette depicted on the materials board (Exhibit 4-6, page 42). No color exceptions would be permitted with this Alternative.

- **DRSC/Applicant Updated Project** – This Alternative addresses the most recent recommendations and comments from the DRSC. The Alternative eliminates signage on the northeast- and southwest-facing elevations of the Icon Tower and reduces the number and sign size of specified tenant ID signs. This Alternative also provides for consistent color of signs on the eastern building elevation and reduces lighting temperature and lumens.

The SEIR itself, as well as the Project Alternatives section, provide sufficient documentary material from which to construct any permutation of alternatives on the Project insofar as environmental impacts are concerned. CEQA Guidelines §15126.6 states “(a) Alternatives to
the proposed Project: An EIR shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would reasonably obtain most of the basic objectives of the Project, and evaluate the comparative merits of the alternatives.” Therefore, this analysis is intended to allow decision-makers to identify alternatives based on sufficient analysis for each environmental topic discussed in the SEIR. The table below lists a comparison of the alternatives with the proposed Project.

Table 6-1 below lists a comparison of the alternatives with the proposed Project.

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Aesthetics</th>
<th>Biological Resources</th>
<th>Land Use/Planning</th>
<th>Transportation/Traffic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 1 - No Project</td>
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<tr>
<td>Alternative 2 – Reduced Size/Reduced Number of Signs</td>
<td>–</td>
<td>●</td>
<td>+</td>
<td>+</td>
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<tr>
<td>Alternative 3 - Project ID Signage Only</td>
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<td>●</td>
<td>●</td>
<td>●</td>
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<td>Alternative 4 – No Color Exceptions</td>
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<td>Alternative 5 – DRSC Applicant Updated Project</td>
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</tbody>
</table>

+ Potential impacts are greater than proposed Project
– Potential impacts are less than proposed Project
● Potential impacts are equal to proposed Project

6.5 Project Alternative 1 - No Project

6.5.1 Description of Alternative

The No Project Alternative assumes that the Project would not be developed as described in this SEIR. A review of the No Project Alternative must be included in every EIR pursuant to state law. Impacts from the proposed Project would not be as stated in the SEIR. The proposed Project is designated as Regional Commercial in the City of San Clemente General Plan. This category permits general retail, commercial, factory outlet stores, promotional and specialty retail, restaurants, entertainment, professional offices, financial institutions, lodging and similar regional serving uses.

The Project site is zoned Specific Plan under the City’s zoning ordinance. The purpose and objectives of the Marblehead Specific Plan include promoting regional commercial uses to generate sales tax revenues and providing for a variety of land uses within the Specific Plan area capable of generating new tax revenues to the City.

Section 15126.6(e)(2) of the CEQA Guidelines states:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis commenced, as well as what would be reasonably expected to
occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Section 15126.6(e)(3)(B) of the CEQA Guidelines indicates that when the project is not a land use or regulatory plan, the “no project” alternative:

... is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others... this “no project” consequence should be discussed.

The Project site is developed, with the retail outlet component of Phase 1 of the larger Marblehead development area. The approved but unbuilt portion consists of Phase 2 of the retail component and a hotel. The Marblehead Coastal Specific Plan envisioned a fully operational regional shopping center that includes appropriate signage.

The No Project Alternative would result in the site being left in its current condition consisting of a retail outlet center with no freeway-oriented signage. Approved and unbuilt portions of the site would be developed without freeway-oriented signage. Existing monument signage and building signage is not oriented toward the freeway and would remain.

1. **Aesthetics**

The No Project alternative would result in no freeway-oriented signage for the outlets and the approved but unbuilt hotel. The building facades would be blank, with no Project identification or tenant identification signage. Because there would be no freeway-oriented signage, no new night lighting would be installed. Existing sources of night lighting, including building lighting, parking lot lighting, and landscape lighting, would remain visible. The existing signage at the retail outlets is internal to the site and only minimally visible to visitors approaching or on the site. While the visibility of signs diminishes with distance, from the perspective of the residential neighborhoods nearby, this would likely be perceived as an improved aesthetics condition. However, as viewed from the freeway, it could create the appearance of a vacant project with no signage to identify the use or the occupants. Large buildings with no signage could be viewed as out of character with the surrounding commercial development where identifying signage is visible from a variety of vantage points, including the freeway.

Impacts in the areas of aesthetics are somewhat different compared to the proposed Project, but would still result in impacts to aesthetics. While nearby residents may perceive the absence of freeway-oriented signage as a benefit, views from private areas are not protected by the City’s Zoning Ordinance. In addition, a complete absence of signage may result in the buildings appearing vacant or unfinished, which would present a negative aesthetic condition.
2. **Biological Resources**

The No Project Alternative not would result in impacts to biological resources. Such impacts were fully analyzed in the Marblehead EIR as well as the Biological Report prepared for this EIR. Because neither the Project proposed herein nor the project as previously analyzed would result in impacts to biological resources, the No Project Alternative is equal to the proposed Project.

3. **Land Use**

The proposed Project adds signage to a previously approved development. Land uses will remain consistent, because a portion of the retail outlet center is currently developed and operational. The approved but unbuilt portion of the retail/commercial designated area will ultimately be constructed in accordance with previous approvals. The Marblehead Development Agreement provides that regulations and codes in existence at the time of approval of the Development Agreement will remain the prevailing regulatory documents. The Project, as proposed, is regulated by the Zoning Ordinance in effect in 1998, which permitted Sign Exception Permits to modify sign plans in terms of size, number, and type, and to allow freeway-oriented signage.

The No Project Alternative would deprive the Project applicant of the ability to seek approval of freeway-oriented signage which is allowed by the Zoning Code in place at the time the Development Agreement was approved. Because the Development Agreement allows for freeway-oriented signs, an impact would occur if the Applicant was denied the opportunity to provide signage as proposed. The No Project Alternative would result in greater impacts than the proposed Project with respect to land use regulations. In addition, the Alternative does not meet the goal of providing a fully operational, successful regional shopping center that provides wayfinding and tenant identification signage to potential customers and visitors accessing the site from the I-5 Freeway.

4. **Transportation/Traffic**

The Project’s proximity to the I-5 Freeway results in a potential safety factor for motorists who are not familiar with the area or the location of the outlet center. As noted in the Sign Impact Analysis prepared by Linscott, Law & Greenspan for the proposed Project, providing wall-mounted and tower icon/hotel freeway signage will not significantly impact traffic on the adjacent I-5 Freeway, but not providing signage may cause significant impacts on traffic safety because of potential driver confusion about where to exit the freeway and lack of Project and tenant identification. The Traffic Analysis has shown that the proposed signage will enhance wayfinding and improve circulation system conditions. Because the No Project Alternative could result in more traffic circulation and safety impacts, this Alternative does not meet the goals of the proposed Project.

6.5.2 **Attainment of Project Objectives**

The No Project Alternative is equal to the proposed Project in the areas of Biological Resources. Impacts under Aesthetics would be different but would still result in greater impacts compared to the proposed Project, because the No Project alternative would result in
large buildings with no identification or information and would not be in character with other commercial development which provides signage information. The No Project Alternative would have a greater impact in the area of Land Use and Planning and Transportation/Traffic. The Project is permitted to be developed consistent with the Zoning Code regulations in effect when the Development Agreement was approved. The applicant would be denied the ability to provide freeway-oriented signage under this Alternative. With regard to Traffic, the location of the outlet center adjacent to the I-5 Freeway presents a unique need for appropriate signage for motorists accessing the site from the freeway. Absent adequate signage, drivers could experience confusion about the exact location of the shopping center, including which exit to use, resulting in unsafe vehicular movement while attempting to exit the freeway. Visible signage would also reduce potential wayfinding impacts, which could impede traffic flow and safety for drivers trying to find the outlet center entrances.
6.6 Project Alternative 2 – Reduced Size/Reduced Number of Signs Alternative

6.6.1 Description of Alternative

This Alternative would limit tenant identification signs to 17 signs with a maximum size of 64 square feet. A Sign Exception Permit would not be included in this Alternative to increase the size of tenant identification signs. The sign numbers and size would be consistent with the Site Plan approved by the City in 2004. Colors would be limited to the proposed color palette, including metallic and neutral colors with no color exceptions permitted. The Icon Tower would include Project ID signs only, and no individual tenant names would be included. The allowable area of the icon signage would be 100 square feet, and the two wall-mounted Project identifications signs would be 200 square feet, as with the proposed Project. There would be no change to the hotel signage from what is identified in the proposed Project.

View simulations have been prepared to depict this Alternative from four key view vantage points. The simulations portray the following:

- Portions of existing buildings and the Icon Tower from northbound I-5
- View from Vista Hermosa heading west toward the Project
- Portions of existing buildings and proposed hotel from northbound I-5
- View toward Project from 2165 Avenida Espada more than one-half mile from the Hotel

1. Aesthetics

Tenant identification signs would be limited to 64 square feet, and no Sign Exception Permit would be required for the tenant sign size. The total number of tenant signs would be 17 compared to 27 as proposed. From an aesthetics standpoint, there would be a minimal improvement between this Alternative and the proposed Project. Freeway-facing Project ID signs as viewed by passers-by would be the same with fewer tenant signs. While all signs cannot be seen at the same time from any one location, reducing the number of tenant ID signs may somewhat improve the visual appearance. The Icon Tower would be the same structure under either this Alternative or the proposed Project, with the only difference being the elimination of tenant identification on the tower. There would be no change to the proposed hotel signage under this Alternative, and the visual effect would be the same.

Signs under this Alternative would exhibit the same type of lighting as the proposed Project. Even though distance diminishes the appearance of signs, the view of lighted signs would be marginally reduced with fewer, smaller signs. This Alternative is anticipated to be better perceived by nearby residents, even though the private views are not protected by the City's Zoning Ordinance, because it could be argued that fewer tenant signs, with a 64-square-foot maximum, would provide an improved aesthetics condition. The removal of the color exceptions would ensure that the signs would not conflict with the Spanish style architecture theme. When compared to the proposed Project, this alternative would result in a reduction of aesthetics impacts to below a level of significance because no color exceptions would be allowed.
Candidate Key View 13 Visual Simulation: Option B - Reduced Size / Reduced Number (with No Color Exceptions) Alternative

Source: Visual Impact Analysis of Proposed Freeway Signage by LLG; September 27, 2017

Exhibit 6-2  – Avenida Vista Hermosa – Alternative 2
Exhibit 6-3  – I-5 NB, Portions of Existing Buildings Proposed Hotel – Alternative 2
Candidate Key View 41a Visual Simulation: Option B- Reduced Size / Reduced Number (with No Color Exceptions) Alternative

Source: Visual Impact Analysis of Proposed Freeway Signage by LLG; September 27, 2017

Exhibit 6-4  – 2165 Avenida Espada More than One-Half Mile to Hotel – Alternative 2
2. Biological Resources

Impacts would be identical to the proposed Project. Neither the proposed Project nor this Alternative would disturb the canyons and drainages where biological resources have been identified. Signs would be lighted with halo illumination under either scenario. Reducing the number and the size of the signs would not result in fewer biological impacts because the ambient light levels reaching the resources would remain substantially the same since the site is basically developed and lighting exists throughout the outlet center. Therefore, this Alternative is the same as the proposed Project with respect to biological resources.

3. Land Use and Planning

As noted herein, the Marblehead Development Agreement conveyed a vested right to the developer to develop the outlet center in accordance with standards in place at the time the Development Agreement was approved. This includes freeway-oriented signage and an ability to apply for a Sign Exception Permit. Under this Alternative, the number of tenant signs would be reduced from 27 to 17, and the sign colors would be restricted to the proposed color palette including bronze and neutral colors. No Sign Exception Permit as allowed under the Development Agreement provisions, would be required for tenant identification sign size. The applicable Zoning Ordinance restricts the sign sizes to a maximum of 64 square feet and under this Alternative, tenant sign sizes would be in compliance with that standard. From an objective of allowing signs consistent with the Development Agreement, this Alternative would have similar impacts to the proposed Project, because an SEP would still be required for the freeway-oriented signs and the size of the Project ID signs.

4. Transportation and Traffic

As noted herein, impacts to transportation and traffic have been analyzed from a perspective of wayfinding and freeway egress safety for visitors to the outlet center. The reduction in the number of signs, sign scaling, and color palette would not result in a substantially greater or lesser impact. Providing fewer tenant signs would not result in an impact because Project identification and Icon Tower signage would remain as proposed. Therefore, this Alternative is substantially the same as the proposed Project.

6.6.2 Attainment of Project Objectives

This Alternative is superior to the proposed Project in the area of Aesthetics. There will be a reduction of 10 tenant identification signs, and size of the tenant identification signs would be limited to 64 square feet. Sign colors would be limited, and no color exceptions would be permitted, which may improve perception of visual appearance. No color exceptions would also result in consistency with the Marblehead Coastal Specific Plan Spanish design theme.

This Alternative is equal to the proposed Project in the area of biological resources. The Alternative would not create any impacts to biological resources, because no disturbance or grading would occur in the areas where biological resources have been identified. Because this Alternative recognizes the Marblehead Development Agreement’s vesting of codes and regulations in place at the time the Development Agreement was approved, this alternative is
consistent in providing freeway-facing signage. The elimination of and reduction in size of tenant ID signs would likely not adversely impact safety or freeway egress, or markedly affect wayfinding. This Alternative meets most of the objectives outlined herein and is marginally superior to the proposed Project.
6.7 Project Alternative 3 - Project ID Signs Only

6.7.1 Description of Alternative

Several commenters at the April 13, 2107 Public Scoping Meeting noted that the Project should be limited to Project ID signage (The Outlets at San Clemente), removing the individual tenant signs proposed. This Alternative addresses the potential environmental impacts associated with the elimination of tenant identification signage on the building façade and the Icon Tower. The Alternative assumes two Icon Tower Project ID signs and two building façade Project ID signs for a total of four Project ID signs.

The approved but yet unbuilt hotel would continue to provide signage as described in the proposed Project. Due to the unique nature of the use compared with the retail shops, the signage would be required to identify the location and brand of the hotel. The signage would consist of four 64-square-foot signs and one 30-square-foot sign with freeway-oriented positioning.

View simulations have been prepared to depict this Alternative from four key view vantage points. The simulations portray the following:

- Portions of existing buildings and the Icon Tower from northbound I-5
- View from Vista Hermosa heading west toward the Project
- Portions of existing buildings and proposed hotel from northbound I-5
- View toward Project from 2165 Avenida Espada more than one-half mile from the Hotel

The Icon Tower signage would consist of two 100-square-foot signs, 25 feet above ground level and facing northeasterly and easterly toward the I-5 Freeway. The current Zoning Ordinance does not provide a Sign Exception Permit allowing a variance in the size, number, height, or length of proposed signs. However, the City is required to consider the signs under the Zoning Ordinance in place at the time the Development Agreement was approved. A Sign Exception Permit, allowed under the Zoning Ordinance would be required for the Icon Tower signs to exceed the size regulations and for freeway-oriented signs. The tower signs would be up-lit and down-lit consistent with the proposed Project.

The two wall Project ID signs would be freeway-facing and placed on the building façade. The signs would be halo-illuminated as described in the proposed Project. However, the elimination of tenant identification signage along the building façade would substantially reduce the number of illuminated signs visible from off-site viewing locations.

Aesthetically, the difference between the proposed Project and this Alternative would be the reduction in the number of signs from the 36 signs to 9 total signs (4 Project identification signs and 5 hotel signs). No color exceptions would be permitted as color exceptions only apply to the tenant ID signs.
Candidate Key View 2 Visual Simulation: Option C - Project Identification (no Tenant Signs and no color exceptions) Alternative
Final Report - September 2017

Source: Visual Impact Analysis of Proposed Freeway Signage by LLG; September 27, 2017

Exhibit 6-5   I-5 NB, Portions of Existing Buildings and Tower – Alternative 3
Candidate Key View 13 Visual Simulation: Option C - Project Identification (no Tenant Signs and no color exceptions) Alternative Final Report - September 2017

Source: Visual Impact Analysis of Proposed Freeway Signage by LLG; September 27, 2017
Candidate Key View 17 Visual Simulation: Option C - Project Identification (no Tenant Signs and no color exceptions) Alternative
Final Report - September 2017

Source: Visual Impact Analysis of Proposed Freeway Signage by LLG; September 27, 2017

Exhibit 6-7  – I-5 NB, Portions of Existing Buildings Proposed Hotel – Alternative 3
Candidate Key View 41a Visual Simulation: Option C- Project Identification (no Tenant Signs and no color exceptions) Alternative Final Report - September 2017

Source: Visual Impact Analysis of Proposed Freeway Signage by LLG; September 27, 2017

Exhibit 6-8 – 2165 Avenida Espada More than One-Half Mile to Hotel – Alternative 3
Hotel signage would be as proposed herein and would be placed on the hotel building. The signs would be halo-illuminated and the impacts would be as described under the proposed Project. All signs would be within the 64-square-foot maximum standard and would not require a Sign Exception Permit for sign size. From an aesthetics standpoint, less night lighting would occur as viewed by residents across and drivers along the I-5 Freeway with the elimination of 23 building façade tenant ID signs and 4 Icon Tower tenant identification signs.

1. **Aesthetics**

   The Project ID Signs Only alternative would continue to provide Project identification signage on the Icon Tower and on the building façade consistent with the proposed Project, but would eliminate all tenant ID signage. The proposed Project would result in Aesthetics impacts, because the proposed color exceptions associated with the tenant ID signage would conflict with the Spanish style theme required by the Marblehead Coastal Specific Plan. This alternative would eliminate this aesthetics impact, because the color exceptions only apply to Tenant ID signs, which are not considered by this alternative. While the City's Zoning Ordinance does not protect private views and the viewing of signage in and of itself is not considered an environmental impact, the elimination of tenant ID signage would likely be perceived by nearby residents as an aesthetic improvement. The Project ID signs would be lit consistent with the proposed Project, but the reduction of the tenant signs would eliminate a large number of signs (27) that would otherwise be illuminated at night. Again, the proposed night lighting, as mitigated, would not result in an unavoidable adverse impact, but the reduction in the total number of lit signs would likely be perceived as an aesthetics improvement.

   It is important to consider whether the outlet buildings would look aesthetically pleasing with large expanses of the building facades absent of signage. This alternative would place one Project ID sign on the existing outlet building and one Project ID sign on the approved but unbuilt building. The signage would likely be adequate to preclude the assumption that the site was vacant, or closed, and would not degrade the visual character of the site or the surrounding area in a way that would result in a significant aesthetics impact.

   This Alternative would result in fewer aesthetics impacts compared to the proposed Project because no color exceptions would be included.

2. **Biological Resources**

   As analyzed herein, the proposed Project will not result in impacts to biological resources, because there will be no additional ground or habitat disturbance associated with the signage. This Alternative would not result in any ground disturbance or habitat disturbance and, therefore, would be identical to the proposed Project. The nearest biological resources occur in the adjacent drainages and canyons where no development or disturbance will occur. The lighting levels associated with either the proposed Project or this Alternative will not impact biological resources due to the distance between the signage and the location of the nearest habitat or species as identified in the biological resources report. Therefore, impacts with this Alternative would be the same as the proposed Project with respect to biological resources.
3. **Land Use**

The proposed Project is regulated by the Zoning Ordinance that was in place at the time the Development Agreement was approved. The Zoning Ordinance included provision for Sign Exception Permits, which allowed for deviations in the number, size, height, and length of signs. As previously noted, the City’s current Zoning Ordinance no longer includes the Sign Exception Permit and does not allow freeway-oriented signage.

Under the Project ID Signage Only Alternative, two Icon Tower Project ID signs, two building façade Project ID signs, and five hotel building façade signs would be allowed. No tenant ID signs would be included. The oversized Project ID signage on the Icon Tower and retail building would require a Sign Exception Permit; however, the hotel signage is within the 64-square-foot maximum in the Zoning Ordinance in place with approval of the Development Agreement. This Alternative would result in similar impacts to the proposed Project because both the Alternative and the proposed Project would require Sign Exception Permits for sign heights, square footage and to allow freeway-oriented signage.

4. **Transportation and Traffic**

The traffic analysis provided information related to a sign impact evaluation based on Caltrans criteria, a wayfinding impact evaluation, and an I-5 southbound freeway egress evaluation. Project ID signs on the Icon Tower and the building façade would allow drivers on the freeway sufficient visibility and recognition for safe freeway egress and wayfinding to the Project site. The elimination of individual tenant signage on the Icon Tower or building façade will not result in a significant impact from the perspective of Project identification and location from the freeway. Impacts with this Alternative would be generally similar to the proposed Project in terms of visitors’ ability to identify the retail outlets, access the appropriate freeway egress point and locate the center from the freeway.

6.7.2 **Attainment of Project Objectives**

The Project ID Signs Only Alternative is equal to the proposed Project in the area of Biological Resources, because no impacts would occur with either the proposed Project or this Alternative. Impacts to Aesthetics would be less with this Alternative, because no color exceptions would be allowed. Impacts under Land Use and Planning would be substantially the same, because a Sign Exception Permit would still be required for the over-height, over-size signs and to allow freeway-oriented signage. Transportation and Traffic impacts would be substantially the same with this Alternative in terms of safety for vehicles attempting to locate the site because hotel and Project ID signage will still be visible from the freeway.

This Alternative does not meet all the objectives of the proposed Project, which include providing adequate signage for project and tenant identification. Removal of the individual tenant signs from the Icon Tower and building façade will make it more difficult for visitors to identify which major retail stores are in the center before actually arriving at the Project site. However, impacts would be less in the area of Aesthetics, so the Alternative results in somewhat fewer environmental impacts than the proposed Project.
6.8 Project Alternative 4 – No Color Exceptions

6.8.1 Description of Alternative

The No Color Exceptions Alternative would maintain the number and placement of signage as identified in the proposed Project, but would prohibit signs using any colors other than the proposed color palette, including metallic and neutral colors consistent with the Spanish design theme required by the Marblehead Coastal Specific Plan. No distinctive logo colors for the nationally known brand tenants that consumers have come to recognize would be permitted. The all metallic and neutral color signage would still include halo illumination for all wall-mounted signs and up/down lighting for the Icon Tower. View simulations have not been provided for this Alternative, because it is essentially the proposed Project without colors other than metallic and neutral colors for the sign lettering and logos.

1. Aesthetics

The number and size of signs under this Alternative would remain the same as in the proposed Project, however, the color palette would be restricted to metallic and neutral colored lettering/logos with no option for additional colors. Lighting would remain the same as the proposed Project, and hours of illumination for the signage would be consistent with the proposed Project.

Views from the residences across the freeway would not be significantly different than the proposed Project because the distance between the residences and the signs would result in a more muted visual appearance, but signs would still be lighted at night and visible to the same degree. Elimination of occasional spot colors would not substantially reduce the tenants’ ability to provide national brand recognition through the use of logos, which are intended to be for “nationally recognizable brands.” This alternative would reduce the aesthetic impact that will occur under the proposed Project because the use of color exceptions is inconsistent with the Spanish style theme required by the Marblehead Coastal Specific Plan. In addition, because only four color exceptions are proposed, the colors may clash with the majority of the signs that will be in metallic and neutral tones, creating an aesthetics effect that is visually unappealing. The No Color Exceptions Alternative would result in fewer aesthetics impacts compared to the proposed Project.

2. Biological Resources

Impacts would be identical to the proposed Project. Neither the proposed Project nor this Alternative would disturb the canyons and drainages where biological resources have been identified. Signs would be lighted with halo illumination under either scenario. Therefore, this Alternative is the same as the proposed Project with respect to biological resources.

3. Land Use and Planning

This Alternative is equal to the proposed Project in terms of consistency with the City's policies and regulations. As noted, the Marblehead Development Agreement conveyed a
vested right to the developer to develop the outlet center in accordance with standards in place at the time the Development Agreement was approved.

Under this Alternative, the number of signs would remain as proposed but the color palette would be restricted to metallic and neutral colors. There would be no conflict with the City’s General Plan, the Zoning Code or the Marblehead Development Agreement with this Alternative. This Alternative would still require a Sign Exception Permit for freeway-oriented signs and impacts would be substantially the same as the proposed Project.

4. **Transportation and Traffic**

Impacts to transportation and traffic have been analyzed from a perspective of wayfinding and freeway egress safety for visitors to the outlet center. The color palette would not result in any impact as the number and sizes of the signs would provide adequate visibility and notice of freeway egress to allow safe wayfinding for drivers. It is presumed that nationally recognized brand logos will be distinguishable to drivers whether they are presented in color or in a metal or neutral scheme. The elimination of the four color exceptions will not diminish project identification or wayfinding. No further impacts would occur as a result of this Alternative and the impacts under transportation and traffic would be identical to the proposed Project.

6.8.2 **Attainment of Project Objectives**

This Alternative is equal to the proposed Project in the areas of biological resources, land use and planning and transportation and traffic. The Alternative would not create any impacts to biological resources because no disturbance or grading would occur in areas where biological resources were identified. There is no conflict with the number, size or location of signs under land use and planning with this Alternative. Limiting color choices for the signage would not impact drivers in terms of safety and wayfinding.

This Alternative is superior to the proposed Project with respect to Aesthetics through the elimination of the four color exceptions for tenant ID signs. The use of four colored logo signs where the majority of the signs are metal and neutral colors will create an aesthetics impact because it is inconsistent with the Spanish style architectural design theme specified in the Marblehead Coastal Specific Plan. This aesthetics impact will be most visible for drivers passing the outlet center along the freeway. This Alternative may result in a slight reduction of visual impacts due to the elimination of the four color exceptions from more distant locations as well. However, the colored signs would appear less prominent as viewed from off-site locations east of the Project site across the I-5 Freeway. This Alternative meets the stated Project objectives identified in Section 4.6 above, including to provide adequate signage for project identification, provide wayfinding to ensure safe egress from the I-5 Freeway.
6.9 Project Alternative 5 – DRSC/Applicant Updated Project

6.9.1 Description of Alternative

The DRSC/Applicant Updated Project Alternative would respond to on-going feedback from the Design Review Subcommittee (DRSC) and public comments related to the impacts of the proposed signage on adjacent residential neighborhoods. The DRSC held meetings on August 4, 2016, July 26, 2017 and September 27, 2017, and provided recommendations and comments to the Applicant for additional modifications to the Project, as proposed. The modifications have been incorporated in updated SEP Permit Documents and a revised Sign Example booklet, included herein as noted below. The updated Sign Examples are included herein as Appendix K.

This Alternative proposes the re-orientation of the Icon Tower signs to eliminate the signage on the east-facing elevation directly facing the residential areas across the freeway. Rather, the Icon Tower will provide signage visible to north and southbound drivers on the freeway. Only Project ID signage and one movie theatre identification sign will appear on the Tower. The freeway-facing building façade tenant ID signage will be reduced from 14 signs to 10 with the flexibility to utilize any 10 of the 14 identified locations. All tenant ID signs are proposed to be uniform in color. Tenant ID signs will average 36” in height. Specified signs, identified below, will also have reductions in maximum sign heights and widths.

This Alternative also includes a change in the lighting temperature and light output.

Specifically, the number and size of signs under this Alternative have been modified as follows. Exhibit 6-9 through Exhibit 6-16 depict the signage as proposed in this Alternative.

1. The Sign Area Calculation and Lighting Specifications components of the Sign Example Booklet have been incorporated into the Sign Exception Permit package to provide one stand-alone Sign Program document.
2. The specifications for the LED sign lighting temperature have been reduced from 6500 K (cool white) to 4000 K (pure white), a softer, warmer color in harmony with the plaster surface of the structures.
3. SEP 1.0 has been coordinated to match elevation refinements and Icon Tower reduced signage. The Outlet ID light output has been reduced to 2000 lumens.
4. Tenant Sign Zones SEP 1.1 and 1.2 have been modified as follows:
   - On the East elevation face, reduce the number of tenant signs from 14 to a maximum of 10 tenant signs. Sign may be located in any of the 14 identified tenant sign locations. These signs shall be a uniform color, and the average height of those 10 signs shall be 36” as measured from the tallest element of each sign.
   - The sign area control strings for maximum sign length and maximum sign height have been adjusted for precise centering of signage on the architectural facades as shown in Appendix K herein.
   - Tenant Sign Location 12, maximum sign width, has been reduced from 26'0" to 22'-0".
• Tenant Sign Location 14, maximum sign height, has been reduced from 7'-0" to 5'-0" to better fit the wall area.

• Tenant Sign Location 15 includes additional restrictions on sign placement to left justify the sign for the asymmetrical façade and requires a 48" minimum margin between top of sign projections and the clay tile edge detail.

• Tenant Sign Location 17 includes a corrected façade to restore the symmetry to the background facade, allowing the sign to be centered.

• Tenant Sign Locations 21 and 22 include reduced maximum sign width to 7'-9" and increased vertical sign allowance to 10'. Additional restrictions have been added on sign placement to left justify the sign for this asymmetrical façade, requiring a 12" minimum margin to the outside corner of the Tower.

• Tenant Sign Location 23 includes a corrected façade to restore the symmetry to the background façade, allowing the sign to be centered.

5. Proposed Hotel Signage SEP 1.3 has been further restricted to provide additional perimeter margins to provide for more neutral wall space, away from architectural features. An 18" perimeter margin is required on all signs with the exception of the North Conference Center Entry which has a 12" perimeter margin requirement.

6. Icon Tower Signage SEP 1.4 has been reduced in scale and quantity and revised positions to better shield the signs from Marblehead Inland. The southeast facing elevation has 1 Project identity as originally proposed. The two tenant ID signs have been removed and replaced with one theatre identification sign. All signs have been removed from the northeast facing elevation. The northwest facing elevation will include one Project identification sign and one theatre identification sign. Both proposed theatre identification signs conform to the existing City standard of 64 square feet maximum sign area. No signs are proposed for the southwest-facing elevation.

The halo-illuminated lighting would remain the same as the proposed Project, but as noted above, the lighting temperature would be reduced to 4000 K, and hours of illumination for the signage would be consistent with the proposed Project. Signs would still be lighted at night for one hour past the close of individual tenants, consistent with the proposed project. Signs would remain visible to a similar degree compared to the proposed project, although the number of signs and the size of some signs would be reduced.
Exhibit 6-9  Site Plan  Alternative 5
Exhibit 6-10  Tenant Sign Zones - Alternative 5
6. Alternatives Analysis

6.9 – Project Alternative 5 – DRSC/Applicant Updated Project

The Outlets at San Clemente

Exhibit 6.10 – Tenant Sign Locations – Alternative 5

Source: Alternative 5 Sign Exception Permit exhibits; Studio Progetti, November 7, 2017

November 2017

The Outlets at San Clemente
Exhibit 6-12  – Tenant Sign Zones, Hotel – Alternative 5

Source: Alternative 5 Sign Exception Permit exhibits; Studio Progetti, November 7, 2017
Exhibit 6-13 – Icon Tower, Northeast and Southeast Elevations – Alternative 5
Exhibit 6-14 – Icon Tower, Northwest and Southwest Elevations – Alternative 5
Example of Sign Area Calculation

To demonstrate how the allowable sign area and size formula function, three different TEnANT IDENtITIES each show a different controlling constraint.

Max Sign Area Calculation
Sign AreaCalc = 0.75" x 1.5" x 1.5" = 100.5 of sign area.
50% of 0.75" in width max width = 0.375" max sign width.
50% of 1.5" wall height = 0.75" max sign height.
Exhibit 6-16 – Signage Criteria – Alternative 5
1. **Aesthetics**

The Project Icon Tower would still have signage on two faces as with the proposed Project. However, the signage would be removed from the northeast-facing elevation and placed on the northwest facing elevation. Views from the residences across the freeway would be different than the proposed Project because the Icon Tower signage facing the residences would be eliminated with no signs being placed on the northeast and southwest facing elevations. This alternative would reduce the aesthetic impact that will occur under the proposed Project because the perceived impacts for the residents will be reduced through elimination of the most visible and nearest signage on the Icon Tower. In addition, the Icon Tower would identify only the Project and the movie theatre.

This Alternative would include a proposed uniform color for the building facade signage, which will likely be viewed as an aesthetic improvement, and specified tenant identification signs would be reduced in width and height. However, the color exception permitted under the proposed Project would remain with this alternative for south-facing tenant ID signs and, therefore, would be similarly inconsistent with the Specific Plan Spanish theme concept and would remain a significant unavoidable impact.

As noted, the reduction in the lighting temperature and lumens is an aesthetic improvement compared to the proposed Project. The DRSC/Applicant Updated Project Alternative would result in fewer perceived aesthetics impacts to residents across the I-5 Freeway compared to the proposed Project and is, therefore, marginally superior to the proposed Project in the area of aesthetics.

2. **Biological Resources**

Impacts would be identical to the proposed Project. Neither the proposed Project nor this Alternative would disturb the canyons and drainages where biological resources have been identified. Signs would be lighted with halo illumination under either scenario. Therefore, this Alternative is the same as the proposed Project with respect to biological resources.

3. **Land Use and Planning**

This Alternative is equal to the proposed Project in terms of consistency with the City’s policies and regulations. As noted, the Marblehead Development Agreement conveyed a vested right to the developer to develop the outlet center in accordance with standards in place at the time the Development Agreement was approved.

Under this Alternative, the number of tenant signs would be reduced and the sign size would be reduced as detailed above. There would be no conflict with the City’s General Plan, the Zoning Code, or the Marblehead Development Agreement with this Alternative. This Alternative would include color exceptions similar to the proposed Project for south-facing tenant signage, which is inconsistent with the City’s Spanish design theme. In addition, this Alternative would still require a Sign Exception Permit for freeway-oriented signs, and impacts would be substantially the same as the proposed Project.
4. Transportation and Traffic

Impacts to transportation and traffic have been analyzed from a perspective of wayfinding and freeway egress safety for visitors to the outlet center. This Alternative would not result in any impact, because the re-orientation of Icon Tower signs on two sides would still provide adequate visibility and notice of freeway egress to allow safe wayfinding for drivers on the I-5 Freeway, because the Icon Tower signage would be visible and would face both northbound and southbound drivers. The signage facing across the freeway towards the residences would be eliminated under this Alternative. In addition, signs on the Icon Tower would be limited under this Alternative to the retail center identification and the movie theatre. Building wall-mounted signage will be modified somewhat as described above, but the Project ID signage is unchanged. The modifications identified in this Alternative would still provide adequate wayfinding for vehicles accessing the Outlet Center from the freeway. No additional impacts would occur as a result of this Alternative, and the impacts under transportation and traffic would be similar to the proposed Project.

6.9.2 Attainment of Project Objectives

This Alternative is generally equal to the proposed Project in the areas of biological resources, land use and planning, and transportation and traffic. The Alternative would not create any impacts to biological resources, because no disturbance or grading would occur in areas where biological resources were identified. There is no conflict with the number, size, or location of signs under land use and planning with this Alternative. The elimination of signage on the residence-facing side of the Icon Tower would not impact drivers in terms of safety and wayfinding, because signage would be re-oriented to provide Project ID and one anchor tenant name on the tower sides facing the northbound and southbound freeway drivers.

This Alternative is superior to the proposed Project with respect to aesthetics based on the reduction of the number of tenant ID signs on the eastern façade from 14 to 10, and the reduced size of signs as detailed above. Reduced lighting temperatures and lumens will reduce lighting levels, and the uniform colors for the freeway-facing signage on the east building façade would further enhance the aesthetics views. The modifications identified in this Alternative would result in signage that is less prominent as viewed from off-site locations east of the Project site across the I-5 Freeway. However, the signage generally will still be highly visible from the adjacent residences east of the freeway. In addition, the color exceptions on the south elevation will be inconsistent with the City's Spanish design theme and would still be considered a significant unavoidable impact. This Alternative meets the stated Project objectives identified in Section 4.6 (beginning on page 55 above), including to provide adequate signage for project identification, provide wayfinding to ensure safe egress from the I-5 Freeway.
6.10 Environmentally Superior Alternative

Per CEQA Guidelines §15126.6, a range of reasonable alternatives has been considered in this SEIR. The Alternatives were intended to reduce the significant impact of the proposed Project and to address concerns presented at the Scoping Meeting and in Notice of Preparation comment letters. CEQA does not require that an alternative meet all project objectives, rather, CEQA §15126.6(f) specifies that alternatives should “feasibly attain most of the basic objectives of the project.” As detailed above, the No Project Alternative does not meet most of the project objectives because it would not provide Project Identification Signage, Assist in Wayfinding and Safe Egress from the Freeway, and it would not allow signage consistent with the approvals vested in the Development Agreement. The No Project Alternative results in greater impacts in the areas of aesthetics, Land Use and Planning and Traffic. Alternative 3 – Project ID Signage Only does not meet the objective of allowing for signs consistent with the Development Agreement.

The remaining Project alternatives presented herein, including Alternative 2 – Reduced Size/Reduced Number, Alternative 4 – No Color Exceptions, and Alternative 5 – DRSC/Applicant Updated Project, would reduce Project impacts in the area of aesthetics, compared to the proposed Project. However, a significant impact would still result because of the color exceptions for the signs on the south elevation. In addition, these alternatives would not result in new or greater impacts in the areas of biology, land use and planning, or transportation and traffic as compared to the proposed Project. While these three Project alternatives would each reduce Project impacts in the area of Aesthetics, the alternatives were analyzed to foster meaningful public participation and informed decision making.

Alternatives 2 and 4 may both be considered the Environmentally Superior Alternative because both alternatives would result in the same reduction of impacts in the area of Aesthetics (elimination of color exceptions). These alternatives may be perceived differently by members of the public, residents living within one-quarter mile of the site where the signs will be most visible, and residents living at greater distances. This is because the visual appearance of the signs is diminished with distance, and also because certain viewer groups may be more sensitive to the visual appearance of signs, and the number of signs, even if they are not considered to be significant environmental impacts.

For purposes of this analysis, Alternative 2 – Reduced Size/Reduced Number, would reduce the significant impact in the area of aesthetics and may be perceived to result in an improvement compared to the proposed Project, because it lessens the perceived aesthetics impacts such as sign clutter and night lighting. This Alternative would allow 17 tenant ID signs rather than 27 and would permit a maximum size of 64 square feet for tenant ID signs. Therefore, Alternative 2 is considered to be the superior alternative, because it would result in a reduction of significant impacts in the area of aesthetics (no color exceptions) compared to the proposed Project and would also result in an overall reduction in sign number and size, which may be perceived as a beneficial outcome.
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