7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.l(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in the *CEQA Guidelines* as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*[1]

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[2] The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.[3]

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* Section 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability) economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. . .*

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[4] In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The following are the project's goals and objectives, which were developed by the project Applicant, in consultation with the City of Newport Beach:

1 *CEQA Guidelines Section 15126.6(a).*
2 *CEQA Guidelines Section 15126.6(b).*
3 *CEQA Guidelines Section 15126.6(f).*
4 *CEQA Guidelines Section 15126.6(e)(2).*

- Enhance Newport Beach and Lido Village by creating a highly visible, iconic development with distinctive architecture, significant landscaped areas, and focal points to serve as a gateway to the Balboa Peninsula.

- Help implement the City's goal to revitalize Lido Village by creating a catalytic development consistent with the Lido Village Design Guidelines that enhances economic activity and contributes to Newport Beach's reputation as a premier destination for shopping and recreation.

- Create a pedestrian oriented development that is physically well-connected to the community while not significantly increasing traffic to the site when compared to the prior use of the site.

- Provide and enhance public access to the property by creating publically accessible open space and visitor accommodations.

- Provide needed services to residents and visitors including visitor accommodations, recreational, personal services, shopping, dining, and assembly opportunities.

- Create a premier boutique hotel that is a financially viable operation.

- Create City revenue through lease payments and transient occupancy tax.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The proposed project would not result in any significant and unavoidable impacts and all potential impact were reduced to a less than significant level.

Potential environmental impacts associated with the following alternatives are compared to impacts from the proposed project:

- Alternative 1.1 – "No Project/No Build" Alternative;
- Alternative 1.2 – "No Project/Existing General Plan Land Use Designation" Alternative;
- Alternative 2 – "Reduced Density" Alternative; and
- Alternative 3 – "Mixed Use" Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in Sections 5.1 through 5.12 of this EIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. Table 7-4, *Comparison of Alternatives*, which is included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the proposed project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Among the factors used to eliminate alternatives from detailed consideration are: failure to meet most of the basic project objectives; infeasibility; or inability to avoid significant environmental impacts. Section 7.4, *Environmentally Superior Alternative*, references the "environmentally superior" alternative, as required by the *CEQA Guidelines*.

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. One alternative that has been considered and rejected as infeasible is summarized as follows:

- One alternative that has been considered and rejected as infeasible is the Alternative Location Alternative. The project site is available for development because it is a vacant and underutilized site within the City of Newport Beach. It is unlikely that the Applicant would be able to acquire another property within the City on which to develop a project of similar size and scale to that currently proposed. In addition, no significant and unavoidable impacts have been identified to be associated with the proposed project. Therefore, considering development of the project at an alternative location would serve no purpose. Furthermore, it is a key objective of the proposed project, and a key aspect of its design, to enhance the Lido Village area. As such, this alternative has been rejected from further consideration by the City.

7.1 "NO PROJECT" ALTERNATIVE

In accordance with the *CEQA Guidelines*, "the no project analysis shall discuss the existing conditions …, 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."[5] The *CEQA Guidelines* continue to state that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."[6] The "No Project/No Build" Alternative (Alternative 1.1) includes a discussion and analysis of the existing baseline conditions at the time the Notice of Preparation was published on November 6, 2013. The "No Project/Existing General Plan Land Use Designation" Alternative (Alternative 1.2), which is the reasonably foreseeable development alternative, includes a discussion and analysis of what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on the property's current entitlement, which is the "Public Facilities" General Plan land use designation, Coastal Land Use Plan (CLUP) designation, and Zoning designation. The No Project scenarios are described and analyzed in order to enable the decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

[5] *CEQA Guidelines Section 15126.6(e)(2).*
[6] *CEQA Guidelines Section 15126.6(e)(3)(B).*

7.1.1 "NO PROJECT/NO BUILD" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The project site is located at the northeast corner of the intersection of Newport Boulevard and 32nd Street on the Balboa Peninsula in the Lido Village area of the City. The project site consists of the former Newport Beach City Hall Complex, which supports approximately 60,600 square feet of administration/office floor area, and the existing Fire Station No. 2 that is approximately 7,100 square feet. The City relocated City Hall staff from the site to the new Civic Center located at Newport Center in April of 2013, although the City continues limited use of various buildings. Fire Station No. 2 remains staffed and in operation at the project site.

The No Project/No Build Alternative would retain the project site in its current condition. With this Alternative, the City Hall Complex would remain vacant and unimproved although the City would likely continue very limited use of existing buildings suitable of occupancy. The existing 60,600 square feet of administration/office floor area would not be removed. The existing landscaping would be retained and maintained. Public open spaces consisting of pedestrian plazas, landscape areas, and other amenities would not be constructed along Newport Boulevard or 32nd Street. None of the improvements as part of the Lido House Hotel would be constructed. Under the No Project/No Build Alternative, the land use, zoning, and CLUP categories would not be amended.

The following discussion evaluates the potential environmental impacts associated with the No Project/No Build Alternative, as compared to impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the No Project/No Build Alternative, no development would occur within the Coastal Zone; therefore, no Coastal Development Permit from the California Coastal Commission is proposed under this Alternative. With the No Project/No Build Alternative, the General Plan land use designation, zoning, and CLUP land use categories would not be amended. Therefore, the project's proposed General Plan amendment, zoning code amendment, and CLUP amendment would not be implemented. Additionally, construction of the 130-room hotel would not be implemented. New land use approvals and permits would not be required.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding land use and relevant planning since no amendments of relevant land use planning policy documents or the zoning code would be required and no physical change to the environment would occur.

Aesthetics/Light and Glare

The existing visual character of the project site is illustrated on the following exhibits: Exhibit 5.2-2, *Key View 1 - Existing Condition*; Exhibit 5.2-3, *Key View 2 - Existing Condition*; and Exhibit 5.2-5, *Key View 3 - Existing Condition.* The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would not occur with the No Project/No

Build Alternative. Therefore, the project's construction-related impacts to the visual character/quality of the project site and its surroundings would be avoided.

The project site's long-term visual character would be altered with the proposed project, because the existing City Hall Complex would be replaced with a new 130-room hotel development. Project implementation would alter the visual character of the site and its surroundings, as the former Newport Beach City Hall Complex would be replaced with the proposed hotel and associated parkways/landscaping. Surrounding land uses provide a mix of uses consistent with retail/restaurant and hotel uses focused toward a more visitor-oriented character. The long-term visual character of the project site would not be altered with the No Project/No Build Alternative, because no construction activities would occur, and the project site would remain in its current condition. The project's less than significant impact to the area's visual character/quality and light/glare would be avoided with the No Project/No Build Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding aesthetics/light and glare, given it would avoid less than significant impacts to short-term visual character/quality, long-term visual character/quality, and light/glare.

Biological Resources

Project implementation would result in less than significant impacts as the project is currently developed and does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the City's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Additionally, the project would not conflict with a habitat conservation plan. Under the No Project/No Build Alternative, no construction activities would occur, and the project site would remain in its current condition. Therefore, although less than significant, the project's impacts would be avoided. As with the proposed project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters, or wildlife movement corridors would occur with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding biological resources, given it would not change the site, and would avoid less than significant impacts to migratory birds and special status trees.

Cultural Resources

There are no cultural resources that have been identified on the project site. Project implementation would require demolition of this structure, which is concluded to be a less than significant impact. Under the No Project/No Build Alternative, there would be no potential for impacts to historical resources, since the existing structures would not be demolished. Comparatively, less than significant potential impacts to historical resources would occur with the proposed project, while no impacts would occur with this Alternative.

As there are several locations within the City that have known significant paleontological resources, the project site is determined to potentially have archaeological and paleontological resource sensitivity. Therefore, the potential exists for as yet undiscovered archaeological and paleontological resources to be present on the project site. With the No Project/No Build Alternative, there would

be no potential for impacts to archaeological/paleontological resources, given no ground-disturbing activities would occur. Comparatively, less than significant potential impacts (with mitigation incorporated) to archaeological/paleontological resources would occur with the proposed project, while no impacts would occur with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding cultural resources, given it would avoid the potential for any impact to occur.

Traffic and Circulation

Existing AM and PM peak hour intersection and roadway operating conditions were evaluated in the Traffic Impact Analysis; refer to Section 5.5, *Traffic/Circulation*. All study intersections are currently operating at an acceptable level of service (LOS) (LOS D or better for City intersections and LOS C or better for State Highway intersections) during the AM and PM Peak hours based on City of Newport Beach/City of Costa Mesa, and Caltrans analysis methodologies and performance criteria, respectively. These existing conditions would continue with the No Project/No Build Alternative, but may be affected by additional growth in the area over time. Project implementation would result in less than significant impacts at intersections. The increase in average daily traffic (ADT) projected to occur with the proposed project would not occur with this Alternative, because the proposed project would not be developed. Therefore, although less than significant, the project's impacts to study area intersections and roadways would be avoided.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding traffic and circulation, given it would result in no increase in ADT and no traffic impacts at intersections or roadways.

Air Quality

Table 5.6-5, *Maximum Daily Pollutant Emissions During Construction*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, and construction activities would not occur with the No Project/No Build Alternative. Therefore, the short-term air quality impacts that would occur with the proposed project would be avoided with this Alternative.

The proposed project would not exceed the South Coast Air Quality Management District's (SCAQMD) regional emissions thresholds or localized significance thresholds (LST), as indicated in Table 5.6-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would not occur with the No Project/No Build Alternative. Therefore, the air quality emissions that would occur with the proposed project would be avoided with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding air quality, given it would result in no short- or long-term air quality impacts.

Greenhouse Gas Emissions

As indicated in Table 5.7-1, *Business As Usual Greenhouse Gas Emissions*, project implementation would result in 2,031.2 metric ton of carbon dioxide equivalent per year ($MTCO_2eq/yr$), which is below the 3,000 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational greenhouse gas (GHG) emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would not occur with the No Project/No Build Alternative. Therefore, the GHG emissions that would occur with the proposed project would be avoided with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding GHG emissions, since no GHG emissions would occur.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Construction-related short-term noise impacts from stationary and mobile sources, and vibration impacts would not occur with the No Project/No Build Alternative. Therefore, the short-term construction-related noise and vibration impacts that would occur with the proposed project would be avoided with this Alternative.

Existing modeled noise levels would range from 51.6 dBA to 72.6 dBA at 100 feet from the roadway centerline. These existing conditions would continue with the No Project/No Build Alternative, although, may be impacted by additional growth in the area over time. Project implementation would result in less than significant impacts from mobile noise sources. The increase in ADT projected to occur with the proposed project would not occur with this Alternative, because the proposed hotel would not be developed. Therefore, although less than significant, the project's long-term noise impacts from mobile sources would be avoided.

These existing conditions would continue with the No Project/No Build Alternative. Project implementation would result in less than significant impacts from stationary noise sources. The increased noise from the proposed project, which would be typical of commercial and residential uses, would not occur with this Alternative, because the proposed residential subdivision would not be developed. Therefore, although less than significant, the project's long-term noise impacts from stationary sources would be avoided.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding noise, since it would result in no short-term construction-related, or long-term operational mobile or stationary source noise impacts.

Geology and Soils

The project site consists of the former City Hall Complex that include impervious surfaces (developed land). The project site is essentially flat and does not possess site conditions necessarily conducive soil erosion and loss of topsoil. Soil erosion or the loss of topsoil from grading and excavation operations would not occur with the No Project/No Build Alternative, because site development would not occur. Comparatively, less than significant impacts (with mitigation incorporated) involving soil erosion would occur with the proposed project, while no soil erosion impacts would occur with this Alternative.

The project site is susceptible to seismic hazards (i.e., strong seismic ground shaking, and seismically induced liquefaction, lateral spreading, landsliding, settlement, and ground lurching), geologic hazards (i.e., subsidence, shallow groundwater, and excavation-related sloughing/caving), and hazardous soils (expansive and corrosive). Implementation of the No Project/No Build Alternative would not expose additional people or structures to potential adverse effects associated with seismic, geologic, or soil hazards, since no new land uses would be developed on the project site. Comparatively, a less than significant impact (with mitigation incorporated) would occur with the proposed project, while no impacts would occur with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding geology and soils, given it would avoid the potential for any impacts to occur. It should be noted that the existing site would remain susceptible to the same geologic conditions and hazards that were identified for the proposed project.

Hazards and Hazardous Materials

Short-term construction-related impacts involving the potential for accidental release of hazardous materials (i.e., asbestos containing materials (ACMs), lead-based paints (LBPs), and soil/groundwater contamination) would not occur with the No Project/No Build Alternative, since the former City Hall Complex and on-site improvements would not be demolished/removed and ground-disturbing activities would not occur. Comparatively, less than significant potential impacts (with mitigation incorporated) involving accidental release of hazardous materials from construction activities would occur with the project, while no impacts would occur with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding hazardous materials, given it would avoid the potential for any impacts to occur.

Hydrology and Water Quality

The No Project/No Build Alternative would result in no short-term impacts to water quality associated with grading, excavation, or construction activities, because site development would not occur. Comparatively, less than significant potential impacts (with mitigation incorporated) involving water quality impacts from construction activities would occur with the Project, while none would occur with this Alternative.

The No Project/No Development Alternative would avoid the Project's long-term operational impacts to water quality and quantity, because new land uses would not be developed and increased traffic activities would not occur. The post-construction Best Management Practices (BMPs) to

address pollutants in storm water runoff and new drainage improvements that would be constructed with the proposed Project would not be constructed with this Alternative. Since new development would not occur, impacts related to hydrology and water quality that would occur with the proposed Project would not occur with the No Project/No Development Alternative. While the Project would result in less than significant operational impacts to water quality and quantity, this Alternative would not include BMPs and storm water runoff would remain untreated.

The No Project/No Development Alternative would be environmentally inferior to the proposed Project regarding hydrology and water quality impacts. As construction activities would not occur and new land uses would not be developed, no changes in drainage patterns or on-site operations would occur and BMPs would not be implemented and storm water runoff would not be treated.

Public Services and Utilities

Implementation of the proposed project would place increased demands upon public services (i.e., fire and police protection, schools, and parks and recreation) and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone). The No Project/No Build Alternative would result in none of the impacts associated with increased demands upon public services, and utilities and service systems, because no new land uses would be developed. Therefore, the increased demands upon public services, and utilities and service systems that would occur with the proposed project would be avoided with this Alternative.

The No Project/No Build Alternative would be environmentally superior to the proposed project regarding public services and utilities, given no impacts to public services or utilities would occur.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/Development Alternative would not attain any of the project's basic objectives. An iconic development that would revitalize the Lido Village and create a pedestrian oriented development would not be constructed. Shopping, dining, assembly opportunities, publically accessible open space, and visitor accommodations for visitor and residents of Newport Beach would not be provided on the project site. The No Project/No Build Alternative would also not create City revenue through lease payments and transient occupancy tax.

7.1.2 "NO PROJECT/EXISTING GENERAL PLAN LAND USE DESIGNATION" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The "No Project/Existing General Plan Land use Designation" Alternative proposes development of what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on the property's current General Plan land use and zoning designations of "Public Facilities." The Public Facilities Zoning District is intended to provide for areas appropriate for public facilities, including community centers, cultural institutions, government facilities, libraries, public hospitals, public utilities, and public schools. Neither the General Plan or the Zoning Code (Title 20 of the Newport Beach *Municipal Code)* identifies a maximum development density or intensity for this use, but requires a Minor Use Permit (MUP). The City does not currently have a need for municipal offices at this location and does not plan to relocate the police

station to the project site. Additionally, the City sent a notice of surplus land to the school district, affordable housing advocates, and park districts in accordance with Section 54222 of the Government Code and did not get a response. Therefore, this Alternative will assume a development of 60,600 square feet of municipally-sponsored uses that could include government offices, community meeting rooms, and parking necessary to support on-site uses of a similar development intensity as the former City Hall Complex. The development associated with this alternative would include the demolition of the existing outdated structures, and would construct a new modern facility that would serve the community for meetings, recreation, and ancillary uses.

The following discussion evaluates the potential environmental impacts associated with the No Project/Existing General Plan Alternative, as compared to impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use

Under the No Project/Existing General Plan Designation Alternative, a new development would occur within the Coastal Zone; therefore, a Coastal Development Permit from the California Coastal Commission would be required under this Alternative. With the No Project/ Existing General Plan Designation Alternative, the General Plan land use designation, zoning, and CLUP land use categories would not be amended. Therefore, the project's proposed General Plan amendment, zoning code amendment, and CLUP amendment would not be implemented. However, a MUP would be required.

The No Project/Existing General Plan Designation Alternative would be environmentally superior to the proposed project regarding land use and relevant planning due to the lack of need to amend the relevant planning policy documents and zoning code.

Aesthetics/Light and Glare

The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would similarly occur with the No Project/Existing General Plan Designation Alternative. Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be less than the proposed project, given this Alternative would involve a shorter construction period and less overall construction.

The project site's long-term visual character would be altered with the proposed project, because the existing City Hall Complex would be replaced with new development. The long-term visual character of the project site and its surroundings would be altered with the No Project/Existing General Plan Designation Alternative, to a lesser degree as with the proposed project, because the project site would be developed with 60,600 square feet of public facilities, instead of the proposed 99,625 square-foot hotel. As with the proposed project, this Alternative would result in less than significant impacts with the implementation of mitigation measures.

The No Project/Existing General Plan Designation Alternative would be considered environmentally superior to the proposed project regarding aesthetics/light and glare impacts because it would have less development than the proposed project.

Biological Resources

Project implementation would result in less than significant impacts as the project is currently developed and does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the City's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Under the No Project/Existing General Plan Designation Alternative, construction activities would occur over a slightly smaller development footprint as the proposed project. Therefore, as with the proposed project, this Alternative would result in less than significant impacts to biological resources. As with the proposed project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters, or wildlife movement corridors would occur with this Alternative.

The No Project/Existing General Plan Designation Alternative would be neither environmentally superior nor inferior to the proposed project regarding biological resources, because it would result in similar impacts as the project.

Cultural Resources

There are no cultural resources that have been identified on the project site. Project implementation would require demolition of the existing structures, which is concluded to be a less than significant impact. Similar to the proposed project, under the No Project/Existing General Plan Designation Alternative, impacts to historical resources would be less than significant.

As there are several locations within the City that have known significant paleontological resources, the project site is determined to potentially have archaeological and paleontological resource sensitivity. Therefore, the potential exists for as yet undiscovered archaeological and paleontological resources to be present on the project site. As with the proposed project, under the No Project/Existing General Plan Designation Alternative, potential for impacts to archaeological/paleontological resources would be less than significant, given that ground-disturbing activities would occur.

The No Project/Existing General Plan Designation Alternative would be neither environmentally superior nor inferior to the proposed project regarding potential impacts to cultural resources, given it would involve similar ground-disturbing activities within a slightly smaller development footprint.

Traffic and Circulation

The proposed project is forecast to generate approximately 1,062 ADT for a typical weekday. Under the No Project/Existing General Plan Designation Alternative, the project site would be developed with 60,600 square feet of government office/public facilities, instead of the proposed 99,625 square-foot hotel. Table 7-1, *Comparison of Proposed Project and No Project/Existing General Plan Designation Alternative ADT*, presents the forecast daily and peak hour traffic volumes for the No Project/Existing General Plan Designation Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 1,053 ADT. Therefore, this Alternative could cause a slight decrease in average daily traffic when compared to the proposed project.

Table 7-1
Comparison of Proposed Project and
No Project/Existing General Plan Designation Alternative ADT

Land Use	Trip Generation Rate[1]	Project		Alternative 1.2: No Project/Existing General Plan Designation Alternative		Difference	
		Hotel Rooms	Average Daily Trips	Thousand Square Feet	Average Daily Trips	Average Daily Trips	Average Daily Trips %
Hotel	8.17	130	1,062	--	--	--	--
Government Office	17.38	--	--	60.6	1,053		
Total						***-9***	***-0.85%***

Table 7-1 also compares the No Project/Existing General Plan Designation Alternative trip generation with the proposed project. As indicated in Table 7-1, the No Project/ Existing General Plan Designation Alternative is forecast to generate approximately 0.85 percent fewer ADT (or 9 fewer ADT), when compared to the proposed project. Comparatively, the traffic and circulation impacts under the No Project/Existing General Plan Designation Alternative would be similar to the proposed project, given this Alternative would not significantly change the ADT. Therefore, the less than significant traffic and circulation impacts that would occur with the proposed project would occur also with this Alternative, however, to a slightly lesser degree.

The No Project/Existing General Plan Designation Alternative would be neither environmentally superior nor inferior to the proposed project regarding traffic and circulation impacts due to similar traffic volumes.

Air Quality

Table 5.6-5, *Maximum Daily Pollutant Emissions During Construction*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, and construction activities would occur with the No Project/Existing General Plan Designation Alternative. Comparatively, the construction-related air quality impacts would be less than the proposed project, given that ground-disturbing activities would occur within a smaller development footprint. Therefore, the short-term air quality impacts that would occur with the proposed project would be more than this Alternative.

The proposed project would not exceed the SCAQMD's regional emissions thresholds or LST, as indicated in Table 5.6-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the No Project/Existing General Plan Designation Alternative, although to a lesser degree than the proposed project. This Alternative would result in less floor area and vehicle trips, as compared to the proposed project, this Alternative would result in 1,053 ADT, representing a decrease of 9 ADT or approximately 0.85 percent less than the proposed project. With this Alternative, proportionately less long-term air quality impacts from mobile pollutant emissions (approximately 0.85 percent less) would occur, as compared to the proposed project.

The No Project/Existing General Plan Designation Alternative would be environmentally superior to the proposed project regarding air quality impacts due to decreased mobile source emissions.

Greenhouse Gas Emissions

As indicated in Table 5.7-1, *Business As Usual Greenhouse Gas Emissions*, project implementation would result in 2,031.2 $MTCO_2eq/yr$, which is below the 3,000 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the No Project/Existing General Plan Designation Alternative, although to a lesser degree (an approximately 0.85 percent decrease in ADT), than the proposed project. The Alternative's combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective, although to a lesser degree than the proposed project.

The No Project/Existing General Plan Designation Plan Alternative would be environmentally superior to the proposed project regarding GHG emissions, due to decreased mobile emissions.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts from demolition, grading, and construction activities would occur with the No Project/Existing General Plan Designation Alternative due to construction of the proposed buildings and improvements. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed project, given this Alternative would result in a slightly smaller development footprint. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed project would occur also with this Alternative.

Existing plus project modeled noise levels from long-term mobile would range from 51.9 dBA to 73.0 dBA at 100 feet from the centerline. The proposed project would increase noise levels on the surrounding roadways by a maximum of 0.3 dBA along 32nd Street, east of Newport Boulevard, thus, resulting in less than significant noise levels. Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the No Project/Existing General Plan Alternative, although to a lesser degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be less than the proposed project, given this Alternative would decrease ADT by approximately 0.85 percent. Therefore, the mobile source noise impacts that would occur with the proposed project would occur also with this Alternative, although to a lesser degree.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed project, which would be typical of the surrounding commercial and residential uses. With the No Project/Existing General Plan Alternative, a new public facility would operate on the project site, generating noise levels from new stationary sources, including parking lots and loading/unloading areas, among others. Comparatively, the stationary source noise impacts

under the No Project/Existing General Plan Alternative would be less than the proposed project, given this Alternative would have a smaller footprint and less intense use than the proposed project. Therefore, the stationary source noise impacts that would occur with the proposed project would occur also with this Alternative, however, to a lesser degree.

The No Project/Existing General Plan Alternative would be environmentally superior to the proposed project regarding noise impacts due to decreased stationary noise levels.

Geology and Soils

The project site consists of the former City Hall Complex that include impervious surfaces (developed land). The project site is essentially flat and does not possess site conditions necessarily conducive soil erosion and loss of topsoil. Soil erosion from grading and excavation operations would occur with this Alternative. Comparatively, similar impacts involving soil erosion would occur with the No Project/Existing General Plan Alternative, as with the proposed project, due to a similar ground disturbance area. Therefore, the less than significant (with mitigation incorporated) impacts involving soil erosion that would occur with the proposed project would occur also with this Alternative.

Implementation of the proposed project would result in less than significant impacts (with mitigation incorporated) involving the exposure of additional people or structures to potential adverse effects associated with seismic hazards (i.e., strong seismic ground shaking, and seismically induced liquefaction, lateral spreading, landsliding, settlement, and ground lurching), geologic hazards (i.e., subsidence, shallow groundwater, and excavation-related sloughing/caving), and hazardous soils (expansive and corrosive). Implementation of the No Project/Existing General Plan Alternative would expose additional people and structures to potential adverse effects associated with seismic, geologic, and soil hazards, since new land uses would be developed on the project site, similar to the proposed project. Comparatively, this Alternative's impacts involving geology and soils would be similar to the proposed project, given this Alternative would also introduce additional people and structures on the project site. Therefore, the less than significant (with mitigation incorporated) impacts to geology and soils that would occur with the proposed project would occur also with this Alternative.

The No Project/Existing General Plan Alternative would be neither environmentally superior nor inferior to the proposed project regarding geology and soils.

Hazards and Hazardous Materials

Implementation of the proposed project would result in less than significant impacts (with mitigation incorporated) involving the potential for accidental release of hazardous materials (i.e., ACMs, LBPs, and soil/groundwater contamination). Implementation of the No Project/Existing General Plan Alternative would result in the potential for accidental release of hazardous materials consistent with the construction of a public facility (a combination of community center, small government offices, and public parking uses). Comparatively, this Alternative's impacts involving the potential for accidental release of hazardous materials would be similar to the proposed project, given this Alternative would involve a slightly smaller development footprint.

The No Project/Existing General Plan Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts associated with the potential for accidental release of hazardous materials.

Hydrology and Water Quality

The proposed project would result in less than significant (with mitigation incorporated) short-term impacts to water quality associated with grading, excavation, or construction activities. Implementation of the No Project/Existing General Plan Alternative would similarly result in short-term impacts to water quality. Comparatively, this Alternative's short-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a slightly smaller development footprint.

The proposed project would result in long-term operational impacts to water quality and quantity, due to the increase in impermeable surfaces, new land uses that would operate on the project site, and an increase in traffic volumes that would occur. Implementation of the No Project/Existing General Plan Alternative would result in long-term operational impacts to water quality and quantity. Under this Alternative, the long-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a slightly smaller development footprint.

The No Project/Existing General Plan Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality.

Public Services and Utilities

Implementation of the proposed project would place increased demands upon public services (i.e., fire and police protection, schools, and parks and recreation) and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone). The No Project/Existing General Plan Alternative would result in similar impacts associated with increased demands upon public services (excluding schools), and utilities and service systems, because new land uses would be developed. The less than significant increased demands upon public services, and utilities and service systems that would occur with the proposed project would occur also with this Alternative.

The No Project/Existing General Plan Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts to public services and utilities.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/Existing General Plan Alternative would not attain the project's fundamental objective to revitalize the Lido Village and create a pedestrian oriented development. Shopping, dining, assembly opportunities, publically accessible open space, and visitor accommodations for visitors and residents of Newport Beach would not be provided on the project site. The No Project/No Build Alternative would also not create City revenue through lease payments and transient occupancy tax.

7.2 "REDUCED DENSITY" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under the Reduced Density Alternative, proposes the development of a hotel use on the project site that would have approximately 108 rooms and would be three floors. The Reduced Density would have the same basic building footprint, architecture, open space areas, and vehicular access as the proposed project. The development associated with this alternative would include the demolition of the existing outdated structures. Under the Reduced Density Alternative, the land use, zoning, and CLUP categories would still need to be amended similar to the proposed project.

The following discussion evaluates the potential environmental impacts associated with the Reduced Density Alternative, as compared to impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the Reduced Density Alternative, a new development would occur within the Coastal Zone; therefore, a Coastal Development Permit from the California Coastal Commission would be required. With the Reduced Density Alternative, the General Plan land use designation, zoning, and CLUP land use categories would be amended, similar to the proposed project. Therefore, the project's proposed General Plan amendment, zoning code amendment, and CLUP amendment would be implemented although at a lower intensity of use.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use and relevant planning as the same need to amend relevant planning policy documents and zoning code would be required.

Aesthetics/Light and Glare

The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would similarly occur with the Reduced Density Alternative. Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be slightly less than the proposed project, given this Alternative would involve a shorter construction period and less overall construction.

The project site's long-term visual character would be altered with the proposed project, because the existing City Hall Complex would be replaced with new development. The long-term visual character of the project site and its surroundings would be altered with the Reduced Density Alternative, to a lesser degree as with the proposed project, because the project site would be developed with a three-story 108-room hotel, instead of the proposed four-story 130-room hotel. It should be noted that there were no view impacts associated with the proposed project. Therefore, the three-story alternative would not enhance public views. The Reduced Density Alternative would also reduce the shadows and visual mass associated with the proposed project. However, based on the view simulations prepared for the project, the differences would not be detectable. As with the proposed project, this Alternative would result in less than significant impacts with the implementation of mitigation measures.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding aesthetics/light and glare, given that it would be a similar use and it would similar impacts as the project.

Biological Resources

Project implementation would result in less than significant impacts as the project is currently developed and does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the City's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Under the Reduced Density Alternative, construction activities would occur over the same development footprint as the proposed project but would be three-story hotel instead of a four-story hotel. Therefore, as with the proposed project, this Alternative would result in less than significant impacts to biological resources. As with the proposed project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters, or wildlife movement corridors would occur with this Alternative.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding biological resources, because it would result in similar impacts as the project.

Cultural Resources

There are no cultural resources that have been identified on the project site. Project implementation would require demolition of this structure, which is concluded to be a less than significant impact. Similar to the proposed project, under the Reduced Density Alternative, impacts to historical resources would be less than significant.

As there are several locations within the City that have known significant paleontological resources, the project site is determined to potentially have archaeological and paleontological resource sensitivity. Therefore, the potential exists for as yet undiscovered archaeological and paleontological resources to be present on the project site. As with the proposed project, under the Reduced Density Alternative, potential for impacts to archaeological/paleontological resources would be less than significant, given that ground-disturbing activities would occur.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding potential impacts to cultural resources, given it would involve similar ground-disturbing activities within the same development footprint.

Traffic and Circulation

Under the Reduced Density Alternative, a 108-room hotel would be developed in place of the project's proposed 130-room hotel. Table 7-2, *Comparison of Proposed Project and Reduced Density Alternative ADT*, presents the forecast daily traffic volumes for the Reduced Density Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 882 ADT. Therefore, this Alternative would have 180 fewer daily trips than the proposed project.

Table 7-2
Comparison of Proposed Project and
Reduced Density Alternative ADT

Land Use	Trip Generation Rate[1]	Project		Alternative 2: Reduced Density Alternative		Difference	
		Hotel Rooms	Average Daily Trips	Hotel Rooms	Average Daily Trips	Average Daily Trips	Average Daily Trips %
Hotel	8.17	130	1,062	108	882	-180	-17%

Table 7-2 also compares the Reduced Density Alternative trip generation with the proposed project. As indicated in Table 7-2, the Reduced Density Alternative is forecast to generate approximately 17 percent fewer ADT (or 180 fewer ADT), when compared to the proposed project. Comparatively, the traffic and circulation impacts under the Reduced Density Alternative would be less than the proposed project, given this Alternative would decrease the ADT approximately 17 percent. Therefore, as with the proposed project, the traffic and circulation impacts would be less than significant with this Alternative, however, to a lesser degree.

The Reduced Density Alternative would be environmentally superior to the proposed project regarding traffic and circulation impacts due to decreased average daily traffic volumes.

Air Quality

Table 5.6-5, *Maximum Daily Pollutant Emissions During Construction*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, and construction activities would occur with the Reduced Density Alternative. Comparatively, the construction-related air quality impacts would be less than the proposed project, given ground-disturbing activities would occur within a similar development footprint. Therefore, the short-term air quality impacts that would occur with the proposed project would be similar under this Alternative.

The proposed project would not exceed the SCAQMD's regional emissions thresholds or LST, as indicated in Table 5.6-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the Reduced Density Alternative, although to a lesser degree than the proposed project. This Alternative would result in fewer rooms and vehicle trips, as compared to the proposed project, this Alternative would result in 882 ADT, representing a decrease of 180 ADT or approximately 17 percent less than the proposed project. With this Alternative, proportionately less long-term air quality impacts from mobile pollutant emissions (approximately 17 percent less) would occur, as compared to the proposed project.

The Reduced Density Alternative would be environmentally superior to the proposed project regarding air quality impacts due to decreased mobile source emissions.

Greenhouse Gas Emissions

As indicated in Table 5.7-1, *Business As Usual Greenhouse Gas Emissions*, project implementation would result in 2,031.2 $MTCO_2eq/yr$, which is below the 3,000 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the Reduced Density Alternative, although to a lesser degree (an approximately 17 percent decrease in ADT), than the proposed project. As with the proposed project, the combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective under this Alternative, although to a lesser degree than the proposed project.

The Reduced Density Alternative would be environmentally superior to the proposed project regarding GHG emissions, due to decreased mobile emissions.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts from demolition, grading, and construction activities would occur with the Reduced Density Alternative due to construction of the proposed buildings and improvements. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed project, given this Alternative would result in a similar development footprint. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed project would occur also with this Alternative.

The proposed project would increase noise levels on the surrounding roadways by a maximum of 0.3 dBA along 32nd Street, east of Newport Boulevard, thus, resulting in less than significant noise levels. Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the Reduced Density Alternative, although to a lesser degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be less than the proposed project, given this Alternative would decrease ADT by approximately 17 percent. Therefore, the mobile source noise impacts that would occur with the proposed project would occur also with this Alternative, although to a lesser degree.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed project, which would be typical of the surrounding commercial and residential uses. With the Reduced Density Alternative, a new 108-room hotel would operate on the project site, generating noise levels from new stationary sources, including parking lots and loading/unloading areas, among others. Comparatively, the stationary source noise impacts under the Reduced Density Alternative would be similar to the proposed project, given this Alternative would have a similar development footprint as the proposed project. Therefore, the stationary source noise impacts that would occur with the proposed project would occur also with this Alternative.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding noise impacts due to decreased stationary noise levels.

Geology and Soils

The project site consists of the former City Hall Complex that include impervious surfaces (developed land). The project site is essentially flat and does not possess site conditions necessarily conducive soil erosion and loss of topsoil. Soil erosion from grading and excavation operations would occur with this Alternative. Comparatively, similar impacts involving soil erosion would occur with the Reduced Density Alternative, as with the proposed project, due to a similar ground disturbance area. Therefore, the less than significant (with mitigation incorporated) impacts involving soil erosion that would occur with the proposed project would occur also with this Alternative.

Implementation of the proposed project would result in less than significant impacts (with mitigation incorporated) involving the exposure of additional people or structures to potential adverse effects associated with seismic hazards (i.e., strong seismic ground shaking, and seismically induced liquefaction, lateral spreading, landsliding, settlement, and ground lurching), geologic hazards (i.e., subsidence, shallow groundwater, and excavation-related sloughing/caving), and hazardous soils (expansive and corrosive). Implementation of the Reduced Density Alternative would expose additional people and structures to potential adverse effects associated with seismic, geologic, and soil hazards, since new land uses would be developed on the project site, similar to the proposed project. Comparatively, this Alternative's impacts involving geology and soils would be similar to the proposed project, given this Alternative would also introduce additional people and structures on the project site. Therefore, the less than significant (with mitigation incorporated) impacts to geology and soils that would occur with the proposed project would occur also with this Alternative.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding geology and soils.

Hazards and Hazardous Materials

Implementation of the proposed project would result in less than significant impacts (with mitigation incorporated) involving the potential for accidental release of hazardous materials (i.e., ACMs, LBPs, soil/groundwater contamination, and underground oil pipelines). Implementation of the Reduced Density Alternative would result in the potential for accidental release of hazardous materials. Comparatively, this Alternative's impacts involving the potential for accidental release of hazardous materials would be similar to the proposed project, given this Alternative would involve a similar development footprint.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts associated with the potential for accidental release of hazardous materials.

Hydrology and Water Quality

The proposed project would result in less than significant (with mitigation incorporated) short-term impacts to water quality associated with grading, excavation, and construction activities. Implementation of the Reduced Density Alternative would similarly result in short-term impacts to water quality. Comparatively, this Alternative's short-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a similar development footprint.

The proposed project would result in long-term operational impacts to water quality and quantity, because permeable surfaces would be replaced with impermeable surfaces, new land uses would operate on the project site, and an increase in traffic volumes would occur. Implementation of the Reduced Density Alternative would result in long-term operational impacts to water quality and quantity. Although this Alternative would generate fewer vehicle trips, the long-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a similar development footprint.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality.

Public Services and Utilities

Implementation of the proposed project would place increased demands upon public services (i.e., fire and police protection, schools, and parks and recreation) and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone). The Reduced Density Alternative would result in similar impacts associated with increased demands upon public services, and utilities and service systems, because a new hotel would be developed. Therefore, the less than significant increased demands upon public services, and utilities and service systems that would occur with the proposed project would occur also with this Alternative, but to a lesser degree.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts to public services and utilities.

ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Density Alternative would attain all of the project's objectives provided it is financially viable. As with the proposed project a reduced density hotel project would help revitalize the Lido Village area and create a pedestrian oriented development. Shopping, dining, assembly opportunities, publically accessible open space, and visitor accommodations for visitors and residents of Newport Beach would also be provided on the project site but to a lesser degree when compared to the proposed project. However, the Reduced Density Alternative would create less City revenue through lease payments and transient occupancy tax.

7.3 "MIXED USE" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Mixed Use Alternative would remove the existing City Hall Complex and include the development of 99 multifamily dwelling units and 15,000 square feet of commercial uses on the project site. Based on the number of dwelling units and commercial space, the potential building footprint would likely be similar to the proposed project and building heights would also be similar. This alternative would amend the General Plan, Coastal Land Use Plan (CLUP), and Zoning Code designations from "Public Facilities" for the project site. The following discussion evaluates the potential environmental impacts associated with the Mixed Use Alternative, as compared to impacts from the proposed project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

Under the Mixed Use Alternative, a new development would occur within the Coastal Zone; therefore, a Coastal Development Permit from the California Coastal Commission would be required. With the Mixed Use Alternative, the General Plan land use designation, zoning, and CLUP land use categories would be amended, similar to the proposed project. Therefore, the project's proposed General Plan amendment, zoning code amendment, and CLUP amendment would be implemented.

The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding land use and relevant planning as the same need to amend relevant planning policy documents and zoning code would be required.

Aesthetics/Light and Glare

The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would similarly occur with the Mixed Use Alternative. Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be similar to the proposed project, given this Alternative would involve a similar construction period.

The project site's long-term visual character would be altered with the proposed project, because the existing City Hall Complex would be replaced with new development. The long-term visual character of the project site and its surroundings would be altered with the Mixed Use Alternative, to a similar degree as with the proposed project, because the project site would be developed with 99 multifamily dwelling units and 15,000 square feet of commercial uses, instead of the proposed 130-room hotel. As with the proposed project, this Alternative would result in less than significant impacts with the implementation of mitigation measures.

The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding aesthetics/light and glare, given that it would be a similar size and intensity and it would similar impacts as the project.

Biological Resources

Project implementation would result in less than significant impacts as the project is currently developed and does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and compliance with the City's tree preservation ordinance would also be reduced to a less than significant level with the implementation of mitigation. Under the Mixed Use Alternative, construction activities would disturb a similar area as the proposed project but would include 99 multifamily dwelling units and 15,000 square feet of commercial instead of a 130-room hotel. Therefore, as with the proposed project, this Alternative would result in less than significant impacts to biological resources. As with the proposed project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters, or wildlife movement corridors would occur with this Alternative.

The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding biological resources, because it would result in similar impacts as the project.

Cultural Resources

There are no cultural resources that have been identified on the project site. Project implementation would require demolition of this structure, which is concluded to be a less than significant impact. Similar to the proposed project, under the Mixed Use Alternative, impacts to historical resources would be less than significant.

As there are several locations within the City that have known significant paleontological resources, the project site is determined to potentially have archaeological and paleontological resource sensitivity. Therefore, the potential exists for as yet undiscovered archaeological and paleontological resources to be present on the project site. As with the proposed project, under the Mixed Use Alternative, potential for impacts to archaeological/paleontological resources would be less than significant, given that ground-disturbing activities would occur.

The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding potential impacts to cultural resources, given it would involve similar ground-disturbing activities within the same development area.

Traffic and Circulation

Under the Mixed Use Alternative, 99 multifamily dwelling units and 15,000 square feet of commercial space would be developed in place of the project's proposed 130-room hotel. Table 7-3, *Comparison of Proposed Project and Mixed Use Alternative ADT*, presents the forecast daily traffic volumes for the Mixed Use Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 1,323 ADT. Therefore, this Alternative would have 261 more daily trips than the proposed project.

Table 7-3
Comparison of Proposed Project and
Mixed Use Alternative ADT

Land Use	Trip Generation Rate[1]	Project		Alternative 3: Mixed Use Alternative		Difference	
		Hotel Rooms	Average Daily Trips	Dwelling Units/Thousand Square Feet	Average Daily Trips	Average Daily Trips	Average Daily Trips %
Hotel	8.17	130	1,062	--	--		
Multifamily Residential	--	--	--	99	658		
Commercial	--	--	--	15	665		
Total	--	--	**1,062**	**--**	**1,323**	**261**	**25%**

Table 7-3 also compares the Mixed Use Alternative trip generation with the proposed project. As indicated in Table 7-3, the Reduced Density Alternative is forecast to generate approximately 25 percent more ADT (or 261 more ADT), when compared to the proposed project. Comparatively, the traffic and circulation impacts under the Mixed use Alternative would be greater than the proposed project, given this Alternative would increase the ADT approximately 25 percent. Therefore, the traffic and circulation impacts that would occur with the proposed project would occur also with this Alternative, however, to a greater degree.

The Mixed Use Alternative would be environmentally inferior to the proposed project regarding traffic and circulation impacts due to increased traffic volumes.

Air Quality

Table 5.6-5, *Maximum Daily Pollutant Emissions During Construction*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, and construction activities would occur with the Mixed Use Alternative. Comparatively, the construction-related air quality impacts would be similar to the proposed project, given ground-disturbing activities would occur within a similar development area. Therefore, the short-term air quality impacts that would occur with the proposed project would be similar under this Alternative.

The proposed project would not exceed the SCAQMD's regional emissions thresholds or LST, as indicated in Table 5.6-6, *Long-Term Operational Air Emissions*. Additionally, the project would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the Mixed Use Alternative, although to a greater degree than the proposed project. This Alternative would result in more vehicle trips, as compared to the proposed project, this Alternative would result in 1,323 ADT, representing an increase of 261 ADT or approximately 25 percent more than the proposed project. With this Alternative, mobile pollutant emissions would be proportionately greater (approximately 25 percent greater), as compared to the proposed project.

The Mixed Use Alternative would be environmentally inferior to the proposed project regarding air quality impacts due to increased mobile source emissions.

Greenhouse Gas Emissions

As indicated in Table 5.7-1, *Business As Usual Greenhouse Gas Emissions*, project implementation would result in 2,031.2 $MTCO_2eq/yr$, which is below the 3,000 $MTCO_2eq/yr$ threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the Mixed Use Alternative, although to a greater degree (an approximately 25 percent increase in ADT), than the proposed project. The Alternative's combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective, although to a lesser degree than the proposed project.

The Mixed Use Alternative would be environmentally inferior to the proposed project regarding GHG emissions, due to increased mobile emissions.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant. Short-term noise impacts from demolition, grading, and construction activities would occur with the Mixed Use Alternative due to construction of the proposed buildings and improvements. Comparatively, this Alternative's construction-related noise impacts would be similar to the proposed project, given this Alternative would result in a similar disturbance area. Therefore, the less than significant (with mitigation incorporated) short-term noise impacts that would occur with the proposed project would occur also with this Alternative.

The proposed project would increase noise levels on the surrounding roadways by a maximum of 0.3 dBA along 32nd Street, east of Newport Boulevard, thus, resulting in less than significant noise levels. Long-term noise impacts from vehicular travel on the surrounding roadway network would occur with the Mixed Use Alternative to a greater degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be greater than the proposed project, given this Alternative would increase ADT by approximately 25 percent. Therefore, the mobile source noise impacts that would occur with the proposed project would be greater with this Alternative.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed project, which would be typical of the surrounding commercial and residential uses. With the Mixed Use Alternative, 99 multifamily dwelling units and 15,000 square feet of commercial uses would operate on the project site, generating noise levels from new stationary sources, including parking lots and loading/unloading areas, among others. Comparatively, the stationary source noise impacts under the Mixed Use Alternative would be similar to the proposed project, given this Alternative would have compatible uses and a similar intensity as the proposed project. Therefore, the stationary source noise impacts that would occur with the proposed project would occur also with this Alternative.

The Mixed Use Alternative would be environmentally inferior to the proposed project regarding noise impacts due to increased mobile source noise levels.

Geology and Soils

The project site consists of the former City Hall Complex that include impervious surfaces (developed land). The project site is essentially flat and does not possess site conditions necessarily conducive soil erosion and loss of topsoil. Soil erosion from grading and excavation operations would occur with this Alternative. Comparatively, similar impacts involving soil erosion would occur with the Mixed Use Alternative, as with the proposed project, due to a similar ground disturbance area. Therefore, the less than significant (with mitigation incorporated) impacts involving soil erosion that would occur with the proposed project would occur also with this Alternative.

Implementation of the proposed project would result in less than significant impacts (with mitigation incorporated) involving the exposure of additional people or structures to potential adverse effects associated with seismic hazards (i.e., strong seismic ground shaking, and seismically induced liquefaction, lateral spreading, landsliding, settlement, and ground lurching), geologic hazards (i.e., subsidence, shallow groundwater, and excavation-related sloughing/caving), and hazardous soils (expansive and corrosive). Implementation of the Mixed Use Alternative would expose additional people and structures to potential adverse effects associated with seismic, geologic, and soil hazards, since new land uses would be developed on the project site, similar to the proposed project. Comparatively, this Alternative's impacts involving geology and soils would be similar to the proposed project, given this Alternative would also introduce additional people and structures on the project site. Therefore, the less than significant (with mitigation incorporated) impacts to geology and soils that would occur with the proposed project would occur also with this Alternative. The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding geology and soils.

Hazards and Hazardous Materials

Implementation of the proposed project would result in less than significant impacts (with mitigation incorporated) involving the potential for accidental release of hazardous materials (i.e., ACMs, LBPs, and soil/groundwater contamination). Implementation of the Mixed Use Alternative would result in the potential for accidental release of hazardous materials typical of small-scale retail development and residential use. Comparatively, this Alternative's impacts involving the potential for accidental release of hazardous materials would be similar to the proposed project, given this Alternative would involve a similar ground disturbance area.

The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts associated with the potential for accidental release of hazardous materials.

Hydrology and Water Quality

The proposed project would result in less than significant (with mitigation incorporated) short-term impacts to water quality associated with grading, excavation, and construction activities. Implementation of the Mixed Use Alternative would similarly result in short-term impacts to water quality. Comparatively, this Alternative's short-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a similar development area.

The proposed project would result in long-term operational impacts to water quality and quantity, because permeable surfaces would be replaced with impermeable surfaces, new land uses would operate on the project site, and an increase in traffic volumes would occur. Implementation of the Mixed Use Alternative would result in long-term operational impacts to water quality and quantity. Although this Alternative would generate more vehicle trips, the long-term impacts to water quality would be similar to the proposed project, given this Alternative would involve a similar development area.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality.

Public Services and Utilities

Implementation of the proposed project would place increased demands upon public services (i.e., fire and police protection, schools, and parks and recreation) and utilities and service systems (i.e., wastewater, water, solid waste, electrical, natural gas, and telephone). The Mixed Use Alternative would result in similar impacts associated with increased demands upon public services, and utilities and service systems, because this Alternative would have a similar development intensity. Therefore, the less than significant increased demands upon public services, and utilities and service systems that would occur with the proposed project would occur also with this Alternative.

The Mixed Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding impacts to public services and utilities.

ABILITY TO MEET PROJECT OBJECTIVES

The Mixed Use Alternative would attain the project's objective to revitalize the Lido Village by creating a pedestrian-oriented development; however, it would have a lesser overall economic impact to the community. Shopping, dining, assembly opportunities, publically accessible open space, and visitor accommodations for visitors and residents of Newport Beach would not be provided on the project site. However, the Mixed Use Alternative would not create City revenue through the transient occupancy tax.

7.4 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

Table 7-4, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). Review of Table 7-4 indicates the No Project/No Build Alternative is the environmentally superior alternative, because it would avoid or lessen the majority of impacts associated with development of the proposed project. According to CEQA Guidelines Section 15126.6(e), "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Accordingly, an environmentally superior alternative among the other alternatives is identified below.

Table 7-4
Comparison of Alternatives

Sections	No Project/ No Build	No Project/ Existing General Plan	Reduced Density	Mixed Use
Land Use and Relevant Planning	↘	↘	=	=
Aesthetics/Light and Glare	↘	↘	=	=
Biological Resources	↘	=	=	=
Cultural Resources	↘	=	=	=
Traffic and Circulation	↘	=	↘	↗
Air Quality	↘	↘	↘	↗
Greenhouse Gas Emissions	↘	↘	↘	↗
Noise	↘	↘	=	↗
Geology and Soils	↘	=	=	=
Hazards and Hazardous Materials	↘	=	=	=
Hydrology and Water Quality	↗	=	=	=
Public Services and Utilities	↘	=	=	=

↗ Indicates an impact that is greater than the proposed Project (environmentally inferior).
↘ Indicates an impact that is less than the proposed Project (environmentally superior).
= Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior).
* Indicates a significant and unavoidable impact.

It should be noted that no significant and unavoidable impacts have been identified for the proposed project. However, the environmentally superior alternative is the Reduced Density Alternative because it has impacts that are less than the proposed project. As concluded in the analysis presented above, the Reduced Density Alternative involves a three-story 108-room hotel. This Alternative would reduce its intensity by eliminating the fourth story associated with the proposed project. Although this Alternative would create less City revenue through lease payments and transient occupancy tax, it would fulfill all of the project's objectives.