

## 5. ALTERNATIVES

## 5. ALTERNATIVES

---

### 1. SUMMARY OF THE ALTERNATIVES

Under CEQA, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process. Public Resources Code Section 21002.1(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 *CEQA Guidelines* Section 15126.6(a) 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."*

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts 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."<sup>1</sup> 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 analyzed.<sup>2</sup>

In selecting project alternatives for analysis, potential alternatives should be feasible. *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."*

The *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/No Build Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.<sup>3</sup>

The first alternative selected for analysis is a No Project/No Build Alternative, pursuant to Section 15126.6(e) of the *CEQA Guidelines*, while the second alternative is a No Project/Existing General Plan

---

<sup>1</sup> *CEQA Guidelines* Section 15126.6(b).

<sup>2</sup> *Ibid*, Section 15126.6(f).

<sup>3</sup> *Ibid*, Section 15126.6(e)(2).

Alternative. One additional alternative was selected which would reduce the project's overall environmental impacts, while attaining project objectives even though no significant unavoidable impacts result from implementation of the proposed project.

Based on the proposed project's environmental impacts and the objectives established for the project (refer to Chapter 2, *Project Description*, of this Draft EIR), the following alternatives to the proposed project are evaluated in this Chapter:

1. No Project/No Build Alternative
2. No Project/Existing General Plan Alternative
3. Increased Residential/Reduced Commercial Alternative

## **2. PROJECT OBJECTIVES**

As discussed in Chapter 2, *Project Description*, of this Draft EIR, implementation of the Back Bay Landing project is intended to carry out the goals and policies contained in the Newport Beach General Plan, in an orderly and attractive manner. Therefore, development within the project area would be consistent with applicable provisions of the City's General Plan. The objectives of the proposed project include the following:

1. Provide a high quality mixed-use, marine-related, visitor-serving commercial development with integrated residential units and a unified architectural and landscape theme.
2. Implement the MU-H1 (Mixed-Use Horizontal 1) General Plan and MU-H (Mixed-Use Horizontal) Coastal Land Use Plan categories on an underutilized bayfront location in a manner that provides for a horizontally distributed mix of uses, which includes general or neighborhood commercial, offices, multi-family residential, visitor-serving and marine-related uses, as well as buildings that vertically integrate residential with non-residential uses, adjacent to Coast Highway, and on a bayfront location.
3. Maintain and expand core coastal dependent and coastal-related land uses, including continuation and expansion of existing marina parking, and the development of significant new enclosed bayfront dry stack boat storage and launching facility.
4. Provide new housing opportunities in response to the continued demand for housing, reduce vehicle trips and encourage active lifestyles by increasing the opportunity for residents to live in proximity to jobs, services, coastal recreation and entertainment.
5. Protect and enhance significant visual resources from City-designated Coastal View Points and Coastal View Roads, [such as Coast Highway, Castaways Park, and Coast Highway-Bay Bridge, to the bay and the cliffs of upper Newport Beach] through view corridors designed into the project. Create new public view opportunities on-site.
6. Expand bayfront public access to and along the bay where none exists at the present time, in a manner that protects environmental study areas (ESA) and/or environmentally sensitive habitat areas (ESHA) and does not adversely impact existing private residences adjacent to the site, consistent with Coastal Act section 30214. This new coastal access will be accomplished through a new 12-foot-wide bayfront walkway traversing Planning Areas 1 and 2 of the future project. This

new, public bayfront promenade will link the public docks and marina property south of the Coast Highway-Bay Bridge, to the existing Newport Dunes pedestrian/bicycle trail off of Bayside Drive, and ultimately to the Newport Dunes recreational areas, as well as to an existing County Class 1 Regional Trail.

### 3. ALTERNATIVES CONSIDERED AND REJECTED

In addition, to the guidance cited above regarding purpose and contents of an analysis of alternatives to a proposed project, *CEQA Guidelines* Section 15126.6(c) states that an EIR should identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *CEQA Guidelines*, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible include the following discussed below. It should be noted that an alternative public bayfront access alignment was considered by the project applicant that would have provided an enhanced pedestrian and bicycle access path along the entirety of the project site waterfront on Upper Newport Bay, extending from Planning Area 2 through Planning Areas 1 and 3. However, this alternate access alignment was determined to be infeasible, as discussed in further detail in **Table 4.I-2**, *Coastal Land Use Plan Consistency Analysis*, and **Table 4.I-5**, *California Coastal Act Consistency Analysis*, in Section 4.I, *Land Use*, of this Draft EIR.

#### a. Off-Site Location Alternative

*CEQA Guidelines* section 15126.6(f)(2) describes the requirement, in some circumstances, for analysis of alternative locations. No significant unavoidable impacts were identified for the proposed project, therefore, no significant effects would be avoided or substantially lessened by putting the project in another location. Nevertheless, the City evaluated an alternative location to address whether any feasible alternative locations exist, even though not required to avoid or substantially lessen a significant effect. The Off-Site Location Alternative would be similar to the proposed project but at a different location than the project site; specifically, the undeveloped parcel within the adjacent Newport Dunes Waterfront Resort that is currently planned for a Family Inn hotel. The location of the site is the same property identified as Approved Project D, Newport Dunes, discussed in Chapter 3, *Basis for Cumulative Analysis*, of this Draft EIR. Refer to **Figure 3-1**, *Approved Project Map*, in Chapter 3 for an illustration of the off-site location relative to the project site. This Alternative would include legislative and administrative approvals similar to the proposed project, which would hypothetically allow for a comparable mix of land uses as the proposed project, as well as project-related amenities (e.g., bayfront promenade, public coastal view tower, boating and water recreation facilities, etc.). However, the property is Tidelands Trust and is subject to restrictions on use. The specific site is subject to the terms of a long-term lease with the County of Orange and residential uses are prohibited within the Newport Dunes property, which would preclude future development of proposed land uses at this location. As such, the proposed project would be infeasible and this Alternative was eliminated from further evaluation.

### 4. ANALYSIS FORMAT

In accordance with *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the

---

project objectives, identified in Chapter 2, *Project Description*, of this Draft EIR would be substantially attained by the alternative.<sup>4</sup> The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue area. Where the net impact of the alternative would be clearly less adverse than the impact of the project, the comparative impact is said to be “less.” Where the alternative’s net impact would clearly be more adverse than the project, the comparative impact is said to be “greater.” Where the impacts of the alternative and project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are substantially attained by the alternative.

**Table 5-1, *Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project***, below, provides a summary matrix that compares the impacts associated with the project with the impacts of each of the proposed alternatives.

---

<sup>4</sup> *Ibid*, Section 15126.6(c).

**Table 5-1**

**Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project**

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
<b>A. Aesthetics/Visual Resources</b>				
Views/Scenic Vistas	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Aesthetics/Visual Character	Less Than Significant	Greater (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Light and Glare	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>B. Air Quality</b>				
Air Quality Plan Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Construction-Related Emissions				
Regional Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operational Emissions				
Regional Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Odors	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)

Table 5-1 (Continued)

## Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
<b>C. Biological Resources</b>				
Sensitive Species	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Riparian Habitat/Sensitive Natural Communities	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Wetlands	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Wildlife Movement	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Regulatory Consistency	Less than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>D. Cultural Resources</b>				
Historic Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Archaeological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Paleontological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Human Remains	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)

**Table 5-1 (Continued)**

**Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project**

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
<b>E. Geology and Soils</b>				
Surface Fault Rupture	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Groundshaking, Liquefaction, Ground Failure, and Landslides	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Greater (Less Than Significant w/ Mitigation)
Soil Erosion	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>F. Greenhouse Gas Emissions</b>				
Greenhouse Gas Emissions	Less Than Significant w/ Mitigation	Less (No Impact)	Greater (Significant and Unavoidable)	Less (Less Than Significant w/ Mitigation)
Consistency with GHG Reduction Plans	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>G. Hazards and Hazardous Materials</b>				
Hazardous Materials Releases	Less Than Significant w/ Mitigation	Greater (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Hazardous Emissions Near Schools	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Listed Hazardous Materials Sites	Less Than Significant w/ Mitigation	Greater (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)



**Table 5-1 (Continued)**

**Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project**

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
Emergency Response and Evacuation Plans	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>H. Hydrology and Water Quality</b>				
Violation of Discharge Requirements/ Water Quality Degradation	Less Than Significant	Similar (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Site Drainage Patterns/Storm Drain Capacity	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Levee or Dam Failure	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Erosion and Siltation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Seiche/Tsunami/ Mudflow	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>I. Land Use</b>				
Consistency with Plans, Policies, and Regulations	Less Than Significant	Less (No Impact)	Less (No Impact)	Greater (Less Than Significant)
<b>J. Noise</b>				
Violation of Noise Standards	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)

**Table 5-1 (Continued)**

**Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project**

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
Groundborne Noise and Vibration	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
Permanent Noise Increases	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
Temporary Noise Increases	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
<b>K. Population and Housing</b>				
Population	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Housing	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
Employment	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>L. Public Services</b>				
Fire Protection	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Police Protection	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Parks and Recreation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)

**Table 5-1 (Continued)**

**Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project**

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
Schools	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Libraries	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>M. Transportation/Traffic</b>				
Traffic System Level of Service	Less Than Significant	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Less (Less Than Significant)
Congestion Management Program Facilities	Less Than Significant	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Less (Less Than Significant)
Site Access and Traffic Safety	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Alternative Transportation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<b>N. Utilities</b>				
Water Infrastructure	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Wastewater Conveyance and Treatment	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Greater (Less Than Significant w/ Mitigation)

**Table 5-1 (Continued)**

**Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project**

	<b>Project Impact</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: No Project/Existing General Plan</b>	<b>Alternative 3: Increased Residential/Reduced Commercial Alternative</b>
Stormwater Drainage Facilities	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Landfill Disposal Capacity	Less Than Significant w/ Mitigation	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
Regulatory Consistency	Less Than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
<hr/> <p><i>Source: PCR Services Corporation, 2013.</i></p>				



## 5. ALTERNATIVES

### A. ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

---

#### 1. DESCRIPTION OF THE ALTERNATIVE

In accordance with the *CEQA Guidelines*, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the *CEQA Guidelines* states that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the project site. Thus, the future development of up to 49 residential units and 94,034 square feet of commercial uses would not occur on-site, and other project-related improvements such as the new public bayfront promenade, multi-use trail, and coastal view tower would not be implemented.

Environmental effects under this Alternative would be similar to existing site conditions, as described in the existing setting sections of each analysis in Chapter 4 of this Draft EIR. Further details of the impacts of this Alternative relative to each issue area are discussed below.

#### 2. ENVIRONMENTAL IMPACTS

##### a. Aesthetics/Visual Resources

###### (1) Views/Scenic Vistas

Views of and across the project site, including views from City-designated Coastal View Points and Coastal View Roads, would not be altered under the No Project/No Build Alternative. Views of scenic resources such as Upper Newport Bay, coastal bluffs, San Joaquin Hills, and Santa Ana Mountains would not be further obstructed from locations throughout the project area given the lack of additional urban development under this Alternative. Since existing views of scenic resources would not be further obstructed or otherwise affected under Alternative 1, impacts to scenic vistas would be less than significant and less than the proposed project, although new view opportunities provided by the proposed public, coastal view tower would not be provided.

###### (2) Aesthetics/Visual Character

Under the No Project/No Build Alternative, no changes in the visual character of the project site would occur. The site would remain in its current, under-developed condition, with the site appearance defined by the existing asphalt-paved lot, boat trailers, RVs, kayaks, and other equipment storage, as well as 1960s-era storage lockers and parking spaces. Site improvements including site landscaping, architectural design elements, streetscapes, and unified signage and lighting features would not be provided. Given the lack of notable visual resources within the project boundaries, and current low visual quality of the site, this Alternative would not improve the aesthetic quality of the project area. As such, although no physical changes would result from this Alternative, the beneficial aesthetic effects of the proposed project would not occur, and therefore impacts would be greater than under the proposed project in this regard.

### **(3) Light and Glare**

Under the No Project/No Build Alternative, no new lighting would be added to the project site, in contrast to the proposed project which would add night-time lighting to the project site that is similar to lighting and glare conditions currently occurring on the project site and surrounding area. Since no new light or glare would occur under the No Project/No Build Alternative, this Alternative would result in less light and glare impacts, as no impact would occur.

#### **b. Air Quality**

The No Project/No Build Alternative would include no new development, and therefore would not generate additional air pollutant emissions beyond those currently occurring within the South Coast Air Basin. In contrast, the proposed project's construction activity and long-term operation would generate air quality emissions that would result in less than significant impacts. Since this Alternative does not involve any additional emissions sources, no impact would occur and impacts would be less than the proposed project.

#### **c. Biological Resources**

The No Project/No Build Alternative would not physically alter the project site or affect biological resources or jurisdictional features located off-site in the proximate area. Based on the lack of direct or indirect physical effects on sensitive species, habitats, riparian areas, and wetlands, no impacts would occur under this Alternative. With no improvements, the bluff edge will continue to erode, with potential impacts to the marine environment. In the long term, the No Project/No Build Alternative would allow a potentially significant impact to occur. This impact will be prevented by the proposed project. Similarly, because the No Project/No Build Alternative would not result in any material changes to the site or the resources to which it is proximate, no impacts to plans, policies, or regulations protecting biological resources, including Habitat Conservation Plans and Natural Community Conservation Plans, would occur. Impacts would be less than the proposed project.

#### **d. Cultural Resources**

No changes to the project site would occur under this Alternative, and therefore potential historic resources such as the 1960s-era storage garages on-site, would not be physically altered or adversely affected. Additionally, the No Project/No Build Alternative would not result in grading or other physical modification of on-site soils as would occur under the proposed project. Under the proposed project, excavation would occur mostly in previously disturbed soil and cultural resources are not expected to be encountered. Notwithstanding, mitigation measures to provide for collection and treatment of resources have been proposed in the unlikely-event such resources should be recovered. Since no impacts to cultural resources would occur under Alternative 1, impacts are considered to be less than those of the proposed project.

#### **e. Geology and Soils**

The No Project/No Build Alternative would not involve the future development of new buildings or the placement of additional people within the project boundaries that could be adversely affected by geologic hazards. Since the No Project/No Build Alternative would not result in any new development on-site, no impact would occur and impacts would be less than the proposed project. With no improvements, the bluff edge will continue to erode, with potential impacts to the marine environment. In the long term, the No

Project/No Build Alternative would allow a potentially significant impact to occur. This impact will be prevented by the proposed project.

#### **f. Greenhouse Gas Emissions**

The No Project/No Build Alternative would not contribute new uses to the project site and therefore would not result in the direct or indirect generation of greenhouse gas emissions. At the same time, this Alternative would not support development of a mixed-use project with sustainability features that encourages reductions in greenhouse gas emissions. The proposed project's construction and operational activity would generate greenhouse gases and at the same time would contribute to meeting the AB32 policies regarding reductions in greenhouse gas emissions. The No Project/No Build Alternative also would not implement State law that encourages new development in infill locations. Nonetheless, impacts of the No Project/No Build Alternative would be less than those of the proposed project, as no impact would occur in this regard.

#### **g. Hazards and Hazardous Materials**

The No Project/No Build Alternative would not alter the existing project site, nor would it introduce new uses or activities. Under this Alternative, the existing conditions of the project site, which is currently characterized mainly by an asphalt-paved lot with one restroom structure, temporary storage containers, RVs, trailered boats, and other equipment, would remain. Under Alternative 1, no new hazardous substances would be introduced to the project site. However, the existing 550-gallon UST that was determined to exist on-site would not be removed as part of this alternative. As such, this alternative would have greater impacts than the proposed project with regard to releases of hazardous materials and listed hazardous materials sites, even though no physical changes would occur. However, no impacts to emergency response and evacuation plans would occur under Alternative 1, and therefore impacts in this regard would be less than the proposed project.

#### **h. Hydrology and Water Quality**

Under this Alternative, the project site would remain in its current state and no future construction would occur. Therefore, no modifications to the existing drainage patterns, or type and quality of runoff generated from the project-site would occur. The existing conditions on site, such as the sloughing of the edge of the parking lot, would continue to cause some water quality and sediment effects and erosion exposure to the City vault and water main. The improvements and protections that would be implemented by the proposed project would not occur under this alternative and over time these effects would worsen. While specific development-related impacts would be reduced when compared with the proposed project, the existing deterioration would continue and some erosion, sediment and water quality impacts would occur under this Alternative, since no project-related stormwater Best Management Practices (BMPs) would be implemented on-site. Despite the lack of stormwater quality-related improvements under this Alternative, based on the lack of new development or other increases in stormwater flows or pollutant sources, impacts would be similar to the proposed project, though impacts would be less than significant.

#### **i. Land Use**

Under the No Project/No Build Alternative, there would be no changes to the land uses on-site. As such, there would be no changes in land use patterns in the area and there would be no need for the associated amendments to the City's General Plan, Coastal Land Use Plan, or Zoning Code (Title 20, *Planning and Zoning*,



of the Newport Beach Municipal Code). Further, it would be consistent with other applicable City and regional policies and regulations, as would occur under the proposed project. This alternative would not provide additional coastal access or coastal dependent uses. Since this Alternative would not change the current land use or zoning designations of the project site, or result in any conflicts with plans, policies, or regulations applicable to the project area, impacts would be considered less than those of the proposed project. No impacts would occur.

## **j. Noise**

No development would occur within the project site under this alternative. Consequently, it would not generate any new or increased sources of noise or vibration on the project site or within the surrounding vicinity due to project construction activities, thus avoiding impacts related to construction noise or vibration. The No Project/No Build Alternative would not result in an increase in traffic to the project vicinity and would not introduce new noise sources, and therefore noise levels on the property would remain the same as under current conditions. As such, operational noise impacts under this Alternative would not occur. Noise and vibration impacts of the No Project/No Build Alternative would be less than those of the proposed project, as no impacts would occur.

## **k. Population and Housing**

The No Project/No Build Alternative would not result in any future development on-site, and therefore no additional population growth, housing growth, or employment growth would occur under this scenario. Although the population, housing, and employment growth under the proposed project would be within the range of growth projections for the project area, and therefore impacts would be less than significant, impacts under this Alternative would be less than the proposed project as no impact would occur.

## **l. Public Services**

### **(1) Fire Protection**

Under the No Project/No Build Alternative, no increased demand for fire protection services or fire flow facilities (i.e., upgrades to existing lines and/or additional fire hydrants) would occur. The No Project/No Build Alternative also would not impact the delivery of fire protection services that might otherwise occur from impacts on area traffic flow from construction activities or project-related traffic. While the proposed project would add new population at the project site with potential need for fire and/or emergency services, the impacts on the delivery of fire protection services would be less than significant. The No Project/No Build Alternative would not result in any impacts to fire protection services. Therefore, the impacts of the No Project/No Build Alternative would be less than under the proposed project.

### **(2) Police Protection**

The No Project/No Build Alternative would not change the existing conditions or increase the residential or daytime population currently on-site. As the majority of the project site is currently used passively for RV and boat storage, the current demand for police services is relatively low. This Alternative would not alter the demand for police protection services. No construction or operational activities would occur that would impact emergency vehicle response times to the project site or surrounding area. Implementation of the proposed project would introduce new population growth within the project site and result in the need for

additional police services, staffing, and/or facilities. However, it would result in less than significant impacts. Impacts of the No Project/No Build Alternative on police services would be less than those of the proposed project, as no impact would occur.

### **(3) Parks and Recreation**

The No Project/No Build Alternative would not result in new site population that would increase the demand for parks and recreation services. In contrast, the proposed project would generate approximately 227 net new residents, including direct growth associated with new housing units and indirect growth associated with new employment opportunities, which would generate a demand for parks and recreational facilities, through project-related impacts on park and recreational facilities would be less than significant. However, since the No Project/No Build Alternative would not directly or indirectly generate new residents, no impacts to park facilities would occur and impacts would be less than those under the proposed project.

### **(4) Schools**

As the No Project/No Build Alternative would not directly or indirectly generate any school-age children, there would be no change in the demand for schools relative to existing conditions. Impacts associated with the proposed project would be less than significant. Since the No Project/No Build Alternative would not generate any school-age children or cause an increase in demand for schools compared to existing conditions, no impact would occur in this regard, and impacts to schools would be less than the proposed project.

### **(5) Libraries**

The No Project/No Build Alternative would not result in new site population that would increase the demand for library services. Impacts to library facilities associated with the proposed project would be less than significant. However, since the No Project/No Build Alternative would not generate an increase in demand for library services as compared to existing conditions, no impact would occur and impacts to libraries would be less than under the proposed project.

## **m. Traffic and Circulation**

The No Project/No Build Alternative would not result in additional development at the project site and therefore would not result in any impact to the transportation system due to construction or operation activities. In contrast, the proposed project would add trips to regional and local roadways associated with the site's residential population and employment workforce. The proposed project's daily trips would add trips to the local roadway network and regional transportation system, but impacts would be less than significant. The proposed project's site access patterns have been designed to meet project needs and would have less than significant impacts with mitigation. Impacts of the No Project/No Build Alternative would be less than those of the proposed project, as no impacts would occur under this Alternative.

## **n. Utilities and Service Systems**

### **(1) Water Supply**

The No Project/No Build Alternative would not add new development or population within the project site, and therefore water demand for this Alternative would be identical to existing conditions. Water

infrastructure and water supply are sufficient to meet the proposed project's demands, and thus the project's impacts on the provision of water services would be less than significant with mitigation. Relocation of the existing 1926 water pipeline that bisects the site would not occur under this Alternative. However, impacts of the No Project/No Build Alternative would be less than under the proposed project as no impact would occur under this Alternative.

## **(2) Wastewater**

The No Project/No Build Alternative would not result in the construction of new development at the project site; therefore, wastewater generation for this Alternative would be consistent with the existing conditions. This Alternative would not increase wastewater generation relative to existing conditions and no additional wastewater would be added to the conveyance and treatment system serving the project site and surrounding area. Although the proposed project's wastewater generation would be within the capacity limits of the sewer collection and treatment facilities serving the project site and therefore impacts would be less than significant with mitigation, impacts under this Alternative would be less than those of the proposed project as no impact to wastewater facilities would occur.

## **(3) Solid Waste**

This Alternative would not result in new development within the project site, and therefore would not increase solid waste generation relative to existing conditions, and would not otherwise adversely affect solid waste disposal or recycling activities or programs. Therefore, the No Project/No Build Alternative would not have any adverse impacts on landfill capacity or conflict with any plans, policies, or regulations related to solid waste. The proposed project, with implementation of applicable mitigation measures, would result in less than significant impacts relative to solid waste. As such, since no impact would occur under this Alternative, impacts would be less than under the proposed project.

### **3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES**

The No Project/No Build Alternative would not improve the project site from its current, mostly undeveloped condition, and as such would not fully meet any of the project objectives, and would only partially meet one objective, as summarized below in **Table 5-5, Comparison of Alternatives' Ability to Meet Project Objectives**. Specifically, this Alternative would not provide a high quality mixed-use, marine-related, visitor-serving commercial development with integrated residential units and a unified architectural and landscape theme (Project Objective #1); implement the MU-H1 (Mixed-Use Horizontal 1) General Plan and MU-H (Mixed-Use Horizontal) Coastal Land Use Plan categories on an underutilized bayfront location in a manner that provides for a horizontally distributed mix of uses, which includes general or neighborhood commercial, offices, multi-family residential, visitor-serving and marine-related uses, as well as buildings that vertically integrate residential with non-residential uses, adjacent to Coast Highway, and on a bayfront location (Project Objective #2); maintain and expand core coastal dependent and coastal-related land uses, including continuation and expansion of existing marina parking, and the development of significant new enclosed bayfront dry stack boat storage and launching facility (Project Objective #3); provide new housing opportunities in response to the continued demand for housing, reduce vehicle trips and encourage active lifestyles by increasing the opportunity for residents to live in proximity to jobs, services, coastal recreation and entertainment (Project Objective #4); enhance significant visual resources from City-designated Coastal View Points and Coastal View Roads or create new public view opportunities on-site (Project Objective #5); or expand bayfront public access to and along the bay where none exists at the present time, in a manner that protects environmental study areas (ESA) and/or environmentally sensitive habitat areas (ESHA) and

does not adversely impact existing private residences adjacent to the site, consistent with Coastal Act section 30214. However, this Alternative would protect significant visual resources from City-designated Coastal View Points and Coastal View Roads, [such as Coast Highway, Castaways Park, and Coast Highway-Bay Bridge, to the bay and the cliffs of upper Newport Beach], given the lack of development intensification and associated physical obstructions to existing views (Project Objective #6).



## **5. ALTERNATIVES**

### **B. ALTERNATIVE 2: NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE**

---

#### **1. DESCRIPTION OF THE ALTERNATIVE**

The No Project/Existing General Plan Alternative would reduce the overall allowable square footage of development relative to the proposed project by implementing the existing adopted General Plan and zoning designations for the site. As such, this Alternative would allow for the development of up to 139,680 square feet of recreational and marine commercial uses on the project site, of which 32,500 square feet would be dry stack boat storage, with no residential uses allowed. Assuming a similar proportion of commercial land uses as under the proposed project, this CM (recreational and marine commercial) only Alternative would include 63,380 square feet of retail/marine sales and repair uses, 7,910 square feet of quality restaurant uses, 6,750 square feet of high-turnover restaurant uses, 16,750 square feet of office uses, and 32,500 square feet of dry stack boat storage in Planning Area 1; 8,390 square feet of marine services and office in Planning Area 2; and 4,000 square feet of resident storage and boat lockers in Planning Area 4. No amendments to the City's General Plan, Coastal Land Use Plan, or zoning (PC text) would be necessary. This Alternative would include a minimum six-foot-wide bayfront promenade along the coastal portions of Planning Areas 1 and 2, as well as a water inlet to allow for dry stack boat storage operations, but would not include other project-related amenities such as the new public multi-use trail, bike lanes, and coastal view tower. It is also assumed that this Alternative would require relocation of the existing access driveway off of Bayside Drive to a location similar to the proposed project, and therefore a lot line adjustment (LLA) would be required to accommodate the new access configuration.

#### **2. ENVIRONMENTAL IMPACTS**

##### **a. Aesthetics/Visual Resources**

###### **(1) Views/Scenic Vistas**

Under the No Project/Existing General Plan Alternative, the project site would be developed with urban uses allowable under the existing land use and zoning designations with a reduction in overall development square footage (179,678 total square feet under proposed project versus 139,680 square feet under Alternative 1). Under the CM designation, maximum structural heights are limited to 26 feet with a flat roof and 31 feet with a sloped roof, but may be increased to 35 feet with a flat roof and 40 feet with a sloped roof with the approval of Site Development Review. But, if the site were built with 139,680 square feet of commercial uses, additional parking would be required, which could require a bigger parking garage, in turn requiring additional building height as proposed by the project. As such, this Alternative would result in a similar overall development footprint as the proposed project, but, depending on the parking requirements, with possibly reduced building height and massing due to lower overall square footage. Views of scenic resources, therefore, including Upper Newport Bay, coastal bluffs, San Joaquin Hills, and Santa Ana Mountains might be less obstructed from designated Coastal View Points and Coastal View Roads than under the proposed project, but could be similar, depending on parking requirements. Despite a comparable overall development footprint, the possibly lower overall development intensity under this Alternative might result in incrementally less view obstruction of scenic vistas within and adjacent to the project area than

under proposed project conditions, depending on parking requirements, and impacts would be less than significant.

## **(2) Aesthetics/Visual Character**

This Alternative would improve the project site with a mix of urban uses that would be developed according to established development standards, similar to the proposed project. Although the mix of uses, design theme, and overall development pattern would be different than the proposed project, this Alternative would provide a consistent design theme and unified architecture, landscaping, lighting, and signage features that would result in a beneficial impact related to aesthetics and visual character relative to existing conditions. Therefore, impacts would be less than significant and similar to those of the proposed project.

## **(3) Light and Glare**

Under the No Project/Existing General Plan Alternative, new sources of light and glare would be introduced throughout the project site, as would be the case under the proposed project. While light and glare effects would be increased under this Alternative relative to existing conditions, such light and glare impacts are not expected to be significant given adherence to NBMC lighting standards and general landscaping and screening requirements. As such, similar to the proposed project, impacts related to light and glare effects would be less than significant.

## **b. Air Quality**

The No Project/Existing General Plan Alternative would allow for a mix of commercial development on the project site, but at a lower overall intensity than the proposed project primarily due to the elimination of residential uses. While construction activities would be of a similar nature and intensity as the proposed project for any given future development under this Alternative, and therefore worst-case daily emissions would not exceed thresholds as under the proposed project, the overall duration and frequency of construction activities would be incrementally reduced based on the overall reduction in development intensity on-site. Therefore, construction emission impacts under this Alternative would be less than significant with regard to exceedance of established daily localized and regional emissions thresholds, impacts would be less than the proposed project due to lower overall level of construction activity. Similarly, operational emissions, though increased due to greater traffic generation associated with the expanded commercial uses (see discussion below under Traffic and Circulation), would not exceed established thresholds and therefore would result in less than significant localized and regional air quality impacts. As is the case for the proposed project, impacts related to toxic air contaminants under this Alternative would be less than significant, though impacts would be incrementally increased given the additional project-related traffic (and associated vehicle emissions) and the proximity of people exposed to toxic air contaminants (adjacent mobile homes). Impacts related to odors would be reduced relative to the proposed project due to lower development intensity on-site and lack of residential population, and would remain less than significant.

## **c. Biological Resources**

Under this Alternative, the project site would be developed with new urban uses, as is the case under the proposed project. Although development intensity under the No Project/Existing General Plan Alternative would be reduced relative to the proposed project, intensification of uses on-site would affect existing

resources in a similar manner to the proposed project, including impacts related to construction of a new water inlet along the shoreline of Planning Area 1 to accommodate dry stack boat storage operations. Since the entire project site would be ultimately developed, as under the proposed project, impacts related to sensitive species, riparian habitat, wetlands/jurisdictional features, and wildlife movement would be comparable to those of the proposed project and would be reduced to less than significant with implementation of applicable mitigation measures. Likewise, impacts associated with consistency with regulatory framework and conflicts with Habitat Conservation or Natural Community Conservation Plans would be less than significant and similar to the proposed project.

#### **d. Cultural Resources**

The No Project/Existing General Plan Alternative would allow for the future construction of urban uses within the project site with a comparable development footprint and grading and construction activities as the proposed project. Therefore, this Alternative, like the proposed project, would have the potential to physically affect potential historic resources (i.e., on-site storage garages) and undiscovered archaeological and paleontological resources, including human remains. Site clearing and grading activities on-site would have the highest potential to adversely affect such resources, as is the case under the proposed project, though implementation of applicable mitigation measures would reduce this potential. Therefore, similar to the proposed project, impacts under this Alternative would be less than significant with mitigation.

#### **e. Geology and Soils**

The No Project/Existing General Plan Alternative would allow for future development of the site with new recreational and marine commercial uses at a much higher intensity than exists on the site currently. However, given the decrease in development on-site relative to the proposed project, this Alternative would expose fewer people to risks associated with seismic ground shaking and surface fault rupture. Similarly, given the high collapsible soil potential at the project site, this Alternative would also expose people to secondary seismic risks due to seismic ground failure, but to a lesser extent than the proposed project given lower intensity of development and lack of a resident population on-site. Mitigation would still be required under this Alternative with regard to foundation design and/or soil treatments to address ground shaking and associated ground settlement hazards, but impacts in this regard would be less than the proposed project. Since this Alternative would require similar excavation and grading activities to the proposed project, it would result in comparable impacts regarding soil erosion or the loss of topsoil. However, as is the case with the proposed project, given compliance with applicable water quality regulations, these impacts would be reduced to a less than significant level. As such, despite the comparable amount of grading and excavation under this Alternative, impacts in this regard would be less than the proposed project and less than significant, as lower development intensity and lack of a resident population on-site would expose fewer people and structures to risks associated with geologic hazards.

#### **f. Greenhouse Gas Emissions**

The No Project/Existing General Plan Alternative would allow for the future development of the project site with a mix of urban uses similar to the proposed project, but at a lower overall intensity. However, greenhouse gas emissions resulting from construction and operation of future uses under this Alternative would be incrementally higher relative to the proposed project due to substantially higher traffic generation associated with increased commercial intensity on the site (see discussion below under Traffic and Circulation). While impacts would still require mitigation to the extent feasible, impacts under this



Alternative are anticipated to be significant and unavoidable due to increased vehicle trips, and vehicle-related emissions are the primary sources of GHG emissions from development projects. Nonetheless, impacts related to consistency with GHG reduction plans would be less than significant under this Alternative, as is the case for the proposed project, as all feasible GHG reduction measures would be implemented. Despite the reduction in development intensity, greenhouse gas emissions impacts would be greater than the proposed project, and impacts would be significant and unavoidable.

### **g. Hazards and Hazardous Materials**

This Alternative, like the proposed project, would require that existing potential hazardous materials conditions on-site be adequately addressed prior to development of future uses. Mitigation measures prescribed for the proposed project would also be necessary under this Alternative in order to reduce impacts related to hazardous materials releases and listed hazardous materials sites to less than significant levels. Similarly, mitigation would be required to reduce the significance of impacts regarding emergency response and evacuation plans, as is the case with the proposed project. Implementation of site-specific mitigation measures would reduce potential hazards to acceptable levels under this Alternative, and therefore impacts would be less than significant and similar to the proposed project.

### **h. Hydrology and Water Quality**

Under this Alternative, the project site would be developed with a commercial project that would intensify development on the site relative to its current under-developed condition, similar to the proposed project. Despite the intensification of uses on the site, only a small portion of the existing site is unpaved (i.e., under and south of the East Coast Highway bridge within Planning Areas 1 and 2. Given that the No Project/Existing General Plan Alternative would result in a comparable development footprint as the proposed project, it is assumed that stormwater flow volumes would be similar to those under the proposed project. However, future development under this Alternative would also be subject to applicable stormwater regulations of the City of Newport Beach, County of Orange, and Santa Ana Regional Water Quality Control Board (RWQCB), as applicable, which would preclude the potential for adverse impacts related to flooding, site drainage patterns, exceedance of storm drain system capacity, and floodplains/flood zones. Likewise, a project-specific Stormwater Pollution Prevention Plan (SWPPP) during construction and Water Quality Management Plan (WQMP) for project operations, as required by the City and RWQCB, would also be implemented on-site to minimize potential impacts to water quality. Therefore, given compliance with applicable water quality regulations, impacts associated with violation of waste discharge requirements, erosion and siltation, and overall water quality degradation would be less than significant. Overall, impacts under this Alternative would be less than significant and similar to the proposed project.

### **i. Land Use**

Under the No Project/Existing General Plan Alternative, no amendments to the City's General Plan, CLUP, or zoning would be required, and the project site would remain under the existing Recreational and Marine Commercial (CM) designation. As such, development under this Alternative is expected to be consistent with the applicable policies of the General Plan and CLUP and would not conflict with the City's Zoning Code. Given the similarity in overall development pattern and reduction in overall development intensity relative to the proposed project, this Alternative is also anticipated to be consistent with the goals, policies, and principles of the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Compass Growth Vision, and the Airport Environs Land Use Plan for John Wayne Airport. Based on the lack

of a need for amendment to the City's General Plan, CLUP, Zoning Code, and consistency with applicable policies and requirements of these plans/regulations, impacts under this Alternative would be less than under the proposed project and less than significant.

## **j. Noise**

This Alternative would result in the future construction and operation of a mix of recreational and marine commercial uses on the project site at a lower overall development intensity than under the proposed project. Given the proximity of existing noise-sensitive uses (e.g., mobile homes) adjacent to the project site, construction-related noise would result in potentially significant impacts regarding violation of established noise standards and temporary or periodic noise increases in the project area. However, as with the proposed project, mitigation measures would be implemented to reduce construction noise impacts to less than significant, though the duration of construction activities would be reduced relative to the proposed project based on the reduced overall development intensity. As is the case for the proposed project, groundborne noise and vibration levels would not exceed established thresholds during either construction or operation and therefore impacts would be less than significant in this regard. Additionally, mobile-source noise sources would contribute to less than significant operational impacts associated with permanent noise level increases along area streets (given the existence of sound walls along major roadways in the area), similar to the proposed project, but impacts would be incrementally increased relative to the proposed project given an overall increase in traffic generation. While operational stationary source impacts would be reduced in comparison with the proposed project due to the reduced development square footage and lack of on-site residents that could be affected by increased noise levels, operational mobile-source impacts would be greater than under the proposed project given the substantial increase in traffic generation associated with expanded commercial uses on the site. Overall, however, operational impacts would be similar to the proposed project.

## **k. Population and Housing**

The No Project/Existing General Plan Alternative would result in population, housing, and employment growth within the project boundaries, but to a lesser extent than under the proposed project. The growth associated with this Alternative has been accounted for in the City's most recently adopted General Plan and therefore is also reflected in the growth projections provided by SCAG. Since this Alternative would result in no direct population growth on-site, due to the elimination of residential development, impacts in this regard would also be less than significant and less than those of the proposed project. However, since this Alternative would not result in the future development of residential units, it would not provide housing as would occur under the proposed project. As such, housing impacts would be considered greater in this regard, though they would remain less than significant. Finally, as this Alternative would provide increased commercial uses relative to the proposed project, it is anticipated that it would result in incrementally higher employment levels, and therefore impacts related to employment would be less than under the proposed project and less than significant.

## **l. Public Services**

### **(1) Fire Protection**

Under the No Project/Existing General Plan Alternative, increased demands for fire protection services and fire flow facilities (i.e., upgrades to existing on-site distribution lines and/or additional fire hydrants) would

occur relative to existing conditions. However, the reduction in development intensity and lack of residential uses under the No Project/Existing General Plan Alternative would reduce impacts related to the delivery of fire protection services that might otherwise occur under the proposed project from impacts to area traffic flow from construction activities or operational traffic. Further, the No Project/Existing General Plan Alternative would result in substantially lower population increases on-site, given the lack of residential uses, which would require incrementally less equipment, staff, and facilities compared to the proposed project. Therefore, impacts of the No Project/Existing General Plan Alternative relative to fire protection services would be less than significant and less than those associated with the proposed project.

## **(2) Police Protection**

This Alternative would intensify existing on-site land uses and therefore would incrementally increase the demand for police protection services relative to existing conditions. Development of this Alternative could impact the response times of emergency vehicles due to increased traffic flow in the area from the new development projects on-site, or from construction activities at the project site and its surrounding area. However, given the decrease in additional population relative to the proposed project, it is anticipated that impacts to police protection services would be less than significant, and would be less than those of the proposed project.

## **(3) Parks and Recreation**

The No Project/Existing General Plan Alternative would not directly generate new residents to the project area given the lack of residential uses, and is therefore not expected to impact parks and recreational facilities in the area. Given the lack of direct population growth, impacts under this Alternative would be less than the proposed project.

## **(4) Schools**

Although the No Project/Existing General Plan Alternative would not directly generate additional students, but would instead indirectly increase student population by providing additional employment opportunities on-site, there would be an incrementally increased demand for schools seats in the project area relative to existing conditions. Population growth, and associated student generation, would be substantially less under this Alternative than under the proposed project. Impacts to schools would be addressed via the payment of developer impact fees in accordance with State law, as is the case under the proposed project. However, given the reduction in population growth, impacts relative to schools would be less under the No Project/Existing General Plan Alternative compared to the proposed project and would be less than significant.

## **(5) Libraries**

This Alternative would result in an increased demand for library services relative to existing conditions due to indirect population growth. Although this Alternative would result in an indirect net increase in residents relative to existing conditions, impacts would be substantially reduced compared to the proposed project based on decreased population growth. Given the reduction in population growth, and less than significant library impacts under the proposed project, impacts would also be less than significant under this Alternative. Therefore, impacts under the No Project/Existing General Plan Alternative would be less than the proposed project and less than significant.

## **m. Traffic and Circulation**

The No Project/Existing General Plan Alternative would generate additional traffic at the project site, which could adversely affect the function and associated level of service (LOS) of intersections and roadway segments in the project area. The projected net traffic generation under this Alternative is summarized below in **Table 5-2, *Alternative 2 Traffic Generation***. As shown in Table 5-2, proposed uses under this Alternative would generate 3,988 net new daily vehicle trips, including 190 morning and 285 evening peak hour trips, compared to 2,790 daily trips (131 morning and 217 evening peak hour trips) under the proposed project. Despite the substantial increase in traffic generation associated with expanded commercial uses on-site, it is anticipated that impacts to the traffic system, including CMP facilities (i.e., major regional thoroughfares, freeways, on- and off-ramps, and associated intersections), would be reduced to less than significant levels through implementation of applicable mitigation measures. It should be noted that the proposed project's impact is less than significant without mitigation, and therefore it is expected that mitigation improvements could effectively reduce any impacts under this Alternative to acceptable levels. Since this Alternative would not trigger significant traffic system impact, its impact regarding conflicts with plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system, including the County's CMP, though given the incremental decrease in development intensity and associated traffic generation under this Alternative, impacts would be much greater than under the proposed project. Impacts related to traffic hazards/access would be less than significant with mitigation, as is the case with the proposed project. Impacts associated with conflicts with alternative transportation plans, policies, or programs would be less than significant, but greater than the proposed project, since future development on-site under the existing land use and zoning designations would be required to provide public transit improvements, as appropriate (e.g., new bus shelter), but would not be required to provide a new multi-use public trail or enhanced bicycle facilities as would occur under the proposed project.

## **n. Utilities and Service Systems**

### **(1) Water Supply**

The No Project/Existing General Plan Alternative would require additional on-site water distribution system improvements to serve future uses, including relocation of the existing 1926 water pipeline that currently bisects the site. As off-site facilities within the City of Newport Beach service area currently exist in the project area that could serve on-site uses, and future development would be required to construct or fund construction of necessary on-site water system improvements, impacts related to water infrastructure would be less than significant, similar to the proposed project. Further, this Alternative would require additional water supplies from the City of Newport Beach to serve future uses, but given the reduction in development intensity on-site under this Alternative, such demands would be less than the proposed project. Specifically, this Alternative would generate a water demand of approximately 9,522 gallons per day (gpd), compared to 23,706 gpd under the proposed project, a nearly 60-percent reduction in water demand. Therefore, the City would have adequate supplies of water to serve future uses under this Alternative, and impacts would be less than significant. Overall impacts in this regard would be less than significant and less than the proposed project.

Table 5-2

## Alternative 2 Traffic Generation

Land Use	Quantity	Units <sup>b</sup>	Peak Hour						Daily
			Morning			Evening			
			Inbound	Outbound	Total	Inbound	Outbound	Total	
<b><u>Trip Generation Rates<sup>a</sup></u></b>									
Specialty Retail <sup>c</sup>		TSF	0.61	0.39	1.00	1.19	1.52	2.71	44.32
Quality Restaurant <sup>d</sup>		TSF	0.66	0.15	0.81	5.02	2.47	7.49	89.95
High Turnover (Sit-Down) Restaurant		TSF	5.99	5.53	11.52	6.58	4.57	11.15	127.15
Office		TSF	1.36	0.19	1.55	0.25	1.24	1.49	11.01
Enclosed Dry Stack Storage <sup>e</sup>		Spaces	0.031	0.017	0.048	0.004	0.044	0.048	0.334
<b><u>Displaced Existing Trips Generated</u></b>									
RV/Boat Storage and Kayak Launch <sup>f</sup>			-2	-1	-3	-3	-5	-8	-39
<b><u>Proposed Trips Generated</u></b>									
Specialty Retail	63.38	TSF	39	25	63	75	96	172	2,809
Quality Restaurant	7.91	TSF	5	1	6	40	20	59	712
-Pass-By (43% Evening Peak Hour) <sup>g</sup>						-17	-8	-25	-306
High Turnover (Sit-Down) Restaurant	6.75	TSF	40	37	78	44	31	75	858
-Pass-By (43% Evening Peak Hour)						-19	-13	-32	-369
Office	25.14	TSF	34	5	39	6	31	37	277
Enclosed Dry Stack Storage	140	Spaces	4	2	7	1	6	7	47
<i>Subtotal</i>			<i>123</i>	<i>70</i>	<i>193</i>	<i>130</i>	<i>162</i>	<i>293</i>	<i>4,027</i>
<b>Net New Trips</b>			<b>121</b>	<b>69</b>	<b>190</b>	<b>127</b>	<b>157</b>	<b>285</b>	<b>3,988</b>

<sup>a</sup> Source: Institute of Transportation Engineers, Trip Generation, 8th Edition, 2008, Land Use Categories 230, 710, 814, 820, 931, and 932.

<sup>b</sup> TSF = Thousand Square Feet; DU = Dwelling Units

<sup>c</sup> Institute of Transportation Engineers, Trip Generation, does not provide morning peak hour trip generation rates for the Specialty Retail land use. Therefore, the trip generation rates for Shopping Center (Land Use Category 820) were used to estimate the morning peak hour trips.

<sup>d</sup> Institute of Transportation Engineers, Trip Generation, does not provide inbound/outbound splits for the peak hour of adjacent street traffic (one hour between 7:00 AM -9:00 AM) for the Quality Restaurant land use. Therefore, the inbound/outbound splits for the AM peak hour of generator were used.

<sup>e</sup> Source: Linscott, Law, and Greenspan, Dry Stack Boat Storage: Appendix D - Trip Generation Study Data, 2007.

<sup>f</sup> Based on trip generation count data for the existing site (see Appendix D). The "other uses" shown in Table D-1 (see Appendix D) include trips from the existing marina, Pearson's Port, and some parking from the adjacent residential uses, which will remain after the proposed project is constructed.

<sup>g</sup> Source: Institute of Transportation Engineers, Trip Generation Handbook, 2<sup>nd</sup> Edition, 2004.

## **(2) Wastewater**

The No Project/Existing General Plan Alternative would generate additional wastewater on-site, but at a lower rate than the proposed project based on the incremental reduction in development intensity. On-site infrastructure improvements would be required, as under the proposed project, and such improvements would connect to the Orange County Sanitation District (OCSD) trunk sewer and treatment system. Specifically, this Alternative would generate approximately 7,935 gpd of wastewater compared to 19,755 gpd under the proposed project, a nearly 60-percent reduction in wastewater generation. Given the reduction in development intensity under this Alternative and associated reduction in wastewater generation, impacts to the wastewater conveyance and treatment system would be less than under the proposed project and would be less than significant with mitigation, as it would not compromise OCSD's ability to meet RWQCB treatment requirements, result in significant environmental effects associated with construction of new wastewater facilities, and would not exceed the OCSD's wastewater treatment capacity.

## **(3) Solid Waste**

The No Project/Existing General Plan Alternative would generate additional solid waste on-site, during both construction and operation, but at a higher rate than the proposed project based on the increase in commercial development intensity. Specifically, this Alternative would generate approximately 724 pounds per day of solid waste, compared to 683 pounds per day under the proposed project, which represents an increase of approximately six percent. Despite the reduction in development square footage under this Alternative, impacts to disposal capacity at the Frank R. Bowerman Landfill would be greater than under the proposed project but would be less than significant, as this facility has adequate capacity to accept solid waste from the proposed project in the long-term.

### **3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES**

The extent to which this Alternative would meet each of the stated objectives of the proposed project is summarized below in Table 5-5. The No Project/Existing General Plan Alternative would at least partially meet all but two of the project objectives, and would fully meet two of them. Specifically, this Alternative would fully meet Project Objective #3, as it would maintain and expand core coastal dependent and coastal-related land uses, including continuation and expansion of existing marina parking, and the development of significant new enclosed bayfront dry stack boat storage and launching facility. This Alternative also would protect and enhance significant visual resources from City-designated Coastal View Points and Coastal View Roads, [such as Coast Highway, Castaways Park, and Coast Highway-Bay Bridge, to the bay and the cliffs of upper Newport Beach] through view corridors designed into the project, and would create new view opportunities on-site, and as such would fully meet Project Objective #5. Additionally, the No Project/Existing General Plan Alternative would partially meet Project Objective #1 since it would provide a high quality marine-related, visitor-serving commercial development with a unified architectural and landscape theme, but would not provide a mixed-use development that includes residential uses. This Alternative would partially meet Project Objective #6, as it would expand bayfront public access to and along the bay where none exists at the present time, in a manner that protects environmental study areas (ESA) and/or environmentally sensitive habitat areas (ESHA) and does not adversely impact existing private residences adjacent to the site, consistent with Coastal Act section 30214. The new coastal access will be accomplished through a minimum Code-required six-foot-wide bayfront walkway traversing Planning Areas 1 and 2 of the future project, in contrast to the 12-foot width under the proposed project. However, this new, public bayfront promenade would not be required to link to the existing Newport Dunes pedestrian/bicycle trail off of Bayside Drive, and ultimately to the Newport Dunes recreational areas, via new bicycle lane and

trail improvements on Bayside Drive. The No Project/Existing General Plan Alternative would not implement the MU-H1 (Mixed-Use Horizontal 1) General Plan and MU-H (Mixed-Use Horizontal) Coastal Land Use Plan categories on an underutilized bayfront location in a manner that provides for a horizontally distributed mix of uses, which includes general or neighborhood commercial, offices, multi-family residential, visitor-serving and marine-related uses, as well as buildings that vertically integrate residential with non-residential uses, adjacent to Coast Highway, and on a bayfront location, and therefore would not meet Project Objective #2. Finally, this Alternative would also not meet Project Objective #4, as it would not provide new housing opportunities in response to the continued demand for housing, reduce vehicle trips and encourage active lifestyles by increasing the opportunity for residents to live in proximity to jobs, services, coastal recreation and entertainment.

## **5. ALTERNATIVES**

### **C. ALTERNATIVE 3: INCREASED RESIDENTIAL/REDUCED COMMERCIAL ALTERNATIVE**

---

#### **1. DESCRIPTION OF THE ALTERNATIVE**

The Increased Residential/Reduced Commercial Alternative would allow for a future development pattern and footprint nearly identical to the proposed project, but would include more residential units and reduced commercial square footage. As such, the Increased Residential/Reduced Commercial Alternative would include the same Planning Area boundaries, land use categories, development standards, and design guidelines as the proposed project, as well as all project-related improvements and amenities (e.g., bayfront promenade, pedestrian and bicycle facilities, public coastal view tower, and water inlet for dry stack boat storage). In terms of development intensity, this Alternative would result in the potential future on-site construction of up to 75 residential units totaling 113,000 square feet and up to 58,400 square feet of recreational and marine commercial uses within a mixed-use development. Commercial uses under Alternative 3 are assumed to include 6,400 square feet of retail/marine sales and repair uses, 4,300 square feet of quality restaurant uses, 1,600 square feet of high-turnover restaurant uses, 4,800 square feet of office uses, and 32,500 square feet of dry stack boat storage in Planning Area 1; 4,800 square feet of marine services and office in Planning Area 2; and 4,000 square feet of resident storage and boat lockers in Planning Area 4. It is assumed for the purposes of this analysis that all project-related legislative approvals, including amendments to the City's General Plan, CLUP, and Zoning Code (PC text), and administrative approvals such as the LLA to allow for relocated site access, would be required under this Alternative.

This alternative is not required to avoid or substantially reduce a significant impact. There are different policies relative to providing additional housing on the site. Regional planning and City policies, and state law such as SB 375, encourage the provision of additional housing on sites such as this one (infill sites with access to utilities, etc.). The California Coastal Commission would typically require that no more than 50-percent of a mixed-use waterfront development be residential in relation to commercial use. The City has included this alternative for informational purposes, and to allow the public and decision-makers to evaluate this alternative in light of these differing housing policies.

#### **2. ENVIRONMENTAL IMPACTS**

##### **a. Aesthetics/Visual Resources**

###### **(1) Views/Scenic Vistas**

This Alternative would result in a similar mix of land uses as the proposed project, as well as development standards including a maximum structural height of 35 feet for flat roofs and 40 feet for sloped roofs, as would be required under the proposed PCDP. Given the overall reduction in development square footage, it is anticipated that this Alternative would result in a smaller development. Therefore, this Alternative would incrementally reduce view obstructions of scenic vistas in the project area, most notably views from East Coast Highway of Upper Newport Bay, the Santa Ana Mountains, and San Joaquin Hills to the north and east. However, while view obstructions of these scenic resources would be reduced from locations throughout the project area, including from City-designated Coastal View Points and various points along a Coastal View Road (East Coast Highway) adjacent to the project boundaries, views would not to be substantially affected



by construction of future uses on-site under this Alternative. As such, given the reduction in overall building massing under the Increased Residential/Reduced Commercial Alternative, impacts to scenic vistas would be less than significant and less than the proposed project.

## **(2) Aesthetics/Visual Character**

This Alternative would improve the project site with a mix of urban uses that would be developed according to the same proposed development standards and design guidelines as for the proposed PCDP. Furthermore, the design theme and overall development pattern would be comparable to that of the proposed project, and as such this Alternative would provide a consistent design theme and unified architecture, landscaping, lighting, and signage features that would result in a beneficial impact related to aesthetics and visual character. Therefore, impacts would be less than significant and similar to those of the proposed project.

## **(3) Light and Glare**

Under the Increased Residential/Reduced Commercial Alternative, new sources of light and glare would be introduced to the undeveloped portions of the project site, as would be the case for the proposed project. While light and glare effects would be increased under this Alternative relative to existing conditions, such light and glare impacts are not expected to be significant given adherence to the proposed PCDP and NBMC lighting standards and landscaping and screening requirements. As such, similar to the proposed project, impacts related to light and glare effects would be less than significant.

## **b. Air Quality**

The Increased Residential/Reduced Commercial Alternative would allow for a similar mix of development on the project site, but at a lower overall intensity than the proposed project particularly due to the reduction in commercial intensity. While construction activities would be of a similar nature and intensity as the proposed project for future development under this Alternative, and therefore worst-case daily emissions would exceed thresholds as under the proposed project, the overall duration and frequency of construction activities would be incrementally reduced based on the overall reduction in development intensity on-site. Therefore, although construction emissions impacts under this Alternative would be less than significant, impacts would be less than the proposed project due to lower overall level of construction activity. Similarly, operational emissions would be reduced due to lower overall project development intensity and associated traffic generation, and therefore would not exceed established thresholds and would be less than significant. Impacts related to odors would be reduced relative to the proposed project due to lower development intensity on-site, and would remain less than significant with mitigation. Impacts related to consistency with the applicable AQMP would be less than significant, similar to the proposed project.

## **c. Biological Resources**

Under this Alternative, the project site would be developed with urban uses, as is the case under the proposed project. Although development intensity under the Increased Residential/Reduced Commercial Alternative would be reduced relative to the proposed project, intensification of the under-developed portions of the project area with active urban uses would indirectly affect existing resources near the project site in a similar manner to the proposed project. Direct impacts, as under the proposed project, would include impacts to wetlands resulting from the construction of a new water inlet to accommodate boat launch and retrieval operations associated with a new dry stack boat storage facility. Since the project site

would be ultimately developed as under the proposed project but at a lower intensity (in terms of commercial square footage), impacts related to sensitive species, riparian habitat, wetlands/jurisdictional features, and wildlife movement would be comparable to those of the proposed project and would be reduced to less than significant with implementation of applicable mitigation measures. Likewise, impacts associated with consistency with regulatory framework would be less than significant and similar to the proposed project.

#### **d. Cultural Resources**

The Increased Residential/Reduced Commercial Alternative would allow for the future construction of urban uses within the project site but with a reduced development intensity compared to the proposed project. Although this Alternative would result in incrementally less intensity, it is anticipated that grading and excavation activities would be similar to those of the proposed project. Additionally, redevelopment of the project site with a new mixed-use project would result in the demolition of the existing 1960s-era storage garages in Planning Area 4. Therefore, this Alternative, like the proposed project, would have the potential to physically affect known historic resources (i.e., on-site storage garages) and undiscovered archaeological and paleontological resources, including human remains, which may exist in site soils. Site clearing and grading activities on-site would have the highest potential to adversely affect such resources, as is the case under the proposed project, though implementation of applicable mitigation measures would reduce this potential. Therefore, similar to the proposed project, impacts under this Alternative would be less than significant with mitigation.

#### **e. Geology and Soils**

The Increased Residential/Reduced Commercial Alternative would allow for future development of the site with new residential and commercial uses at a much higher intensity than exists on the site currently, as is the case with the proposed project. However, despite the decrease in development square footage on-site relative to the proposed project, this Alternative would expose more people to risks associated with seismic ground shaking and surface fault rupture since it would provide approximately 50 percent more on-site housing units with permanent residents. Similarly, given the high liquefaction potential at the project site, this Alternative would expose people to secondary seismic risks due to seismic ground failure, but to a greater extent than the proposed project. Mitigation would still be required under this Alternative with regard to foundation design and/or soil treatments to address ground shaking and associated ground settlement hazards, but impacts in this regard would be incrementally greater than the proposed project. Since this Alternative would require similar excavation and grading activities to the proposed project, it would result in comparable impacts regarding soil erosion or the loss of topsoil. However, as is the case with the proposed project, given compliance with applicable water quality regulations, these impacts would be reduced to a less than significant level. As such, despite the comparable amount of grading and excavation under this Alternative, impacts in this regard would be increased relative to the proposed project but less than significant, as greater residential development intensity on-site would expose more people to risks associated with geologic hazards.

#### **f. Greenhouse Gas Emissions**

The Increased Residential/Reduced Commercial Alternative would allow for the future development of the project site with a mix of urban uses similar to the proposed project, but at a lower overall intensity, with considerably less commercial development. Since GHG emissions are largely a result of motor vehicle

emissions, and this Alternative would result in substantially lower daily traffic generation relative to the proposed project, greenhouse gas emissions would also be proportionally reduced (refer to discussion below under Traffic and Circulation). As such, greenhouse gas emissions resulting from construction and operation of future uses would be incrementally lower relative to the proposed project, and impacts would be reduced to less than significant with implementation of applicable mitigation measures. Additionally, impacts related to consistency with GHG reduction plans would be less than significant under this Alternative, as is the case for the proposed project, as all feasible GHG-reduction measures would be implemented consistent with applicable GHG reduction plans. Given the reduction in development intensity and associated traffic generation and greenhouse gas emissions, impacts would be less than the proposed project.

### **g. Hazards and Hazardous Materials**

This Alternative, like the proposed project, would require that existing potential hazardous materials conditions on-site, including the removal of an existing 550-gallon UST and possible remediation of affected soils and groundwater, be adequately addressed prior to development of future uses. Mitigation measures prescribed for the proposed project would also be necessary under this Alternative in order to reduce impacts related to hazardous materials releases and hazardous building materials to less than significant levels. Similarly, mitigation would be required to reduce the significance of impacts regarding emergency response and evacuation plans, as is the case with the proposed project. Implementation of site-specific mitigation measures would reduce potential hazards to acceptable levels under this Alternative, and therefore impacts would be less than significant and similar to the proposed project.

### **h. Hydrology and Water Quality**

Under this Alternative, the project site would be developed with a future project that would intensify the land uses on the site with little change in impervious surface area, similar to the proposed project. Given that the Increased Residential/Reduced Commercial Alternative would result in a comparable development footprint as the proposed project, it is assumed that stormwater flow volumes would not substantially vary from those under the proposed project. Likewise, the proposed project's storm drain improvements would also be implemented under this Alternative, which would ensure that storm drain infrastructure serving the site is constructed to meet the demands of the future development. Additionally, future development under this Alternative would also be subject to applicable stormwater regulations of the Santa Ana Regional Water Quality Control Board (RWQCB) and County of Orange, and would also implement the proposed project's site-specific Water Quality Management Plan (WQMP), which would preclude the potential for adverse impacts related to flooding, site drainage patterns, and exceedance of storm drain system capacity. Likewise, project-specific Stormwater Pollution Prevention Plan (SWPPP) during construction and WQMP for project operations, as required by the City and RWQCB, would also be implemented on-site under this Alternative to minimize potential impacts to water quality. Therefore, given compliance with applicable water quality regulations, impacts associated with violation of waste discharge requirements, erosion and siltation, and overall water quality degradation would be less than significant. Overall, impacts under this Alternative would be less than significant and similar to the proposed project.

### **i. Land Use**

The required amendments to the City's General Plan, CLUP, and Zoning Code under the proposed project would also be necessary under the Increased Residential/Reduced Commercial Alternative. Given the similarity in overall development pattern and reduction in development intensity relative to the proposed

project, this Alternative is anticipated to be consistent with the goals, policies, and principles of the California Coastal Act, City's General Plan, CLUP, Zoning Code, SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG Compass Growth Vision, and the Airport Environs Land Use Plan for John Wayne Airport. Furthermore, the proposed 75 dwelling units under this Alternative is equal to the existing surplus residential density that currently exists within Parcels 1 and 2, and therefore this Alternative would require a re-allocation of this surplus density to Parcel 3, similar to under the proposed project (though the proposed project would only re-allocate 49 of the available 75 units). Similarly, with increased residential uses on-site, this Alternative would be supportive of various policies contained in the City's General Plan Housing Element with regard to provision of additional housing within the City and the location of housing in proximity to or integrated with complementary commercial uses to a greater degree than the proposed project. Overall, however, impacts under this Alternative would be less than significant and similar to the proposed project. But, this alternative will likely not be acceptable to the California Coastal Commission, which will typically require that the residential component on mixed-use waterfront development not be higher than 50-percent of the project.

## **j. Noise**

This Alternative would result in the future construction and operation of a similar mix of urban uses on the project site as under the proposed PCDP, but at a lower overall intensity. Given the proximity of existing noise-sensitive uses (e.g., residences) to the project site, construction-related vibration would result in similar impacts as under the proposed project, which would be temporary and less than significant, though the duration of such impacts would be reduced given a shorter overall construction schedule. Impacts regarding violation of established noise standards and temporary or periodic noise increases in the project area would be less than significant with mitigation incorporated, and would be less than the proposed project based on the reduced overall development intensity on-site. As is the case for the proposed project, operational groundborne noise and vibration levels would not exceed established thresholds and therefore impacts would be less than significant. Given the reduction in development intensity and associated traffic generation, operational noise from stationary and mobile sources would be less than the proposed project and less than significant.

## **k. Population and Housing**

The Increased Residential/Reduced Commercial Alternative would result in population, housing, and employment growth within the project boundaries, but with greater population and housing growth and decreased employment growth compared to the proposed project. The growth associated with this Alternative would be within the growth projections provided by SCAG, as is the case for the proposed project, since 75 dwelling units of surplus housing density is assumed for Parcels 1 and 2 in the City's General Plan (which would be re-allocated to Parcel 3 for this Alternative), and allowable commercial square footage on-site is greater than that proposed under this Alternative. Specifically, as discussed above under Alternative 2, the existing General Plan designations on-site would result in no direct population growth but an indirect population increase of 179 persons; this Alternative would result in total population growth of 237 persons (164 direct and 73 indirect). Further, since this Alternative would only result in slightly greater overall population growth on-site than under the proposed project (237 under this Alternative versus 227 under the proposed project), primarily due to the approximately 50-percent increase in residential development intensity, impacts in this regard would also be less than significant but slightly greater than those of the proposed project. However, since this Alternative would result in increased residential uses, it would provide more housing than the proposed project and as such impacts would be considered less in this

regard, and they would remain less than significant. Finally, as this Alternative would provide a reduced amount of commercial uses, and therefore would result in reduced employment levels compared to the proposed project (133 employees versus 219 under the proposed project), impacts related to employment would be greater than the proposed project but still less than significant.

## **I. Public Services**

### **(1) Fire Protection**

Under the Increased Residential/Reduced Commercial Alternative, increased demands for fire protection services and fire flow facilities (i.e., upgrades to existing lines and/or additional fire hydrants) would occur relative to existing conditions. The Increased Residential/Reduced Commercial Alternative would reduce impacts related to the delivery of fire protection services that might otherwise occur under the proposed project from impacts to area traffic flow from construction activities or operational traffic. However, despite lower project-related traffic under this Alternative, the Increased Residential/Reduced Commercial Alternative would result in slightly higher overall population increases on-site, which would require incrementally more equipment, staff, and facilities compared to the proposed project. Therefore, impacts of the Increased Residential/Reduced Commercial Alternative relative to fire services would be less than significant but greater than those associated with the proposed project.

### **(2) Police Protection**

This Alternative would intensify existing on-site land uses and therefore would incrementally increase the demand for police protection services relative to existing conditions. Development of this Alternative could impact the response times of emergency vehicles due to increased traffic flow in the area from the new development projects on-site, or from construction activities at the project site and its surrounding area, but impacts in this regard would be reduced compared to the proposed project since traffic generation would be substantially reduced. Despite the increase in residential population relative to the proposed project, it is anticipated that impacts to police protection services would be less than significant, and would be less than the proposed project.

### **(3) Schools**

Since the Increased Residential/Reduced Commercial Alternative would directly and indirectly generate additional students, there would be an increased demand on schools in the project area relative to existing conditions. Population growth, and associated student generation, would be incrementally greater under this Alternative than under the proposed project. Given the substantial increase in residential uses and overall population growth, impacts relative to schools would be greater under the Increased Residential/Reduced Commercial Alternative compared to the proposed project, but would remain less than significant.

### **(4) Libraries**

This Alternative would result in an increased demand for library services relative to existing conditions and to a greater extent than the proposed project. This is due to both the over 50-percent increase in residential units under this Alternative, as well as the overall increase in direct and indirect population growth relative to the proposed project. Therefore, impacts under the Increased Residential/Reduced Commercial Alternative would be greater than the proposed project.

## (5) Parks and Recreation

The Increased Residential/Reduced Commercial Alternative would generate new residents on-site and is therefore expected to impact parks and recreational facilities in the area. The increase in residential units and overall population growth under this Alternative would increase demands for parks and recreational facilities compared to the proposed project. However, potential impacts to park and recreational facilities associated with this Alternative would be less than significant given compliance with City requirements, as is the case with the proposed project. Given the incremental increase in population growth, impacts under this Alternative would be greater than the proposed project.

### m. Traffic and Circulation

The Increased Residential/Reduced Commercial Alternative would generate additional traffic at the project site, which could adversely affect the function and associated level of service (LOS) of intersections and roadway segments in the project area. Trip generation rates for this Alternative were determined for daily traffic, morning peak hour inbound and outbound traffic, and evening peak hour inbound and outbound traffic for the project alternative land uses. By multiplying the trip generation rates by the land use quantities, the project generated traffic volumes are determined. **Table 5-3, *Alternative 3 Traffic Generation***, below, exhibits the trip generation rates, project peak hour volumes, and project daily traffic volumes.

The project alternative is projected to generate approximately 1,441 daily vehicle trips, 83 of which occur during the morning peak hour and 107 of which occur during the evening peak hour. It should be noted that a 43-percent pass-by trip reduction was applied to the restaurant land uses based upon the Institute of Transportation Engineers, *Trip Generation Handbook*, 2<sup>nd</sup> Edition, 2004. Diversion of the pass-by trips was accounted for at the intersection of Bayside Drive/East Coast Highway.

Because the project alternative would replace the existing storage space (4,000 square feet in Planning Area 4), the trip generation of the project alternative is equal to the net new trips between this Alternative and the existing development on-site, as no new trips would result from this improvement. Once existing uses and associated traffic has been accounted for, as shown in Table 5-3, the net new trips generated by the Increased Residential/Reduced Commercial Alternative are projected to be approximately 1,402 daily vehicle trips, 80 additional trips of which occur in the morning peak hour and 99 additional trips of which occur during the evening peak hour.

The evaluation of traffic impacts under this Alternative included analysis of the study area intersections that were projected to operate at Level of Service D or worse under the proposed project (as summarized in the proposed project TIA [included in Appendix K of this Draft EIR]). Consistent with the City of Newport Beach approved methodology, the technique used to assess the operation of a signalized intersection is known as Intersection Capacity Utilization. To calculate an intersection Capacity Utilization value the volume of traffic using the intersection is compared with the capacity of the intersection. An Intersection Capacity Utilization value is usually expressed as a decimal. The decimal represents that portion of the hour required to provide sufficient capacity to accommodate all intersection traffic if all approaches operate at capacity.

**Table 5-3**  
**Alternative 3 Traffic Generation**

Land Use	Quantity	Units <sup>b</sup>	Peak Hour						Daily
			Morning			Evening			
			Inbound	Outbound	Total	Inbound	Outbound	Total	
<b>Trip Generation Rates<sup>a</sup></b>									
Specialty Retail <sup>c</sup>		TSF	0.61	0.39	1	1.19	1.52	2.71	44.32
Quality Restaurant <sup>d</sup>		TSF	0.66	0.15	0.81	5.02	2.47	7.49	89.95
High Turnover (Sit[down]) Restaurant		TSF	5.99	5.53	11.52	6.58	4.57	11.15	127.15
Office		TSF	1.36	0.19	1.55	0.25	1.24	1.49	11.01
Enclosed Dry Stack Storage <sup>e</sup>		Spaces	0.031	0.017	0.048	0.004	0.044	0.048	0.334
Residential Condominium		DU	0.07	0.37	0.44	0.35	0.17	0.52	5.81
<b>Displaced Existing Trips Generated</b>									
RV/Boat Storage and Kayak Launch <sup>f</sup>	-	-	2	1	3	3	5	8	39
<b>Proposed Trips Generated</b>									
Specialty Retail	6.4	TSF	4	2	6	8	10	18	284
Quality Restaurant	4.3	TSF	3	1	4	22	11	33	387
-Pass-By (43% Evening Peak Hour) <sup>g</sup>			0	0	0	-9	-5	-14	-14
High Turnover (Sit[down]) Restaurant	1.6	TSF	10	9	19	11	7	18	203
-Pass-By (43% Evening Peak Hour)			0	0	0	-5	-3	-8	-8
Office	9.6	TSF	13	2	15	2	12	14	106
Enclosed Dry Stack Storage	140	Spaces	4	2	6	1	6	7	47
Residential Condominium	75	DU	5	28	33	26	13	39	436
<i>Subtotal</i>			39	44	83	56	51	107	1,441
<b>Net New Trips</b>									
Commercial			32	15	47	27	33	60	966
Residential			5	28	33	26	13	39	436
<b>Total</b>			<b>37</b>	<b>43</b>	<b>80</b>	<b>53</b>	<b>46</b>	<b>99</b>	<b>1,402</b>

<sup>a</sup> Source: Institute of Transportation Engineers, Trip Generation, 8th Edition, 2008, Land Use Categories 230, 710, 814, 820, 931, and 932.

<sup>b</sup> TSF = Thousand Square Feet; DU = Dwelling Units

<sup>c</sup> Institute of Transportation Engineers, Trip Generation, does not provide morning peak hour trip generation rates for the Specialty Retail land use. Therefore, the trip generation rates for Shopping Center (Land Use Category 820) were used to estimate the morning peak hour trips.

<sup>d</sup> Institute of Transportation Engineers, Trip Generation, does not provide inbound/outbound splits for the peak hour of adjacent street traffic (one hour between 7:00 AM -9:00 AM) for the Quality Restaurant land use. Therefore, the inbound/outbound splits for the AM peak hour of generator were used.

<sup>e</sup> Source: Linscott, Law, and Greenspan, Dry Stack Boat Storage: Appendix D - Trip Generation Study Data, 2007.

<sup>f</sup> Based on trip generation count data for the existing site (see Appendix D). The "other uses" shown in Table D-1 (see Appendix D) include trips from the existing marina, Pearson's Port, and some parking from the adjacent residential uses, which will remain after the proposed project is constructed.

<sup>g</sup> Source: Institute of Transportation Engineers, Trip Generation Handbook, 2nd Edition, 2004.

The Levels of Service for existing + growth (Year 2017) + approved projects + cumulative projects + project traffic conditions have been calculated and are shown below in **Table 5-4, *Alternative 3 Intersection Capacity Utilization and Levels of Service***. Existing + growth (Year 2017) + approved projects + cumulative projects + project Intersection Capacity Utilization worksheets and the Level of Service description are provided in Appendix B of the Alternative 3 Traffic Impact Analysis Letter Report (included in Appendix K of this Draft EIR).

For existing + growth (Year 2017) + approved projects + cumulative projects + project traffic conditions, the study area intersections are projected to operate at Level of Service D or better during the morning/evening peak hours, except for the following study area intersections that are projected to operate at Level of Service E during the peak hours:

Newport Boulevard SB Ramp (NS) at:

West Coast Highway (EW) (Morning Peak Hour, Level of Service E)

Jamboree Road (NS) at:

San Joaquin Hills Road (EW) (Evening Peak Hour, Level of Service E)

However, as shown below in Table 5-4, this Alternative would not result in a one-percent or greater increase in delay at any affected intersections operating at LOS D or worse. As such, impacts related to the local and regional traffic system, including CMP facilities, would be less than significant and less than the proposed project based on the overall reduction in vehicle trips.

Impacts related to traffic hazards/access and conflicts with alternative transportation plans and policies would be less than significant and similar to the proposed project, since a future project on-site under this Alternative would be subject to Site Development Review to address traffic safety and access issues (i.e., relocation of project driveway to the north), and would be required to provide public transit improvements, as well as pedestrian and bicycle facilities, within the project area. This Alternative would also not trigger significant traffic system impact, and therefore its impacts regarding conflicts with plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system, including the County's CMP, would also be less than significant, similar to the proposed project.



Table 5-4

## Alternative 3 Intersection Capacity Utilization and Levels of Service

Intersection	Traffic Control <sup>c</sup>	Intersection Approach Lanes <sup>b</sup>				Peak Hour ICU-LOS <sup>a</sup>													
		Northbound		Southbound		Eastbound		Westbound		Existing + Growth (Year 2017) ++ Project Approved Projects + Cumulative Projects (Year 2017) +		ICU Increase							
		L	T	R	L	T	R	L	T	R	Morning	Evening	Morning	Evening					
Newport Boulevard SB Ramp (NS) at:																			
West Coast Highway (EW)	TS	0	0	0	2	0	1	0	2	0	0	3	1>>	0.952-E	0.866-D	0.953-E	0.868-D	0.001	0.002
Riverside Avenue (NS) at:																			
West Coast Highway (EW)	TS	0	1	0	0.5	0.5	1>	1	1.5	0.5	1	3	1	0.760-C	0.880-D	0.763-C	0.883-D	0.003	0.003
Dover Drive (NS) at:																			
West Coast Highway (EW)	TS	1	1.5	0.5	3	1	1	2	2.5	0.5	1	3	1>>	0.683-B	0.790-C	0.688-B	0.795-C	0.005	0.005
Bayside Drive (NS) at:																			
East Coast Highway (EW)	TS	2.3	0.3	0.3	1	0.5	0.5	1	3	1	1	3.5	0.5	0.734-C	0.734-C	0.749-C	0.775-C	0.015	0.041
Jamboree Road (NS) at:																			
San Joaquin Hills Road (EW)	TS	1	3	1>>	2	3	1>>	1.5	1.5	1	1.5	1.5	1	0.680-B	0.961-E	0.682-B	0.963-E	0.002	0.002
East Coast Highway (EW)	TS	1	1.5	0.5	1	2	1>>	3	3.5	0.5	2	4	1	0.661-B	0.828-D	0.664-B	0.831-D	0.003	0.003

<sup>a</sup> ICU-LOS = Intersection Capacity Utilization - Level of Service (see Appendix D).

<sup>b</sup> L = Left; T = Through; R = Right; >> = Free Right Turn; > = Right Turn Overlap; d = De Facto Right Turn Lane

<sup>c</sup> TS = Traffic Signal

<sup>d</sup> Intersection is located on the City boundary line of Costa Mesa and Newport Beach.

## **n. Utilities and Service Systems**

### **(1) Water Supply**

The Increased Residential/Reduced Commercial Alternative would require additional on-site water distribution system improvements to serve future uses, as is the case under the proposed project, which would include the relocation of the existing 1926 pipeline that currently bisects the site. As off-site facilities currently exist in the project area that could serve on-site uses, and a future project would be required to construct or fund construction of necessary on-site water system improvements, impacts related to water infrastructure would be less than significant with mitigation, similar to the proposed project. Further, this Alternative would require additional water supplies from the City of Newport Beach to serve future uses, but given the substantial increase in residential development intensity on-site under this Alternative, such demands would be greater than the proposed project. Specifically, this Alternative would create a water demand for 27,751 gpd compared to 23,706 gpd under the proposed project, an increase of approximately 17 percent. The City of Newport Beach is anticipated to have adequate supplies of water to serve future uses under this Alternative, as this development intensity has been accounted for in the City's General Plan and Urban Water Management Plan. Therefore, impacts to water supply and infrastructure would be less than significant with mitigation but greater than the proposed project.

### **(2) Wastewater**

The Increased Residential/Reduced Commercial Alternative would generate additional wastewater on-site at a higher rate than the proposed project based on the substantial increase in residential development intensity. On-site infrastructure improvements would be required, as under the proposed project, and such improvements would connect to the OCSD's trunk sewer and treatment system. This Alternative would also implement the proposed on-site sewer improvements, which are designed to adequately serve all on-site uses. This Alternative would generate 23,126 gpd of wastewater, compared to 19,755 gpd under the proposed project, which is a 17-percent increase. Based on the increase in wastewater generation under Alternative 3, impacts to the wastewater conveyance and treatment system would be greater than under the proposed project but would be less than significant with mitigation, as it would not compromise OCSD's ability to meet RWQCB treatment requirements, result in significant environmental effects associated with construction of new wastewater facilities, and would not exceed the OCSD's wastewater treatment capacity.

### **(3) Solid Waste**

The Increased Residential/Reduced Commercial Alternative would generate additional solid waste on-site, during both construction and operation, but at a lower rate than the proposed project based on the incremental reduction in commercial development intensity, which generates considerably more solid waste than residential uses. This Alternative would generate 578 pounds per day of solid waste, which is approximately 15 percent less than the 683 pounds per day generated by the proposed project. Given the reduction in commercial development intensity under this Alternative and associated reduction in solid waste generation, impacts to disposal capacity at County landfills would be less than under the proposed project and would be less than significant, as existing facilities have adequate capacity to accept solid waste from the proposed project in the long-term, and this Alternative would generate less waste requiring disposal.

### 3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The extent to which this Alternative would meet each of the stated objectives of the proposed project is summarized below in Table 5-5. The Increased Residential/Reduced Commercial Alternative would at least partially meet all of the project objectives, and would fully meet all but one of them. Specifically, this Alternative would provide a high quality mixed-use, marine-related, visitor-serving commercial development with integrated residential units and a unified architectural and landscape theme (Project Objective #1); implement the MU-H1 (Mixed-Use Horizontal 1) General Plan and MU-H (Mixed-Use Horizontal) Coastal Land Use Plan categories on an underutilized bayfront location in a manner that provides for a horizontally distributed mix of uses, which includes general or neighborhood commercial, offices, multi-family residential, visitor-serving and marine-related uses, as well as buildings that vertically integrate residential with non-residential uses, adjacent to Coast Highway, and on a bayfront location (Project Objective #2); maintain and expand core coastal dependent and coastal-related land uses, including continuation and expansion of existing marina parking, and the development of significant new enclosed bayfront dry stack boat storage and launching facility, but at a lesser degree than the proposed project due to the reduced intensity (Project Objective #3); provide new housing opportunities in response to the continued demand for housing and reduce vehicle trips to a greater extent than the proposed project would, and would also encourage active lifestyles by increasing the opportunity for residents to live in proximity to jobs, services, coastal recreation and entertainment (Project Objective #4); protect and enhance significant visual resources from City-designated Coastal View Points and Coastal View Roads, [such as Coast Highway, Castaways Park, and Coast Highway-Bay Bridge, to the bay and the cliffs of upper Newport Beach] through view corridors designed into the project, and would also create new public view opportunities on-site (Project Objective #5); and expand bayfront public access to and along the bay where none exists at the present time, in a manner that protects environmental study areas (ESA) and/or environmentally sensitive habitat areas (ESHA) and does not adversely impact existing private residences adjacent to the site, consistent with Coastal Act section 30214. As under the proposed project this new coastal access would be accomplished through a new 12-foot-wide bayfront walkway traversing Planning Areas 1 and 2 of the future project that links the public docks and marina property south of the Coast Highway-Bay Bridge, to the existing Newport Dunes pedestrian/bicycle trail off of Bayside Drive, and ultimately to the Newport Dunes recreational areas, as well as to an existing County Class 1 Regional Trail (Project Objective #6).

## 5. ALTERNATIVES

### D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

---

Section 15126.6(e)(2) of the *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The *Guidelines* also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project/No Build Alternative, the No Project/Existing General Plan Alternative, and the Increased Residential/Reduced Commercial Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative with the environmental impacts associated with the proposed project is provided in Table 5-1 above. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the *CEQA Guidelines*, the analysis below addresses the ability of the Alternatives to “avoid or substantially lessen one or more of the significant effects” of the project.

Of the Alternatives analyzed in the Draft EIR, the No Project/No Build Alternative is considered the overall environmentally superior alternative as it would reduce nearly all project-related impacts compared to the proposed project (impacts would be greater with regard to aesthetics/visual character and hazardous materials due to the lack of site improvements and remediation activities that would occur under the proposed project). However, as indicated above, this Alternative would not meet any of the project objectives. The extent to which each project Alternative would meet each of the stated objectives of the proposed project is summarized below in Table 5-5.

In accordance with the *CEQA Guidelines* requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Increased Residential/Reduced Commercial Alternative would be the environmentally superior alternative, relative to the other alternatives. This Alternative would fully meet all of the stated project objectives, and would generally reduce project-related environmental impacts with a few exceptions. Specifically, this Alternative would reduce impacts related to views/scenic vistas, light and glare, construction-related and operational air pollutant emissions, greenhouse gas emissions, water quality degradation, noise and vibration, housing supply, traffic system function, and landfill capacity. The Increased Residential/Reduced Commercial Alternative would result in similar impacts as the proposed project with regard to aesthetics/visual character, AQMP consistency, biological resources, cultural resources, soil erosion and siltation, consistency with GHG reduction plans, hazards and hazardous materials, site drainage patterns, flooding, seiche/tsunami/mudflow hazards, site access/traffic safety, alternative transportation, and water infrastructure. Impacts under this Alternative that are greater than those of the proposed project are directly related to the increase in residential density, which increases demands for public services and exposes greater numbers of on-site residents to pollution, noise, and other hazards; however, these impacts would only be incrementally increased and would not be substantially greater than under the proposed project. These impacts include risks associated with surface fault rupture, seismic ground shaking and associated secondary hazards, consistency with existing plans and policies, population and employment growth, public services, and water and wastewater infrastructure. While some

limited impacts would be increased relative to the proposed project, given that this Alternative reduces the overall environmental effects of the proposed project while still fully achieving all the project objectives, the Increased Residential/Reduced Commercial Alternative is considered the environmentally superior alternative. However, it should be noted that while this Alternative generally meets the identified project objectives and reduces environmental impacts of the proposed project, it is contrary to established policies in the California Coastal Act and the City's Coastal Land Use Plan that encourage expansion of coastal-dependent and coastal-related land uses in lieu of residential development.

**Table 5-5**

**Comparison of Alternatives' Ability to Meet Project Objectives**

Project Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative 1: No Project/No Build Alternative	Alternative 2: No Project/Existing General Plan Alternative	Alternative 3: Increased Residential/Reduced Commercial Alternative
1. Provide a high quality mixed-use, marine-related, visitor-serving commercial development with integrated residential units and a unified architectural and landscape theme.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective
2. Implement the MU-H1 (Mixed-Use Horizontal 1) General Plan and MU-H (Mixed-Use Horizontal) Coastal Land Use Plan categories on an underutilized bayfront location in a manner that provides for a horizontally distributed mix of uses, which includes general or neighborhood commercial, offices, multi-family residential, visitor-serving and marine-related uses, as well as buildings that vertically integrate residential with non-residential uses, adjacent to Coast Highway, and on a bayfront location.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Fully Meets Objective
3. Maintain and expand core coastal dependent and coastal-related land uses, including continuation and expansion of existing marina parking, and the development of significant new enclosed bayfront dry stack boat storage and launching facility.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Partially Meets Objective

**Table 5-3 (Continued)**

**Comparison of Alternatives' Ability to Meet Project Objectives**

Project Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative 1: No Project/No Build Alternative	Alternative 2: No Project/Existing General Plan Alternative	Alternative 3: Increased Residential/Reduced Commercial Alternative
4. Provide new housing opportunities in response to the continued demand for housing, reduce vehicle trips and encourage active lifestyles by increasing the opportunity for residents to live in proximity to jobs, services, coastal recreation and entertainment.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Fully Meets Objective
5. Protect and enhance significant visual resources from City-designated Coastal View Points and Coastal View Roads, [such as Coast Highway, Castaways Park, and Coast Highway-Bay Bridge, to the bay and the cliffs of upper Newport Beach] through view corridors designed into the project. Create new public view opportunities on-site.	Fully Meets Objective	Partially Meets Objective	Fully Meets Objective	Fully Meets Objective

**Table 5-5 (Continued)**

**Comparison of Alternatives' Ability to Meet Project Objectives**

Project Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative 1: No Project/No Build Alternative	Alternative 2: No Project/Existing General Plan Alternative	Alternative 3: Increased Residential/Reduced Commercial Alternative
6. Expand bayfront public access to and along the bay where none exists at the present time, in a manner that protects environmental study areas (ESA) and/or environmentally sensitive habitat areas (ESHA) and does not adversely impact existing private residences adjacent to the site, consistent with Coastal Act section 30214. This new coastal access will be accomplished through a new 12-foot-wide bayfront walkway traversing Planning Areas 1 and 2 of the future project. This new, public bayfront promenade will link the public docks and marina property south of the Coast Highway-Bay Bridge, to the existing Newport Dunes pedestrian/bicycle trail off of Bayside Drive, and ultimately to the Newport Dunes recreational areas, as well as to an existing County Class 1 Regional Trail.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective

*Source: PCR Services Corporation, 2013*