Chapter 7 Alternatives

Section 15126.6 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) requires that an Environmental Impact Report (EIR) describe a reasonable range of alternatives to the proposed project that could feasibly attain most of the project objectives while avoiding or considerably reducing any of the significant impacts of the proposed project. In addition, a "No Project" Alternative must be analyzed in the document. The California Environmental Quality Act (CEQA) also requires that an environmentally superior alternative be identified from among the alternatives. The environmentally superior alternative is the alternative with the fewest or least severe adverse environmental impacts. When the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines, Section 15126.6(e)(2)).

The CEQA Guidelines emphasize a common sense approach. The alternatives shall be reasonable, "foster informed decision making and public participation," and focus on alternatives that avoid or substantially lessen the significant impacts (CEQA Guidelines Section 15126.6(a)). CEQA does not require that an EIR present the alternatives analysis in the same level of detail as the assessment of the proposed project and does not require that every conceivable alternative to a project be considered.

To develop a reasonable range of alternatives to the project, the (lead agency) considered:

- Project objectives
- Significant impacts of the proposed project
- Alternatives suggested during the scoping process
- Other alternatives considered

Through this process, the City of San Juan Capistrano identified four possible alternatives. Of these, one was dismissed from further consideration because it did not meet most project objectives or was not considered even potentially feasible, and three were identified as project alternatives to be evaluated, in addition to the No Project/No Development Alternative required by CEQA.

This chapter includes a description of how the project alternatives were developed, an evaluation of the alternatives in comparison to the Proposed Project, and identification of the environmentally superior alternative.

7.1 Significant and Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that could not be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the Project on various aspects of the environment are discussed in detail

in Chapter 4 of this EIR. The EIR determined that significant and unavoidable impacts from development of the Project would result with the following environmental resource area:

- Transportation

The EIR determined that the Proposed Project would result in a significant and unavoidable transportation impact related to vehicle miles traveled (VMT) under Threshold TRA-b. Implementation of MM TR-1 would require the Project Applicant to develop and implement a Transportation Demand Management (TDM) Plan that includes strategies to reduce single-occupancy vehicle trips by Project employees and encourage alternative modes of transportation, including commute trip reduction marketing and end-of-trip bicycle facilities, as well as ongoing monitoring of TDM Plan implementation. Although these strategies have the potential to reduce Project-related VMT, the extent of the reduction depends on factors such as employee participation, individual travel choices, and actual use of alternative transportation modes and bicycle facilities. Because the approximately 0.08 percent reduction in Citywide Total VMT needed to reduce the Project's impact to a less-than-significant level cannot be assured, the impact would remain significant and unavoidable after implementation of MM TR-1.

7.2 Project Objectives

The process of identifying potential alternatives involves consideration of the objectives for the Proposed Project, which are described in Section 2.2, Project Objectives, in Chapter 2, Project Description, and restated below:

- Preserve, rehabilitate, and adaptively reuse the Domingo Yorba Adobe and Manuel Garcia Adobe in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties while enhancing the historic downtown core of San Juan Capistrano through development that is compatible with the scale, architectural character, and cultural significance of the Historic Town Center area.

- Redevelop a currently underutilized and partially disturbed site with a cohesive, economically viable project that improves site conditions and visual quality.

- Ensure that the Project is compatible with surrounding commercial, residential, and transportation uses.

- Implement a project that is consistent with applicable City policies, including those related to historic preservation, economic development, and land use.

- Promote business activity by providing visitor-serving and supporting uses that enhance the functionality, economic viability, and overall guest experience of the proposed hospitality development while remaining compatible with the Historic Town Center area.

- Increase the City's tax base generating revenue for the City through increased transient occupancy tax (TOT), sales and property taxes.

7.3 Alternatives Considered But Rejected

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The four alternatives listed below were considered but rejected during the scoping/planning process based on one or more of the listed criteria: i) failure to meet most of the basic project objectives, ii) infeasibility, or iii) inability to avoid significant environmental impacts. (CEQA Guidelines Section 15126.6(c)).

The following section describes alternatives or alternative concepts that were given consideration by the lead agency but rejected from further analysis in the EIR.

7.3.1 Alternative Sites

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by developing the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant.

The proposed 70-room boutique hotel would be comprised of two existing buildings, three new buildings and a car lift structure as follows: the Casa Manuel Garcia Adobe ("Building 1"), a new one-story building for the hotel's kitchen and dining ("Building 1A"), a new one-story barn-style event building ("Building 2"), a new three-story building with lobby and guest rooms ("Building 3"), the Domingo Yorba Adobe ("Building 4") and the car lift structure ("Building 5"). The Project will include hotel amenities such as a pool area, gym, outdoor patio, and a public gathering area As discussed in Chapter 4, the Project would not result in any significant and unavoidable adverse impacts. Therefore, development of an Alternative Site would not eliminate any significant impacts to the environment.

Regarding the feasibility of finding another potential location for the Project, there are no existing, undeveloped sites that are a similar size as the Project site within the downtown area and that could reasonably be controlled by the Project Applicant for the purpose of developing the Project. Although the Project Applicant has ownership or control of other parcels of land near the Project site, none of them are suitable for the development of the Project. Additionally, development of an alternative site would not lead to the long-term preservation of the Casa Manuel Garcia Adobe

or the Domingo Yorba Adobe. Therefore, because an alternative location is not available that would avoid or substantially lessen the significant environmental effects of the Project, and because the Project Applicant does not have ownership control over, and cannot reasonably obtain ownership control over any other parcels of land in City that could accommodate the Project, an alternative location alternative is not feasible. Accordingly, this alternative is not further considered in this EIR.

7.4 Analysis of Project Alternatives Selected for Evaluation

The following alternatives are analyzed in this chapter:

- **Alternative 1:** No Project/No Development Alternative
- **Alternative 2:** Subterranean Parking Alternative
- **Alternative 3:** Reduced Intensity Alternative

These alternatives were determined to adequately represent the range of feasible alternatives required under CEQA for the Proposed Project. The No Project Alternative is included, as required by CEQA Guidelines Section 15126.6(e), even though it would not meet the basic project objectives.

7.4.1 Alternative 1: No Project/No Development Alternative

Section 15126.6(e) of the CEQA Guidelines requires than an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a project with the impacts of not approving that project. Section 15126.6(e)(3) of the CEQA Guidelines describes the two general types of no project alternative: (a) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan and (b) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed. The Project Site is zoned as Town Center (TC) in the City of San Juan Capistrano Municipal Code. The Proposed Project is consistent with the zoning for the Project Site. For this reason, this EIR assumes the No Project/No Development Alternative would result in no new development or other improvements within the Project Site. Therefore, under the No Project/No Development Alternative, the proposed development of a 70-room boutique hotel and associated amenities would not occur. The Project Site would remain in its current condition and would remain largely vacant and the two historic structures would remain in their current condition.

7.4.1.1 Impact Analysis

Aesthetics

The No Project/No Development Alternative does not involve any development or change in the current condition of the Project Site. There would be no change to the visual quality or character of the Project Site or surrounding areas. Aesthetic changes associated with development of the Project Site would not occur with this alternative. Accordingly, although the Proposed Project would result in less than significant impacts associated with aesthetics, the No Project/No Development Alternative would result in no impacts. However, the aesthetic improvements associated with the Project would also not occur.

Air Quality

The No Project/No Development Alternative would not involve any construction activities at the Project Site. The No Project Alternative would not require grading or construction and would not change or increase the intensity of the existing on-site use or increase vehicle trips to and from the Project Site. Therefore, no additional air pollutant emissions related to grading, construction, additional vehicle trips, and operational uses would be generated under this alternative, and no air quality impacts would occur. As compared to the proposed project, no new construction or operational emissions would occur. Therefore, although the Proposed Project would result in less than significant air quality impacts, the No Project/No Development Alternative's impacts on air quality would be less than the air quality impacts associated with the Proposed Project.

Biological Resources

The No Project/No Development Alternative would leave the Project Site in its existing condition. While this alternative would avoid permanent impacts to biological resources, the Proposed Project's impacts would be less than significant with incorporation of mitigation measures. Accordingly, although the Proposed Project would result in less than significant biological resources impacts after implementation of mitigation measures, the No Project/No Development Alternative would eliminate the Proposed Project's potential impacts to biological resources and no mitigation would be required.

Cultural Resources

The No Project/No Development Alternative would not involve any excavation or grading activities. Therefore, the potential to discover previously unidentified archaeological resources is eliminated. With incorporation of mitigation measures, Project impacts to archaeological resources are less than significant. With regards to the two historic structures located on-site, they would remain in their current condition under this alternative. This alternative would avoid the less than significant impacts to cultural resources resulting from implementation of the Proposed Project.

Energy

The No Project/No Development Alternative would not involve any construction activities or new development in the Project Site. In the absence of construction activities and operation of the proposed uses, this alternative would require no demand for near-term or long-term energy or fuel use on the site. This alternative would avoid the Proposed Project's near- and long-term energy use and would avoid the Proposed Project's less than significant impacts.

Geology and Soils

The No Project/No Development Alternative would leave the property in its existing condition. The No Project/No Development Alternative would not result in the construction of any new structures at the Project Site; accordingly, there would be no potential for this alternative to expose people or structures to safety risks associated with geologic hazards or result in significant adverse impacts to paleontological resources. This alternative would reduce the Proposed Project's less than significant impacts related to geology and soils.

Greenhouse Gas Emissions

The No Project/No Development Alternative would not involve any construction activities or new development at the Project Site. In the absence of construction activities and operation of the proposed uses (including traffic generation), this alternative would not generate greenhouse gas (GHG) emissions. Although impacts were determined to be less than significant, the No Project/No Development Alternative would eliminate impacts related to GHG emissions that would be generated by the Proposed Project.

Hazards and Hazardous Materials

Because no development would occur under the No Project/No Development Alternative, no new hazards would be introduced to the Project Site. Project impacts were determined to be less than significant related to hazards and hazardous materials, including those associated with the routine transportation, storage, and use of common household chemicals during the operation of the Proposed Project. Therefore, the Proposed Project would not result in any impacts related to hazards or hazardous materials.

Noise

The No Project/No Development Alternative would not involve any grading or construction activities. Therefore, noise and vibration effects associated with these construction activities would not occur under this alternative. However, the construction-related noise impacts from the Proposed Project would be less than significant. Additionally, the increase in long-term, traffic-related, and operational noise levels associated with the Proposed Project would not occur. Therefore, this alternative would result in no impact related to noise.

Transportation

The No Project/No Development Alternative would not change the existing circulation conditions because no new development would occur in the Project Site and because circulation improvements proposed with the Proposed Project would not be implemented (including sidewalk improvements). No long-term (operational) vehicular trips would be generated under the No Project/No Development Alternative. The Proposed Project would have a significant impact related to VMT. Therefore, since no development would occur under this alternative, no VMT impacts related to transportation would occur.

Tribal Cultural Resources

The No Project/No Development Alternative would leave the property in its existing condition. No grading would occur under this alternative and there would be no potential impacts to tribal cultural resources that may be buried beneath the ground surface. This alternative would avoid all new disturbances and would avoid the potential for Proposed Project construction activities to damage buried tribal cultural resources, although Proposed Project impacts are also less than significant with implementation of the identified mitigation measures.

7.4.1.2 Avoid or Substantially Lessen the Significant Impacts of the Project

Because no development would occur under the No Project/No Development Alternative, less than significant impacts resulting from the Proposed Project for the following environmental topics would be avoided: aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, and tribal cultural resources. This alternative would avoid the one significant impact related to VMT. However, as discussed below, this alternative would not attain any of the Project Objectives established for the Proposed Project.

7.4.1.3 Ability to Meet Project Objectives

The No Project/No Development Alternative would not involve any development at the Project Site. This alternative would not attain any of the Project Objectives identified above in Section 5.2, including implementation of the City's General Plan goals and policies relevant to the Project Site and planned Town Center development.

7.4.2 Alternative 2: Subterranean Parking Alternative

The purpose of the Subterranean Parking Alternative is to eliminate the car lift structure ("Building 5") in favor of a subterranean parking structure to be constructed below existing grade. The subterranean parking structure would be one-level below grade and approximately one-acre in size. To build a one-level, one-acre subterranean parking structure, the Project would need to excavate approximately 85,000 cubic yards of earth. This would account for approximately 10 to 12 feet of total depth (to accommodate structural slabs, ventilation, and a 9-foot vehicle clearance)

plus an additional 20% to 30% for soil bulking when it is dug out. The 85,000 cubic yards of excavation would have to be hauled off-site resulting in approximately 15,000 truck trips during construction (12 cubic yards per truck, inbound and outbound). All other aspects of the Proposed Project would remain the same.

7.4.2.1 Impact Analysis

Aesthetics

Similar to the Proposed Project, development of the Subterranean Parking Alternative would alter the existing visual condition of the Project Site through the introduction of development on the rear portion of the property. The maximum building heights associated with the lobby and hotel rooms (Building 3) would be the same, and the overall visual appearance from Camino Capistrano under this alternative would be similar to the Proposed Project and would not represent a significant impact. Therefore, the Reduced Intensity Alternative would have similar impacts as the Proposed Project related to aesthetics.

Air Quality

As with the Proposed Project, development of the Subterranean Parking Alternative would result in less than significant impacts related to sensitive receptors including health risk because the total trip generation would be the same as the Proposed Project. As with the Proposed Project, the Subterranean Parking Alternative would be consistent with the vehicular trips anticipated in the AQMP, thereby resulting in a less than significant impact related to consistency with the AQMP.

Implementation of the Subterranean Parking Alternative would affect the same construction impact area as the Proposed Project, and the construction assumptions with respect to the intensity of construction would be similar. However, due to the 85,000 cubic yards of off-site haul, construction impacts would be increased. As noted above, the 85,000 cubic yards of excavation would have to be hauled off-site resulting in approximately 15,000 truck trips during construction (12 cubic yards per truck, inbound and outbound). This would result in a Significant Unavoidable Adverse Impact during construction.

Because the building operations with the Proposed Project would be the same under the Subterranean Parking Intensity Alternative, total operational emissions (which include area, energy, mobile, and on-site cargo handling equipment sources) would be similar to the Proposed Project. As with the Proposed Project, operational regional emissions generated with the Subterranean Parking Alternative would not exceed the South Coast AQMD thresholds of significance. Therefore, operational emissions and associated impacts would be less than significant, similar to the Proposed Project. However, significant air quality impacts would be associated with this alternative during construction, and this alternative is considered inferior to the Proposed Project with respect to air quality.

Biological Resources

The Subterranean Parking Alternative would involve the same construction impact area as the Proposed Project. Therefore, this alternative would result in the same temporary and/or permanent impacts to biological resources as with the Proposed Project. With incorporation of the mitigation measures, impacts to biological resources would be less than significant with both the Subterranean Parking Alternative and the Proposed Project.

Cultural Resources

As with the Proposed Project, the long-term preservation of the Casa Manuel Garcia Adobe and the Domingo Yorba Adobe would occur. Therefore, no impact to historic or known archeological resources would occur with implementation of either the Subterranean Parking Alternative or the Proposed Project. The Subterranean Parking Alternative would involve the same construction impact area as the Proposed Project, however, it would involve grading to an increased depth. Therefore, this alternative would result in an increase in potential impacts to unknown archaeological resources as compared to the Proposed Project. The Subterranean Parking Alternative would have greater impacts related to cultural resources.

Energy

Implementation of the Subterranean Parking Alternative would result in increased energy demand during construction compared to the Proposed Project because of truck trips associated with the off-site hauling of dirt. The Subterranean Parking Alternative would involve development of a 70-room boutique hotel, the same as the Proposed Project. Therefore, this alternative would result in the same energy demand during operational activities. However, the Subterranean Parking Alternative would have increased energy impacts during construction as compared to the Proposed Project.

Geology and Soils

The Subterranean Parking Alternative would involve grading to an increased depth. Therefore, this alternative would result in the greater impacts related to geology and soils and seismic hazards as compared to the Proposed Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Proposed Project would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because of the grading to an increased depth, this alternative would also increase the potential to impact subsurface paleontological resources. Therefore, impacts related to geology and soils would be increased under the Subterranean Parking Alternative.

Greenhouse Gas Emissions

Implementation of the Subterranean Parking Alternative would result in increased energy demand during construction compared to the Proposed Project because of amount of off-site haul. As noted above, the 85,000 cubic yards of excavation would have to be hauled off-site resulting in approximately 15,000 truck trips during construction (12 cubic yards per truck, inbound and outbound). However, total operational emissions (which include energy, mobile, solid waste, and water consumption sources) for this alternative would be the same as the Proposed Project (765.6 MT CO2e/yr). However, increased GHG impacts would be associated with this alternative during construction, and this alternative is considered inferior to the Proposed Project with respect to greenhouse gas emissions.

Hazards and Hazardous Materials

Neither implementation of the Subterranean Parking Alternative nor the Proposed Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project Site, the Subterranean Parking Alternative and the Proposed Project would have no impact associated with hazardous emissions within 0.25 mile of a school, location on a hazardous materials site, or wildland fire. Land uses that would occur on-site under the Subterranean Parking Alternative would have a similar potential to handle and store hazardous materials as the Proposed Project.

With incorporation of mitigation measures and mandatory regulatory compliance, both the Subterranean Parking Alternative and the Proposed Project would pose a less than significant hazard to the public or the environment related to hazards and hazardous materials.

Noise

Because construction activities would approximately 15,000 truck trips during construction, implementation of the Subterranean Parking Alternative would increase noise impacts during construction as compared to the Proposed Project. This could result in significant construction noise impacts, where the Proposed Project would not.

The Subterranean Parking Alternative would generate the same Project-generated trips as compared to the Proposed Project (approximately 409 daily trips). As with the Proposed Project, off-site traffic noise impacts would be less than significant with the Subterranean Parking Alternative. Therefore, this alternative would have a less than significant impact related to operational noise similar to the Proposed Project. However, significant noise impacts would be associated with this alternative during construction, and this alternative is considered inferior to the Proposed Project with respect to noise.

Transportation

As with the Proposed Project, this alternative would incorporate applicable City standards related to transportation and circulation, including construction of adjacent roadways and access improvements necessary to serve the Proposed Project, and construction of improvements to encourage pedestrian and bicycle travel, and transit use. The Subterranean Parking Alternative and the Proposed Project would not conflict with applicable programs, plans, ordinances or policies addressing the circulation system; would not create hazards through design; and, would not result in inadequate emergency access. As with the Proposed Project, these impacts under this alternative would remain less than significant.

Construction-related truck trips would be increased under the Subterranean Parking Alternative by approximately 15,000 trips. This would impact Camino Capistrano, Del Obispo, and the I-5 Freeway.

Trip generation during operation is based on land uses and its associated size. Therefore, the resulting VMT per employee would be similar to the Proposed Project since it is based on Project generated VMT divided by number of employees. As a result, the Subterranean Parking Alternative would generate a similar VMT per capita, resulting in a significant impact to transportation. Additionally, with regards to trip generation, the Subterranean Parking Alternative would result in the same number of vehicle trips during operation. However, increased traffic impacts would be associated with this alternative during construction, and this alternative is considered inferior to the Proposed Project with respect to transportation.

Tribal Cultural Resources

The Subterranean Parking Alternative would involve grading to an increased depth. Although there are no known tribal cultural resources within the Project area, this alternative would result in increased potential impacts to tribal cultural resources within the Project area, should they be present.

7.4.2.2 Avoid or Substantially Lessen the Significant Impacts of the Project

Due to grading to an increased depth and the associated off-site haul, impacts would be increased during construction. Impacts related to air quality and noise would be considered significant and unavoidable, whereas they are not under the Proposed Project. In addition, impacts related to greenhouse gas emissions and transportation would be increased during construction. During operation, similar impacts would occur with the Subterranean Parking Alternative as compared to the Proposed Project, including a significant impact related to VMT. However, because impacts during constructed would be increased, this alternative is not considered superior to the Proposed Project.

7.4.2.3 Ability to Meet Project Objectives

1. **Preserve, rehabilitate, and adaptively reuse the Domingo Yorba Adobe and Manuel Garcia Adobe in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties while enhancing the historic downtown core of San Juan Capistrano through development that is compatible with the scale, architectural character, and cultural significance of the Historic Town Center area.** The Subterranean Parking Alternative would attain this objective.
2. **Redevelop a currently underutilized and partially disturbed site with a cohesive, economically viable project that improves site conditions and visual quality.** The Subterranean Parking Alternative would attain this objective.
3. **Ensure that the Project is compatible with surrounding commercial, residential, and transportation uses.** The Subterranean Parking Alternative would attain this objective.
4. **Implement a project that is consistent with applicable City policies, including those related to historic preservation, economic development, and land use.** The Subterranean Parking Alternative would attain this objective.
5. **Promote business activity by providing visitor-serving and supporting uses that enhance the functionality, economic viability, and overall guest experience of the proposed hospitality development while remaining compatible with the Historic Town Center area.** The Subterranean Parking Alternative would attain this objective.
6. **Increase the City's tax base generating revenue for the City through increased transient occupancy tax (TOT), sales and property taxes.** The Subterranean Parking Alternative would attain this objective.

7.4.3 Alternative 3: Reduced Intensity Alternative

Under this alternative, the new three-story building with lobby and guest rooms ("Building 3") would be reduced to two-stories. This alternative represents a reduction of approximately 30 percent (30%) of hotel rooms as compared to the Proposed Project, resulting in a 46-room boutique hotel including adaptive reuse of the two historic structures. All other aspects of the Proposed Project would remain the same.

Relevant to this alternatives analysis is the amount of average daily trip (ADT) generation. Applying the trip generation calculations for the Proposed Project (as presented in Table 4.13-1, Trip Generation Summary, in Section 4.13, Transportation), the Reduced Intensity Alternative would result in a net reduction in ADT compared to the Proposed Project. This alternative would result in approximately 269 ADT compared to 409 ADT with the Proposed Project.

7.4.3.1 Impact Analysis

Aesthetics

Similar to the Proposed Project, development of the Reduced Intensity Alternative would alter the existing visual condition of the Project Site through the introduction of development on the rear portion of the property. Although the building heights would be reduced, it is expected that the overall visual appearance from Camino Capistrano under this alternative would be similar, to the Proposed Project and would not represent a significant impact. Due to the reduced building height, the Reduced Intensity Alternative would have slightly reduced impacts as the Proposed Project related to aesthetics.

Air Quality

As with the Proposed Project, development of the Reduced Intensity Alternative would result in less than significant impacts related to sensitive receptors including health risk because the total trip generation would be approximately 30 percent lower than that for the Proposed Project. As with the Proposed Project, the Reduced Intensity Alternative would be consistent with the vehicular trips anticipated in the AQMP, thereby resulting in a less than significant impact related to consistency with the AQMP.

Implementation of the Reduced Intensity Alternative would affect the same construction impact area as the Proposed Project, and the construction assumptions with respect to the intensity of construction would be similar. Therefore, construction emissions and associated impacts would be less than significant, similar to the Proposed Project.

Because the building operations with the Proposed Project would be reduced with the Reduced Intensity Alternative, total operational emissions (which include area, energy, mobile, and on-site cargo handling equipment sources) would be lower than the Proposed Project due to the fewer hotel rooms. Operational emissions would be reduced by approximately 30 percent consistent with the reduction in hotel rooms and trip generation (which is calculated based on number of rooms). As with the Proposed Project, operational regional emissions generated with the Reduced Intensity Alternative would not exceed the South Coast AQMD thresholds of significance. Therefore, although the amount of emissions would be reduced, operational emissions and associated impacts would be less than significant, similar to the Proposed Project.

Biological Resources

The Reduced Intensity Alternative would involve the same construction impact area as the Proposed Project. Therefore, this alternative would result in the same temporary and/or permanent impacts to biological resources as with the Proposed Project. With incorporation of the mitigation measures, impacts to biological resources would be less than significant with both the Reduced Intensity Alternative and the Proposed Project.

Cultural Resources

As with the Proposed Project, the long-term preservation of the Casa Manuel Garcia Adobe and the Domingo Yorba Adobe would occur. Therefore, no impact to historic or known archeological resources would occur with implementation of either the Reduced Intensity Alternative or the Proposed Project. The Reduced Intensity Alternative would involve the same construction impact area as the Proposed Project. Therefore, this alternative would result in the same potential impacts to unknown archaeological resources as the Proposed Project. With incorporation of the applicable mitigation measures, the Reduced Intensity Alternative would have similar impacts as the Proposed Project related to cultural resources.

Energy

Implementation of the Reduced Intensity Alternative would result in lower energy demand during construction compared to the Proposed Project because of the overall reduction in building size. The Reduced Intensity Alternative would involve development of a 46-room boutique hotel instead of 70 rooms. This alternative would result in reduced energy demand during operational activities. Therefore, the Reduced Intensity Alternative would have reduced energy impacts as compared to the Proposed Project. The Reduced Intensity Alternative would have less than significant impacts as compared to the Proposed Project related to energy.

Geology and Soils

The Reduced Intensity Alternative would involve the same construction impact area as the Proposed Project. Therefore, this alternative would result in the same potential impacts related to geology and soils and seismic hazards as the Proposed Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Proposed Project would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because the construction impact area would be the same as the Proposed Project, this alternative would also have the potential to impact subsurface paleontological resources and the impact would be reduced to a less than significant level with mitigation. Therefore, with incorporation of mitigation measures, and adherence to applicable regulations, geology and soils impacts would be less than significant with implementation of the Reduced Intensity Alternative and the Proposed Project.

Greenhouse Gas Emissions

Implementation of the Reduced Intensity Alternative would result in lower energy demand during construction compared to the Proposed Project because of the reduction in building size. This alternative would also result in reduced emissions from all operational GHG sources because the emissions from each source would vary in direct proportion to the building size. Total operational emissions with mitigation (which include energy, mobile, solid waste, and water consumption

sources) for this alternative would be approximately 536 MT CO2e/yr (compared to 765.6 MT CO2e/yr with the Proposed Project). Therefore, the Reduced Intensity Alternative would have lower GHG emission impacts than the Proposed Project. Therefore, like the Proposed Project, the GHG emissions under this alternative would be below the 3,000 MT CO2e/yr threshold of significance and be considered less than significant.

Hazards and Hazardous Materials

Neither implementation of the Reduced Intensity Alternative nor the Proposed Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project Site, the Reduced Intensity Alternative and the Proposed Project would have no impact associated with hazardous emissions within 0.25 mile of a school, location on a hazardous materials site, or wildland fire. Land uses that would occur on-site under the Reduced Intensity Alternative would have a similar potential to handle and store hazardous materials as the Proposed Project.

With incorporation of mitigation measures and mandatory regulatory compliance, both the Reduced Intensity Alternative and the Proposed Project would pose a less than significant hazard to the public or the environment related to hazards and hazardous materials.

Noise

Because construction activities would be similar, implementation of the Reduced Intensity Alternative would result in similar noise impacts during construction as the Proposed Project. Construction noise impacts would be less than significant, similar to the Proposed Project.

As identified previously, the Reduced Intensity Alternative would generate fewer Project-generated trips than the Proposed Project (approximately 269 daily trips compared to 409 daily trips with the Proposed Project). As with the Proposed Project, off-site traffic noise impacts would be less than significant with the Reduced Intensity Alternative, but reduced compared to the Proposed Project. Therefore, this alternative would have a less than significant impact related to operational noise as with the Proposed Project, but reduced compared to the Proposed Project.

Transportation

As with the Proposed Project, this alternative would incorporate applicable City standards related to transportation and circulation, including construction of adjacent roadways and access improvements necessary to serve the Proposed Project, and construction of improvements to encourage pedestrian and bicycle travel, and transit use. The Reduced Intensity Alternative and the Proposed Project would not conflict with applicable programs, plans, ordinances or policies addressing the circulation system; would not create hazards through design; and, would not result

in inadequate emergency access. As with the Proposed Project, these impacts under this alternative would remain less than significant.

Construction and operation-related vehicle trips would be reduced under the Reduced Intensity Alternative and would decrease by approximately 30 percent. Trip generation is based on land uses and its associated size. This would result in a corresponding decrease in overall VMT and proportional decrease in employees. Therefore, the resulting VMT per employee would be similar to the Proposed Project since it is based on Project generated VMT divided by number of employees. As a result, the Reduced Intensity Alternative would generate a similar VMT per capita, and would remain significant. However, with regards to trip generation, the Reduced Intensity Alternative would result in fewer vehicle trips compared to the Proposed Project.

Tribal Cultural Resources

The Reduced Intensity Alternative would involve the same construction impact area. Although there are no known tribal cultural resources within the Project area, this alternative would result in the same potential impacts to tribal cultural resources within the Project area as the Proposed Project, should they be present. With incorporation of mitigation measures, the Reduced Intensity Alternative would have similar, less than significant impacts as the Proposed Project related to tribal cultural resources.

7.4.3.2 Avoid or Substantially Lessen the Significant Impacts of the Project

Due to the 30 percent reduction in hotel rooms with the Reduced Intensity Alternative, there would be a related 30 percent reduction in average daily trip generation. However, the resulting VMT per employee would be similar to the Proposed Project since it is based on Project generated VMT divided by number of employees. As a result, the Reduced Intensity Alternative would generate a similar VMT per capita, and would remain significant. For all other topical areas, similar or reduced impact levels would occur with the Reduced Intensity compared to the Proposed Project.

7.4.3.3 Ability to Meet Project Objectives

7. **Preserve, rehabilitate, and adaptively reuse the Domingo Yorba Adobe and Manuel Garcia Adobe in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties while enhancing the historic downtown core of San Juan Capistrano through development that is compatible with the scale, architectural character, and cultural significance of the Historic Town Center area.** The Reduced Intensity Alternative would attain this objective.
8. **Redevelop a currently underutilized and partially disturbed site with a cohesive, economically viable project that improves site conditions and visual quality.** The Reduced Intensity Alternative would attain this objective.

9. **Ensure that the Project is compatible with surrounding commercial, residential, and transportation uses.** The Reduced Intensity Alternative would attain this objective.
10. **Implement a project that is consistent with applicable City policies, including those related to historic preservation, economic development, and land use.** The Reduced Intensity Alternative would attain this objective.
11. **Promote business activity by providing visitor-serving and supporting uses that enhance the functionality, economic viability, and overall guest experience of the proposed hospitality development while remaining compatible with the Historic Town Center area.** The Reduced Intensity Alternative would attain this objective, but not to the same extent as the Proposed Project because of the reduction in hotel rooms.
12. **Increase the City's tax base generating revenue for the City through increased transient occupancy tax (TOT), sales and property taxes.** The Reduced Intensity Alternative would attain this objective, but not to the same extent as the Proposed Project since the reduced number of hotel rooms would also reduce the TOT taxes generated.

7.5 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Table 5-1 provides a summary comparison of the alternatives with the Proposed Project to highlight if each alternative would result in a similar, greater, or lesser impact regarding potentially significant impacts. In addition, Table 5-2 provides a summary comparison of the alternatives with the proposed project to determine if each alternative would meet the objectives of the Proposed Project.

The No Project/No Development Alternative has the least impact to the environment because it would not involve any construction activities or development. There would be no impacts related to air quality, biological resources, greenhouse gas emissions, and no VMT impacts. However, none of the objectives established for the Proposed Project would be met.

With regard to the remaining development alternatives, the Reduced Intensity Alternative is environmentally superior to the Proposed Project. Due to the 30 percent reduction in hotel rooms with the Reduced Intensity Alternative, there would be a related 30 percent reduction in average daily trip generation. However, the resulting VMT per employee would be similar to the Proposed Project since it is based on Project generated VMT divided by number of employees. As a result, the Reduced Intensity Alternative would generate a similar VMT per capita, and would remain significant.As shown in Table 5-2, the Reduced Intensity Alternative would result in reduced impacts related to air quality, energy, GHG emissions, and noise. For the other impact categories, the level of impact would be similar as compared to the Proposed Project. The Reduced Intensity

Alternative would attain some of the Project objectives, but not to the same extent as the Proposed Project as there would be less employment generation and less economic benefit to the City. For example, the Reduced Intensity Alternative would reduce future TOT taxes to the City by approximately 30 percent. In addition, it is not known of this alternative is financially feasible considering land values in San Juan Capistrano and current construction costs related to labor and building materials in California. These are factors that will be considered by the San Juan Capistrano decision-makers when considering approval of the Proposed Project over the Reduced Density Alternative.

Table 5-1. Comparison of Potentially Significant Impacts for Alternatives to the Project

Impact	Proposed Project		Alternatives		
	Without Mitigation	With Mitigation	No Project	Alternative 2	Alternative 3
Section 4.1, Aesthetics					
Threshold AES-c: Degradation of Existing Visual Character or Conflict with Zoning or Regulations for Scenic Quality	LS		NI (less)	LS (similar)	LS (less)
Threshold AES-d: Light and Glare	LS		NI (less)	LS (similar)	LS (similar)
Section 4.2, Air Quality					
Threshold AQ-a: Consistency with Applicable Air Quality Plan	LS		NI (less)	LS (similar)	LS (similar)
Threshold AQ-b: Cumulative Increase in Criteria Pollutant Emissions	LS		NI (less)	PS (greater)	LS (less)
Threshold AQ-c: Sensitive Receptors	LS		NI (less)	PS (greater)	LS (less)
Section 4.3, Biological Resources					
Threshold BIO-a: Candidate, Sensitive, or Special-Status Species	PS	LSM	NI (less)	LSM (similar)	LSM (similar)
Threshold BIO-e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	LS		NI (less)	LS (similar)	LS (similar)
Section 4.4, Cultural Resources					
Threshold 1: Historical Resources	LS		NI (less)	LS (similar)	LS (similar)
Threshold 2: Archaeological Resources	PS	LSM	NI (less)	LSM (greater)	LSM (similar)
Section 4.5, Energy					
Threshold EN-1: Wasteful or Inefficient Energy Usage	LS		NI (less)	LS (greater)	LS (less)
Threshold EN-2: Conflict with Renewable or Energy Efficiency Plan	LS		NI (less)	LS (similar)	LS (similar)
Section 4.6, Geology and Soils					
Threshold GEO-a(iii): Exposure to Seismic-Related Hazards	LS		NI (less)	LS (similar)	LS (similar)
Threshold GEO-c: Geologic Stability	LS		NI (less)	LS (greater)	LS (similar)

Table 5-1. Comparison of Potentially Significant Impacts for Alternatives to the Project

Impact	Proposed Project		Alternatives		
	Without Mitigation	With Mitigation	No Project	Alternative 2	Alternative 3
Section 4.7, Greenhouse Gas Emissions					
Threshold GHG-1: Generation of Greenhouse Gas Emissions	LS		NI (less)	LS (greater)	LS (less)
Threshold GHG-2: Conflict with Applicable Plan	LS		NI (less)	LS (similar)	LS (less)
Section 4.8, Hazards and Hazardous Materials					
Threshold HAZ-b: Accidental Releases	LS		NI (less)	LS (similar)	LS (less)
Section 4.9, Noise					
Threshold N-a: Exceedance of Noise Standards	LS		NI (less)	LS (greater)	LSM (less)
Threshold N-b: Excessive Groundborne Vibration or Noise	LS		NI (less)	LS (greater)	LS (similar)
Section 4.10, Transportation					
Threshold TR-a: Circulation System Performance	LS		NI (less)	LS (greater)	LS (less)
Threshold TR-b: Induction of Substantial Vehicle Miles Traveled	SU	SU	NI (less)	SU (greater)	SU (similar)
Section 4.11, Tribal Cultural Resources					
Threshold TCR-1: Tribal Cultural Resources	PS	LSM	NI (less)	LSM (greater)	LSM (similar)

Notes: LS = Less than Significant Impact; LSM = Less than Significant with Mitigation, NI = No Impact; PS = Potentially Significant Impact; SU = Significant and Unavoidable

Table 5-2. Ability of Project Alternatives to Meet the Project Objectives

Project Objectives	Ability of Alternatives to Meet the Project Objectives		
	No Project	Alterative 2	Alternative 3
1. Preserve, rehabilitate, and adaptively reuse the Domingo Yorba Adobe and Manuel Garcia Adobe in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties while enhancing the historic downtown core of San Juan Capistrano through development that is compatible with the scale, architectural character, and cultural significance of the Historic Town Center area.	No	Yes	Yes
2. Redevelop a currently underutilized and partially disturbed site with a cohesive, economically viable project that improves site conditions and visual quality.	No	Yes	Yes
3. Ensure that the Project is compatible with surrounding commercial, residential, and transportation uses.	No	Yes	Yes
4. Implement a project that is consistent with applicable City policies, including those related to historic preservation, economic development, and land use.	No	Yes	Yes
5. Promote business activity by providing visitor-serving and supporting uses that enhance the functionality, economic viability, and overall guest experience of the proposed hospitality development while remaining compatible with the Historic Town Center area.	No	Yes	Yes, but not to the same extent as the Proposed Project
6. Increase the City's tax base generating revenue for the City through increased transient occupancy tax (TOT), sales and property taxes.	No	Yes	Yes, but not to the same extent as the Proposed Project

This page intentionally left blank.