5.0 ALTERNATIVES

5.1 INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this draft Environmental Impact Report (draft EIR) contains a comparative impact assessment of alternatives to the proposed Hyatt Place Project (project). The primary purpose of this section is to provide decision makers and the public with a range of reasonable project alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening any of the project's significant adverse environmental effects. Important considerations for these alternatives analyses are described below:

- An EIR need not consider every conceivable alternative to a project
- An EIR should identify alternatives that were considered by the lead agency but rejected as infeasible during the scoping process
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives;
  - Infeasibility; or
  - Inability to avoid any significant environmental impact

5.2 PROJECT OBJECTIVES

As described in **Chapter 3.0, Project Description**, the City's primary project objectives are as follows:

- Implement the California Coastal Act, including protecting coastal resources such as wetlands and providing coastal zone priority uses such as restaurants and accommodations geared towards visitors, especially lower coast coastal access provisions including lower cost accommodations on or off-site and/or public access and recreation benefits such as airport shuttles, bicycle rentals, or trail connections.

- Conform with the Local Coastal Program, including promotion of bicycle and pedestrian trails, such as along State Route 1 (SR-1) and the Downtown area.
- Enhance Half Moon Bay's southern entrance to the city by:
    - Providing connectivity to local trails and the downtown core
    - Supporting the City's plans to highlight access to Main Street, Historic Downtown, and the commercial core
    - Providing a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast
    - Integrating the artisanal culture of Half Moon Bay into the design theme of the development and the project site
    - Enhancing access to and patronage of the adjacent theater
- Be designed as contextually appropriate for the city and provide compatibility with both the Downtown and the adjacent residential neighborhood with building massing reflective of traditional development and scale within the city and providing maintenance of adequate views.
- Be designed to be compatible with and enhance the aesthetic of the south entry to the city.
- Be served by existing public infrastructure including water supply, sewer and roadway capacity and through on-site provision of green infrastructure for storm water management.
- Support Downtown vitality and the City's economic development goals.
- Meet the demand for more hotel rooms to support the city's growing local tourist and agribusiness economies.
- Establish a higher level of use on an underused parcel in the city.
- Support the local job market by providing new employment opportunities.
- Provide an opportunity for the City to increase revenue stream.

The project applicant's objectives for the project are as follows:

- Develop a mid-range hotel to fill a gap in the market.
- Provide a conference and wedding venue primarily for hotel guests.
- Provide service sector employment opportunities for Half Moon Bay residents.
- Provide public recreational opportunities through a multi-use bicycle and pedestrian path, which will become part of the City's circulation plan.
- Provide shuttle transportation for hotel guests to beaches, harbor points of interest and downtown areas.

- Create a destination at the southern end of Main Street which will indirectly support the existing retail, hospitality, restaurants, and entertainment venues in the downtown area.
- Encourage pedestrian use of the southern portion of Main Street by providing infrastructure improvements including installing a curb, gutters, sidewalk, and landscaping between Seymour Street and the SR-1/Main Street intersection.

5.2.1 LOCAL COASTAL PROGRAM

As indicated above in **Section 5.2**, **Project Objectives**, one of the City's and project applicant's project objectives is for project conformance with the Local Coastal Program, which consists of the Local Coastal Land Use Plan (LCLUP) and the City's Zoning Ordinance (often referred to as the Local Coastal Implementation Plan). The LCLUP, which is the policy component of the Local Coastal Program, contains policies for residential development. While the project does not include a residential element, project alternatives that include a residential component would need to be assessed for their consistency with applicable policies of the LCLUP. Policies pertaining to residential development that are anticipated to apply to project alternatives are outlined in **Table 5-1**.

Table 5-1 Applicable LCLUP Policies for Residential Alternatives

Applicable Policy	Policy Contents
2-16: Residential Growth Management	Provide for compatible and orderly residential growth at a managed pace and ensure that future development is consistent with the City's growth management standards. Measure D (Residential Growth Limitation Ordinance) added the following provisions to the Land Use Plan and they may not be amended or repealed except by a majority vote of the people of Half Moon Bay as follows: The number of dwelling units which the City may authorize each calendar year may not exceed the number of units which would result in a growth of 1 percent in the City's population as of January 1 of that year. In determining the number of permissible units, the City shall use the most recent United States Census figures for Half Moon Bay to calculate the average number of persons per household. The number of dwelling units authorized each year under subsection a. may be increased by 50 percent for additional dwelling units in the Downtown Area. Applications for new units from areas of the City outside the Downtown Area have priority for one-half of the units authorized under subsection a. If fewer applications are received, the remainder of these units may be authorized in the Downtown Area. Subject to subsections b. and c., the city shall allocate permissible dwelling units among applications under the existing

Applicable Policy	Policy Contents
	allocation system in the Municipal Code, to the extent feasible, and subsequent modifications by the City Council. The limitations in the Section shall not apply to replacement of existing dwelling units on a one-for-one basis, nor shall it apply to density bonuses for the provision of low and moderate income housing to the extent required by State law. The Downtown Area is the area designated as the Downtown Half Moon Bay Redevelopment Survey Area in City Resolution No. C-91-98, November 3, 1998.
2-21: Lot Retirements	Require mitigation for the individual and cumulative impacts of development when a new residential lot is created through retirement of development potential on an existing and separate lot, pursuant to the following criteria: a. At least the same number of lots shall be retired as are created; b. The retired lot(s) shall be located within city limits and have potential for residential development, including lots with PD land use designations where residential development is a potentially permitted use; c. Retirement of development potential may occur through recordation of a no-build restriction, an accepted offer to a land trust, or through an in-lieu fee to support such retirement; and d. Deed restricted affordable housing shall be exempt from lot retirement requirements.
2-81: Mixed-Use Development	Permit horizontal and vertical mixed-use development to incorporate residential development in the Commercial – General, Commercial – Visitor-Serving, and in certain cases, Light Industrial land use designations.
5-61: Parkland Standard	Provide a minimum of 5 acres of City parkland including neighborhood and community park area for each 1,000 city residents, with additional parkland for specialized and low use park acreage. The parkland standard shall ensure that new development accommodates the recreational needs of future residents in pace with population increase.
6-57: Land Divisions	Design land divisions, including lot line adjustments, to preclude new development within and minimize impacts to ESHAs and their buffer areas. Land divisions shall only be permitted if each new parcel being created could be developed (including construction of any necessary access road), without building in ESHA or ESHA buffers, or removing ESHA for fuel modification. Require any new land divisions containing areas of ESHA or ESHA buffer zones to record a deed restriction that protects such areas from non-resource dependent development. Require any new land divisions near ESHA to accommodate migration of ESHA as a result of the impacts of sea level rise.

Source: City of Half Moon Bay, 2021.

5.3 SUMMARY OF IMPACTS

5.3.1 SIGNIFICANT IMPACTS

Based on the analysis completed for this draft EIR, the project's impacts in the following resource areas would be considered significant without the implementation of mitigation measures:

- Aesthetics: The proposed hotel structure on the project site would have a substantial effect on a scenic vista, impact scenic resources within a state scenic highway, degrade the quality of public views from a publicly accessible vantage point, and produce new sources of light and glare.
- Air Quality: Project construction would result in a cumulatively considerable net increase of criteria pollutants (fugitive dust) and would temporarily expose sensitive receptors to substantial pollutant concentrations.
- Biological Resources: Project construction would result in impacts to special-status wildlife, aquatic habitat, federally protected wetlands, and protected trees.
- Cultural and Tribal Cultural Resources: Construction activities have the potential to impact undiscovered historic resources, archaeological resources, paleontological resources, tribal cultural resources, and/or human remains during the construction period.
- Geology and Soils: The project would be subject to geologic hazards, such as on-site subsidence, liquefaction, or collapse. The project would also be located on moderately expansive soils, which have the potential to create a substantial direct or indirect risk to life and property.
- Hazards and Hazardous Materials: Project construction would create a significant hazard to the public and environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Construction activities would also mobilize residual agrichemicals or hazardous building materials within one-quarter mile of an existing school during the construction period.
- Noise: Sensitive receptors adjacent to the project site would be exposed to construction noise.

- Transportation and Traffic: Implementation of the project would conflict with section 15064.3, subdivision (b).

Each of the impacts described above, except for aesthetic impacts, would be avoided or reduced to a less-than-significant level with the implementation of mitigation measures or standard conditions of approval. However, impacts related to aesthetics resources are significant and unavoidable, as implementation of the project would have a substantial adverse effect on a scenic vista, impact scenic resources within a state scenic highway, and degrade the visual quality of views from a publicly accessible vantage point. These impacts are further described in **Section 5.3.2, Significant and Unavoidable Impacts** below.

5.3.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project has significant unavoidable adverse impacts to aesthetics as discussed below.

Impact AES-1. The project would have a Substantial Adverse Effect on a Scenic Vista.

Significant and Unavoidable. The project would interfere with the protected long-range views of the ridgelines north and east of the project site from SR-1 (Viewpoint 3). Although screening techniques and other design considerations would be used, the mass and scale of the proposed development would obstruct views of the protected ridgeline from SR-1. This is a significant and unavoidable impact.

Impact AES-2. The project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway

Significant and Unavoidable. The project site is located adjacent to SR-1. Although this section of SR-1 is not officially designated as a scenic highway, the City considers it as a visual area subject to regulations applicable to a scenic corridor, and specifically relies upon policy in the 2020 certified LCLUP.

Policy 9-12 Town Boulevard Scenic Corridor is especially applicable:

> *Require that new development in close proximity to or easily visible from the Town Boulevard scenic corridor, including Highways 1 and 92: a. Protects views of visual resource areas as seen from the Town Boulevard, including views to the ocean, upland slopes (i.e., minimizes*

intrusions into the ridgeline), and the historic Johnston House; b. Incorporates design standards such as screening of commercial parking areas and landscaping provisions; and c. Is visually compatible with the surrounding land and development. Update the IP with additional standards for new development along the Town Boulevard based on additional study of the scenic corridor. Assessment should, at a minimum, consider views of visual resource areas from the perspective of existing and potential development along the Town Boulevard and identify scenic segments along Highway 1 and 92, including views of the ridgelines and other visual resource areas. Development standards should address, at a minimum, appropriate building heights and setbacks, longest wall lines, minimum space between buildings, and streetscape design.

The proposed site development, including buildings and landscaping, in conjunction with the gateway right-of-way improvements, include numerous approaches to reduce impacts to scenic resources, especially with respect to ridgeline views of the Santa Cruz Mountains and foothills from SR-1. These features and design considerations are described below:

Buildings: Project design has incorporated appropriate setbacks of 38 to 100 feet, which surpasses the setback minimum of 30 feet. In addition, project design has provided a sizable buffer between SR-1 and the structures to avoid impacts to wetlands and provides a larger setback from SR-1 reducing the visual encroachment into views from SR-1 and the Wavecrest area looking east and north. The project design also includes design elements that minimize massing of the proposed two- to three-story high buildings, such as incorporating the third story of the lodging buildings within a dormer roof form and by stepping the height down toward the southern gateway corner.

Landscaping: The landscape plan has three primary components: the “gateway” side of the site (described below), the SR-1 or west side of the site, and the Main Street or east side of the site. The west side of the site includes wetlands and the proposed landscaping consists of a mix of species found in the adjacent Wavecrest area that are compatible with seasonal wetland habitats and include coastal terrace prairie species. Landscaping on the east side of the property would consist of ornamental trees, shrubs, vines and groundcovers. Street trees would be generally retained and parking lot trees would be dispersed to provide filtered shade and a canopy throughout the lot. Some tree removals would be necessary to accommodate the development. Four bottlebrush street trees along the eastern side of the project site along Main Street would be removed. Trees would be planted to replace the ones removed. Landscaping and trees proposed with project design would contribute to the visual character of scenic resources visible from SR-1,

especially the west side of the site where landscaping will be consistent with habitats found in Wavecrest, including coastal terrace prairie.

Gateway: The southern entryway project includes a new monument sign and landscaping as part of a signalization project to identify the southern entrance to Main Street and the city from SR-1, which is shown in **Figure 4.1-8 (Section 4.1, Aesthetics)**. The project implements a gateway at the south end of Downtown Half Moon Bay. The monument sign and accompanying landscaping will create a foreground and visual transition to views of the proposed hotel structures from northbound SR-1. The project landscaping on the south end of the site will provide transition between the city's gateway and the buildings.

Notwithstanding the project design treatments discussed above, project implementation would still impact views of scenic resources visible from the highway, specifically the ridgelines of the Santa Cruz Mountains and foothills, would be encroached upon by the project. There is no feasible mitigation available that would improve impacts to the viewshed given the mass and scale of the project. This impact is considered significant and unavoidable.

Impact AES-3. T**he project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.**

Significant and Unavoidable. Project design was developed with the intention of reflecting the visual character and visual quality of the project site's surroundings, as well as maintaining the quality of public views to preserve the heritage and character of the city. Build out of the project would result in permanent changes in the existing visual quality of public views to the project site and its surroundings, namely the long-range views of the hillsides and ridgeline available from publicly accessible viewpoints near the project site. Changes to the project site and the surrounding visual character would be consistent with the developed nature of Downtown, although the buildings are significantly larger and present longer facades than existing development patterns throughout Downtown and in the immediate neighborhood. Although the project would incorporate high quality design elements, landscaping, and screening techniques that would address changes in visual character, the visual quality of the project site as seen from public viewpoints is conservatively considered to be adversely affected by the project, given the circumstances of the project site and the proposed development (described further in **Section 4.1, Aesthetics**). This impact is considered significant and unavoidable.

Cumulative Aesthetic Impacts

The project would cumulatively contribute to the degradation of established viewsheds, or other scenic vistas especially the long-range views of hillsides and ridgelines in Half Moon Bay. Notwithstanding the design and setbacks required of the project, it would still contribute to a cumulative impact on aesthetics and visual resources due to the permanence of the project site aesthetics and the obstruction of hillside and ridgeline views from SR-1.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED FOR FURTHER ANALYSIS

CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered by the Lead Agency but rejected as infeasible. The EIR must briefly explain the reasons underlying the Lead Agency's determination to reject an alternative. The following factors may be used to eliminate alternatives from further consideration:

(i) Failure to meet most of the basic project objectives
(ii) Infeasibility
(iii) Inability to avoid significant environmental impacts

As stated in Section 15126.6(f)(1) of the Guidelines, factors that may be considered when a lead agency is assessing the feasibility of an alternative include:

> "Site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)."

The project has been developed to meet the previously identified objectives while avoiding or minimizing environmental impacts. The project was chosen based on the multiple planning efforts listed in **Chapter 3.0, Project Description**, which considered various environmental impacts of the area.

5.4.1 ALTERNATIVE SITE LOCATIONS

CEQA Guidelines Section 15126.6(f)(2) states that an EIR must consider off-site alternatives unless such alternatives are determined to be feasible by the Lead Agency. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.

North of Project Site: The project applicant has site control over the auto dealership to the north of the project site. However, as stated above in **Section 5.3.2**, **Reduced Intensity, Alternative 2**, in lieu of the hotel project, it would be more economically viable for the project applicant to expand the dealership south and subdivide the north portion of the dealership which has R-2 zoning for future development of residential uses. The applicant has therefore determined that locating the hotel project, or a portion of the hotel project, on the existing dealership site is not feasible.

Downtown Area: The Downtown area, especially the "Town Center" as delineated by the Half Moon Bay LCLUP, is the City's preferred location for visitor-serving commercial development of any significant scale. The project applicant does not own any large-scale sites in the Downtown area that could accommodate this project. Furthermore, the only other site of this scale in the Downtown area is at the southeast corner of SR-1 and SR-92 adjacent to Pilarcitos Creek and in a flood plain. The property's zoning could potentially allow for a hotel of some scale; however, the numerous site constraints, including access, may limit its future development for such a project.

Outside Downtown Area: The only sites of adequate size that could potentially accommodate the proposed development are in Planned Development areas. Many of these areas have multiple owners; and most are west of SR-1 where numerous environmental and visual resource constraints exist, such as the potential obstruction of broad ocean views. Such constraints are similar to those on the project site where wetlands are present and visual resource protections are required for views of the hillsides and ridgelines from SR-1. Thus, from the perspective of Coastal Act requirements, these alternative sites would not reduce any project impacts.

Because the project would include the creation of a hotel and associated features, an off-site alternative would not be feasible in other potential sites due to the aforementioned constraints associated with each site. There are currently no off-site alternatives available within the general area of Half Moon Bay that would meet the City's and project applicant's objectives. The significant effects of the project would not be avoided or substantially lessened by moving the project site.

5.4.2 ALTERNATIVE DEVELOPMENT SCENARIOS

The project applicant considered several development scenarios that were ultimately rejected because they did not meet City objectives or project applicant objectives.

Auto Dealership Expansion Scenario: An alternative development scenario that was considered but rejected proposed expansion of the James Ford Auto Dealership. The Auto Dealership Expansion scenario would not involve construction of a hotel or any residential units.

Hotel with Increased Number of Rooms Scenario: Earlier versions of the proposed project included an increased number of rooms, up to 149. This development scenario did not comply with the City's 100-foot wetland buffer requirement. Further, the development scenario involved construction of one large structure to contain all hotel rooms and facilities.

5.5 ALTERNATIVES ANALYZED

This section provides a range of reasonable project alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening some of the project's significant adverse environmental effects.

The following analysis describes the extent to which the alternatives meet or do not meet the City's and project applicant's primary project objectives as described in **Chapter 3.0, Project Description**, and discussed above. This section also evaluates whether Alternatives 1, 2, or 3 would reduce the significant impacts of the project to a less-than-significant levels. This analysis considers whether Alternatives 1, 2, or 3 would generate impacts other than those that would occur as a result of the project. For each environmental topic, the study area discussed below is the same as the study area established for the topic in **Chapter 4.0, Setting, Impacts, and Mitigation Measures**, unless otherwise noted. Mitigation measures developed for the project are referred to in the analysis below; these mitigation measures are fully described in each resource section within **Chapter 4.0, Setting, Impacts, and Mitigation Measures**. A summary comparison of project impacts and impacts from alternatives is provided in **Table 5-2** at the end of this section.

5.5.1 NO PROJECT, ALTERNATIVE 1

State CEQA Guidelines Section 15126.6 (e) (1) requires that the no project alternative be described and analyzed "to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project." The no project analysis is required to discuss "the existing conditions at the time the notice of preparation is published… as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" Section 15126.6 (e)(2)).

Under the No Project alternative, Alternative 1, the project site would remain in its current undeveloped state and there would be no development of the structures or uses. The project site would remain in its undeveloped condition as a vacant lot.

Ability to Accomplish Project Objectives

Under Alternative 1, the project site would remain in its current undeveloped state and no development of the structures or uses would occur. The project site would remain in its undeveloped condition as a vacant lot. Under this alternative, the City's and project applicant's project objectives would not be met.

Environmental Impacts

Under the No Project alternative, Alternative 1, the existing conditions at the project site would remain unchanged. Therefore, there would not be any interference with long-range views of the ridgelines or impacts to views along SR-1. Alternative 1 would have no impact to aesthetic resources. Alternative 1 also would have no impact to biological resources at the project site, and would not contribute to air quality emissions, greenhouse gas (GHG) emissions, noise impacts, or traffic impacts.

5.5.2 REDUCED INTENSITY, ALTERNATIVE 2

A reduced intensity alternative, Alternative 2, was proposed in response to public and agency feedback on the project during release of the Notice of Preparation for the project as well as during public forums with the City for the project. This public and agency feedback identified the concept of a smaller hotel and addressed the need for additional housing in the city. Alternative 2 also would reduce the overall massing of the project which in turn reduces the aesthetic impacts associated with the project.

Alternative 2 would include construction of a 66,784 square-foot, 102-room hotel on the project site along with a subdivision allowing for future development of up to 16 dwelling units (8 duplexes), potentially with accessory dwelling units, along Seymour Street (**Figure 5-1**) and the expansion of the car dealership parking lot. The hotel, as proposed under Alternative 2, would consist of two main buildings, a north building and south building, and a parking lot that faces Main Street. A third one-story building is proposed on the east side of the north building that would house a bicycle rental shop. The north building would be a three-story structure consisting of guestrooms and employee areas and the south building would be a two-story structure consisting of the lobby and public space, lobby, with guestrooms on the second level (**Figure 5-2** and **Figure 5-3)**.

The project site for Alternative 2 was expanded to include a 1.15-acre parcel north of Seymour Street along SR-1, used by the auto dealership for extra parking. Alternative 2 would require a lot line adjustment on the 5.02-acre parcel, adding 0.61 acres to the dealership and using the remaining 4.41 acres for the hotel and open space. Adding 0.61 acres to the dealership allows for the creation of an 8-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant, for future development with duplexes. **Figure 5-4** shows the property division and phasing plan required for development of Alternative 2. Upon completion of a subdivision map, Lots 1 and 2 would be developed with a minimum of 4 units of affordable housing. Lots 3 through 8 would remain in use as parking for the dealership as needed but could be developed in the future.

Under Alternative 2, the building massing and number of guestrooms would be reduced, as compared to the project. The proposed conceptual site plans for Alternative 2 are depicted in **Figure 5-5** and **Figure 5-6**. The proposed structures under Alternative 2 have been reduced, spanning a length of 452 feet across the project site. This makes up approximately 50 percent of the project site, which would maintain the balance of structures and open space on the project site. **Figure 5-7** shows the proposed drainage system for the project site. **Appendix I, Drainage Memorandum - Alternative 2**, further illustrates how Alternative 2 would manage stormwater flows, enhance wetland buffer zones with native plants, and incorporate source control measures and bioretention areas that help filter potential pollutants from the water system.

Alternative 2 differs from the project in the following ways:

- Guestrooms: Reduced from 129 to 102 rooms
- Parking Spaces: Reduced from 148 to 108 spaces

- Square Footage of Structures: Reduced from 90,784 square feet to 66,784 square feet; includes meeting space reduction from 2,700 square feet to 1,210 square feet
- Elimination of the pool and pool house
- Elimination of north parking area and alley from project site to Seymour Street
- Setbacks of proposed structures from the existing property lines:
    - South setback from Gateway has increased from 218 feet to 391 feet
    - East setback from Main Street has increased from 15 feet to 75 feet
    - North setback from Ford Dealership was 74 feet and now 65 feet
    - West setback from SR-1 has increased from 35 feet to between 90 feet and 150 feet
- The subject property extends a length of 894 feet in a north to south direction. Proposed structures for Alternative 2 have been reduced from spanning a length of 608 feet to 452 feet across the project site.
- Alternative 2 consists of two primary structures and an ancillary structure to reduce overall massing:
    - A three-story structure (north building) consisting of guestrooms and employee areas
    - A two-story structure (south building) consisting of public space and guestrooms on the second level
    - An ancillary one-story structure next to parking lot for bike rentals

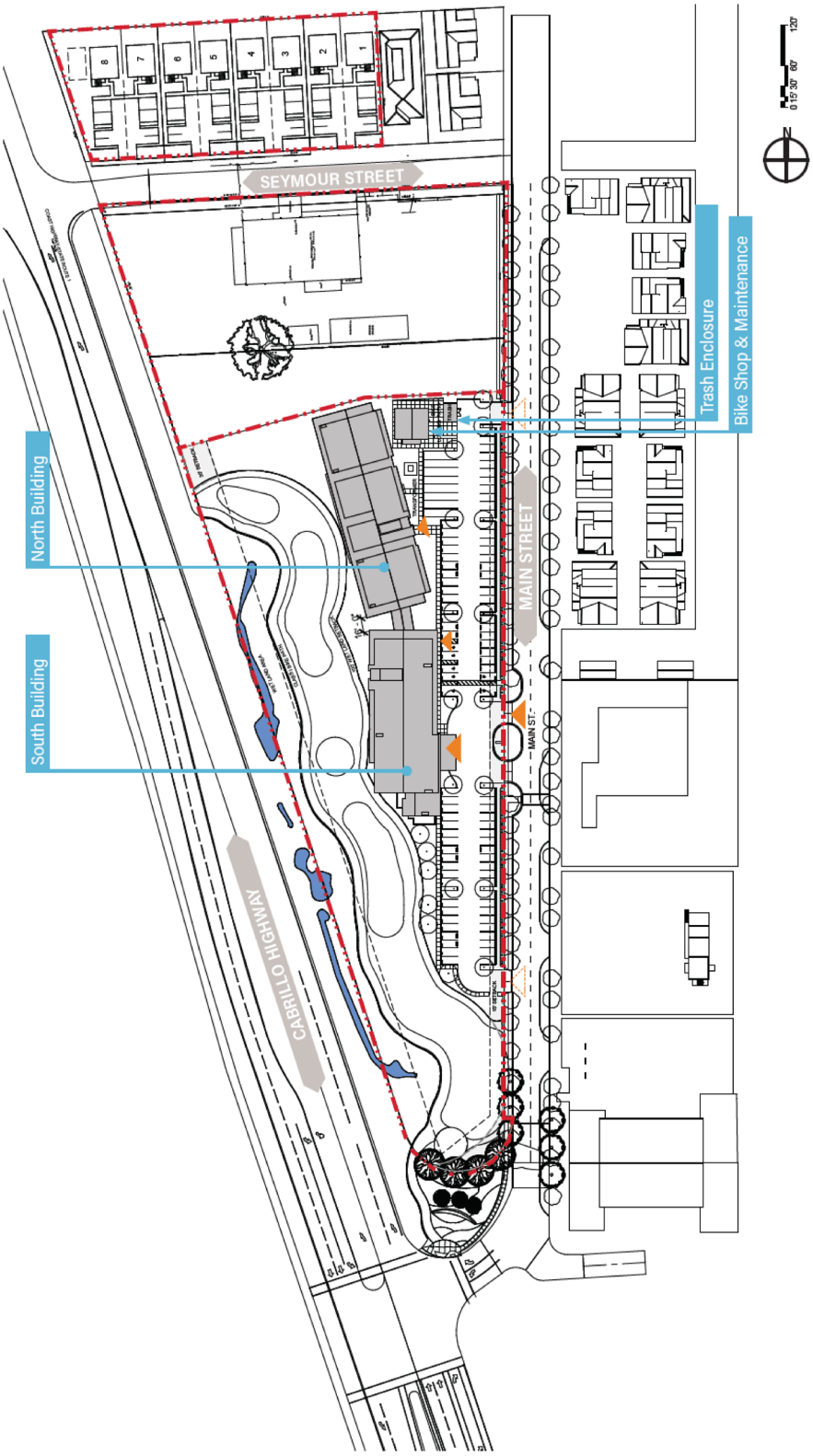


Figure 5-1

Proposed Site Layout

Hyatt Place Half Moon Bay Project

Source: AXIS/GFA Architecture + Design, 2021



North Building - West Elevation



North Building - North Elevation



North Building - East Elevation

North Building Elevations Figure **5-2**

Source: AXIS/GFA Architecture + Design, 2021



South Building - West Elevation



South Building - South Elevation



South Building - East Elevation

South Building Elevations Figure **5-3**

Source: AXIS/GFA Architecture + Design, 2021

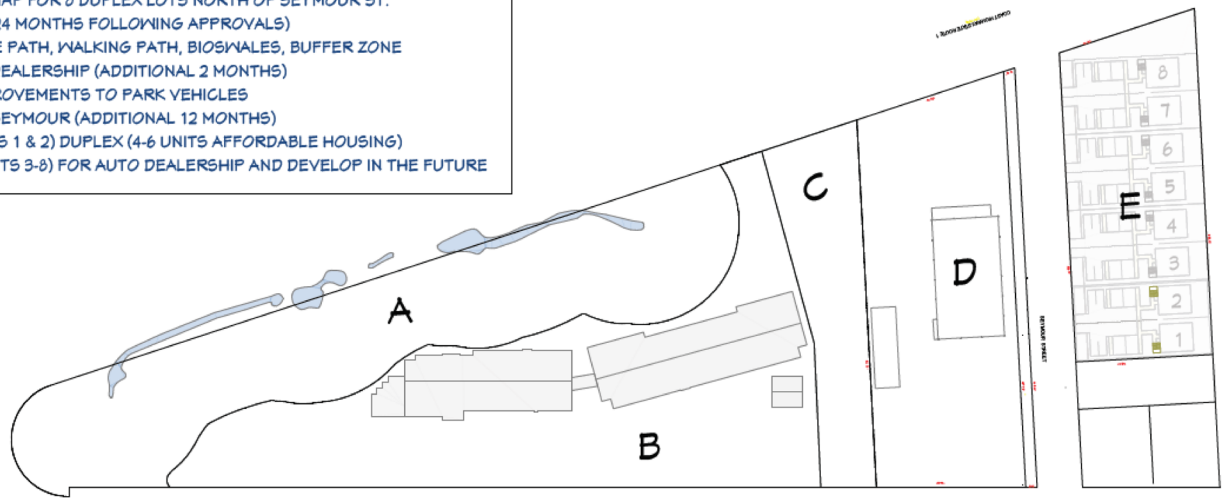
CONCEPTUAL PHASING PLAN

1). OBTAIN NECESSARY APPROVALS
- HOTEL SITE
- LOT LINE ADJUSTMENT ADDING LAND TO AUTO DEALERSHIP
- SUBDIVISION MAP FOR 8 DUPLEX LOTS NORTH OF SEYMOUR ST.

2). BUILD HOTEL (18-24 MONTHS FOLLOWING APPROVALS)
- INCLUDES BIKE PATH, WALKING PATH, BIOSWALES, BUFFER ZONE

3). LAND ADDED TO DEALERSHIP (ADDITIONAL 2 MONTHS)
- SURFACE IMPROVEMENTS TO PARK VEHICLES

4). LAND NORTH OF SEYMOUR (ADDITIONAL 12 MONTHS)
- DEVELOP (LOTS 1 & 2) DUPLEX (4-6 UNITS AFFORDABLE HOUSING)
- MAINTANIN (LOTS 3-8) FOR AUTO DEALERSHIP AND DEVELOP IN THE FUTURE



PROPERTY DIVISION

	87,137	SF	2.00	ACRES	OPEN SPACE (A)
	105,023	SF	2.41	ACRES	HOTEL LOCATION (B)
	26,772	SF	0.61	ACRES	ADD LAND TO AUTO DEALERSHIP (C)
APN 065-012-030	218,932	SF	5.02	ACRES	EXISTING VACANT PARCEL (A, B & C)
APN 065-012-020	65,377	SF	1.50	ACRES	EXISTING AUTO DEALERSHIP (SOUTH OF SEYMOUR ST.) (D)
APN 064-352-150	50,280	SF	1.15	ACRES	EXISTING AUTO DEALERSHIP (NORTH OF SEYMOUR ST.) (E)
	115,657	SF	2.65	ACRES	EXISTING AUTO DEALERSHIP (D & E)
	26,772	SF	0.61	ACRES	ADD LAND TO AUTO DEALERSHIP (C)
	142,429	SF	3.26	ACRES	TOTAL (C, D & E)
	50,280	SF	1.15	ACRES	CREATE 8 DUPLEX LOTS (NORTH OF SEYMOUR ST.) (E)
	92,149	SF	2.11	ACRES	AUTO DEALERSHIP AFTER DEVELOPING ALL NORTH OF SEYMOUR ST. (C & D)

Property Division Map and Phasing Plan Figure **5-4**

Source: AXIS/GFA Architecture + Design, 2021



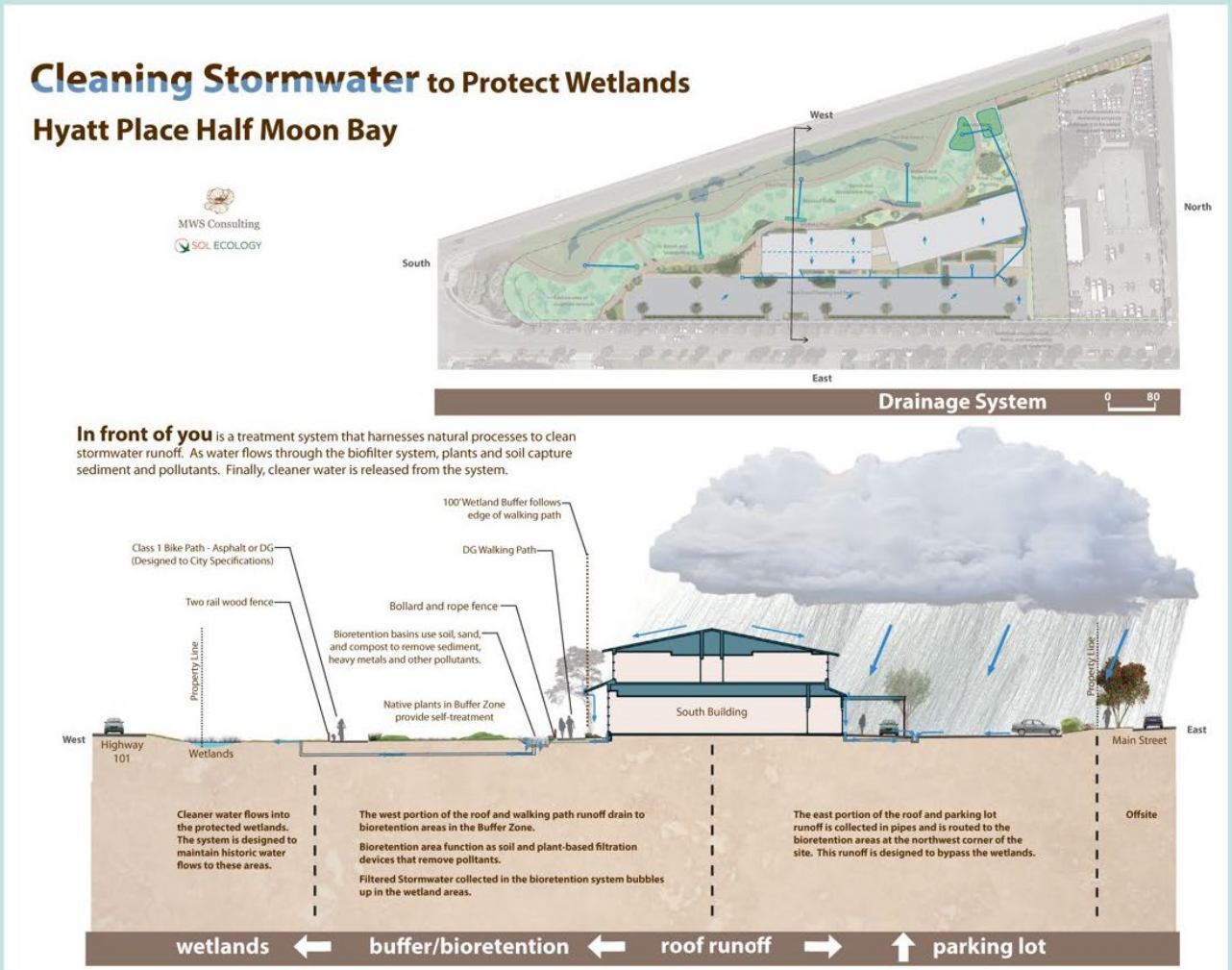
Proposed Floor Plans – First Floor Figure **5-5**

Source: AXIS/GFA Architecture + Design, 2021



Landscape Plan Figure **5-6**

Source: MWS Consulting, 2021



A Biofilter System protecting Wetlands adjacent to the new South Gateway in Half Moon Bay

The project is designed to harness natural processes to treat stormwater runoff while promoting habitats that encourage pollination and wildlife habitat. The system uses plants, soils, and filter media to capture sediment and pollutants before releasing cleaner water from the system. The bioretention areas and buffer zone also serve as an educational tool for students, the community and visitors to the area as the surrounding ADA-compliant paths are lined with educational signage and benches where visitors can observe the preserved wetlands and the restored native vegetation introduced in the buffer zone areas. This area provides two acres of open space enhancing the South Gateway for the City.

Drainage System Figure **5-7**

Source: MWS Consulting, 2021

Ability to Accomplish Project Objectives

Alternative 2 would meet the same objectives met by the project. In some cases, Alternative 2 would achieve the City's primary project objectives to a greater degree than the project described in **Chapter 3.0, Project Description**. These objectives are discussed in further detail below.

The overall size of the hotel buildings would be reduced under Alternative 2 (from 90,784 square feet to 66,784 square feet). Forty percent of the project site would be dedicated to open space under Alternative 2, which is more open space than what was proposed as part of the project. Dedicated open space would include bioretention areas to function as a soil and plant-based filtration to naturally process stormwater runoff. This area would also host native plants and grasses. This dedicated open space and natural landscaping would support the City's and project applicant's objective of providing a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast.

The southern entrance to Downtown, located at the intersection of SR-1 and Higgins Canyon Road at the southern tip of the project site, is a gateway which helps define the character of the city. As such, it is important that development at the project site be designed as contextually appropriate for the city and provide compatibility with both the Downtown and the adjacent residential neighborhood. Alternative 2 would reduce the size and scale of the hotel proposed as part of the project, reducing significant impacts to aesthetic resources, as compared to the project. The reduced building massing would be more reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape. The reduced massing combined with the increased setbacks, open space and natural landscaping proposed under Alternative 2 would enhance the aesthetic of the Southern gateway of the city.

Given the above, Alternative 2 would support the City's and project applicant's primary project objectives for aesthetic resources and design to a greater degree than the project.

Environmental Impacts

Aesthetics

Alternative 2 would reduce the overall massing of the project as well as increase building setbacks, which would reduce the aesthetic impacts associated with the project. As discussed in **Section 5.5.2**, **Reduced Intensity**, **Alternative 2,** the hotel, as proposed under Alternative 2, would consist of two main buildings, a north building and south building, and a

parking lot that faces Main Street. A third one-story building is proposed on the east side of the north building that would house a bicycle rental shop. The north building would be a three-story structure consisting of guestrooms and employee areas and the south building would be a two-story structure consisting of the lobby and public space, with guestrooms on the second level. Many of the facilities proposed as part of the project, such as the pool/fitness center, lobby/reception building, and conference center, have been eliminated in Alternative 2 in order to reduce the overall project footprint.

The proposed massing of structures under Alternative 2 is reduced, spanning a length of 452 feet, or approximately 50 percent of the project site. This would maintain the visual balance of structures and open space. The overall floor area would also be reduced under Alternative 2 (from 90,784 square feet to 66,784 square feet). As with the project, Alternative 2 would comply with **Standard Condition AES-1** and **Mitigation Measure AES-1**, which would minimize light and glare associated with the construction and operation of Alternative 2.

For the purposes of analyzing aesthetic impacts associated with Alternative 2, the same viewpoints identified in **Section 4.1, Aesthetics**, were utilized. **Figure 5-8** through **Figure 5-11** depict the general massing associated with Alternative 2. **Figure 5-8** depicts public views of the project site from Viewpoint 1 at the residential developments located northeast of the project site. **Figure 5-9** depicts the project site from Viewpoint 2, which is on SR-1 south of Higgins Canyon Road. **Figure 5-10** depicts the project site from Viewpoint 3 on SR-1, just north of Viewpoint 2. **Figure 5-11** depicts the project site from Viewpoint 4, at the bicycle path associated with the Naomi Patridge Trail. Viewpoint 1 and Viewpoint 4 were included in response to public interest and would not interfere with protected views.

The view from Main Street across SR-1 to Wavecrest (Viewpoint 1) provides a view of an open agricultural field, and not the coastal views available from the western side of Wavecrest. Implementation of Alternative 2 would generally block views of the open field on the eastern side of the Wavecrest from Main Street as depicted in **Figure 5-8**. However, given the reduced massing, Alternative 2 would not block as much of this view as the project. Additionally, this viewpoint was selected in response to public interest and is not a protected view or considered a sensitive view or vista, nor does it contain scenic resources within a state scenic highway.

The view from the southern Downtown gateway intersection of SR-1 and Higgins Canyon Road (Viewpoint 2) provides a view of an open field, and of the protected ridgeline. The ridgeline represents both a scenic vista and a

scenic resource, per the LCLUP. As shown in **Figure 5-9**, Alternative 2 would not interfere with the long-range views of the ridgeline for Viewpoint 2 (same as the project).

However, it is noted that it may be possible that Alternative 2 would interfere with a ridgeline view from areas adjacent to Viewpoint 2, but the analysis indicates that, given the speed of vehicles traveling on SR-1, such an interference would be fleeting. Further, the reduced massing proposed under Alternative 2 would not block as much of this view as the project.

The project, as analyzed in **Section 4.1, Aesthetics**, of this draft EIR, would interfere with the long-range views of the ridgelines north and east of the project site from SR-1 (Viewpoint 3). As discussed in **Section 5.3.2**, **Significant and Unavoidable Impacts**, the project was found to have a substantial adverse effect on the ridgeline, which is a scenic vista and a scenic resource within a scenic corridor and would substantially degrade visual quality of public views. These impacts were found to be significant and unavoidable for the project. However, Alternative 2 would reduce the overall massing of the structures at the project site, improving available views from surrounding viewsheds, including those available from SR-1, as compared to the project (see **Figure 5-10**). Although this section of SR-1 is not officially designated as a scenic highway, the City considers it as a visual resource area subject to regulations applicable to a scenic corridor. Under Alternative 2, 40 percent of the project site would be dedicated to open space, which is more than what was proposed for the project. As discussed in **Section 5.5.2**, **Reduced Intensity, Alternative 2,** building setbacks from the southern gateway, Main Street, and SR-1 would each be substantially increased under Alternative 2. Given the above, Alternative 2 would have a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor that are available from Viewpoint 3, unlike the project, which would have a significant and unavoidable impact at this viewpoint.

While long-range views of the ridgeline would still be available from SR-1 and most other viewsheds surrounding the project site, **Figure 5-11** depicts the obscured views from Viewpoint 4. Because the north building would be constructed at an angle on the project site, the view of the ridgeline from Viewpoint 4 would still be obstructed. Viewpoint 4 is not a protected view according to the City's LCLUP; however, it was evaluated due to community interest.

As described above, Alternative 2 would have a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor where the project would have a significant and unavoidable impact to both thresholds. While Alternative 2 would reduce impacts to scenic vistas and scenic resources, build out of Alternative 2 would result in permanent changes in the existing visual quality of the project site. Although the project would incorporate high quality design elements, landscaping, and screening techniques the visual quality of the project site from public views is conservatively considered to be adversely affected by the project. Therefore, Alternative 2 would substantially degrade the existing visual quality of the project site from public views and this impact would be significant and unavoidable, consistent with the project.



Reduced Intensity, Alternative 2 – Viewpoint 1 Figure **5-8**

Source: FastCast, 2022

Reduced Intensity, Alternative 2 – Viewpoint 2

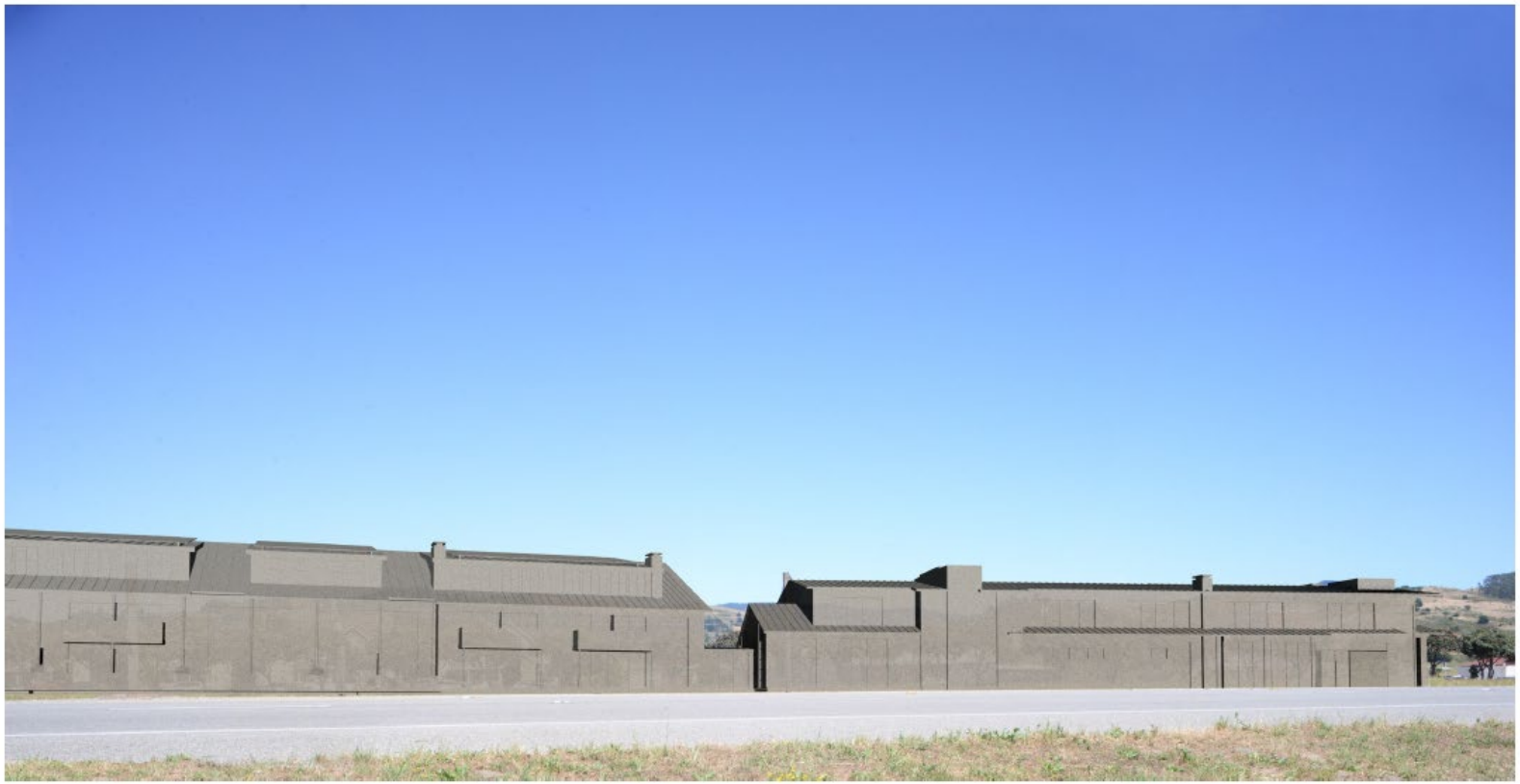
Figure 5-9

Source: FastCast, 2022

Hyatt Place Half Moon Bay Project

Reduced Intensity, Alternative 2 – Viewpoint 3 Figure **5-10**

Source: FastCast, 2022



Reduced Intensity, Alternative 2 – Viewpoint 4 Figure **5-11**

Source: FastCast, 2022

Air Quality

Alternative 2 would result in slightly higher construction period emissions than the project because of additional construction activity required for the new residential site. However, construction emissions for Alternative 2 would not exceed the Bay Area Air Quality Management District (BAAQMD)'s significance thresholds for construction criteria pollutants. Operational emissions for Alternative 2 would be similar to or slightly greater than those of the project. Annual and average daily emissions remain well below the thresholds used to judge the significance of these emissions. Alternative 2 would also require approximately three percent less energy usage than the project.

PM_{10} exhaust emissions, which are assumed to be mostly diesel particulate matter (the toxic air contaminant (TAC) emitted by construction equipment) would be slightly higher for Alternative 2 as compared with the project – approximately 10 percent higher.[1] Alternative 2 would have slightly higher emissions than the project, but lower emissions than reported for the project in the 2020 assessment. However, these emissions would occur mostly further away from the closest sensitive receptor affected by construction. The construction area would include a parcel that is about 22 percent of the project size that is in a completely different area. Emissions from the project site would decrease because the project would be smaller in size. Health risk impacts are primarily dependent on the magnitude of TAC emissions and proximity of those emissions with respect to the sensitive receptors, when considering wind flow. When considering these effects, health risk impacts with the Alternative 2 would be similar to those identified previously for the project. **Standard Condition AQ-1** and **Mitigation Measure AQ-2** would be adequate to reduce the impact to a less-than-significant level similar to the project.

Biological Resources

The biological resources study area for Alternative 2 is generally the same as the study area for the project; however, an additional 1.88 acres were studied to include analysis of the wetlands beyond the parcel north of Seymour Street. The increased study area includes the 1.15-acre parcel north of Seymour Street, and portions of the adjacent parcels. Biological resource

[1] To note, updated emissions modeling for the project are lower due to the new CalEEMod model which incorporates newer motor vehicle emission rates reflective of the State's Emission Factors model, updated building energy consumption rates based on 2019 State Buildings Codes, and newer GHG intensity rates for electricity generated by Peninsula Clean Energy (the default electricity provider).

impacts for Alternative 2 are generally the same as those for the project. A biological site visit occurred on June 10, 2021, to survey the new study area and confirm that existing conditions on the original study area had not changed.

As with the project, impacts to special-status plant species are not expected to occur as a result of Alternative 2. Additionally, impacts to special-status wildlife species are not expected to occur as a result of Alternative 2 with implementation of Mitigation Measures **BIO-1a**, **BIO-1b**, **BIO-1c**, **BIO-1d**, **BIO-1e**, **BIO-1f**, and **BIO-1g** as outlined in **Section 4.4, Biological Resources**. The aforementioned mitigation measures would be adequate to reduce the impact to a less-than-significant level, similar to the project.

As described in Chapter 6 of the LCLUP and Section 18.38.080 of the City's zoning ordinance, any new permanent structures are required to be placed outside of a 100-foot buffer from jurisdictional wetlands. Four seasonal wetland features are located on the western boundary of the original study area. The hotel structures proposed as part of Alternative 2 would be constructed outside of the 100-foot wetland buffer. Two seasonal wetland features, which were determined to meet the USACE three-parameter criteria for wetlands under Section 404 of the Clean Water Act, were identified along the western boundary of the new study area. The existing features (i.e., roadway, residential housing, and parking lot) that are currently within 100 feet- of these newly documented wetlands can be grandfathered in and would be allowed to remain in their existing conditions. However, the proposed dwelling units associated with Alternative 2 would be located within the 100-foot wetland buffer for the two seasonal wetland features if the 1.15-acre site is subdivided as proposed. As proposed, the subdivision would result in a new parcel that would be located fully within the 100-foot buffer for wetlands which is inconsistent with Policy 6-57 Land Divisions of the 2020 LCLUP. This impact would be significant unless mitigated. The following mitigation measures apply specifically to the residential units proposed as part of Alternative 2 and would reduce potential project impacts on wetlands:

- **Mitigation Measure BIO-4a:** The subdivision plans for the reduced intensity alternative, Alternative 2, shall be revised to ensure that all of the resulting parcels can be developed without intrusion into the 100-foot wetland buffer so as to be consistent with Policy 6-57 Land Divisions of the 2020 LCLUP.
- **Mitigation Measure BIO-4b:** Residential development of the subdivided 1.15-acre site north of Seymour Street shall comply with all applicable wetland buffer requirements. Furthermore, site development shall not result in direct or indirect water quality impacts that could occur due to

adjacent development. During construction, suitable erosion control, sediment control, source control, treatment control, material management, and stormwater management measures would be used in conformance with the NPDES Statewide Construction General Permit (Order No. 2009-0009-DWQ). Additionally, the project will be designed to comply with the California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit (MRP) (Water Board Order No. R2-2009-0074). This will require that the project implement BMPs into the design that prevents stormwater runoff pollution, promotes infiltration, and holds/slows down the volume of water coming from a site. In order to meet these permit and policy requirements, projects must incorporate the use of tree planters, grassy swales, bioretention and/or detention basins, among other factors. The site is already largely designed to preserve existing drainage characteristics, as seen by the placement of stormwater treatment basins near the area of the site where the seasonal wetlands occur. These basins shall be designed to drain to the avoided wetland area to preserve hydrological inputs from the site.

- **Mitigation Measure BIO-4c**: Compensate for lost wetlands by restoring avoided wetlands. Consistent with **Mitigation Measure BIO-4b**, development of the subdivided 1.15-acre site north of Seymour Street shall comply with all applicable wetland buffer requirements. As such, development within the buffer shall be limited to uses identified in the Policy 6-40 and 6-42 of the LCLUP. If all jurisdictional wetland areas (as determined by site verification) cannot be avoided by components of the project considered to be allowed uses, the project will restore avoided wetlands onsite at a ratio of 4:1 by implementing a weed removal program in the avoided wetlands, which are dominated by weedy, non-native species such as pennyroyal (*Mentha pulegium*). A qualified restoration ecologist will develop a Wetland Restoration and Monitoring Plan, which will contain the following components (or as otherwise modified by regulatory agency permitting conditions):
    - Goal of the restoration (to increase wetland habitat functions and values by removing invasive species);
    - Restoration design:
        - Weed removal, control, and monitoring plan
        - Soil amendments and other site preparation elements as appropriate
        - Planting plan (to replace non-natives with native wetland species)

    - Maintenance plan
    - Remedial measures/adaptive management
- Monitoring plan, including final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc.); at a minimum, success criteria will include restoration of native wetland vegetation and no more than 5 percent cover of non-native species, and provision of ecological functions and values equal to or exceeding those in the habitat that was impacted; and
- Contingency plan for mitigation elements that do not meet performance or final success criteria.

Implementation of **Mitigation Measures BIO-4a, BIO-4b,** and **BIO-4c** would be adequate to reduce the impact to a less-than-significant level. Additionally, with adherence to the aforementioned mitigation measures, Alternative 2 would not conflict with applicable plan, policy or regulations adopted for the purpose of wetland protections, and this impact would be less than significant with mitigation, similar to the project.

Greenhouse Gas

Alternative 2 would have slightly higher GHG emissions than the project. GHG emissions generated during project construction would be similar to, or slightly higher than, the project. The residential units proposed as a part of Alternative 2 would result in relatively increased long-term emissions associated with vehicle emissions and solid waste generation. However, Alternative 2 would generate 585 Metric Tons (MT) of carbon dioxide equivalent (CO_2e) emissions annually, which is well below BAAQMD's threshold of 660 MT of CO_2e. Therefore, Alternative 2 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and this impact would be less than significant, similar to the project. Half Moon Bay's Title 14 of the Half Moon Bay Municipal Code Building Electrification Ordinance will assist the State in reaching Senate Bill 32 goals. The Building Electrification Ordinance requires all new building constructions to be electric-only, with no gas or propane used in the new construction. Additionally, the Building Electrification Ordinance would require electric retrofits for various types of remodels and require fuel gas lines to be capped/decommissioned in existing buildings by 2045. However, to note the GHG modeling did not assume all-electric fuel for the units; therefore, the emissions would be less than modeled.

Land Use and Planning

Alternative 2 would not have the potential to physically divide an established community. Rather, this alternative would allow for future development of up to 16 dwelling units (8 duplexes) along Seymour Street with additional potential for Accessory Dwelling Units (ADUs). The project site for Alternative 2 was expanded to include a 1.15-acre parcel north of Seymour Street along SR-1, used by the auto dealership for extra parking. As discussed in **Section 5.5.2**, **Reduced Intensity, Alternative 2,** Alternative 2 would require a lot line adjustment on the 5.02-acre parcel, adding 0.61 acres to the dealership and using the remaining 4.41 acres for the hotel and Open Space. Adding 0.61 acres to the dealership allows for the creation of an 8-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant, for future development with duplexes. The parcels associated with the development of the duplexes are designated as residential – medium density in the LCLUP, and the site is zoned for residential development in the R-2 (Two family Residential) Zoning District. The existing use at the 1.15-acre parcel, as overflow parking for the dealership, is in conflict with the parcel's land use and zoning. However, residential development under Alternative 2 would be consistent with the parcel's land use designation and zoning.

Neither implementation of the project nor Alternative 2 would result in any inconsistencies with the Half Moon Bay General Plan or Zoning Code, as the zoning is consistent with current zoning designations. Based on the above, both the project and Alternative 2 would have less-than-significant impacts related to land use, similar to the project.

Noise and Vibration

Construction of Alternative 2 would result in temporary noise increases that could exceed local standards. Under Alternative 2, the hotel includes an outdoor patio along the southern façade of the building. The future exterior noise levels would be below 65 decibels (dBA) at the center of the outdoor patio.

The western façade of the proposed hotel would be located between 160 and 205 feet from the centerline of SR-1. The hotel rooms along this building façade would be exposed to future exterior noise levels up to 66 dBA. The rooms located on the eastern façade would be set back approximately 100 to 160 feet from the centerline of Main Street. At these distances, noise from SR-1 would attenuate such that exterior noise levels along the eastern façade would be at or below 60 dBA. By providing a suitable form of forced-air mechanical ventilation, as determined by the local building official the interior noise levels would be reduced. For hotel rooms facing Cabrillo Highway Sound Transmission Class (STC) rated windows and doors would be

required in addition to forced-air mechanical ventilation. Additionally, for exterior-facing units facing Main Street and the fire station, windows and doors would also need to be fitted with a minimum STC rating of 30 to 31, in addition to forced-air mechanical ventilation to meet interior noise thresholds.

The proposed duplexes located north of Seymour Street would also have backyards subject to exterior noise criteria. While the duplex structures would provide adequate shielding from Seymour Street and the existing buildings to the east would provide adequate shielding from traffic along Main Street, these backyards would be exposed to traffic noise from Cabrillo Highway. The centers of the backyards would be set back approximately 125 to 400 feet from the centerline of the highway. With partial shielding from the row of existing residences to the north, the backyards of the duplexes would be exposed to future exterior noise levels ranging from 54 to 67 dBA.

The future noise environment would exceed the exterior noise criteria by up to 7 dBA at the nearest duplex structure adjoining Cabrillo Highway. To meet the exterior noise threshold, additional noise control measures would be implemented.

Methods available to reduce exterior noise levels at the backyards would be limited due to the small parcel of land available. The optimal measure for noise reduction would be to construct a sound wall or a specially-designed barrier fence capable of reducing noise levels by at least 7 dBA.

With the implementation of an 8-foot tall barrier, the exterior noise environment would be at or below 60 dBA. The City could, however, approve a 6-foot barrier to achieve an exterior noise environment at the duplex backyards of 65 dBA CNEL under a conditionally acceptable condition. Furthermore, consistent with the City's approval of residential development of other lots adjacent to Cabrillo Highway, the entire yard area would not need to conform to the 60 dBA threshold provided that a sound protected outdoor space can be established on each site.

For interior noise levels, the duplex unit located along Cabrillo Highway (Unit 8) would require windows and doors with a minimum STC rating of 35 to 36 and an adequate form of forced-air mechanical ventilation to meet the 40 dBA threshold. Duplex units 6 and 7, which are located within 200 feet of the centerline of Cabrillo Highway would require minimum STC ratings of 31 and a form of forced-air mechanical ventilation to meet the 40 dBA threshold. All other units would require standard construction materials with adequate forced-air mechanical ventilation. It should be noted however, that the wetland buffer requirements will result in increased distance between the westernmost units and the roadway. Thus, these requirements for

soundproofing such units will be more than adequate to attenuate highway noise to acceptable levels.

In addition to the aforementioned measure, a qualified acoustical specialist shall prepare a detailed analysis of interior hotel noise levels resulting from all exterior sources during the design phase pursuant to requirements set forth in the State Building Code. Treatments would include, but are not limited to, sound-rated windows and doors, sound-rated wall and window constructions, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted on a room-by-room basis in the hotel or a unit-by-unit basis in the duplexes during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit. The implementation of these noise insulation features would reduce interior noise levels to 45 dBA or less and 55 dBA L_{max} or less.

Construction activities for the reduced hotel for Alternative 2 is expected to be similar to the project, which was estimated to last about 18 months. The same phasing information and equipment used in each phase is not expected to change under project alternative conditions. Therefore, with the implementation of *Construction Best Management Practices*, included in **Mitigation Measure NOI-1a**, the temporary construction would be reduced to a less-than-significant level similar to the project.

The additional duplex units located north of Seymour Street, however, would generate temporary construction noise near existing residential land uses. Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. The highest maximum noise levels generated by the construction of these eight duplex units would typically range from about 80 to 90 dBA L_{max} at a distance of 50 feet from the noise source, and typical hourly average noise levels for residential land uses would range from 65 to 88 dBA L_{eq}, as measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Therefore, under Alternative 2, **Mitigation Measure NOI-1a** would also be applicable, and would reduce temporary construction noise impacts to a less-than-significant level at all noise-sensitive receptors surrounding the project site.

Transportation and Traffic

Similar to the project, Alternative 2 would be consistent with all programs, plans, and ordinances which address the circulation system in Half Moon

Bay. Alternative 2 includes a building dedicated to bicycle rentals as well as bicycle and pedestrian pathways throughout the project site.

Trip generation, or the amount of traffic predicted to enter and exit the project site, is anticipated to be decreased under Alternative 2. The commercial component and residential component proposed as part of Alternative 2 are anticipated to generate an average of 572 trips per day, including 42 trips during the a.m. peak hour, 46 during the p.m. peak hour and 84 during the weekend peak hour. This represents a decrease of three daily trips, two fewer trips during the a.m. peak hour, no change to the number of trips during the p.m. peak hour and a decrease of nine trips during the weekend peak hour compared to the project. Of the average 572 daily trips, 48 percent of trips would be to or from north of the project view SR-1; 40 percent of trips would be to or from East of the project site from SR-92; and 12 percent of trips would be to or from South of the project site from SR-1.

As discussed in **Section 4.15, Transportation and Traffic**, Senate Bill (SB) 743 established the increase in Vehicle Miles Traveled (VMT) as a result of a project as the basis for determining transportation impacts. As of the date of this analysis, the City of Half Moon Bay has not yet established thresholds of significance related to VMT. As a result, the project related VMT impacts were assessed based on guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018. This document states that each component of a mixed-use project can be evaluated independently with separate significance thresholds applied for each component.

Residential VMT. For the purposes of the traffic analysis, the regional area comprises the coastal region, as defined by the *Connect the Coastside Comprehensive Transportation Management Plan*, dated October 2021. Based on data from the Local Coastal Plan version of the C/CAG travel demand model, the Connect the Coastside study area has a baseline average residential VMT of 24.12 miles per capita. Applying OPR's guidance, a residential project generating a VMT that is 15 percent or more below this value, or 20.50 miles per capita or less, would have a less-than-significant VMT impact.

The project alternative is eligible for VMT adjustments based on the site density and the number of affordable housing units offered. A reduction of 11.6 percent can be applied to the VMT because the site consists of 16 dwelling units on a 1.15-acre parcel. Additionally, another reduction of 2.3 percent in VMT can be applied since four of the dwelling units would qualify as affordable housing, bringing the total VMT adjustment to 13.9 percent. The

13.9 percent reduction in project VMT would result in a value of 16.90, which is less than the VMT significance threshold of 20.50. Therefore, the residential portion of the Alternative 2 would be expected to result in a less than-significant VMT impact.

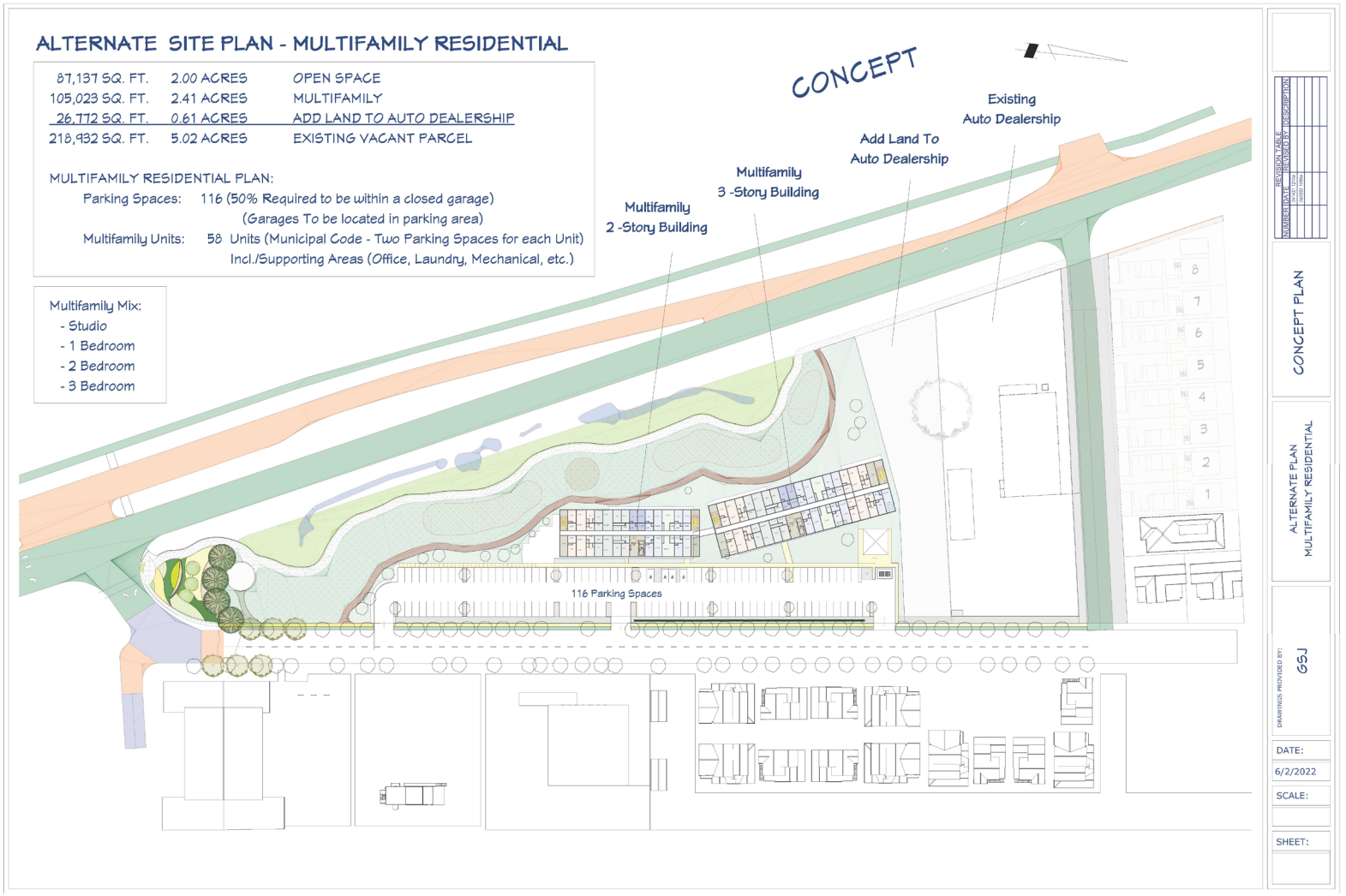
Commercial VMT. The OPR Technical Advisory includes suggested VMT significance thresholds for residential, employment, and retail uses but does not address hotel or other visitor-based land uses. Consistent **Section 4.15, Transportation and Traffic**, the City of Half Moon Bay Staff has determined that a project that generates 15 (or more) percent less than the unmitigated project VMT, with the implementation of Transportation Demand Management (TDM) measures, would indicate a less-than-significant VMT impact.

VMT associated with the hotel component under Alternative 2 is substantially reduced as compared to the project. The unmitigated project condition for the hotel component was estimated by separating the total number of daily trips into three trip categories: employee trips, guest trips to/from the airport and local guest trips. These three trip categories were anticipated to generate 3,965 daily VMT assuming peak room occupancy. The suite of TDM measures described in **Section 4.15, Transportation and Traffic**, provided the framework for reducing both guest and employee vehicle trips and VMT. The expected VMT reductions associated with the various TDM measures were estimated to reduce VMT to 3,354 daily VMT, a 15.4 percent reduction, resulting in a less-than-significant VMT impact.

5.5.3 MULTI-FAMILY RESIDENTIAL, ALTERNATIVE 3

The Multi-family Residential Alternative, Alternative 3, would involve the construction of residential units at the project site rather than a hotel. Alternative 3 consists of 2 main buildings, a 2-story structure and a 3-story structure with 58 Multifamily Units, which would encompass a building floor area of approximately 66,581 square feet (**Figure 5-12**). Alternative 3 also includes a parking lot on the east side of the project site with 116 parking spaces, 50 percent of which would be enclosed within a garage/carport. The auto dealership would be extended south and housing would be proposed on the north side of Seymour Street, similar to Alternative 2. The layout for Alternative 3 was designed to obtain the most efficient parking and is based on the same layout and building floor area as the hotel in Alternative 2, including the structure locations.

Under Alternative 3, the multi-family residential buildings would be the same size and height as the hotel buildings proposed in Alternative 2. The structures associated with Alternative 3 would comprise 66,581 square feet of the project site (not including carports or garages) while the project and Alternative 2 would comprise 90,784 square feet and 66,784 square feet, respectively. Alternative 3 would feature the same amount of open space as Alternative 2.



Multi-Family Residential, Alternative 3 – Site Layout Figure **5-12**

Source: AXIS/GFA Architecture + Design

Ability to Accomplish Project Objectives

Alternative 3 would not meet several of the City's and project applicant's project objectives, which are generally framed to support the City's growing local tourist and agribusiness economies. It is noted that while housing, and specifically affordable housing, are City priorities, this particular site has been held in a commercial land use designation for many years through the previous L.C. Smith Estate Planned Development designation and associated PUD (Planned Unit Development) zoning. The updated LCLUP brought the intention of the former Planned Development designation forward with a redesignation to the Commercial-General Land Use Designation. While that designation allows for residential and/or mixed-use development, the site's location and orientation serve as the southern commercial gateway to Downtown Half Moon Bay. The City also recently lost a hotel when the 52-room Coastside Inn was purchased by San Mateo County and converted to a homeless shelter; and thus, the continued land use focus for this property has been to maintain adequate visitor serving commercial uses consistent with the California Coastal Act. The Act includes provisions for accommodations geared towards visitors and recreation benefits such as bicycle rentals, which would not be achieved under Alternative 3. As a residential project, while Alternative 3 would provide multi-family residential units, it would not help meet the city's demand for more hotel rooms, support the City's economic development goals, support the local job market by providing new employment opportunities, or provide an opportunity for the City to maintain revenue stream.

The overall floor area and building footprint for Alternative 3 would be less than the project and similar to Alternative 2. Because Alternative 3 would have the same general massing as Alternative 2, the structures would be generally reflective of traditional development and scale within the city and would help to maintain adequate views of the surrounding landscape. Alternative 3 would also have the same amount of open space as Alternative 2.

The design of Alternative 3 was not developed to the extent that it was for the project or Alternative 2. However, it assumed that Alternative 3 would be designed in compliance with the City's standards and policies to be visually compatible with the character of the surrounding areas.

Environmental Impacts

Aesthetics

As discussed above, Alternative 3 would have a similar building footprint as compared to Alternative 2. The structures associated with Alternative 3 would comprise 66,581 square feet of the project site while the structures associated with the project and Alternative 2 would comprise 90,784 square feet and 66,784 square feet, respectively. Alternative 3 would have 2 main buildings, a north building and a south building, similar to Alternative 2. The north building would be 3 stories in height while the south building would be 2 stories. Alternative 3 would also have the same amount of open space as Alternative 2 (2 acres). 40 percent of the project site would be dedicated to open space under Alternative 3, which is more open space than what was proposed as part of the project. Alternative 3 would also have one-story carport or garage structures located within the parking lot area. These structures would have limited visibility from SR-1.

For the purposes of analyzing aesthetic impacts associated with Alternative 3, the same viewpoints identified in **Section 4.1, Aesthetics**, were utilized. Viewpoint 1 and Viewpoint 4 were included in response to public interest and would not interfere with protected views. Similar to the project and Alternative 2, Alternative 3 would not interfere with protected long-range views associated with Viewpoint 2.

The project, as analyzed in **Section 4.1, Aesthetics**, of the draft EIR, would interfere with the long-range views of the ridgelines north and east of the project site from SR-1 at Viewpoint 3. As discussed in **Section 5.3.2**, **Reduced Intensity, Alternative 2,** the project was found to have a substantial adverse effect on the ridgeline view, which is a scenic vista and a scenic resource within a scenic corridor, and would substantially degrade the quality of public views. These impacts were found to be significant and unavoidable for the project. Alternative 3 would have a smaller footprint than the project, and have a smaller building massing. Forty percent of the project site would be dedicated to open space under Alternative 3, which is more than what was proposed for the project. Therefore, it is anticipated that Alternative 3 would not impact long-range views compared to the project, and would be similar to Alternative 2.

Alternative 3 would have similar aesthetic impacts to those identified for Alternative 2 due to the reduced building massing and footprints compared to the project. Given the reduced massing and footprint, Alternative 3 would have a less-than-significant impact to protected scenic vistas and scenic resources within a scenic corridor where the project would have a significant

and unavoidable impact to both thresholds. Similar to Alternative 2, build out of Alternative 3 would result in permanent changes in the existing visual quality of the project site from publicly accessible viewpoints. Although the project would incorporate high quality design elements, landscaping, and screening techniques, the visual quality of the project site is conservatively considered to be adversely affected by the project. Therefore, Alternative 3 would substantially degrade the existing visual quality of the project site and this impact would be significant and unavoidable, consistent with the project and Alternative 2.

Air Quality

Alternative 3 is anticipated to result in a similar or less emissions as Alternative 2 and more emissions than the project. Alternative 3 involves the construction of 58 residential units, and a subdivision for 8-units on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant. The project and Alternative 2 involve construction of 129 guest rooms and 102 guest rooms, respectively. Both Alternative 2 and 3 would include construction of two similarly sized buildings at the project site. While construction emissions were not calculated for Alternative 3, it is anticipated that construction emissions for Alternative 3 would not exceed the Bay Area Air Quality Management District (BAAQMD)'s significance thresholds for construction criteria pollutants based on the review of similar residential projects. Similarly, operational emissions for Alternative 3 are anticipated to be similar or less to those of the project and Alternative 2, which would be well below the thresholds used to judge the significance of these emissions.

Biological Resources

Biological resource impacts for Alternative 3 are generally the same as those for the project, with the exception of the added 1.88-acre study area north of Seymour Street, which is also proposed as part of Alternative 2. Alternative 2 and Alternative 3 would likely have very similar biological resource impacts as both alternatives propose the construction of 2 buildings at the project site and include a subdivision for residential units on the parcel north of Seymour Street. Therefore, Mitigation Measures **BIO-1a**, **BIO-1b**, **BIO-1c**, **BIO-1d**, **BIO-1e**, **BIO-1f**, and **BIO-1g** as outlined in **Section 4.4, Biological Resources** can be assumed to reduce impacts to a less-than-significant level.

As described in **Section 5.5.2, Reduced Intensity, Alternative 2,** four seasonal wetland features are located on the western boundary of the original study area and two seasonal wetland features, are located along the western boundary of the parcel north of Seymour Street. Per Chapter 6 of the

LCLUP and Section 18.38.080 of the City's zoning ordinance, any new permanent structures are required to be placed outside of a 100-foot buffer from jurisdictional wetlands. Therefore, both buildings proposed under Alternative 3 would be required to occur outside the 100-foot wetlands buffer. The proposed dwelling units associated with Alternative 2 and 3 would be located within the 100-foot wetland buffer for the two seasonal wetland features. As proposed, the subdivision would result in a new parcel and would be located fully within the 100-foot buffer for wetlands which is inconsistent with Policy 6-57 Land Divisions of the 2020 LCLUP. This impact would be significant unless mitigated. Mitigation Measures **BIO-4a**, **BIO-4b**, and **BIO-4c** (described in **Section 5.5.2, Reduced Intensity, Alternative 2**) would reduce potential wetland impacts related to the residential units proposed on the parcel north of Seymour Street.

Implementation of **Mitigation Measures BIO-4a, BIO-4b,** and **BIO-4c** would be adequate to reduce the impact to a less-than-significant level. Additionally, with adherence to the aforementioned mitigation measures, it is anticipated that Alternative 3 would not conflict with applicable plan, policy or regulations adopted for the purpose of wetland protections, and this impact would be less than significant with mitigation, similar to the project.

Greenhouse Gas

Alternative 3 would have slightly higher GHG emissions than the project. GHG emissions generated during project construction would be similar to the Alternative 2. The residential units proposed as a part of Alternative 3 would result in relatively increased long-term emissions associated with vehicle emissions and solid waste generation. However, based on the review of similar residential projects, the GHG emissions associated with Alternative 3 are anticipated to be well below BAAQMD's threshold of 660 MT of CO_2e. Therefore, Alternative 3 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and it is anticipated that this impact would be less than significant, similar to the project.

Land Use

Similar to Alternative 2, Alternative 3 would require a lot line adjustment on the 5.02-acre parcel, adding 0.61 acres to the dealership and allowing for the creation of an 8-lot subdivision on the north side of Seymour Street on the 1.15-acre parcel owned by the project applicant. This use would be consistent with the parcel's LCLUP land use designation and Zoning Code.

The project site, between SR-1 and Main Street, is currently designated for Commercial General uses and zoned as PUD. Single- and multi-family

residential uses are allowed within the Commercial General designation, with a maximum density equivalent to the Residential – High Density designation. Typical maximum building height is three-stories.

Based on the above, both the project and Alternative 2 would have less-than-significant impacts related to land use, similar to the project.

Noise and Vibration

Similar to the project and Alternative 2, Alternative 3 would result in temporary noise increases that could exceed local standards.

Construction activities for the reduced hotel for Alternative 3 is expected to be similar to the project, which was estimated to last about 18 months. The same phasing information and equipment used in each phase is not expected to change under project alternative conditions. Therefore, with the implementation of *Construction Best Management Practices*, included in **Mitigation Measure NOI-1a**, the temporary construction would be reduced to a less-than-significant level similar to the project.

The additional multifamily homes located on the north side of Seymour Street; however, would generate temporary construction noise in close proximity to existing residential land uses, similar to Alternative 2. Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. The highest maximum noise levels generated by the construction of the 2 main buildings would typically range from about 80 to 90 dBA L_{max} at a distance of 50 feet from the noise source, and typical hourly average noise levels for residential land uses would range from 65 to 88 dBA L_{eq}, as measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.).Therefore, under Alternative 3, **Mitigation Measure NOI-1a** would also be applicable, and would reduce temporary construction noise impacts to a less-than-significant level at all noise-sensitive receptors surrounding the project site.

Transportation and Traffic

Similar to the project and Alternative 2, Alternative 3 would be consistent with all programs, plans, and ordinances which address the circulation system in Half Moon Bay. However, Alternative 3 does not include bicycle rentals.

Trip generation is anticipated to be decreased under Alternative 3 as compared to the project and Alternative 2. The multi-family units would produce an average of 425 trips per day. This represents 147 fewer trips per day when compared to Alternative 2.

As described in **Section 5.5.2**, **Reduced Intensity**, **Alternative 2**, the City of Half Moon Bay has not yet established thresholds of significance related to VMT. Therefore, this analysis follows the OPR Technical Advisory and assumes that a residential project generating vehicle travel that is 15 or more percent below the existing coastal region residential VMT per capita, 20.50 miles per capita, may indicate a less than significant VMT impact. Alternative 3 would have a base VMT of 19.63 miles per capita, which is the same as Alternative 2 before VMT adjustments. There is also potential to apply VMT adjustments to Alternative 3 if some units were designated as affordable or a robust TDM program was applied. Therefore, Alternative 3 would be expected to result in a less than-significant VMT impact.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 21002 of the CEQA Guidelines requires lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the proposed project (CEQA Guidelines Section 15126.6). If one of the No Project Alternatives is the environmentally superior alternative, the EIR must also specify which of the other build alternatives (including the project) would be environmentally superior.

On the basis of comparing the extent to which the alternatives would reduce or avoid the significant impacts of the project, No Alternative 1 would be the environmentally superior alternative. However, the No Project alternative, Alternative 1, would not attain the primary objectives of the project. As required by State CEQA Guidelines (California Code of Regulations Section 15126.6 [e][2]), because the environmentally superior alternative was identified as Alternative 1, another environmentally superior alternative must be identified among the other alternatives considered.

Alternative 2 would result in lesser environmental impacts to some environmental resources and introduce incrementally greater impacts to others compared to the project. **Table 5-2** presents a comparative summary of the impacts for the project and each alternative. Most notable, Alternative 2

would reduce the overall massing of the project as well as increase building setbacks, which would substantially reduce the aesthetic impacts associated with the project. The protected view of the ridgeline (available from Viewpoint 3) would not be obstructed by the structures associated with Alternative 2. As such, Alternative 2 would not result in a significant and unavoidable impact to protected scenic vistas and visual resources within a scenic corridor, and would therefore be environmentally superior for this environmental criterion. Alternative 2 would also result in fewer trips to and from the project site. Therefore, VMT associated with the hotel component of Alternative 2 would be substantially reduced. Alternative 2 would result in incrementally higher air pollutant and GHG emissions than the project.

Alternative 2 would best meet the City's and project applicant's primary project objectives. Alternative 2 would provide a development that is aesthetically pleasing by balancing the urban landscape with natural elements of the coast; would enhance the aesthetics of the Southern entry to the city; and would be designed contextually appropriate in order to match traditional development within the city and maintain adequate views.

Similar to Alternative 2, Alternative 3 would result in lesser environmental impacts to some environmental resources and introduce incrementally greater impacts to others compared to the project. Alternative 3 would be similar in building floor area to Alternative 2, and would result in a smaller building floor area, as compared to the project. Therefore, the aesthetic impacts associated with Alternative 3 would be similar to those identified for Alternative 2, due to nearly identical building massing and footprints and would not result in significant and unavoidable impacts to protected scenic vistas, visual resources within a scenic corridor. Additionally, trip generation is anticipated to be decreased under Alternative 3 as compared to the project and Alternative 2. Alternative 3 would result in similar air pollutant and GHG emissions as Alternative 2 and incrementally higher air pollutant and GHG emissions than the project.

Given the above, Alternative 2 and Alternative 3 are environmentally superior to the project. Both Alternative 2 and Alternative 3 would substantially reduce the aesthetic impacts associated with the project as a result of the reduced project massing, increased setbacks, and improved site plan. While both Alternatives would have similar environmental effects, Alternative 2 better aligns with the City's and project applicant's primary project objectives, goals, and policies, therefore, Alternative 2 is the environmentally superior alternative.

Table 5-2 Comparison of Impacts between Project Alternatives

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Aesthetics							
Causes a substantial adverse effect on a scenic vista	SU	NI	↓	LTS	↓	LTS	↓
Substantially damages scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a State scenic highway	SU	NI	↓	LTS	↓	LTS	↓
Substantially degrades the existing visual character or quality of the site and its surroundings	SU	NI	↓	SU	=	SU	=
Creates a new source of substantial light or glare, which would adversely affect day or nighttime views in the area	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Cumulative	SCI	NCI	↓	NCI	↓	NCI	↓
Air Quality							
Conflicts with or obstructs implementation of the BAAQMD 2017 Clean Air Plan	LTS	NI	↓	LTS	=	LTS	↓
Violates any air quality standard or contributes substantially to an existing or projected air quality violation	LTS/M	NI	↓	LTS/M	↑	LTS/M	↓
Exposes sensitive receptors to substantial pollutant concentrations, including those that increase health risks such as cancer	LTS	NI	↓	LTS	=	LTS	=
Creates objectionable odors affecting a substantial number of people	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Cumulative	NCI	NCI	↓	NCI	=	NCI	=
Biological Resources							
Has a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife and or U.S. Fish and Wildlife Service	LTS/M	NI	↓	LTS/M	=	LTS/M	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Has a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service	LTS/M	NI	↓	LTS/M	=	LTS/M	=
Has a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	LTS	NI	↓	LTS/M	=	LTS/M	=
Interferes substantially with the movement of any native resident or	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites							
Conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	LTS	NI	↓	LTS	=	LTS	=
Conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	NI	NI	↓	NI	=	NI	=
Cumulative	NCI	NCI	↓	NCI	=	NCI	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Greenhouse Gas							
Generates greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	LTS	NI	↓	LTS	↑	LTS	↑
Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	NI	↓	LTS	=	LTS	=
Cumulative	NCI	NCI	↓	NCI	=	NCI	=
Land Use and Planning							
Physically divides an established community	LTS	NI	=	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Causes a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	LTS	NI	=	LTS	=	LTS	=
Cumulative	NCI	NCI	=	NCI	=	NCI	=
Noise and Vibration							
Generates a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	LTS/M	NI	↓	LTS/M	=	LTS/M	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Generates excessive groundborne vibration or groundborne noise levels	LTS	NI	↓	LTS	=	LTS	=
Exposes people residing or working in the project area to excessive noise levels (for projects project located within the vicinity of a private airstrip or an airport land use plan)	LTS	NI	↓	LTS	=	LTS	=
Cumulative	NCI	NI	↓	NCI	=	NCI	=
Transportation and Traffic							
Conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	LTS	NI	↓	LTS	=	LTS	=

Environmental Topic	Project	No Project, Alternative 1		Reduced Intensity, Alternative 2		Multi-Family Residential, Alternative 3	
		Significance	Comparison	Significance	Comparison	Significance	Comparison
Conflicts or is inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	LTS	NI	↓	LTS	↓	LTS	↓
Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	LTS	NI	↓	LTS	=	LTS	=
Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses	LTS	NI	↓	LTS	=	LTS	=
Results in inadequate emergency access	LTS	NI	↓	LTS	=	LTS	=
Cumulative	NCI	NI	↓	NCI	=	NCI	=

Key: NI = No Impact; LTS = Less than Significant; SU = Significant Unavoidable; LTS/M = Less than Significant with Mitigation; NCI = No Cumulative Impact; SCI = Significant Cumulative Impact; = Equal to; ↓ Lesser Impact than Project; ↑ Greater Impact than Project