

## **5.0 ALTERNATIVES**

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### INTRODUCTION

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is to identify alternatives to the project."

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

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

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

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

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

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

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

<sup>2</sup> *CEQA Guidelines* Section 15126.6(b).

<sup>3</sup> *CEQA Guidelines* Section 15126.6(f).

<sup>4</sup> *CEQA Guidelines* Section 15126.6(e)(2).

Of the various alternatives available for evaluation, the process of selecting project alternatives to be analyzed in this EIR included an identification of the significant effects associated with the project, a review of the basic objectives established for the project (outlined in Chapter 2, *Project Description*, and in subsection 2, below), and consideration of the land use plans applicable to the project site. Based on these factors, the alternatives that were selected for analysis include:

- **No Project/No Development Alternative:** Under the No Project/No Development Alternative, no improvements to the project site would occur, and the site would remain in its vacant, undeveloped state.
- **Reduced Project Alternative:** Under the Reduced Project Alternative, the proposed skate park and retail/concession use would be constructed and operated at the project site, but would be reduced in terms of skate facilities and retail/concession intensity.
- **Alternate Location Alternative:** Under the Alternate Location Alternative the proposed project would be developed with the same skate park and retail/concession facilities and development intensity as the proposed project, but at another location in the City.

Each of these alternatives is described in more detail in Subsection 5.B, below.

## 1. OBJECTIVES OF THE PROPOSED PROJECT

Section 15124(b) of the CEQA *Guidelines* states that the project Description shall contain “a statement of the objectives sought by the proposed project.” As set forth by the CEQA *Guidelines*, the list of objectives that the City and project applicant seeks to achieve for the project is provided below.

### City Objectives

- Implement the policies and development standards of the City’s General Plan, Beach and Edinger Corridors Specific Plan (BECSP), and the Zoning and Subdivision Ordinance (ZSO) as referred to in the BECSP.
- Create a development that is compatible with and sensitive to the existing land uses in the project area.
- Enhance the community image of Huntington Beach through the design and construction of a high quality master skate park that attracts users from across the City.
- Minimize development and operational cost to the City by partnering with a private equity partner.
- Mitigate environmental impacts to the greatest extent possible.

### Applicant Objectives

- Develop a skate park facility that is free of admission and open to the public.
- Build a new master skate park facility large enough to meet the current and future demand of Huntington Beach skate board enthusiasts.

- Locate a master skate park in an area with nearby public amenities that support skate park users, such as public transit, accessible pathways, trees and benches, and restrooms within a reasonable distance.
- Provide a state-of-the-art skate park facility designed to allow for innovative programming to meet the needs of a culturally diverse and multi-generational skate board enthusiast population.
- Develop a skate park in a location that is readily accessible, highly visible, and provides a safe environment for visitors.

## 2. ALTERNATIVES CONSIDERED AND REJECTED

In accordance with *CEQA Guidelines* Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *CEQA Guidelines*, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failure to meet most of the basic project objectives (outlined above), the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Given the relatively specific objectives of the proposed project and the limited scope of proposed uses, no additional project Alternatives were considered for analysis in this EIR.

## 3. ANALYSIS FORMAT

In accordance with *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be fewer, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives, as stated above, will be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

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

**Table 5-1**, *Comparison of Impacts Associated with the Alternatives and Impacts of the project*, provides a summary comparison of the impacts associated with each of the proposed alternatives with the impacts of the project.

Table 5-1

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

	<b>Project Impact</b>	<b>Alternative 1 No Project/ No Development</b>	<b>Alternative 2 Reduced Project</b>	<b>Alternative 3 Alternate Location</b>
<b>A. Aesthetics</b>				
Visual Character - Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant With Mitigation)	Similar (Less Than Significant With Mitigation)
Visual Character - Operation	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Light and Glare	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<b>B. Air Quality</b>				
AQMP Consistency	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Construction Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Operational Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Exposure to substantial pollutant concentrations	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Odors	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<b>C. Greenhouse Gas Emissions</b>				
GHG Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Plan Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>D. Hydrology and Water Quality</b>				
Hydrology and Drainage	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

**Table 5-1 (Continued)**

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

	<b>Project Impact</b>	<b>Alternative 1 No Project/ No Development</b>	<b>Alternative 2 Reduced Project</b>	<b>Alternative 3 Alternate Location</b>
Water Quality	Less Than Significant	Greater (Less Than Significant Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<b><i>E. Land Use and Planning</i></b>				
Plan Consistency	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Less Than Significant)
<b><i>F. Noise</i></b>				
Violation of Noise Standards	Less Than Significant	Less (No Impact)	Less (Less Than Significant with Mitigation)	Similar (Less Than Significant)
Groundborne Vibration	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Temporary or Periodic Noise Increases	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Less Than Significant)
Permanent Noise Increases	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<b><i>G. Traffic/Transportation</i></b>				
Intersection LOS	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant With Mitigation)
Access/Circulation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Parking	Less Than Significant With Mitigation	Less (No Impact)	Similar (Less Than Significant With Mitigation)	Less (Less Than Significant)
Alternative Transportation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<hr/> <p><i>Source: PCR Services Corporation, 2012.</i></p>				

## **4. ALTERNATIVE ANALYSIS**

### **a. Alternative 1 – No Project/No Development Alternative**

Under the No Project/No Development Alternative, no improvements to the project site would occur, and the site would remain in its vacant, undeveloped state. Additionally, the project site would remain designated as “Residential Required” under the BECSP, with the potential to accommodate up to 175 affordable housing units.

#### **(1) Environmental Impact Categories**

##### **(a) Aesthetics**

Under the No Project/No Development Alternative, the site would continue to be vacant with no development occurring on-site. As such, the project would have no physical effects on the existing visual character or quality of the site or its surroundings, and would not affect light or glare effects in the project area. However, given that the site would not be improved with landscaping and structures with architectural design features that are consistent with other development in the area, impacts to operational visual quality would be greater than under the proposed project. As such, while impacts would be less than significant, they would be greater than the proposed project.

##### **(b) Air Quality**

Under this Alternative, no construction activities would occur, and therefore the project would not have the potential to result in an exceedance of established air quality standards or associated conflicts with the Air Quality Management Plan (AQMP). Additionally, the project site would remain undeveloped under this Alternative, and as such no operational air emissions would occur. Overall, therefore, this Alternative would not have the potential to adversely affect air quality, and impacts would be less than that proposed project.

##### **(c) Global Climate Change**

No development would occur under this Alternative, and as such no additional GHG emissions would result from its implementation. Therefore, this Alternative would not result in any adverse impacts related to GHG emissions or consistency with any applicable plan, policy, or regulation to reduce GHG emissions, and impacts would be less than the proposed project.

##### **(d) Hydrology and Water Quality**

Alternative 1 would not result in any physical development, and therefore no construction or ground-disturbing activities would occur that could temporarily increase potential adverse water quality effects to receiving waters or other sensitive resources. Likewise, the lack of physical changes to the environment would preclude potential adverse effects related to altered drainage patterns or flooding, as the entire site would remain pervious. However, since the skate park and retail/concession improvements would not occur, including associated stormwater management facilities and BMPs, operational water quality impacts would be greater than under the proposed project. Overall, this Alternative would result in less than significant impacts relative to hydrology and water quality, but given that water quality BMPs would not be implemented on-site as would occur under the proposed project, impacts would be greater than the proposed project.

### **(e) Land Use and Planning**

The No Project/No Development Alternative would not entail any approvals or physical improvements. As such, this Alternative would have no potential to result in conflicts with existing plans, policies, or regulations applicable to the project area. Therefore, no land use impact would occur and impacts would be less than the proposed project.

### **(f) Noise**

Implementation of Alternative 1 would not result in any physical changes to the environment, and therefore would not have any potential to generate noise or vibration beyond what currently exists. Because this Alternative would not result in any construction activities and would maintain the project site in an undeveloped state, no impacts related to noise or vibration would occur. Therefore, noise and vibration impacts would be less than under the project.

### **(g) Transportation/Traffic**

This Alternative would not result in generation of additional vehicle trips relative to existing conditions, as the project site would remain vacant and undeveloped. As such, Alternative 1 would have no potential to affect the function of the local and regional traffic network, result in hazards associated with design features, result in inadequate parking capacity, or conflict with plans, policies, or regulations related to alternative transportation. Therefore, impacts would be less than the proposed project.

## **(2) Impact Summary**

A comparative summary of the environmental impacts associated with the No Project/No Development Alternative with the environmental impacts anticipated under the project is provided in Table 5-1. As summarized in Table 5-1, the No Project/No Development Alternative would result in reduced impacts with regard to all environmental issues except for aesthetics (operational visual quality) and hydrology and water quality (operational water quality), which would be greater than under the proposed project, and would avoid significant unavoidable land use and noise impacts that would occur under the proposed project.

## **(3) Relationship of the Alternative to Project Objectives**

The ability of Alternative 1 to meet the stated goals and objectives of the project is summarized below in **Table 5-2, Project Alternatives' Ability to Meet Project Objectives**. As summarized in Table 5-2, Alternative 1 would fail to meet any of the project's goals and objectives, either partially or fully.

## **b. Alternative 2 – Reduced Project Alternative**

Under the Reduced Project Alternative, the proposed skate park and retail/concession use would be constructed and operated at the project site, but would be reduced in terms of skate facilities and retail/concession intensity. Specifically, the proposed skate park and retail/concession use would be constructed at the project site, but would exclude the skate bowl area, reduce the skate plaza area to 8,000 square feet, and reduce the retail/concession use to 2,000 square feet. This represents a reduction of 13,000 square feet of skate bowl area, 6,000 square feet of skate plaza area, and 1,500 square feet of retail/concession floor area relative to the proposed project. Despite the reduction in development intensity on-site under this Alternative, it is assumed that special events would still be held at the reduced skate park

facility. Additionally, the General Plan Amendment and Specific Plan/Zoning Text Amendment to allow for non-residential uses on the site would also be necessary under this Alternative.

## **(1) Environmental Impact Categories**

### **(a) Aesthetics**

Under the Reduced Project Alternative, skate park and retail/concession uses would be developed on-site, but at an incrementally lower intensity than the proposed project. Further, landscaping and other visual improvements would also be implemented under this Alternative. As such, similar to the proposed project, this Alternative would be subject to the development standards contained in the BECSP to ensure visual compatibility with surrounding development, and impacts would be less than significant and less than those of the proposed project. Similarly, while this Alternative would generate additional sources of light and glare in the project area, including nighttime lighting for the skate park component of the development, these would be provided at an incrementally lower intensity than the proposed project. Overall, aesthetics impacts would be less than significant and less than the proposed project.

### **(b) Air Quality**

Implementation of Alternative 2 would entail the construction of only a portion of the skate park improvements and a reduced intensity retail/concession use. As such, while this Alternative would result in the generation of air pollutant emissions during construction activities and operation of proposed uses, these emissions would be incrementally reduced relative to the proposed project given the reduction in development intensity and impacts therefore would be less than significant. Similarly, based on the reduction in development on-site, impacts related to pollutant concentrations, odors, and AQMP consistency would be less than under the proposed project and less than significant.

### **(c) Greenhouse Gas Emissions**

This Alternative would result in reduced construction activities and less intense skate park recreational usage and retail operation relative to the project, and therefore its implementation would be expected to generate incrementally fewer GHG emissions. Based on the overall reduction in construction and operational GHG emissions under this Alternative, impacts in this regard would be less than the proposed project and would be less than significant. As is the case with the project, this Alternative would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions, and impacts would be less than significant. Overall, GHG emissions impacts would be less than impacts under the proposed project.

### **(d) Hydrology and Water Quality**

Implementation of Alternative 2 would entail less development intensity on-site than under the proposed project, and as such this Alternative would result in reduced construction activities and operational intensity within the project area. Therefore, Alternative 2 would require less earthwork and would have a reduced potential to result in adverse water quality effects during construction activities, and would also have a lower potential to contribute to impacts to receiving water bodies or other sensitive resources during project operations. Similarly, the reduced intensity of construction and operation under this Alternative would result in fewer impacts regarding drainage patterns and flooding potential relative to the project, and as such impacts would be less than significant. Overall, given compliance with standard City and County stormwater requirements, impacts would be less than significant and less than the proposed project.

### **(e) Land Use and Planning**

This Alternative would implement the proposed project on-site but at a reduced intensity. As such, some of the same approvals, including a General Plan Amendment and Zoning Text Amendment, would be necessary for development of this Alternative as would be necessary for the proposed project. Furthermore, as special events are anticipated to still be held at the skate park under this Alternative, periodic noise impacts during special events would exceed established thresholds at the nearby multi-family residential uses to the east of the site. Therefore, periodic noise impacts during special events would be significant and unavoidable, which would also create a conflict with applicable goals and policies in the City's General Plan relative to noise generation. Similarly, this Alternative would displace potential affordable housing units currently designated for the project site, which could result in a conflict with the housing allocation identified for the City in the SCAG RHNA and a significant unavoidable land use plan consistency impact. In addition, given the reduced development footprint of this Alternative compared to the proposed project, it is anticipated that adequate parking could be provided on-site without the need for a variance for reduced parking stall dimensions. Overall, despite the reduction in development intensity and lack of parking standards variance required under this Alternative, impacts would remain significant and unavoidable though reduced relative to the proposed project.

### **(f) Noise**

As noted previously, this Alternative would result in incrementally reduced construction and operational intensity relative to the proposed project. Accordingly, noise and vibration effects associated with the construction and normal daily operation of proposed skate park and retail/concession improvements would be incrementally reduced compared to the project. However, as is the case with the proposed project, periodic noise increases associated with special events at the skate park would result in noise levels at nearby sensitive receptors in excess of established thresholds, which would result in a significant unavoidable noise impact. Overall, while noise and vibration impacts would be incrementally reduced relative to the proposed project and less than significant under normal operations, special event noise impacts would remain significant and unavoidable.

### **(g) Transportation/Traffic**

Potential transportation impacts associated with Alternative 2 would be incrementally reduced compared to the proposed project. Trips associated with skate park and retail/concession operations during both normal daily operation and special events, would not result in significant traffic impacts at local intersections, including impacts to CMP facilities. Impacts associated with traffic hazards from design features and site access/circulation would be less than significant, similar to the proposed project. Based on the reduced development footprint on-site, it is anticipated that adequate parking would be provided on-site for normal operations, and special event parking would be accommodated off-site at the Sports Complex, as is the case with the proposed project, although mitigation would still be required to reduce parking impacts to less than significant. Additionally, similar to the proposed project, this Alternative would not result in conflicts with applicable plan, policies, or regulations related to alternative transportation. Overall, impacts would be less than significant and similar the proposed project.

## **(2) Impact Summary**

A comparative summary of the environmental impacts associated with the Reduced Project Alternative with the environmental impacts anticipated under the project is provided in Table 5-1. As summarized in Table

5-1, Alternative 2 would result in less impacts regarding aesthetics (visual character and light and glare), air quality (localized and regional construction emissions and operational emissions, AQMP consistency, pollutant concentrations, and odors), greenhouse gas emissions (GHG emissions), hydrology and water quality (hydrology, drainage, and water quality), noise (construction and operational noise and vibration), and transportation/traffic (intersection LOS, CMP impacts, access/circulation, alternative transportation plan consistency). This Alternative would also result in similar impacts regarding greenhouse gas emissions (GHG plan consistency), land use (plan consistency), and transportation/traffic (parking). This Alternative would not result in any impacts greater than those under the proposed project.

### **(3) Relationship of the Alternative to Project Objectives**

The ability of Alternative 2 to meet the stated goals and objectives of the project is summarized below in Table 5-2. As summarized in Table 5-2, Alternative 2 would at least partially meet many of the project's goals and objectives, but would not achieve all goals and objectives to the extent the project would.

### **c. Alternative 3 – Alternate Location Alternative**

Under the Alternate Location Alternative the proposed project would be developed with the same skate park and retail/concession facilities and development intensity as the proposed project, but at another location in the City. Specifically, the proposed skate park and retail/concession use would be constructed and operated on County-owned property at the former Gothard Landfill site, which is located at 18131 Gothard Street, on west side of Gothard Street south of Talbert Avenue. The project would be built on a 3.5-acre portion of the approximately 11.5-acre property along the eastern side of the site fronting Gothard Street, and would include all improvements contemplated as part of the proposed project, including on-site parking and additional space for special event parking and turf/vendor areas. Specifically, the northern half of the site would be developed with an above-grade skate bowl area, a 15,000 square-foot above-grade skate plaza area, a 4,000-square-foot retail/concession use and restroom structure, a turf area surrounding the skate plaza (which would also contain temporary spectator seating during special events), and on-site surface parking lot with 40 parking spaces. The southern half of the alternate site would remain undeveloped to provide space for special event parking. Primary vehicle access would be provided by a driveway at the northeastern corner of the site on Gothard Street, while a secondary access would be located at the southeast corner of the property and would only be used during special events. As the site is currently designated for industrial uses in the City's General Plan and zoned for open space/recreation, amendments to the City's General Plan and Zoning Code would be required under this Alternative. Additionally, since the site is a former landfill, various structures housing equipment to capture landfill gases are located throughout the site and would remain on-site under this Alternative to address landfill gas-related hazards. This site may also contain sensitive biological resources, such as coastal sage scrub habitat, though the extent of such resources has not yet been determined.

### **(1) Environmental Impact Categories**

#### **(a) Aesthetics**

Under the Alternate Location Alternative, the proposed skate park and retail/concession uses would be constructed as under the proposed project, including landscaping and other design features, but on the larger alternate site location adjacent to the HB Sports Complex and other public facility and industrial uses. Despite the fact that the alternate site is not located within the boundaries of the BECSP, and thus would not be subject to the development standards contained therein, it is assumed for the purposes of this analysis

that building heights and the overall project design would be comparable to the proposed project. Given that the alternate site is also undeveloped, as well as the existence of surrounding low-rise development and generally urbanized nature of the area, this Alternative would result in similar visual character impacts as the proposed project. Given the similarity in proposed uses and development intensity, light and glare impacts would also be similar to the proposed project and less than significant.

### **(b) Air Quality**

Implementation of Alternative 3 would entail the construction of all the proposed skate park and retail/concession use but at the alternate location within the City. As such, all impacts related to construction and operational air pollutant emissions, generation of substantial pollutant concentrations, odors, and AQMP consistency would be similar to the proposed project and less than significant.

### **(c) Greenhouse Gas Emissions**

Similar to air quality impacts discussed above, this Alternative would result in similar air emissions that would contribute to global climate change during construction and operation of the proposed skate park and retail/concession uses. Based on the fact that proposed uses and associated structural and outdoor lighting, utilities, equipment, and amenities, as well as overall operational characteristics of the project, would be comparable to the proposed project, impacts related to greenhouse gas emissions would be less than significant and similar to the proposed project. Likewise, impacts related to consistency with GHG emissions plans, policies, and regulations would also be less than significant and similar to the proposed project.

### **(d) Hydrology and Water Quality**

Implementation of Alternative 3 would entail development of the proposed uses at a similar intensity as the proposed project but at the alternate location. It is assumed for the purposes of this analysis that this Alternative would result in a comparable amount of impervious surface area as the proposed project and would also include landscaping and necessary stormwater improvements. As this alternate location is also within the City of Huntington Beach (and therefore within the County of Orange), this Alternative would be subject to the same stormwater regulations and requirements as the proposed project. As such, development under this Alternative would be required to implement an approved project- and site-specific hydrology/drainage study and a Water Quality Management Plan (WQMP) to address stormwater-related impacts. It should be noted that groundwater monitoring at the former landfill site indicates that landfill-related leachate has adversely affected groundwater quality beneath the site; however, implementation of Alternative 3 would not have any effect on groundwater quality in this regard as development of the skate park and retail/concession use would not involve any notable excavation or disturbance of landfill waste materials. Overall, given compliance with applicable stormwater regulations and requirements, impacts related to hydrology and water quality would be less than significant and similar to the proposed project.

### **(e) Land Use and Planning**

This Alternative would implement the proposed project, but at a different location within the City of Huntington Beach but outside the boundaries of the BECSP. The property is owned by the County of Orange and therefore use of this site under this Alternative would require that the property be acquired from the County or, alternatively, an agreement be reached with the County for use of the site for the proposed uses. The alternate site is designated for Industrial uses in the City's General Plan with a floor-area ratio (FAR) limit of 0.5 and special design standards overlay (I-F2-d), while the site is zoned Open Space – Parks and

Recreation Subdistrict (OS-PR). The General Plan Industrial designation allows for retail and restaurant uses but not recreational uses, and the OS-PR zoning district allows recreational and take-out restaurant uses but does not allow for retail uses. The development of the proposed skate park and retail/concession uses could be accomplished by changing the General Plan and Zoning to Visitor Serving Commercial, which allows for commercial recreational and entertainment uses or by a General Plan amendment to Open Space - Commercial Recreation, as well as a Zoning Text Amendment to allow retail uses within the OS-PR district. Further, the larger property at the alternate site would allow additional space for parking areas not afforded by the project site, and therefore it is anticipated that a variance for parking stall standards would not be necessary under this Alternative. As such, significant unavoidable impacts related to consistency with the applicable goals and policies of the General Plan Land Use Element would not occur under this Alternative. Finally, given the limited intensity of the project in a regional context, and the fact that the alternate site is not designated for affordable housing units, this Alternative would be consistent with the applicable policies of the SCAG RHNA, 2008 RTP, and 2008 Final RCP. Overall, although this Alternative would require amendments to the City's General Plan and Zoning Code, impacts would be less than significant and less than the proposed project.

#### **(f) Noise**

As noted previously, this Alternative would result in the development of the proposed skate park and retail/concession uses on the alternate site, and would also hold periodic special events at this location. Construction activities would result in comparable noise and vibration impacts on a temporary basis, similar to the proposed project in terms of duration and intensity. Further, operational noise and vibration, during both normal operation and special events, would be similar to the proposed project. However, given the lack of residential or other noise-sensitive uses in the area surrounding the alternate site, no significant special event noise impacts would occur under this Alternative. Therefore, overall, this Alternative would result in less than significant noise impacts, which would be less than those of the proposed project.

#### **(g) Transportation/Traffic**

Potential transportation impacts associated with Alternative 3 would be very similar to those of the proposed project under normal daily operations, but would simply occur at a different location in the City (i.e., approximately 2.5 miles south of the proposed project site). The development proposed under this Alternative would be expected to generate the same amount of traffic as the proposed project. However, the alternate site is located outside of the BECSP area, and therefore this Alternative would not be required to implement traffic-related improvements required as part of the BECSP EIR. However, per City requirements, this Alternative would be required pay traffic impact fees to address project-related traffic impacts (including any impacts to CMP facilities affected by the project). These fees would help fund traffic system improvements that would reduce traffic impacts of this Alternative to less than significant. Based on the alternate site's location along Gothard Street, with one main point of access, impacts related to access/circulation and related safety hazards would be similar to the proposed project. As indicated previously, it is anticipated that the larger site could accommodate parking for the proposed uses on-site or on adjoining property at the HB Sports Complex, thus eliminating the need for off-site parking or shuttle services during special events. As such, given the lack of off-site trips for vehicle parking and shuttle trips, special event-related traffic impacts would be less than under the proposed project. Similar to the proposed project, this Alternative would not conflict with plans, policies, or regulation related to alternative transportation. Overall, traffic and parking-related impacts under this Alternative would be less than the proposed project.

## **(h) Other CEQA Issues**

Given the fact that Alternative 3 would be implemented at an alternate location within the City, site conditions under this Alternative vary from those of Alternatives 1 and 2, which were identical to the proposed project. As such, a discussion of additional CEQA issues for Alternative 3 is warranted. Specifically, potential impacts related to biological resources, geology and soils, and hazards and hazardous materials would occur under this Alternative that would not occur at the Center Avenue project site.

First, the former landfill property, a portion of which is proposed for development under Alternative 3, is known to contain coastal sage scrub habitat, which is considered a sensitive biological resource that supports rare, threatened, and/or endangered wildlife species. Although the extent of such habitat areas on-site is not currently known, this Alternative could potentially physically impact these resources; however, it is anticipated that a biological resources assessment for the site would be required by the City under this Alternative, which would include mitigation measures to be implemented to reduce impacts to less than significant. It should be noted that the development portion of the site, or approximately the eastern half of the site, contains substantially less vegetation than the western portion, which would minimize potential adverse effects to habitat areas. Nonetheless, given the lack of sensitive resources on the Center Avenue site, biological resources impacts under this Alternative would be greater than under the proposed project.

Second, the presence of landfill waste materials and associated landfill gases in on-site soils precludes substantial excavation, and therefore the proposed improvements associated with the skate park and retail/concession use would be constructed above-grade. This would result in the need for import of soil materials during grading and site preparation. Additionally, the presence of landfill wastes and potentially unconsolidated soil materials associated with the landfill cap soil layer(s), which range in thickness from 2.5 to 14 feet and consist mainly of silt and clay soils, could present risks to on-site structures associated with soil instability, including seismic ground failure and/or liquefaction. However, the preparation of a project-specific geotechnical study would identify potential hazards to the proposed skate park facilities and retail/concession structures and recommend mitigation measures to address impacts. As such, while impacts in this regard would be reduced to less than significant with the implementation of applicable mitigation measures, impacts would be greater than under the proposed project.

Finally, the use of the alternate site as a landfill facility presents a number of potential health risks associated with the presence of hazardous materials. Such risks include potential off-site migration of contaminated groundwater from beneath the site, exposure of construction workers to buried landfill materials during site preparation and grading, and risks associated with the presence of landfill gases. While site-specific measures have been and would continue to be implemented on-site relative to the former landfill operations, which would serve to reduce hazardous materials impacts to less than significant, impacts in this regard would be greater than under the proposed project.

## **(2) Impact Summary**

A comparative summary of the environmental impacts associated with the Alternate Location Alternative with the environmental impacts anticipated under the project is provided in Table 5-1. As summarized in Table 5-1, Alternative 3 would result in similar impacts regarding aesthetics (construction and operational visual character and light/glare), air quality (AQMP consistency, construction emissions, and operational emissions), greenhouse gas emissions (GHG emissions and GHG plan consistency), hydrology and water quality (hydrology, drainage, and water quality), land use (plan consistency), noise (violation of noise

standards, groundborne vibration, and permanent noise increases), and traffic/transportation (intersection LOS, access/circulation, and alternative transportation). Alternative 3 would result in less impacts regarding air quality (exposure to substantial pollutant concentrations and odors), noise (temporary or periodic noise increases), and transportation/traffic (parking). Alternative 3 would not result in any impacts greater than those under the proposed project among those issues analyzed in the EIR. However, as discussed above, Alternative 3 would result in greater impacts than the proposed project with regard to biological resources, geology and soils, and hazards and hazardous materials.

### **(3) Relationship of the Alternative to Project Objectives**

The ability of Alternative 3 to meet the stated goals and objectives of the project is summarized below in Table 5-2. As summarized in Table 5-2, Alternative 3 would fully meet all of the project objectives.

#### **d. Environmentally Superior Alternative**

Section 15126.6(e)(2) of the *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The *CEQA Guidelines* also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this EIR, the range of feasible alternatives to be considered includes Alternative 1, the No Project/No Development Alternative; Alternative 2, the Reduced Project Alternative; and Alternative 3, the Alternate Location Alternative.

A comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the project is provided in Table 5-1, while a summary of the ability of each alternative to meet the project goals and objectives is provided below in Table 5-2. A more detailed description of the potential impacts associated with each alternative is provided above. Based on the evaluation of impacts presented above, and the findings regarding each Alternatives' ability to meet the project's stated goals and objectives summarized in Table 5-2 below, Alternative 3, the Alternate Location Alternative, is determined to be the environmentally superior alternative. Alternative 3 would result in fewer impacts relative to the proposed project, with the exception of impacts to biological resources, geology and soils, and hazards and hazardous materials, would eliminate significant unavoidable noise and land use impacts, and would fully meet all of the project objectives.

**Table 5-2**

**Alternatives' Ability to Meet Project Objectives**

Project Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Reduced Project Alternative	Alternative 3 Alternate Location Alternative
<b>City Objectives</b>				
Implement the policies and development standards of the City's General Plan, Beach and Edinger Corridors Specific Plan (BECSP), and the Zoning and Subdivision Ordinance (ZSO) as referred to in the BECSP.	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
Create a development that is compatible with and sensitive to the existing land uses in the project area.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective
Enhance the community image of Huntington Beach through the design and construction of a high quality master skate park that attracts users from across the City.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective
Minimize development and operational cost to the City by partnering with a private equity partner.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Mitigate environmental impacts to the greatest extent possible.	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
<b>Applicant Objectives</b>				
Develop a skate park facility that is free and open to the public.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Build a new master skate park facility large enough to meet the current and future demand of Huntington Beach skate board enthusiasts.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Fully Meets Objective

**Table 5-2 (Continued)**

**Alternatives' Ability to Meet Project Goals and Objectives**

Project Objective	Ability to Meet Project Goal/Objective			
	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Reduced Project Alternative	Alternative 3 Alternate Location Alternative
Locate a master skate park in an area with nearby public amenities that support skate park users, such as public transit, accessible pathways, trees and benches, and restrooms within a reasonable distance.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Provide a state-of-the-art skate board facility designed to allow for innovative programming to meet the needs of a culturally diverse and multi-generational skate board enthusiast population.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
Develop a skate park in a location that is readily accessible, highly visible, and provides a safe environment for visitors.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective
<i>Source: PCR Services Corporation, 2012</i>				