
Chapter 4 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

Section 15126.6(a) of the CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to the project or to the location of the project that could feasibly attain the basic objectives of the project while reducing significant project impacts. An EIR is not required to consider every conceivable alternative to a project; rather, it must consider a range of potentially feasible alternatives that will foster informed decision-making and public participation. In addition, an EIR should evaluate the comparative merits of the alternatives. Therefore, this chapter sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines relating to the alternatives analysis (Section 15126.6 *et seq.*) are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The “no project” alternative shall be evaluated along with its impact. The “no project” analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

4.1.1 Rationale for Selecting Potentially Feasible Alternatives

Since the CEQA Guidelines require that an EIR state why an alternative is being rejected, a preliminary rationale for rejecting an alternative is presented, below, in this section. If the City ultimately rejects an alternative, the rationale for the rejection will be presented in the findings that are required to be made before the City certifies the EIR and takes action on the project.

The alternatives may include no project, a different type of project, modification of the proposed project, or suitable alternative project sites. However, the range of alternatives discussed in an EIR is governed by a “rule of reason” which CEQA Guidelines Section 15126.6(f) defines as:

...set[ting] forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative whose effects could not be reasonably identified, and whose implementation is remote or speculative. Those alternatives found to be infeasible are described in Section 4.3 of this chapter.

For purposes of this analysis, the project alternatives are evaluated to determine the extent to which they attain the basic project objectives, while significantly lessening any significant effects of the project. The objectives for both the City of Huntington Beach and the Applicant are stated as follows:

4.1.2 City of Huntington Beach Objectives

- Assist in the implementation of the City’s Genera Plan, Downtown Specific Plan, and Redevelopment Plan.
- Enhance the Downtown as a destination for visitors by expanding hotel, retail, and entertainment opportunities.
- Expand residential opportunities in the Downtown to provide for a greater number and variety of housing options and a stronger base for the commercial sector of the Downtown.
- Enhance the community image of Huntington Beach through the design and construction of high quality development consistent with the Urban Design Element of the General Plan.
- Ensure adequate utility infrastructure and public services for new development.
- Mitigate environmental impacts to the greatest extent possible.

4.1.3 Applicant Objectives

- *Housing.* Provide the full number of housing units allowed by the General Plan and Downtown Specific Plan at 30 dwelling units per net acre in order to assist the City of Huntington Beach in

meeting its housing goals and the housing allocation determined by the City and the Southern California Association of Government's Regional Housing Needs Assessment, and to meet the purpose of the District No. 8A, Downtown Specific Plan.

- *Economic Growth and Employment.* Provide: (a) economic growth opportunities for the community through development of the project dining/retail/entertainment center, consistent with the City's General Plan goals; (b) additional employment opportunities for local and area residents through the commercial and retail uses on site; and (c) residential density at the General Plan designation of 30 dwelling units per net acre, to support the commercial retail components of Pacific City, the resort areas to the south and existing Downtown businesses.
- *Neighborhood Identity.* Reinforce the neighborhood identity of Pacific City and coordinate development of Districts 7 and 8A, through control of both districts' project design elements such as architecture, landscaping, color, paving, walls, fencing, signage, entry treatment, and roadway design.
- *Commercial Phasing and Residential Density.* Maintain ability to build commercial and residential areas in phases to provide a population base to help support the commercial uses consistent with the purpose of District No. 8A.
- *Pedestrian Access.* Implement a means of pedestrian access through the project via onsite paths consistent with the Specific Plan objectives. Provide residents and visitors with safe access to the beach via an elevated crossing of Pacific Coast Highway (PCH) from the project site, including avoiding pedestrian conflicts with the existing PCH Transit Terminal.
- *Traffic Improvements.* Enhance project circulation and the surrounding roadway system by providing efficient vehicular access through the site and connecting the site to the surrounding existing roadway network.
- *Public View Opportunities.* Develop the hotel district to the maximum allowable height (8 stories) under the Downtown Specific Plan, in order to provide ocean view opportunities while maintaining space for amenities on lower floors and retention of ocean vistas. Implement an overall site design that provides public view opportunities for visitors and residents.

4.2 ALTERNATIVES ANALYSIS

A total of six alternatives were initially identified as alternatives to the proposed project. Three scenarios, representing a range of reasonable alternatives to the proposed project or to the location of the project, were selected for detailed analysis. The goal for evaluating any of these alternatives is to identify ways to avoid or lessen the significant environmental effects resulting from implementation of the proposed project, while attaining most of the project objectives. Alternatives that did not achieve this goal were not evaluated in detail, and these alternatives are summarized in Section 4.3. Alternatives selected for further analysis include the following:

- **No Project/No Development Alternative:** This alternative assumes maintenance of the project site in its current status, and no changes would occur.
- **Reasonably Foreseeable Development:** Under this alternative, the proposed project would not be developed, but a reasonably foreseeable use for the project site would occur.
- **Reduced Project Alternative:** This alternative includes a reduction in visitor-serving commercial uses while maintaining the same amount of residential and resort uses as the proposed project.

4.2.1 No Project/No Development Alternative

Description

The No Project/No Development Alternative represents the status quo, or maintenance of the project site in its current state. The purpose of examining such an alternative is to allow decision-makers to compare the effects of approving the project with the effects on not approving the project. Currently the project site is vacant and undeveloped, with disturbed or no vegetation occupying most of the site. The southwest corner of the site was recently used as a temporary staging/storage facility for beach cleaning equipment and employee vehicles for the City of Huntington Beach. Since the 31.5-gross-acre project site would not be developed under this alternative, these existing uses and conditions on the property would remain.

Attainment of Project Objectives

Implementation of the No Project/No Development Alternative would not meet any of the project objectives listed above for either the Lead Agency or the Applicant, as no new uses would be developed.

Impacts

In general, no new environmental effects would directly result from the selection of this alternative. Maintenance of the project site in its present state would avoid any environmental impacts associated with aesthetics, air quality, biological resources, cultural resources, energy and mineral resources, geology and soils, hazardous materials, hydrology and water quality, land use, noise, population housing, public services, recreation, traffic, and utilities and service systems that were identified for the proposed project. No changes to view corridors would occur; however, no additional viewing opportunities of the pier and ocean would be provided under this alternative. In addition, although implementation of this alternative would not result in environmental changes to the existing hydrologic or soil conditions at the project site, erosion and siltation may occur due to the current undeveloped nature of the site. In terms of land use, the present state of the project site as a vacant and undeveloped parcel of land would conflict with the City's General Plan land use designations, but would represent a continuation of the existing conditions at the site. The site

would remain as an underutilized parcel of land adjacent to the ocean. As such, no significant and adverse environmental impacts directly or cumulatively associated with the No Project/No Development Alternative would occur.

4.2.2 Reasonably Foreseeable Development

Description

The consideration of the Reasonably Foreseeable Development Alternative is required by Section 15126.6(e)(3)(B) of the CEQA Guidelines and describes the use of the project site if the proposed project were not to occur, but a reasonably foreseeable use for the project site were to occur. For this alternative, the foreseeable uses at the project site are analyzed under a maximum build-out scenario on the property with allowed land uses that are designated in the City's Downtown Specific Plan. Based on the Downtown Specific Plan, which includes development regulations and zoning standards that are intended to supplement and/or supersede the City's Zoning Ordinance, the project site is located in two districts. Specifically, the southwestern portion of the site that fronts PCH and extends northeast to the proposed extension of Pacific View Avenue (Walnut Avenue) is within District No. 7 (Visitor-Serving Commercial), while the balance of the site is within District No. 8A (High Density Residential).

The maximum floor area ratio (FAR) allowed for building intensity within District No. 7 is 3.0 with an allowed maximum building height of eight stories. Thus, the 10.6 net acres of land on the project site located within District No. 7 could allow for a maximum of approximately 1.4 million sf of visitor-serving commercial uses under this alternative, as opposed to the 240,000 sf of visitor-serving commercial development proposed for the project.¹⁵ The building height for the commercial development under the proposed project would be the same as the maximum building height allowed within District No. 7, which is eight stories. For District No. 8A, the maximum allowable number of residential dwelling units is 30 units per net acre with an allowed maximum building height of 50 feet. Since the residential component of the proposed project would develop a total of 516 condominiums on 17.2 net acres of land, which represents an average of 30 dwelling units per net acre, the intensity of development within District No. 8A would be the same between the proposed project and this alternative. In addition, the allowed building heights under the proposed project would also be up to 50 feet for the residential component, which is the maximum building height allowed under District No. 8A.

¹⁵ This calculation is based on the size of the commercial component (10.6 acres x 43,560 feet/acre = 416,736 sf) x FAR of 3.0 = 1,385,280 sf.

Attainment of Project Objectives

Implementation of the Reasonably Foreseeable Development Alternative would fully meet all of the objectives established for the proposed project, as listed above for the Lead Agency and the Applicant, by providing the maximum utilization of the land uses designated and allowed under the Downtown Specific Plan. Development in District No. 8A under this alternative would be to the same magnitude as that of the proposed project, and would allow for high density residential uses to help provide a population base to support the commercial and office uses in the Downtown area. Development in District No. 7 under this alternative would exceed that of the proposed project, and would allow the maximum amount of development possible to provide visitor-serving commercial facilities to serve seasonal visitors to the area as well as to serve local residents on a year-round basis.

Impacts

Aesthetics

Under the Reasonably Foreseeable Development Alternative, a greater number of structures to accommodate the 1.4 million sf of visitor-serving commercial uses would be developed on the project site. Impacts to aesthetics would overall be greater than under the proposed project. Impacts to scenic resources within PCH would be the same under this alternative.

The primary scenic resources visible from PCH near the project site include the beach and Pacific Ocean, and Huntington Beach Pier, located south and west of PCH. The project would develop land east and north of PCH, such that the project would not affect views of these scenic resources. A pedestrian overcrossing could be constructed in the future as part of the project, and similar to the proposed project, impacts on scenic resources as a result of this project feature would be less than significant.

The substantial increase in building intensity would result in greater building heights and potential changes to views of the ocean and beach area from a number of locations. In addition, the visual character would change due to the sizeable development that would occur on site, which could be out of character with the intensity of surrounding uses. The project would have the potential to create a wall of development along PCH.

Impacts on shade/shadow and light and glare under this alternative would be greater than under the proposed project. The proposed project includes an eight-story hotel tower that would cast shadows on adjacent development during the Winter Solstice, although this would occur for a period of fewer than 3 hours. This alternative would result in additional structures eight stories in height, resulting in the casting of

shadows on more structures than the proposed project. However, building heights would be no taller than under the proposed project, such that the duration of shadows cast on adjacent light-sensitive uses would not increase.

This alternative would result in additional sources of nighttime lighting and glare above those identified for the proposed project and further diminishment of views of the nighttime sky. As the lighting provisions of the Huntington Beach standard conditions of approval require that all outdoor lighting be directed to prevent light spillage onto adjacent properties, the impact of nighttime lighting on the project site and the project vicinity would be less than significant under this alternative. Since the location of project access under this alternative would not change, the impacts related to vehicular headlights on neighboring residences would remain a less-than-significant impact. Due to the scale of development, effects of glare would be greater than under the project due to the larger number of building faces with potentially reflective surfaces (e.g., brightly colored building façades, reflective glass). Due to the intensity of development and the difference in development intensity on this site, impacts would be greater than the proposed project.

Air Quality

Under the Reasonably Foreseeable Development Alternative, the current site would be developed to the same site coverage but would include a greater intensity (approximately twice as much) of visitor-serving commercial development when compared to the proposed project. Air Quality impacts associated with project construction and operation would thus be greater under this alternative. In addition, the increase in visitor-serving commercial development would induce more operational vehicular trips to the project site by consumers and/or delivery trucks than the proposed project. Therefore, air quality impacts would be greater than those anticipated under the proposed project, and impacts would be significant and unavoidable.

Biological Resources

Although implementation of the Reasonably Foreseeable Development Alternative would result in additional visitor-serving commercial uses when compared to the proposed project, similar site coverage of vegetation would be present on site. As such, biological resource impacts associated with disturbance to potential special status wildlife and special status plant species that could occur on the site would be the same as under the proposed project. Due to the lack of quality natural habitat onsite, the project site would not provide suitable nesting habitat for any Threatened or Endangered raptor species, and impacts under this alternative would be less than significant. Special status plant species, however, would have the potential to occur on the project site, and thus impacts associated with this alternative would be considered potentially

significant. However, incorporation of the identified mitigation measures would reduce this significant impact to a less-than-significant level, identical to the proposed project. In addition, impacts associated with consistency with local policies or ordinances protecting biological resources, construction effects, and night lighting on biological resources would be the same as the proposed project, and would be less than significant.

Cultural Resources

Although the intensity of visitor-serving commercial development at the project site would increase, the amount of site coverage and extent of excavation would be similar to the proposed project. As such, the impacts to the two archaeological sites identified on the project site, one prehistoric (CA-ORA-149) and one historic with a late prehistoric component (CA-ORA-1582H), would still occur and be affected to the same extent under this alternative as the proposed project. Impacts to CA-ORA-149, which has been determined to qualify as a historic resource, would be potentially significant, as the likelihood of unearthing archaeological resources associated with CA-ORA-149 is considered very high. Since CA-ORA-1582H does not satisfy any of the criteria of a historic resource, as defined in Section 15064.5(a)(3) of the CEQA Guidelines, the site is not considered a historic resource, and a less-than-significant impact would result from the excavation of the site under this alternative. Impacts to cultural resources would, under this alternative, be similar as those anticipated under the proposed project. The potentially significant impact to CA-ORA-149 could be mitigated to a less-than-significant level with incorporation of the identified mitigation measures.

Energy and Mineral Resources

As the amount of visitor-serving commercial development would be increased by 790,000 sf, which is more than double what is proposed under the project, increases in the demand for electricity and natural gas would also occur, as well as construction of additional electricity and natural gas infrastructure. Since SCE and SCGC both anticipate load growth in the area according to the City's General Plan land use designations, it is anticipated that the electrical and natural gas loads of the project under this alternative are within SCE and SCGC's parameters of projected load growth in the area. Thus the increase in development would not increase energy demands beyond available electricity and natural gas supply. Impacts under this alternative would be less than significant, but slightly greater when compared to the proposed project.

The impact associated with the loss of availability of a known mineral resource or the loss of availability of a locally important mineral resource site under this alternative would be to the same extent as the proposed project since the site would be developed to the same site coverage. Similar to the proposed project, the feasibility of slant drilling would ensure that the mineral resources would remain accessible despite

development on site, and impacts associated with the loss of mineral resources would be less than significant.

Geology and Soils

Due to the increase in visitor-serving commercial development on the project site under this alternative, geologic impacts would potentially be greater than those described for the proposed project because more people and structures would be exposed to seismic- and soil-related hazards. Impacts related to development on potentially unstable soils and long-term exposure of persons and property to seismic risks would still be reduced to less-than-significant levels by incorporation of the identified mitigation measures described for the proposed project. Soil erosion as a result of wind and water would occur during project construction, which would be similar to conditions under project implementation. Overall, geology impacts would be reduced to a less-than-significant level under this alternative, but would be slightly greater than those of the proposed project.

Hazards and Hazardous Materials

Project-related hazardous material impacts would result from the potential exposure of construction personnel and the public to unidentified contamination present in the soil during grading and excavation of the site. In addition, potential damage to existing abandoned oil wells on the site could occur during implementation of this alternative. Although the length of construction would be longer due to the increased square footage of development, the amount of excavation and grading would be similar to the proposed project, and result in less-than-significant impacts with incorporation of mitigation measures.

Hydrology and Water Quality

Although the intensity of visitor-serving commercial development under this alternative would be greater and more patrons would frequent the site when compared to the proposed project, the building footprints representing impervious surfaces would be similar to the proposed project. It is unknown whether further improvements to the City's storm drain system would be required as a condition of approval for future development, and the impacts to hydrology could potentially be greater than with the proposed project, which provides for specific infrastructure improvements to the storm drain system. The drainage improvements, which allow for freeing up of capacity in the Atlanta Stormwater Pumping Station, could potentially not occur with other development. The effects on water quality and runoff resulting from construction and operation of development under this alternative would still be governed by existing water quality regulations, including the NPDES process. As with the proposed project, implementation of structural and nonstructural best management practices (BMPs) described for the proposed project would

ensure that water quality impacts would remain less than significant. Overall, hydrology and water quality impacts would potentially be greater than those of the proposed project, and could be significant depending on the conditions of approval with regard to infrastructure improvements.

Land Use and Planning

Implementation of this alternative would result in a maximum development scenario that is allowed under the City's existing General Plan and the Downtown Specific Plan. As such, similar to the proposed project, implementation of this alternative would be consistent with applicable land use plans, and would implement the vision for the site. Although the proposed mix of uses, consisting of residential and visitor-serving commercial, are identical to the proposed project, a much greater intensity of commercial uses would occur on site. As such, although compatibility of the proposed uses under this alternative would be less than significant, impacts would be greater when compared to the proposed project.

Noise

Since the ultimate development potential would be greater under this alternative, operational vehicle trips would be increased, and roadway noise impacts would be more intense than those described for the proposed project. The duration of site preparation would be longer, lengthening construction noise impacts to the surrounding uses. As daily construction activities would likely be the same and the duration of the construction period would be lengthened, construction-related impacts would be less than significant, similar to the proposed project. On-site noise impacts related to the increased visitor-serving commercial development of this alternative would be greater than that of the proposed project, with more visitors arriving and departing from the project site. Overall, noise impacts would be more intense under this alternative when compared to the proposed project, although operational noise impacts would not be anticipated to exceed allowable noise levels in the City.

Population and Housing

Implementation of this alternative would result in the same amount of residential development as the proposed project, while increasing visitor-serving commercial development to the maximum amount allowed under the Downtown Specific Plan. With an identical number of residential units proposed for this alternative and the proposed project, no changes to direct increases in population would occur. However, with development of 1.4 million sf of visitor-serving commercial space under this alternative, additional indirect growth in population may occur due to development on the project site. Since maximum build-out at the project site under this alternative would consist of land uses that are consistent with the land use designations and zoning under the Downtown Specific Plan, any population growth induced indirectly by

this alternative would be accounted for in the General Plan. Similar to the proposed project, implementation of this alternative would not directly or indirectly induce substantial population growth in the area beyond the City's growth projection. Affordable housing would need to be provided, similar to the proposed project, and this could be addressed through the mitigation measure identified for the proposed project. As such, impacts associated with population and housing would be reduced to less than significant, but would represent a greater magnitude in effects when compared to the proposed project.

Public Services

Public service impacts would result from additional demand for fire, police, and lifeguard services, and school facilities as a result of implementation of this alternative. As the visitor-serving commercial development would increase under the Reasonably Foreseeable Development when compared to the proposed project, more visitors to the project site would occur and impacts associated with fire, police, and lifeguard services would also be greater. Demands would not be anticipated at levels that would adversely impact the ability for fire, police and lifeguard services to provide a safe environment for the public, although constraints to emergency access could occur. Since the same amount of residential units would occur on the project site under this alternative as the proposed project, the demands on school facilities would be substantially similar. Impacts on public services would be mitigable to less than significant.

Recreation

No additional population increases would directly result from implementation of this alternative because the same number of residential units would be provided, although indirect increases in population could occur as a result of the additional visitor-serving commercial uses. The project does not propose adequate recreational facilities, although these could be provided through on-site areas and payment of in-lieu fees, as identified in MM REC-1. A similar amount of recreational facilities would be anticipated under this alternative, and, consequently, impacts associated with construction of recreational facilities related to air quality, biological resources, cultural resources, geology, and hazardous materials would occur, similar to the proposed project.

Transportation and Traffic

Transportation impacts would occur and could be exacerbated under this alternative, since additional traffic would be generated by more intensive uses.

Under 2008 background conditions, PCH and Warner would operate at LOS E (ICU 0.966) and LOS F (ICU 1.043) during the A.M. and P.M. peak hours, respectively under City criteria. Under 2008 background conditions, PCH and Warner would operate at LOS F under Caltrans Criteria. Under this alternative, more

traffic would be added to the circulation system, and the addition of traffic would worsen impacts at this intersection under the City and Caltrans criteria for this alternative. Under 2020 background conditions, intersection operations at this location would improve due to projected roadway improvements, and significant impacts would not be anticipated. Similar to the proposed project, roadway improvements for the year 2008 condition have been identified under MM TR-1. However, because the feasibility of this alternative cannot be determined, impacts would remain significant and unavoidable at this intersection, as identified under Impact TR-1.

The intersection of PCH and Seapoint would operate at LOS E (HCM 62.8) under background year 2008 conditions under Caltrans criteria during the P.M. peak hour. Under this alternative, more traffic would be added to the circulation system, and the addition of traffic would worsen impacts at this intersection under the Caltrans criteria for this alternative. MM TR-2 would reduce impacts under 2008 conditions, although impacts could remain significant. Under background 2020 conditions, this intersection would operate at LOS E (ICU 0.952) during the P.M. peak hour, as described under Impact TR-4. Under this alternative, more traffic would be added to the circulation system, and the addition of traffic would worsen impacts at this intersection. MM TR-2 would reduce the ICU at this intersection, although impacts could remain significant. Roadway segments would not be significantly impacted under the 2008 or 2020 conditions under the proposed project, as described under Impact TR-3 and Impact TR-5. Since additional traffic would be generated by more intensive uses under this alternative, it would be anticipated that impacts to roadway segments would be greater in magnitude than the proposed project.

Impact TR-6 under the proposed project identifies the need for a traffic signal at the intersection of First Street and Atlanta Avenue. This alternative would also result in the need for a traffic signal at this intersection. Additional intersections may also require signalization under this alternative due to the increase in visitor-serving commercial uses.

Impacts described for the proposed project related to parking, access, roadway hazards, and compliance with transportation policies (Impact TR-7 through Impact TR-11) would be the same under this alternative. The increase in visitor-serving commercial uses would increase demands on parking, and a corresponding increase in parking spaces would be provided. The overall site layout, in particular project access and internal circulation, would not change under this alternative. Therefore, impacts to these issues would remain the same as under the proposed project. Project operations that would ensure compliance with transportation policies would also remain unchanged and these impacts would be the same as described for the proposed project.

Utilities and Service Systems

Under this alternative, the increase in visitor-serving commercial development would increase the demands on water and wastewater services, and the amount of solid waste generated at the project site. Similar to the proposed project, construction of the necessary water and wastewater lines on- and off-site would be performed to accommodate the demands of the project.

In terms of the increased demand on water services, the City's 2000 Water Master Plan, which evaluates and plans for adequate water supply at build-out of the General Plan, as amended, and adopted specific plans, including the Downtown Specific Plan, as amended, concluded that water can be provided at full system build-out by Year 2020. This alternative would be within the allowable intensities for development, and therefore, has been accounted for in the 2000 Water Master Plan. As such, maximum build-out of the project site would not result in significant impacts on water supply.

In terms of wastewater service, the Orange County Sanitation District (OCSD) estimates that there would be more than 30 mgd of unused peak flow capacity for the Coast Trunk Sewer through the year 2020, which is more than sufficient to handle the peak sewage flows resulting from the project under this alternative. Therefore, the impact of development under this alternative on the Coast Trunk Sewer capacity would be less than significant.

In terms of solid waste, the City is responsible for meeting the requirements of AB939, which includes a 50 percent disposal reduction by the start of 2000 and preparation of a solid waste reduction plan to help reduce the amount of solid waste disposed at landfills. Incorporation of the identified mitigation measures would help minimize this impact, although solid waste impacts would be greater under this alternative. Overall, impacts associated with utilities and service systems would be greater under this alternative than the proposed project, although impacts would be mitigated to less-than-significant levels.

4.2.3 Reduced Project Alternative

Description

Implementation of the Reduced Project Alternative would result in less visitor-serving commercial uses, while maintaining the same amount of resort and residential uses as under the proposed project. Specifically, this alternative would provide a total of 561,100 sf of visitor-serving commercial uses, which include 112,200 sf of retail uses, 48,900 sf of restaurant/clubs, and 30,000 sf of office space, as shown in Table 4-1, below. These uses under the Reduced Project Alternative would represent a reduction of 28,900 sf of retail uses and a 30,000 sf decrease in office uses, while increasing restaurant/club uses by 10,000 sf. Commercial

structures would be one and two stories in height, instead of one to three stories in height as under the proposed project. Square footage on the first floor would be reduced by 1,000 sf, as compared to the proposed project. However, the overall site coverage would be similar.

Table 4-1 Reduced Project Commercial Uses	
<i>Component</i>	<i>Square Footage</i>
Visitor-Serving Commercial Uses (6.4 net acres)	
Retail	112,200sf
Restaurants/Clubs	48,900 sf
Office	30,000 sf
Total	191,100 sf
Hotel Uses (4.2 net acres)	
400 Guest Rooms	334,000 sf
Ballroom	16,000 sf
Spa (30 treatment rooms)	15,000 sf
Restaurant	5,000 sf
Total	370,000 sf

SOURCE: Makallon Atlanta Huntington Beach, LLC, July 3, 2003a

The remaining proposed resort and residential uses are identical to the proposed project. A 400-room hotel/resort totaling 370,000 sf would be provided on eight floors. Other resort uses include a 16,000 sf ballroom, a 15,000 sf spa with 30 treatment rooms on two floors, and a 5,000 sf restaurant. The residential component of this alternative would include 516 units totaling approximately 1,089,387 sf, which includes common area and decks. Similar to the proposed project, approximately 1,543 parking spaces would be provided in a subterranean garage as well as approximately 55 on-site surface parking spaces along Pacific View Avenue for the hotel and visitor-serving commercial uses. In addition, approximately 1,341 parking spaces would be provided in a subterranean garage and approximately 19 spaces along the loop road for the residential uses.

Attainment of Project Objectives

This alternative, by maintaining the same amount of residential development and reducing the amount of visitor-serving commercial development by 48,900 sf, would achieve most of the project objectives identified by the Applicant and the City. The reduction in visitor-serving commercial development under this alternative includes reducing the amount of office uses by 30,000 sf and retail uses by 28,900 sf, while increasing the amount of restaurants/clubs by 10,000 sf. Implementation of this alternative would meet the City’s objective of enhancing its Downtown as a destination for visitors by expanding hotel, retail, and entertainment opportunities. However, because the extent of visitor-serving commercial development

would not be as great as that allowed under the proposed project, the Applicant's objective of generating economic growth opportunities for the community that is consistent with the City's General Plan goals and creating additional employment opportunities for local and area residents would be achieved to a lesser degree.

Impacts

Aesthetics

A reduction in retail and office uses under this alternative would reduce the development intensity on the site. Impacts to scenic resources within PCH, as described under Impact AES-1, would be the same under this alternative. The primary scenic resources visible from PCH near the project site include the beach and Pacific Ocean and Huntington Beach Pier, all located south and west of PCH. The project would develop land east and north of PCH, such that the project would not affect views of these scenic resources. A pedestrian overcrossing could be constructed in the future, and similar to the proposed project, impacts on scenic resources as a result of this project feature would be less than significant. Impacts to scenic vistas, as described under Impact AES-2 for the proposed project, would also be less than significant under this alternative. This alternative would include no 3-story commercial structures, although the overall building footprint would remain the same. Thus, views of the beach area from locations north of PCH would be similarly affected under this alternative, and impacts would be less than significant.

Changes to visual character as described under Impact AES-3 for the proposed project would be similar under this alternative. The project would implement a high-quality mixed-use development on an underutilized site with no scenic resources. The project would implement the objectives of the Downtown Specific Plan on the site, and would be compatible in massing and character with adjacent development. The reduction in massing and building height associated with the less intense uses under this alternative reduces the contribution of the project to the overall density of development in the Downtown area. However, this alternative would not change the project effects to the visual character, and impacts under this alternative would remain less than significant.

Impacts on shade/shadow and light and glare under this alternative would be similar to the proposed project. The primary contributor to shadows would be the eight-story hotel tower, which would remain a part of this alternative. This project feature would cast shadows onto adjacent residential areas during the Winter Solstice for fewer than three hours. Impacts would be similar to the proposed project, and would be less than significant, as described under Impact AES-4. As discussed under Impact AES-5, the project would result in additional sources of nighttime lighting and glare. As the lighting provisions of the Huntington Beach standard conditions of approval require that all outdoor lighting be directed to prevent light spillage

onto adjacent properties, the impact of nighttime lighting on the project site and the project vicinity would be less than significant under this alternative. However, although there would be a decrease in the amount of visitor-serving commercial development, the project under this alternative may also introduce additional reflective surfaces (e.g., brightly colored building façades, reflective glass) that could increase existing levels of daytime glare, which would potentially constitute a significant impact. Incorporation of MM AES-1 would reduce this impact associated with daytime glare to a less-than-significant level. Since the location of project access under this alternative would not change, the impacts related to vehicular headlights on neighboring residences would remain a less-than-significant impact, as described under Impact AES-6. Impacts under the Reduced Project Alternative would generally be less severe than the proposed project.

Air Quality

The reduced project alternative would reduce total site development by 48,900 sf, which would result in a corresponding decrease in vehicular trips, and, therefore, air quality emissions.

Air Quality impacts associated with site preparation activities that include excavation and grading, as well as construction of proposed structures, as identified in Impact AQ-1, would be the similar to those under the proposed project. MM AQ-1 through MM AQ-5 would be required to reduce construction emissions. Despite the reduction in the project site, the size of the site, coupled with the concurrent residential and commercial/hotel construction would result in significant and unavoidable construction air quality impacts.

Under project operations, fewer operational trips by consumers and/or delivery trucks would occur, and air quality impacts associated with exceeding SCAQMD thresholds as identified in Impact AQ-2 would be less severe under this alternative than those anticipated under the proposed project. The estimated daily operational emissions associated with the reduced project alternative are presented in Table 4-2 and take into consideration the internal trip reduction and mode-shift reduction characteristics of the mixed-use interaction of the proposed project and the surrounding land uses, and the design features of the proposed project. As shown, the reduced project alternative would generate daily emissions of VOC that exceed the thresholds of significance recommended by the SCAQMD. MM AQ-6 and MM AQ-7 would reduce effects, although operational impacts as described under Impact AQ-2 would remain significant and unavoidable.

Table 4-2 Reduced Project Alternative Daily Operational Emissions

<i>Emissions Source</i>	<i>Emissions in Pounds per Day</i>				
	<i>CO</i>	<i>VOC</i>	<i>NOx</i>	<i>SOx</i>	<i>PM₁₀</i>
Water and Space Heating	3.13	0.57	7.58	0.00	0.01
Landscape Maintenance	1.10	0.13	0.02	0.00	0.00
Consumer Products	—	25.24	—	—	—
Motor Vehicles	445.36	41.66	47.09	0.31	58.55
Total Emissions	449.60	67.60	54.69	0.31	58.57
Thresholds (lb/day)	550.00	55.00	55.00	150.00	150.00
Significant Impact	No	Yes	No	No	No

SOURCE: EIP Associates, 2003. Computer sheets are provided in Appendix B.

Implementation of this alternative would also have a less-than-significant impact associated with localized pollutant concentrations as discussed under Impact AQ-3. This alternative would have a less-than-significant impact associated with implementation of the Air Quality Management Plan, similar to the proposed project as described under Impact AQ-4. In addition, similar to the proposed project and as discussed under Impact AQ-5, implementation of the proposed project could release toxic air contaminants, but not in significant amounts. Overall, impacts would be less than the proposed project, but would remain significant and unavoidable.

Biological Resources

As the current site would be developed to the same site coverage and excavated to similar depths under this alternative, both direct and indirect biological resource impacts associated with project development on the site would be similar when compared to the proposed project. In addition, identical to the proposed project, all existing vegetation would be removed from the site and the vacant site would be replaced with urban uses. As such, impacts associated with special status plant species and special status wildlife species would be similar to conditions under the proposed project as described in Impact BIO-1 and Impact BIO-2. With incorporation of MM BIO-1, which requires that a special status plant survey be prepared, these impacts would be reduced to a less-than-significant level. Implementation of the Reduced Project Alternative would also be consistent with local policies and ordinances protecting biological resources. This would result in a less-than-significant impact, identical under Impact BIO-3 for the proposed project. Similar to the proposed project, the Reduced Project Alternative would not result in impacts to federally protected wetlands, as described under Impact BIO-4. Indirect impacts associated with construction effects and nighttime lighting would occur under this alternative, as described under Impact BIO-5 and Impact BIO-6. The overall impacts to biological resources under this alternative would be similar to those anticipated under the proposed project but slightly less severe.

Cultural Resources

Although the intensity of visitor-serving commercial development at the project site would decrease under this alternative, the result would be the elimination of one building floor that was designated for office use under the proposed project. The amount of site coverage and the extent of excavation and grading activities would be similar to conditions under the proposed project. As such, the impacts associated with documented paleontological resources on-site could occur due to the potential disturbance and degradation of these resources, as described under Impact CR-1. Similar to the proposed project, this impact would be reduced to a less-than-significant level with incorporation of MM CR-1. Construction activities under this alternative could also cause substantial adverse change in the significance of a prehistoric archaeological site (CA-ORA-149) or of previously unknown archaeological resources, including human burials, as described under Impact CR-2 and Impact CR-3. Similar to the proposed project, these impacts would be reduced to a less-than-significant level with incorporation of MM CR-1 and MM CR-2. Also similar to the proposed project is that implementation of this alternative would not cause a substantial adverse change in the significance of CA-ORA-1582H, a historical archaeological dump site, as the site is not considered a historic resource under CEQA, as described under Impact CR-4. This impact would also be less than significant under this alternative. Impacts to cultural resources would, under this alternative, be similar to those anticipated under the proposed project.

Energy and Mineral Resources

The decrease in the amount of visitor-serving commercial development under this alternative by 48,900 sf, when compared to the proposed project, would result in less demand for electricity and natural gas. Specifically, the increased demands from this alternative would be approximately 128,662 KVA less of electricity and 1,635,600 cubic feet less of natural gas in comparison to those described in Impact EM-1 and Impact EM-2. As a result, implementation of this Reduced Project Development alternative would not increase energy demands beyond available electricity and natural gas supply, and, similar to the proposed project, impacts would be less than significant.

Impacts associated with the loss of availability of a known mineral resource or the loss of availability of a locally important mineral resource site under this alternative would occur to the same extent as the proposed project as described under Impact EM-3 because the site would be developed to the same site coverage and the same amount of excavation would occur. The feasibility of slant drilling would ensure that the mineral resources would remain accessible despite development on site, and impacts associated with the loss of mineral resources would be less than significant. Overall, impacts to energy and mineral resources

under this alternative would be less severe than those anticipated under the proposed project, since less demand for electricity and natural gas would occur.

Geology and Soils

Development under this alternative would result in a reduction of visitor-serving commercial uses, with fewer patrons present on the project site. As such, implementation of the Reduced Project Alternative would expose fewer people and structures on-site to strong seismic ground shaking and seismic-related ground failure associated with liquefaction. Impacts would be similar to the proposed project as described in Impact GEO-1, but less severe. Impacts would be reduced to a less-than-significant level with incorporation of MM GEO-1. Also similar to the proposed project, development under this alternative would result in structures that would be located on soils that are considered potentially expansive, unstable, prone to settlement, and corrosive, as described under Impact GEO-2. Thus, impacts under this alternative would be potentially significant but reduced to a less-than-significant level with incorporation of MM GEO-1. Soil erosion on the project site resulting from construction activities would occur under this alternative, as described under Impact GEO-3. However, similar to the proposed project, the development would be required to incorporate the provisions of the General Construction Activity Stormwater Permit adopted by the SWRCB, and be in compliance with Chapters 29 and 70 of the CBC. Erosion impacts would be similar to the proposed project, and be less than significant under this alternative. Overall, geological impacts associated with the Reduced Project Alternative would be similar to but less severe when compared to those under the proposed project.

Hazards and Hazardous Materials

The extent of excavation and grading under this alternative would be similar to the proposed project. Since there is the potential for unidentified soil contamination to exist on the project site, construction activities under this alternative could expose construction personnel and the public to these hazards, as described under Impact HAZ-1. In addition, these construction activities could also result in damage to existing abandoned oil wells on site, as described under Impact HAZ-2. Similar to the proposed project, incorporation of MM HAZ-1 through MM HAZ-8, which requires preparation of closure reports, sampling of the project site in select areas, formulation of a remediation plan, and adherence to the outlined construction protocols in the event contaminated soils are discovered or oil wells are damaged, would be required. As such, these impacts would be reduced to a less-than-significant level, similar to the proposed project. Despite remediation efforts performed on site, development under this alternative could also expose visitors and residents to residual oil contamination that may have not been previously detected, as described under Impact HAZ-3. However, the potential for residual oil contamination in the soil is rather

remote. Thus, this impact would be less than significant, similar to conditions under the proposed project. Overall, impacts associated with hazards and hazardous materials under this alternative would be similar but less severe when compared to those of the proposed project.

Hydrology and Water Quality

Impacts associated with hydrology and water quality under this alternative would be substantially similar to those described for the proposed project, as the same amount of impermeable surface area would be created despite the decrease in visitor-serving commercial development intensity. The quantity and constituents of stormwater runoff would be anticipated to be substantially similar to the proposed project. New development affecting water quality would occur, and similar to the proposed project, this development would be governed by existing regulations, including the NPDES process. As with the proposed project, implementation of structural and nonstructural best management practices (BMPs) described for the proposed project would ensure that impacts would remain less than significant, as described under Impact HYD-1. Infrastructure improvements would be required as a condition of approval, and, therefore, impacts to the storm drain system would be substantially similar to the proposed project, as described under Impact HYD-2. This alternative would also contribute to a reduction in flows to the Atlanta Stormwater Pump Station, as discussed under Impact HYD-3. This alternative would result in the placement of additional structures in an area of low to moderate tsunami risk, similar to the project as described under Impact HYD-4, and these impacts would be mitigated through the participation in citywide emergency preparedness plans, as described under MM HYD-1. Overall, hydrology and water quality impacts would be reduced to less than significant and substantially similar to those of the proposed project.

Land Use and Planning

Similar to the proposed project, implementation of this alternative would not result in conflicts with the City's General Plan, the Downtown Specific Plan, or adjacent uses as described under Impact LU-1 and Impact LU-2. Specifically, the same land uses, which include visitor-serving commercial, resort, and residential uses would be provided under this alternative, although there would be reduction in 48,900 sf of visitor-serving commercial space. Therefore, the project would be consistent with applicable land use plans and adjacent uses. Similar to the proposed project, impacts would be less than significant.

Noise

Since the ultimate development potential would be reduced under this alternative by 48,900 sf, operational vehicle trips would be reduced, and roadway noise impacts would be less intense than those described for the proposed project. While less overall development would occur, daily construction activities would be

anticipated to be the same, such that resulting construction noise levels would be the same as described under Impact N-1 and Impact N-2. Similar to the proposed project, construction-related impacts would be less than significant and would be further reduced through MM N-1. On-site noise impacts related to the reduced commercial development of this alternative would be less than that of the proposed project, with less vehicular noise due to fewer cars arriving and departing from the project site than compared to the proposed project. However, increased noise could still expose new residential land uses on site to noise levels in excess of City standards, as described under Impact N-3, and this impact would be mitigable to less-than-significant levels by MM N-2. Since the proposed project would not increase ambient noise levels above City requirements, this alternative would also result in noise within allowable levels, as described under Impact N-4. Impacts would be mitigable to less than significant, and overall, noise impacts would be less intense under this alternative than under the proposed project.

Population and Housing

Since this alternative would result in the same amount of residential development (516 condominiums) as the proposed project, impacts associated with direct increases in population and housing would be similar under this alternative, as described under Impact P-1 and Impact P-2. This increase in population and housing would be consistent with the growth that was assumed to occur under the City's General Plan, and a less-than-significant impact would occur. Implementation of this alternative would result in hotel and visitor-serving commercial uses that would generate increases in employment, and indirectly increase the population of the City. This alternative would result in generation of 513 employees and office tenants, in comparison to 573 employees and office tenants provided under the proposed project. Although commercial uses would be less than under the proposed project, increases in employment, similar to the proposed project, would remain consistent with what was assumed to occur under the City's General Plan. An affordable housing plan would need to be provided in order to meet Redevelopment Agency requirements, and this could be accomplished through implementation of MM P-1. As such, impacts associated with population and housing under this alternative would be mitigable to less than significant and would be less in magnitude when compared to the conditions of the proposed project.

Public Services

Implementation of this alternative would result in an increase of residents and visitors within the project site, thereby increasing demands for fire protection, police services, school facilities, and lifeguard services. Overall, the demands on public services under this alternative would be largely the same as the proposed project as described under Impact PS-1, Impact PS-2, Impact PS-3, and Impact PS-4. The reduction in square footage of office and retail uses would not measurably affect impacts on public services. Constraints

to emergency access could still occur, and these impacts would be addressed through MM PS-1 through MM PS-3. Impacts to police and lifeguard services would be less than significant. MM PS-4 and MM PS-6 would remain recommended in order to further reduce impacts.

The same number of additional residents and resulting students as the project would result, and a total of approximately 66 high school, 68 middle school, and 183 elementary students would be generated. Payment of statutory school fees, as identified in MM PS-5, would reduce this impact, and impacts would be reduced to less-than-significant levels.

Recreation

Since the amount of residential units under this alternative would be the same as the proposed project, the impact related to the City's standard park ratio would be the same as the proposed project, as described under Impact REC-1. The project does not propose recreational facilities that would meet the City parkland requirements, although these could be provided through on-site areas and payment of in-lieu fees, as identified in MM REC-1. The same amount of recreational facilities would be developed under this alternative, and, consequently, impacts associated with construction of recreational facilities, as described under Impact REC-2, related to air quality, biological resources, cultural resources, geology, and hazardous materials would occur, similar to the proposed project. Overall, recreational impacts would be the same as the proposed project under this alternative.

Transportation and Traffic

Less traffic would be generated by the reduction in commercial uses, although impacts to transportation would remain.

Under 2008 background conditions, PCH and Warner would operate at LOS E (ICU 0.966) and LOS F (ICU 1.043) during the A.M. and P.M. peak hours, respectively under City criteria, as discussed under Impact TR-1. Under 2008 background conditions, PCH and Warner would operate at LOS F under Caltrans Criteria. With a reduction in visitor-serving commercial uses under this alternative, less traffic would be added to the circulation system. However, as background levels are already projected to operate at unacceptable levels, the addition of traffic would remain significant at this intersection under the City and Caltrans criteria for this alternative. Under 2020 background conditions, intersection operations at this location would improve due to projected roadway improvements, and significant impacts would not be anticipated. Similar to the proposed project, roadway improvements for the year 2008 condition have been identified under MM TR-1. However, because the feasibility of this alternative cannot be determined, impacts would remain significant and unavoidable at this intersection, as identified under Impact TR-1.

The intersection of PCH and Seapoint would operate at LOS E (HCM 62.8) under background year 2008 conditions under Caltrans criteria during the P.M. peak hour, as discussed under Impact TR-2. With a reduction in visitor-serving commercial uses under this alternative, less traffic would be added to the circulation system. However, as background levels are already projected to operate at unacceptable levels, the addition of traffic would remain significant at this intersection under the Caltrans criteria for this alternative. MM TR-2 would reduce impacts under 2008 conditions to a less-than-significant level, similar to the proposed project.

The intersection of PCH and Seapoint would operate at LOS E (ICU 0.952) under background 2020 conditions during the P.M. peak hour, as discussed under Impact TR-4. With a reduction in visitor-serving commercial uses under this alternative, less traffic would be added to the circulation system. However, as background levels are already projected to operate at unacceptable levels, the addition of traffic would remain significant at this intersection. MM TR-2 would reduce impacts at this intersection to a less-than-significant level.

Roadway segments would not be significantly impacted under the 2008 or 2020 conditions under the proposed project, as described under Impact TR-3 and Impact TR-5. This alternative would result in less traffic, and would also have a less-than-significant impact on roadway segments.

Impact TR-6 under the proposed project identifies the need for a traffic signal at the intersection of First Street and Atlanta Avenue. The reduction in traffic would not eliminate the need for a signal at this location, since a signal would be required due to existing plus ambient growth. MM TR-3 would reduce this impact to less than significant.

Impacts described for the proposed project related to parking, access, roadway hazards, and compliance with transportation policies (Impact TR-7 through Impact TR-11) would be the same under this alternative. The reduction in visitor-serving commercial uses would reduce demands on parking. Under this alternative, the total number of parking spaces provided would be identical to the proposed project. Since less development would occur, there would be fewer demands on parking spaces under this alternative, and the parking spaces provided would exceed demand, based on the shared parking analysis. The overall site layout, in particular project access and internal circulation, would not change under this alternative. Therefore, impacts to these issues would remain the same as under the proposed project. Project operations that would ensure compliance with transportation policies would also remain unchanged and these impacts would be the same as described for the proposed project.

Utilities and Service Systems

Under this alternative, the decrease in office and retail development would result in fewer demands on water and wastewater services, and the amount of solid waste generated at the project site than as described under Impact U-1 through Impact U-4. Overall, utilities and service systems impacts would be less severe under this alternative than the proposed project since less development would occur.

The City's 2000 Urban Water Management Plan and Water Master Plan indicated that adequate water supply exists to serve the proposed project. This alternative would result in fewer additional demands on water. Therefore, impacts associated with sufficient water supply under this alternative would also be less than significant. This alternative is anticipated to result in demands of approximately 406,950 gpd, which is 1,950 gpd less than the proposed project. Additionally, since the project Applicant has agreed to fund the construction of new water lines on- and off-site to improve the City's distribution system beyond its present capabilities, sufficient fire flows would also exist.

Adequate capacity exists in the Coast Trunk Sewer and OCSD's existing wastewater treatment facilities to serve the proposed project. This alternative would result in approximately 228,280 gpd of wastewater, which is 7,700 gpd less generation of wastewater compared to the proposed project. Because the existing facilities would adequately serve the project, this alternative, which has a lower wastewater generation, would also be adequately served and this impact would also be less than significant.

The reduction in visitor-serving commercial development under this alternative would result in annual solid waste generation at the project site of 1,666 tons, which is approximately 215 tons less than the proposed project. Incorporation of MM U-1 identified for the proposed project would further reduce solid waste impacts under this alternative to a less-than-significant level.

4.3 OTHER ALTERNATIVES CONSIDERED

This section discusses alternatives that were considered but not carried forward for detailed analysis. These alternatives were part of the initial screening process, which identified a range of potential alternatives. Alternatives were not evaluated in detail because they either did not meet project objectives, and/or did not reduce significant project impacts.

4.3.1 Alternative Site

An alternative site was reviewed as a potential alternative to the project site. Due to the developed nature of the City, there are a limited number of sites that are at least 31 acres in size and could accommodate the

proposed project components. A site known as the Nesi Ascon Site, located southeast of the project site on the southwest corner of Magnolia Street and Hamilton Avenue within the City, was considered, as it is large enough to accommodate the proposed uses. However, this site is a former landfill that accepted hazardous waste, and usage of this site would require extensive remediation efforts prior to project implementation. In addition, this site is general planned and zoned solely for residential uses, which would not meet the Applicant or City objectives related to generation of employment and strengthening the City as a visitor-serving destination. Thus, this site was not analyzed in detail because it would not meet project objectives and would require extensive remediation.

4.3.2 Limited Development Alternative

An alternative that would result in limited commercial development beyond the Reduced Project Alternative was considered. As previously discussed, the intent of the alternatives analysis is to provide alternatives to the project that would reduce significant project impacts while meeting most of the objectives of the project. Significant and unavoidable impacts would result from operational air emissions. In addition, one of the significant project impacts is traffic impacts to the intersection of PCH and Seapoint Avenue under 2008 and 2020 conditions. Significant and unavoidable impacts would occur at the intersection of PCH and Warner, although these would occur in the near-term conditions only.

The key contributor of roadway trips that result in the significant air quality and traffic impacts is a result of the retail and office components of the project. In order to reduce project contribution to operational air quality emissions and impacts to the PCH/Seapoint intersection to less-than-significant levels without mitigation, the project would need to be reduced to 96,600 sf of retail uses, with no office or hotel uses contained in the project at all. This reduction would be less than half the commercial development currently proposed and would result in less-than-significant operational air quality impacts and traffic effects.

This alternative would fail to satisfy the basic objectives of the project and would likely render the project infeasible. A key City objective is the implementation of the Downtown Specific Plan, which identifies strengthening the visitor-service services of the area, such as hotel and retail uses. The need for hotels in the Downtown is a key element of the Specific Plan that would bring a critical mass of activity to the waterfront area to support expansion of other services. In addition, the City objectives include enhancement of the Downtown as a destination for visitors by expanding hotel, retail, and entertainment opportunities. None of these project objectives would be met under this alternative. In addition, the Applicant has indicated that without a critical mass of commercial and hotel uses, the project is not feasible to implement from an economic perspective and would not be implemented. Therefore, this alternative is not analyzed in detail.

4.3.3 Reduced Residential Density Alternative

A reduced residential density alternative was also considered. This alternative would focus on a decrease in the number of condominiums proposed as part of the project. A reduction in the density of residential units would reduce the severity of impacts, but would not lessen any significant impacts to less-than-significant levels. Significant and unavoidable impacts to air quality would result during project construction and operation. Daily construction activities would be the same even with a reduction in density, so this impact would remain. Significant impacts related to operational air emissions are largely a result of vehicular traffic, of which commercial development is the primary contributor. A reduction in density of residential uses would not reduce operational air emissions or traffic impacts below levels of significance.

A reduction in density would reduce the changes in the character of the area, as discussed under the aesthetic and land use analyses. Visual changes were determined not to adversely impact the visual quality of the area or the public availability of scenic views, as discussed in Section 3.1. The project would also be compatible with the density of surrounding areas, and with the allowable zoning for the site, such that land use impacts would be less than significant under the proposed project, as discussed in Section 3.9. Therefore, the reduction in density would not address any significant visual or land use impact, since none would result from the proposed project. All other project impacts would be mitigable to less-than-significant levels. A reduced residential density alternative would not reduce significant impacts that could not otherwise be reduced by mitigation measures identified for the proposed project. As such, an analysis of this alternative is not provided in detail.

4.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

A comparison of the proposed project with the alternatives analyzed in this section provides the basis for determination of the environmentally superior alternative. Impacts of each of the alternatives are compared to the proposed project in Table 4-3. Impacts to a particular resource that would be greater than the proposed project are indicated with a plus (+) sign, and impacts to a particular resource that would be less than the proposed project are indicated with a minus (-) sign. Impacts to resources that would be roughly equivalent to the proposed project are indicated with an equals (=) sign in the table below.

The No Project/No Development Alternative would be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. However, the CEQA Guidelines require that if the environmentally superior alternative is the No Project Alternative, “the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Table 4-3 Comparison of Alternatives to the Proposed Project

<i>Environmental Issue Area</i>	<i>No Project/No Development Alternative</i>	<i>Reasonably Foreseeable Development Alternative</i>	<i>Reduced Project Alternative</i>
Aesthetics	-	+	-
Air Quality	-	+	-
Biological Resources	-	=	=
Cultural Resources	-	=	=
Energy and Mineral Resources	-	+	-
Geology and Soils	-	+	-
Hazards and Hazardous Materials	-	+	-
Hydrology and Water Quality	-	+	=
Land Use	-	+	=
Noise	-	+	-
Population and Housing	-	+	-
Public Services	-	+	=
Recreation	-	+	=
Transportation	-	+	-
Utilities	-	+	-

(-) = Impacts considered to be less when compared with the proposed project.
 (+) = Impacts considered to be greater when compared with the proposed project.
 (=) = Impacts considered to be equal or similar to the proposed project.

The Reasonably Foreseeable Development Alternative would result in impacts that would be greater than the proposed project. Therefore, this alternative would not be environmentally superior. The remaining alternative that is considered feasible and would reduce project impacts is the Reduced Project Alternative. This alternative would meet the overall project objectives. This alternative would reduce environmental impacts on some resources. The resources where impacts would be significant and unavoidable include air quality and transportation. The Reduced Project Alternative would not reduce impacts to levels of less than significance for either of these resources. This alternative would reduce the number of vehicular trips and associated impacts on air quality and transportation, although impacts would remain significant and unavoidable. The Reduced Project Alternative would reduce environmental impacts to 9 out of 15 resources. Therefore, the Reduced Project Alternative would be considered the environmentally superior alternative to the proposed project. Implementation of this alternative, as shown in the table above, would result in less severe impacts associated with aesthetics, air quality, energy and mineral resources, geology and soils, hazards and hazardous materials, noise, population and housing, transportation, and utilities. Significant and unavoidable impacts would remain to air quality and transportation. When compared to the proposed project, implementation of the Reduced Project Alternative would result in similar impacts to biological resources, cultural resources, hydrology and water quality, land use, public services, and

recreation. While the overall level of significance of impacts to each of these resources would remain the same, the magnitude of impacts would be less than under the proposed project. Under this alternative, most of the project objectives identified by the City of Huntington Beach and the Applicant would be achieved.