CHAPTER VI
Alternatives

The purpose of this chapter is to identify and describe the alternatives to the Marina Center project. Project alternatives are developed to reduce or eliminate the significant or potentially significant adverse environmental effects identified in Chapter IV that would result from development of the Marina Center project.

A. CEQA Requirements

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) describe and evaluate a reasonable range of alternatives to the proposed project, or to the location of the proposed project, and evaluate the comparative merits of the alternatives. The "range of alternatives" is governed by the "rule of reason" which requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines Section 15126.6[f]).

A reasonable range of alternatives for comparison must include those alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines Section 15126.6). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. In addition, the following may be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (Section 15126.6(f)(1)).

The requirement that an EIR evaluate alternatives to the proposed project or alternatives that address the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed project. The discussion of alternatives does not need to be exhaustive and an EIR need not consider alternatives for which the effects cannot be reasonably determined and for which implementation is remote and speculative. An EIR need not describe or evaluate the environmental effects of alternatives in the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project.

CEQA requires that an environmentally superior alternative be selected among the alternatives. When the No Project Alternative is the environmentally superior alternative, an EIR must also

identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]). In general, the environmentally superior alternative is defined as the alternative with the least adverse impacts on the project area and its surrounding environment.

B. Criteria for Selecting Alternatives

Assumptions

1. The EIR must contain a meaningful discussion of project alternatives.

2. The EIR must present a reasonable range of feasible alternatives to the project or project location that could feasibly attain most of the basic project objectives.

3. The EIR need set forth only those alternatives necessary to permit a reasoned choice.

4. Alternatives that are not reasonable or feasible need not be discussed at length.

5. Alternatives that do not offer substantial environmental advantages over the project also can be rejected from consideration.

6. Alternatives that do not accomplish most of the basic objectives of the project can be excluded from the analysis.

7. The consideration of alternative sites depends upon a variety of factors, including site ownership, whether the site is within the lead agency's jurisdiction, and the current land use designation in a general plan or local coastal program.

8. On-site alternatives would use all or the majority of the property.

9. Off-site alternatives would construct the Marina Center project to the maximum extent achievable constrained only by the property size.

Steps for Finding Reasonable Range of Alternatives

1. Define basic objectives.

2. Determine significant impacts to be avoided or substantially lessened.

3. Develop a broad list of potential alternatives.

4. Use screening criteria to screen alternatives down to a "reasonable range."

    a. Does the alternative avoid or substantially lessen at least one of the significant environmental impacts of the proposed project?

    b. Does the alternative meet most of the basic objectives of the project?

c. Is the alternative economically, socially, environmentally, legally, and technically feasible? If the alternative is infeasible, explain why

5. If the alterative passes screening criteria, conduct a detailed evaluation.

C. Screening for Alternatives

Step 1. Define Basic Objectives

To carry out Lead Agency obligations under CEQA for the conduct of an analysis of a reasonable range of alternatives, the City of Eureka has reviewed the applicant's objectives and determined that the following are the **basic objectives** of the project:

1. Strengthen Eureka as the retail and employment center of Humboldt County.

2. Develop an economically viable mixed use project (e.g., retail, office, residential, industrial).

3. Facilitate brownfield redevelopment and urban infill development of property in the redevelopment area in the City of Eureka.

Step 2. Determine Significant Impacts to be Avoided or Substantially Lessened

Based on the analysis in Chapter IV, the following are the categories of significant or potentially significant impacts that would occur if the Marina Center project were approved. Following each impact category are the significance criteria used to determine if an alternative would substantially lessen the significant impact.

1. **Air Quality**
   An alternative would substantially lessen impacts on air quality if it would not contribute to non-attainment of PM emissions.

2. **Biological Resources**
   An alternative would substantially lessen impacts on biological resources if it would not involve temporary or permanent impacts on wetlands resources.

3. **Cultural Resources**
   An alternative would substantially lessen impacts on cultural resources if it were not located in an area of a known or suspected cultural site.

4. **Geology/Seismicity**
   An alternative would substantially lessen geology and seismicity impacts if it would not involve the construction of structures for human use or occupation.

5. **Hazardous Materials**
   An alternative would substantially lessen impacts resulting from hazardous materials if it would not involve the handling or disposal of hazardous or contaminated materials or soils.

6. **Land Use**
An alternative would substantially lessen impacts on land use if the alternative were more consistent with the existing zoning and general plan.

7. **Light Or Glare**
An alternative would substantially lessen impacts from light or glare if it involved only a minimal amount of low-level lighting, such as accent or street lighting.

8. **Noise**
An alternative would substantially lessen impacts from noise if it reduced the noise levels to below significance thresholds.

9. **Tsunami**
An alternative would substantially lessen impacts from tsunami inundation by being located outside a potential tsunami run-up zone.

10. **Transportation/Traffic**
An alternative would substantially lessen impacts on traffic/transportation if it would likely prevent degradation of an intersection or roadway segment to an unacceptable operating condition.

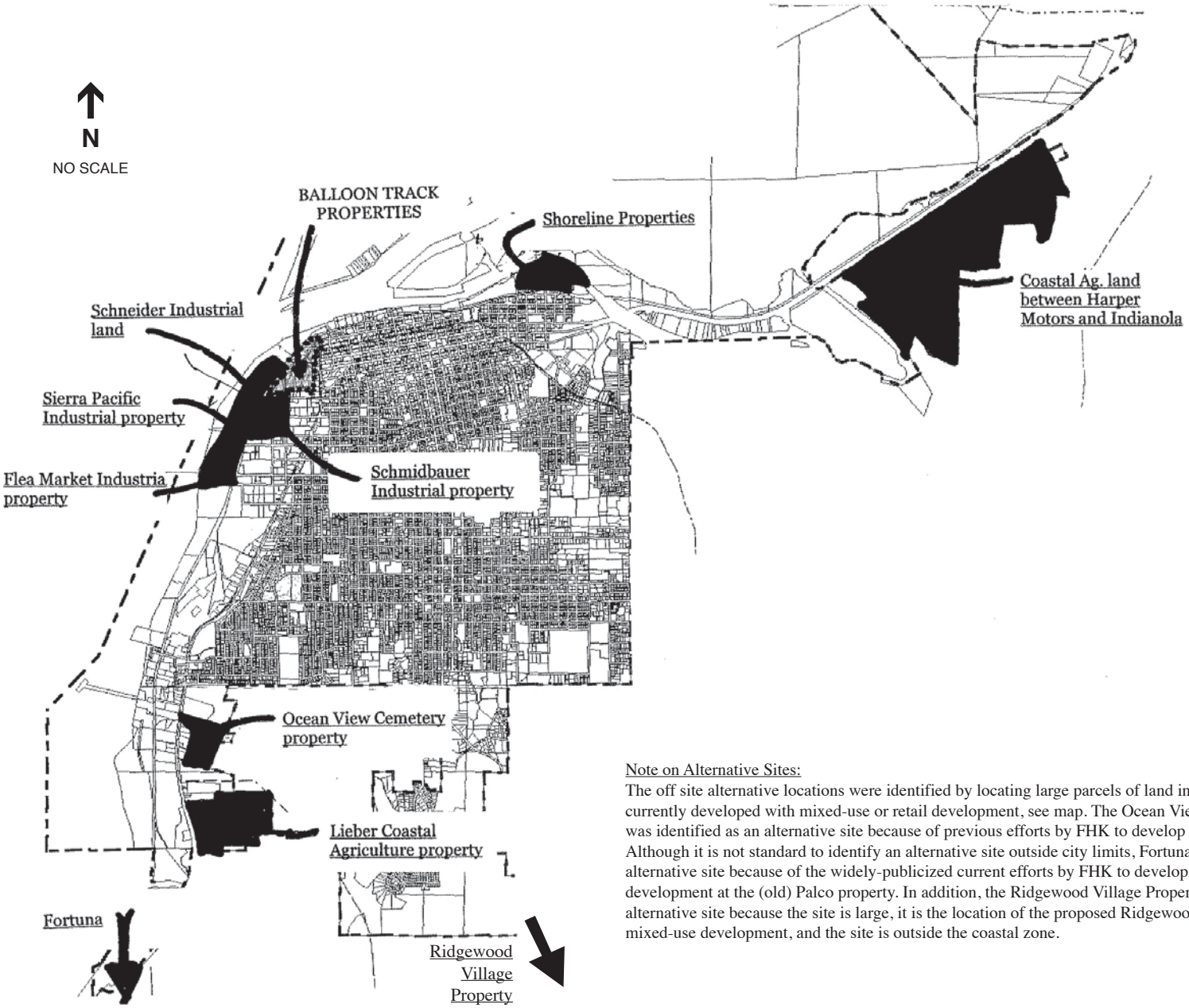
Step 3. Develop Broad List of Potential Alternatives

The broad list of alternatives described below was developed by the Lead Agency largely in response to comments received during the scoping process. The off-site locations were chosen based on City staff's knowledge of the properties and adequate acreage to support the project. Figure VI-1 shows the locations within the city of the off-site alternatives.

1. **No Project**
The "No Project" Alternative is the circumstance under which the Marina Center project does not proceed. The No Project Alternative will compare the environmental effects of the property remaining in its existing state (including, based on current plans and consistent with available infrastructure and community services, what would reasonably be expected to occur in the foreseeable future if the project were not approved) against environmental effects that would occur if the Marina Center project were approved.

2. **Marina Center Reduced Footprint**
The Marina Center Reduced Footprint Alternative would include the following:

- 182,000 square feet of retail/service/ furniture, including 28,000 square feet of nursery/garden
- 160,000 square feet of office
- 96,000 square feet of industrial
- 7,000 square feet of restaurant
- Extension of Second and Fourth Streets through the project site
- 1,351 parking spaces



Note on Alternative Sites:
The off site alternative locations were identified by locating large parcels of land in city limits not currently developed with mixed-use or retail development, see map. The Ocean View Cemetery property was identified as an alternative site because of previous efforts by FHK to develop the site for a Super K-Mart. Although it is not standard to identify an alternative site outside city limits, Fortuna is listed as an alternative site because of the widely-publicized current efforts by FHK to develop a large-scale retail development at the (old) Palco property. In addition, the Ridgewood Village Property is listed as an alternative site because the site is large, it is the location of the proposed Ridgewood Village mixed-use development, and the site is outside the coastal zone.

SOURCE: City of Eureka

Figure VI-1
Marina Center Alternative Site Locations

3. **Limited Industrial Zoning**

Under this alternative, the zoning and general plan designation of the site would be changed to Limited Industrial. The alternative would provide for 407,000 square feet of industrial buildings and 626 parking spaces on the project site, along with the extension of Second and Fourth Streets through the project site.

4. **Coastal Dependent Industrial Zoning**

Under this alternative, the zoning and general plan designation of the site would be changed to Coastal Dependent Industrial, which would allow coastal-dependent and coastal-related uses. Coastal-dependent development or use means any development or use that requires a site on or adjoining the sea in order to function. Coastal-related development means any use that is dependent on a coastal-dependent development or use. As the subject property is not on or adjacent to Humboldt Bay, no coastal-dependent uses are proposed under this alternative. The following coastal-related development could occur under this alternative: boat repair and ship building; marine services; seafood processing; water-borne carrier import and export facilities; access support facilities; boat launching and berthing facilities; electrical generating or other facilities that require intake, outfalls, or pipelines; fish waste processing plants; ice and cold storage facilities; Outer Continental Shelf (OCS) oil and/or gas processing and treatment facilities; oil and gas pipelines; onshore petroleum production; and warehouses serving permitted uses.

The Coastal Act (Public Resources Code) Section 30233 provides for the diking, filling, or dredging of wetlands for coastal-dependent industrial uses. Because the site is not located on or adjacent to Humboldt Bay, however, this alternative would include only coastal-related uses, not coastal dependent uses; therefore, development under this alternative would not fall under the provisions of Section 30233 of the Coastal Act.

5. **Off-Site Shoreline Property, Eureka, CA**

(T5N, R1W, Sections 14 & 23, HBM.)

The site of the Shoreline Property Off-Site Alternative is owned by CUE IV, LLC. It is located within the city limits of Eureka and is within the redevelopment area. It is approximately 30 acres in size and is, for the most part, zoned and planned Commercial Waterfront with some Natural Resources zoning. The property is located adjacent to Humboldt Bay in the coastal zone and has about 16.5 acres of wetlands primarily around the outside edges of the property. Access to the site would come from the north end of “T” Street, “V” Street, “X” Street and “Y” Street, and from the east end of Waterfront Drive. Although urban-level services are available in the vicinity, they would need to be extended onto the property to accommodate development. The property is predominantly vacant land with some minor structures of some potential historical value. This site was selected as an alternative off-site location for the following reasons: it is owned by the parent company that is the project proponent; it is a large undeveloped site; it is within city limits and the redevelopment area; it is similarly situated along the Eureka waterfront as the project site; and a mixed-use development was previously intended for the site.

6. **Off-Site. Ocean View Cemetery, Eureka, CA**
(T4N, R1W, Section 4, HBM.)
The Ocean View Off-Site Alternative property is owned by the Roman Catholic Bishop of Santa Rosa and the Ocean View Sunset Memorial Association. The property is located within the city limits of Eureka and is approximately 21 acres in size. The site is outside the redevelopment area. It is zoned and planned as Public and is vacant cemetery land (no internments). The property is located on the east side of Broadway (Highway 101) near the southern end of the city. The property is not located in the coastal zone and there are no known wetlands on the property. Access to the site would come from Sunset Avenue via Broadway. Although urban-level services are available in the vicinity, they would need to be extended onto the property. This site was selected as an alternative off-site location for the following reasons: it is a large, undeveloped property; it is outside the coastal zone; it is within the city limits; and it was the location of a previous proposal for a Super K-Mart.

7. **Off-Site Coastal Agriculture Land Between Harper Motors And Indianola, Eureka, CA**
(T5N, R1E, Sections 17, 18 & 19, HBM.)
The Coastal Agriculture Off-Site Alternative property is over 100 acres owned by the State of California; it is located within the city limits of Eureka near the Indianola cutoff. It is not within the redevelopment area. The property is in the coastal zone, is zoned Coastal Agriculture and is dominated by an environmentally sensitive habitat area. Access would be directly from Highway 101. Urban services are not located in the vicinity. This site was selected as an alternative off-site location because it is a large, undeveloped tract of land located within the city limits.

8. **Off-Site Schneider Industrial Land, Eureka, CA**
(T5N, R1W, Section 21, HBM.)
This property if about 16 acres is owned by David Schneider and zoned Coastal Dependent Industrial. The property adjoins Humboldt Bay and has a working dock; it is developed with a variety of industrial uses, primarily warehouses. This site was selected as an alternative off-site location for the following reasons: the site is relatively large and could be combined with the Sierra Pacific and Old Flea Market sites to form an even larger property; the site is across Waterfront Drive from the Balloon Track property and the site is within the city limits and the redevelopment area.

9. **Off-Site Sierra Pacific Industrial Property, Eureka, CA**
(T5N, R1W, Sections 21 & 28, HBM.)
This property of about 16 acres is owned Eureka Forest Products and zoned Coastal Dependent Industrial. The property adjoins Humboldt Bay and has a working dock; it is used for import and export of timber forest products. This site was selected as an alternative off-site location for the following reasons: the site is relatively large and could be combined with the Schneider and Old Flea Market sites to form an even larger property; the site is in close proximity to the Balloon Track property; and the site is within the city limits and the redevelopment area.

10. **Off-Site Old Flea Market Property, Eureka, CA**
(T5N, R1W, Section 28, HBM.)
This property of about 14 acres is owned by Preston Properties and zoned Coastal Dependent Industrial. The property adjoins Humboldt Bay and is developed with several large buildings. For many years the site was the location of the Eureka Flea Market. This site was selected as an alternative off-site location for the following reasons: the site is relatively large and could be combined with the Schneider and Sierra Pacific sites to form an even larger property; the site is close to the Balloon Track property; and the site is within the city limits and the redevelopment area.

11. **Off-Site Schmidbauer Lumber Co. Property, Eureka, CA**
(T5N, R1W, Sections 21 & 28, HBM.)
This property of about 22 acres is owned by Schmidbauer Lumber Company and is zoned Heavy Industrial. The property is located in the Westside Industrial area across Washington Street from the Balloon Track property. The entire property is used by the Schmidbauer Lumber Company for forest product manufacture, warehouse and storage. This site was selected as an alternative off-site location for the following reasons: this site is relatively large; the site is close to the Balloon Track property; and the site is within the city limits and the redevelopment area.

12. **Off-Site Lieber Property, Eureka, CA**
(T4N, R1W, Section 4, HBM)
The Lieber property is located at the southern city limits east of Broadway and north of the Herrick overpass; it is not within the redevelopment area. Virtually the entire property is located within the coastal zone and is zoned Coastal Agriculture. Although the property is located within the city limits it is outside the Urban Limit Line. The property is predominantly grazed or farmed wetlands, representing an Environmentally Sensitive Habitat Area (ESHA). This site was selected as an alternative off-site location for the following reasons: the property is large, vacant and within the city limits, and it has been the location of a number of proposed developments.

13. **Off-Site Ridgewood Village Property, Humboldt County, CA**
(T4N, R1W, Section 14, HBM.)
The Ridgewood Village Off-Site Alternative location is about 17 acres of an approximately 380-acre property located in the unincorporated area of Humboldt County. An application for the phased construction of the Ridgewood Village mixed-use development project on the 380 acres is pending before the Humboldt County Community Development Services Department. The Ridgewood Village development's first phase would include 17 acres that would be developed with 742 residential units; 227,000 square feet of retail space; 100,000 square feet of office space; and 1,055 parking spaces. This site was selected as an alternative off-site location for the following reasons: the project site is large, it is the location of the proposed Ridgewood Village mixed-use development, and the site is outside the coastal zone.

14. **Off-Site Palco Property, Fortuna, CA**
(T2N, R1W, Section 2, HBM.)
The site is about 75 acres located between Highway 101 and Fortuna Boulevard in the city limits of Fortuna. The property is relatively flat and contains the remnants of a lumber product processing mill. This site was selected as an alternative off-site location because the site has been discussed by the Fortuna City Council and developer Fred Katz for the construction of a big-box anchored development.

15. **Convention Center**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the Convention Center Alternative would involve the construction of a convention center on the project site including secondary uses, such as parking, lodging and dining. This alternative assumes the convention center to be a public use.

16. **Tourism Use**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the Tourism Use Alternative would include a destination-type use on the project site that would draw and keep tourists for more than one night.

17. **Covered Swimming Pool**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternative analysis, the covered swimming pool would be an Olympic size swimming pool of 50 meters in length by 25 yards in width, along with a separate diving pool, and separate kiddy or warm-up pool, on the project site. Locker rooms, weight or training rooms, and team assembly rooms would also be included. Public parking would be included. This alternative assumes the swimming pool to be a public use.

18. **Horticultural Gardens**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternative analysis, the Horticultural Gardens Alternative would be a public garden that would include the development of several outdoor and indoor gathering spaces such as a gazebo(s), meeting or lecture hall(s), and greenhouse(s) on the project site. Public Parking would be included. This alternative assumes the horticultural garden to be a public use.

19. **No Retail Option**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the No Retail Option Alternative would be the Marina Center project without retail uses.

20. **Public Facilities Option**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the Public Facilities Option Alternative would include the construction of a new civic center, housing, and government offices on the project site. This alternative assumes the public facilities to be a public use.

21. **Intermodal Bus Terminal**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the Intermodal Bus Terminal Alternative would include the construction of a bus terminal on the project site that would include passenger area, offices, and facilities for bus parking, maintenance, and repair. This alternative assumes the intermodal bus terminal to be a public use.

22. **Wetland Restoration and Public Park**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the Wetland Restoration and Public Park Alternative would include restoring the wetlands, primarily in place, and the constructing a public park and recreation area on the project site. The public park would include green lawn, children's play area and ball fields. This alternative assumes the wetland restoration and public park to be a public uses.

23. **No Fossil Fuel**
This alternative was mentioned in the scoping comments and no detailed project description was provided. For purposes of the alternatives analysis, the No Fossil Fuel Alternative would be the Marina Center project without the use of fossil fuels.

24. **College of the Redwoods**
The alternative was identified in the press in early 2008: no detailed project description was provided. For purposes of the alternatives analysis, the College of the Redwoods Alternative would involve the construction of a new college campus on the project site.

Step 4. Use Screening Criteria to Screen Alternatives Down to a "Reasonable Range"

Tables VI-1 through VI-3 illustrate how the screening criteria were used to narrow down the list of alternatives to a "reasonable range" that allows informed public participation and an informed and reasoned choice by the decision-making body. As described above, the screening criteria evaluate whether the alternative (1) avoids or substantially lessens at least one of the project's significant environmental impacts (see Table VI-1), (2) meets most of the basic project objectives (see Table VI-2), and (3) is economically, environmentally, legally, and technically feasible (see Table VI-3).

TABLE VI-1
SIGNIFICANT IMPACT SCREENING

	Does the alternative avoid or substantially lessen at least one of the significant environmental impacts of the proposed project?	**Air Quality**	**Biological Resources**	**Cultural Resources**	**Geology/ Seismicity**	**Hazardous Materials**	**Land Use**	**Light or Glare**	**Noise**	**Tsunami**	**Transportation/ Traffic**
1.	No Project	yes	no	no	yes	no	yes	yes	yes	yes	yes
2.	Marina Center Reduced Footprint	no	yes	no	no	no	no	no	yes	no	yes
3.	Limited Industrial Zoning	no	yes	no	no	no	no	no	no	no	yes
4.	Coastal Dependent Industrial Zoning	no	no	no	no	no	no	no	no	no	no
5.	Shoreline Property	no	yes	no	no	no	no	no	no	no	no
6.	Ocean View Cemetery	no	yes	?	no	yes	no	no	no	yes	no
7.	Coastal Ag Land Between Harper Motors & Indianola	no	no	?	no	yes	no	no	no	no	no
8.	Schneider Industrial Land	no	yes	yes	no	no	no	no	no	no	no
9.	Sierra Pacific Industrial Property	no	yes	yes	no	no	no	no	no	no	no
10.	Old Flea Market Property	no	yes	yes	no	no	no	no	no	no	no
11.	Schmidbauer Lumber Co. Property	no	yes	?	no	no	no	no	no	no	no
12.	Lieber Property	no	no	?	no	yes	no	no	no	no	no
13.	Ridgewood Village Property	no	?	?	no	yes	no	no	no	yes	no
14.	Palco Property, Fortuna	no	yes	yes	no	no	no	no	no	yes	no
15.	Convention Center	no	no	no	no	no	yes	no	no	no	no
16.	Tourism Use	no	no	no	no	no	no	no	no	no	yes
17.	Covered Swimming Pool	no	no	no	no	no	yes	no	yes	no	yes
18.	Horticultural Gardens	yes	no	no	no	no	yes	no	yes	no	yes
19.	No Retail Option	no	no	no	no	no	no	no	no	no	no
20.	Public Facilities Option	no	no	no	no	no	yes	no	no	no	no
21.	Intermodal Bus Terminal	no	no	no	no	no	yes	no	no	no	no
22.	Wetland Restoration and Public Park	yes	no	no	no	no	yes	no	yes	no	yes
23.	No Fossil Fuel	yes	no	no	no	no	no	no	no	no	yes
24.	College of the Redwoods	no	no	no	no	no	yes	no	no	no	no

TABLE VI-2
OBJECTIVE SCREENING

	Does the alternative meet most of the basic objectives of the project?	**Strengthen Eureka as the retail and employment center of Humboldt County**	**Develop an economically viable mixed use project (e.g., retail, office, residential, industrial)**	**Facilitate brownfield redevelopment and urban infill development of property in the redevelopment area in the City of Eureka**
1.	No Project	no	no	no
2.	Marina Center Reduced Footprint	yes	yes	yes
3.	Limited Industrial Zoning	yes	no	yes
4.	Coastal Dependent Industrial Zoning	yes	no	yes
5.	Shoreline Property	yes	yes	yes
6.	Ocean View Cemetery	yes	yes	no
7.	Coastal Ag Land Between Harper Motors & Indianola	yes	yes	no
8.	Schneider Industrial Land	yes	yes	yes
9.	Sierra Pacific Industrial Property	yes	yes	yes
10.	Old Flea Market Property	yes	yes	yes
11.	Schmidbauer Lumber Co. Property	yes	yes	yes
12.	Lieber Property	yes	yes	no
13.	Ridgewood Village Property	no	yes	no
14.	Palco Property, Fortuna	no	yes	no
15.	Convention Center	yes	no	yes
16.	Tourism Use	yes	no	yes
17.	Covered Swimming Pool	no	no	yes
18.	Horticultural Gardens	no	no	no
19.	No Retail Option	yes	no	yes
20.	Public Facilities Option	yes	no	yes
21.	Intermodal Bus Terminal	yes	no	yes
22.	Wetland Restoration and Public Park	no	no	no
23.	No Fossil Fuel	yes	yes	yes
24.	College of the Redwoods	yes	no	yes

TABLE VI-3
FEASIBILITY SCREENING

Is the alternative economically, socially, environmentally, legally, and technically feasible? If the alternative is infeasible, explain why		economically	socially	environmentally	legally	technically	**Explanation**
1.	No Project	no	yes	yes	yes	yes	The No Project Alternative would not be economically feasible.
2.	Marina Center Reduced Footprint	yes	yes	yes	yes	yes	The Marina Center Reduced Footprint alternative is feasible.
3.	Limited Industrial Zoning	yes	yes	yes	yes	yes	The Limited Industrial Alternative is feasible.
4.	Coastal Dependent Industrial Zoning	yes	yes	yes	yes	yes	The Coastal Dependent Industrial Alternative is feasible.
5.	Shoreline Property	yes	yes	yes	yes	yes	The Shoreline Property Alternative is feasible.
6.	Ocean View Cemetery	yes	no	yes	no	yes	The City Council previously determined that rezoning the cemetery property would not be in the public interest. The land available for internment is limited and should be reserved for such use. Rezoning would require judicial action. This assumes a willing seller and willing buyer.
7.	Coastal Ag Land Between Harper Motors & Indianola	no	no	no	no	no	The property is predominantly grazed or farmed wetlands; according to Eureka Municipal Code § 156.052(C) grazed or farmed wetlands are considered Environmentally Sensitive Habitat Areas (ESHA). Eureka Municipal Code § 156.052(D) requires that ESHA be protected against any significant disruption of habitat values, and only uses dependent on such resources, including restoration and enhancement projects, shall be allowed within such areas.
8.	Schneider Industrial Land	yes	no	yes	yes	yes	Development of these three properties would require acquisition and merger to accommodate the Marina Center project. All three lots are zoned Coastal Dependent Industrial, and it is unlikely that the loss of these lands for coastal industrial use would be socially acceptable. This assumes a willing seller and willing buyer.
9.	Sierra Pacific Industrial Property	yes	no	yes	yes	yes	
10.	Old Flea Market Property	yes	no	yes	yes	yes	
11.	Schmidbauer Lumber Co. Property	yes	no	yes	yes	yes	The property is home to Schmidbauer Lumber Co., a longtime timber related business. It is presumed that it would not be socially acceptable to close Schmidbauer Lumber in order to develop the Marina Center project at the site. This assumes a willing seller and willing buyer.
12.	Lieber Property	no	no	no	no	no	The property is located outside the Urban Limit Line and is predominantly grazed or farmed wetlands that are ESHA. ESHA is required to be protected against any significant disruption of habitat values. Per Code there shall be no extension of urban services beyond the Urban Limit Line.
13.	Ridgewood Village Property	yes	yes	yes	yes	yes	The off-site Ridgewood Village Property Alternative is feasible. This assumes a willing seller and willing buyer.

TABLE VI-3 (Continued)
FEASIBILITY SCREENING

Is the alternative economically, socially, environmentally, legally, and technically feasible? If the alternative is infeasible, explain why		economically	socially	environmentally	legally	technically	**Explanation**
14.	Palco Property, Fortuna	yes	yes	yes	yes	yes	The off-site Palco Property Alternative is feasible. This assumes a willing seller and willing buyer.
15.	Convention Center	no	yes	yes	yes	yes	The convention center would be a public project. The cost to acquire the land, remediate the site and construct the convention center is economically prohibitive.
16.	Tourism Use	no	yes	yes	yes	yes	The tourism use would be a public project. The cost to acquire the land, remediate the site and construct the tourist use is economically prohibitive.
17.	Covered Swimming Pool	no	yes	yes	yes	yes	The covered swimming pool use would be a public project. The cost to acquire the land, remediate the site and construct the covered swimming pool is economically prohibitive.
18.	Horticultural Gardens	no	yes	yes	yes	yes	The horticultural garden would be a public project. The cost to acquire the land, remediate the site and construct the horticultural garden is economically prohibitive.
19.	No Retail Option	yes	yes	yes	yes	yes	The no retail option is feasible.
20.	Public Facilities Option	no	yes	yes	yes	yes	The civic center would be a public project. The cost to acquire the land, remediate the site and construct the civic center is economically prohibitive.
21.	Intermodal Bus Terminal	no	yes	yes	yes	yes	The intermodal bus terminal would be a public project. The cost to acquire the land, remediate the site and construct the intermodal bus terminal is economically prohibitive.
22.	Wetland Restoration and Public Park	no	yes	yes	yes	yes	The wetland restoration and public park would be a public project. The cost to acquire the land, remediate the site and construct the wetland restoration and public park is economically prohibitive.
23.	No Fossil Fuel	no	yes	yes	yes	no	It is not technically feasible to construct or operate the Marina Center project without the use of fossil fuels. Even if the project could be constructed without the use of fossil fuels, it would be infeasible to operate the Marina Center project without fossil fuels, which would include the use of vehicles.
24.	College of the Redwoods	No	yes	yes	yes	yes	The college campus would be a public project. The cost to acquire, remediate and construct the college campus is economically prohibitive.

Step 5. If Alternative Passes Screening Criteria, Conduct Detailed Evaluation

Table VI-4 shows how the final alternative screening was conducted. As shown in the table, three of the alternatives passed the three-part screening test described above.

TABLE VI-4
FINAL ALTERNATIVE SCREENING

		Does the alternative avoid or substantially lessen at least one significant impact?	Does the alternative meet most of the basic objectives of the project?	Is the alternative feasible?	Does the alternative pass the screening criteria?
1.	No Project	yes	no	yes	no
2.	Marina Center Reduced Footprint	yes	yes	yes	yes
3.	Limited Industrial Zoning	yes	yes	yes	yes
4.	Coastal Dependent Industrial Zoning	no	yes	yes	no
5.	Shoreline Property	yes	yes	yes	yes
6.	Ocean View Cemetery	yes	yes	no	no
7.	Coastal Ag Land Between Harper Motors & Indianola	yes	yes	no	no
8.	Schneider Industrial Land	yes	yes	no	no
9.	Sierra Pacific Industrial Property	yes	yes	no	no
10.	Old Flea Market Property	yes	yes	no	no
11.	Schmidbauer Lumber Co. Property	yes	yes	no	no
12.	Lieber Property	yes	yes	no	no
13.	Ridgewood Village Property	yes	no	yes	no
14.	Palco Property, Fortuna	yes	no	yes	no
15.	Convention Center	yes	yes	no	no
16.	Tourism Use	yes	yes	no	no
17.	Covered Swimming Pool	yes	no	no	no
18.	Horticultural Gardens	yes	no	no	no
19.	No Retail Option	no	yes	yes	no
20.	Public Facilities Option	yes	yes	no	no
21.	Intermodal Bus Terminal	yes	yes	no	no
22.	Wetland Restoration and Public Park	yes	no	no	no
23.	No Fossil Fuel	yes	yes	no	no
24.	College of the Redwoods	yes	yes	no	no

D. Selection of Alternatives

As indicated above, there are three alternatives that pass the three-part screening test. In addition, there is the No Project Alternative which must be examined in an EIR. Therefore, the Lead Agency has evaluated in more detail in this document the following alternatives:

- **No Project**
  Consideration of a No Project Alternative is required under CEQA. Section 15126.6(e) of the CEQA Guidelines states: "The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." Although this alternative would by definition not meet most of the basic objectives of the project and may not be economically feasible for the applicant, it would avoid or substantially reduce many significant impacts of the project and is otherwise feasible.

- **Marina Center Reduced Footprint**
  The Reduced Footprint Alternative would meet most of the basic objectives of the project and is feasible. This Alternative would also generate approximately 40 percent fewer daily trips on area roadways and would likely substantially lessen significant impacts at one or more study area intersections as compared to the proposed project. In addition, the Reduced Footprint Alternative would likely make it possible to retain more wetlands on the property in their current state.

- **Limited Industrial Zoning**
  The Limited Industrial Zoning Alternative would meet all of the basic project objectives and is feasible. The property is located in the Westside Industrial Area and was zoned General Industrial (MG) prior to being zoned Public (P). This Alternative would also generate approximately 33 percent fewer daily trips on area roadways and would therefore likely substantially lessen significant impacts at one or more study area intersections as compared to the project. It may also be capable of avoiding a greater percentage of wetlands on the property.

- **Off-Site Shoreline Property**
  The Shoreline Property was chosen as on off-site alternative because it is under the ownership of the parent company of CUE VI, the project applicant. This Alternative would also meet most of the basic project objectives and is considered feasible. In addition, this Alternative would likely be capable of substantially lessening impacts to wetlands since most of them exist along the site property perimeter and therefore would be easier to avoid and protect.

E. Alternatives Considered but Not Carried Forward for Analysis

CEQA Guidelines Section15126.6(c) requires an EIR to identify and briefly discuss any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the project objectives. Those alternatives that would have impacts identical to or more severe than the proposed project, or that would not meet most of the project objectives, were rejected from further consideration (see Section C., Screening for Alternatives, above).

The following alternatives were initially considered but screened from further analysis as documented in Tables VI-1 through VI-4 above:

- Coastal Dependent Industrial Zoning
- Ocean View Cemetery
- Coastal Agriculture Land Between Harper Motors and Indianola
- Schneider Industrial Land
- Sierra Pacific Industrial Property
- Old Flea Market Property
- Schmidbauer Lumber Co Property
- Lieber Coastal Agricultural Property
- Ridgewood Village Property
- Palco Property, Fortuna
- Convention Center
- Tourism Use
- Covered Swimming Pool
- Horticultural Gardens
- No Retail Option
- Public Facilities Option
- Intermodal Bus Terminal
- Wetland Restoration and Public Park
- No Fossil Fuel
- College of the Redwoods

F. Analysis of Alternatives

No Project Alternative

CEQA Guidelines Section 15126.6 states that “When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the ‘no project’ alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.”

Under the No Project Alternative, if the project does not go forward, the property would remain zoned and planned predominantly for Public uses. A small portion of the project site is zoned Limited Industrial and would remain so.

The following uses are either principally or conditionally permitted in the Public zone: airports; animal shelters; boat harbors and wharves; cemeteries; corporation yards; fire stations; hospitals; libraries; offices; police stations; power stations; pumping stations; public recreation facilities, including parks, playgrounds, zoos, and golf courses; public buildings and grounds; public schools, including nursery, elementary, junior high, and high schools, colleges and universities; reservoirs; sewage treatment plants; storage tanks; uses that are accessory and incidental to a permitted use; oil and gas pipelines; parking facilities located on a site separated from the use that the facilities serve; and storage or processing of materials or equipment accessory to other permitted or conditional uses.

Under the No Project Alternative, only those uses consistent with the Public zoning and general plan designation could be put forward (on those portions of the property zoned Public). Although the property is privately owned, the Public zoning would not preclude the owner from developing a use consistent with the Public zoning, and, for example, leasing the completed development to a governmental agency. The smaller portion of the project site zoned Limited Industrial could be developed with uses consistent with the Limited Industrial zoning. Because the property is located in the coastal zone, any development of the property would be subject to the provisions and regulations of the City's adopted Local Coastal Program.

Notwithstanding, the City has not had any discussions with the property owner regarding, and is not aware of, any other substitute projects that could reasonably be expected to occur in the foreseeable future if the Marina Center project were not approved.

Objectives

The No Project Alternative would not meet the basic objectives of the project (see Table VI-2). Presuming the Regional Water Quality Control Board (RWQCB) issued a revised Clean Up & Abatement Order for the site (see discussion below), the No Project Alternative would result in brownfield remediation, but it would not result in infill development; thus, the alternative would meet only one part of the third basic objective.

Significant Impacts

The RWQCB has stated that, if the Marina Center project were not approved, the RWQCB would likely revise the Clean Up & Abatement Order for the property to require clean-up on a fixed time line.[1]

The California Coastal Act Section 30412 and Water Code Sections 13001 and 13160 establish the State Water Resources Control Board and the California Regional Water Quality Control Boards as the state agencies with primary reasonability for the coordination and control of water quality. The Coastal Act Section 30412 states that the [Coastal] Commission "*shall not…modify, adopt conditions, or take any action in conflict with any determination by the State Water Resources Control Board or any California regional water quality control board in matters*

[1] Ashley, Kasey, RWQCB, personal communication.

relating to address on-site contamination issues but to water quality..." Therefore, the RWQCB could conceivably issue an order to remediate the site that caused reduction or elimination of the on-site wetlands (i.e., removal of contaminated soils in wetland areas and fill with clean dirt).

Presuming under the No Project Alternative that the RWQCB issued a revised Clean Up & Abatement Order and that the site is remediated in accordance with the order, it is probable that the site would be graded to eliminate the remnant drainage ditches and debris piles, and that the on-site wetlands would be substantially reduced or eliminated. However, it is possible that some wetlands would be left to remain in their current state rather than be remediated. Therefore, under the No Project Alternative, there would likely be significant biological impacts due to the loss of on-site wetlands, although perhaps to a less degree than for the project. The loss of wetlands could be mitigated through payment into a mitigation bank or restoration offsite.

Further, under the No Project Alternative, site remediation would probably involve the handling and transport of hazardous materials. It is not assumed that this would result in significant impacts because of the myriad laws and regulations pertaining to the handling and transport of such materials. However, remediation of the site could result in impacts on cultural resources.

Under the No Project Alternative, regardless of whether the RWQCB issued a revised Clean Up & Abatement Order, the significant or potentially significant impacts associated with the construction and long-term operation of the Marina Center project would not occur (see Table VI-1).

If the RWQCB does not issue a revised Clean Up & Abatement Order, the No Project Alternative would likely result in little change to the property or the use of the property as it existed at the time the Notice of Preparation was issued (the baseline). No significant or potentially significant impacts beyond those associated with the baseline conditions would occur.

Marina Center Reduced Footprint Alternative

The Marina Center Reduced Footprint Alternative would provide approximately three quarters of the building space (in square feet) proposed by the Marina Center project. However, the reduction would not be across the board for each use type. The Marina Center Reduced Footprint Alternative would increase office space by about 150 percent and increase industrial space by about 140 percent, but it would reduce restaurant and retail space and eliminate the residential and museum space proposed by the project. Table VI-5 below compares the square footage of the specific land use types proposed by the Marina Center project with those included in the Marina Center Reduced Footprint Alternative. A conceptual site plan for the Marina Center Reduced Footprint Alternative is shown in Figure VI-2.

The Marina Center Reduced Footprint Alternative would extend Second and Fourth Streets through the project site and would include the construction of 1,351 parking spaces. The Marina Center Reduced Footprint Alternative would include the development of a 142,000-square-foot single-occupant retail tenant (consisting of a 114,000-square-foot retail space and a 28,000-square-foot garden sales area).

TABLE VI-5
COMPARISON OF PROPOSED PROJECT AND
MARINA CENTER REDUCED FOOTPRINT ALTERNATIVE

Use	Proposed Marina Center Project (square feet)	Marina Center Reduced Footprint Alternative (square feet)	Percent Change
Industrial	70,000	96,000	137%
Museum	12,500	0	100%
Nursery/Garden	28,000	28,000	0%
Office	104,000	160,000	154%
Residential	72,000	0	100%
Restaurant	14,000	7,000	50%
Retail/Service/Furniture	285,500	154,000	54%
Total	**586,000**	**445,000**	**76%**

Objectives

The Marina Center Reduced Footprint Alternative would meet all of the basic objectives of the project, as follows.

- *Would the alternative strengthen Eureka as the retail and employment center of Humboldt County?*
  The Marina Center Reduced Footprint Alternative would construct 445,000 square feet of new development that would provide new retail space and new jobs to strengthen Eureka as the retail and employment center of Humboldt County.

- *Would the alternative develop an economically viable mixed use project (e.g., retail, office, residential, industrial)?*
  The Marina Center Reduced Footprint Alternative would provide for a mixed-use development without the residential or museum component proposed by the project. Whether the Marina Center Reduced Footprint Alternative would be economically viable is speculative and would depend on whether the applicant or other developer was willing to invest in the development.

- *Would the alternative facilitate brownfield redevelopment and urban in-fill development of property in the redevelopment area in the City of Eureka?*
  The Marina Center Reduced Footprint Alternative would require remediation of the site and would be infill development.

Significant Impacts

Because the Marina Center Reduced Footprint Alternative would provide 76 percent of the building area proposed by the Marina Center project, it would result in some reduced impacts. From a traffic standpoint, this Alternative would result in approximately 40 percent fewer daily trips being generated. This would likely substantially lessen impacts to one or more intersections

SITE DATA

RETAIL/ SERVICE
BUILDING AREA = 154,000 SF
PARKING REQ = 508 SPACES (3.3/1000)
PARKING PROV = 540 SPACES (3.5/1000)

NURSERIES/ GARDEN/ FURNITURE
BUILDING AREA = 28,000 SF
PARKING REQ = 56 SPACES (2/1000)
PARKING PROV = 56 SPACES (2/1000)

OFFICE
BUILDING AREA = 160,000 SF
PARKING REQ = 528 SPACES (3.3/1000)
PARKING PROV = 544 SPACES (3.4/1000)

RESTAURANT
BUILDING AREA = 7,000 SF
PARKING REQ = 35 SPACES (5/1000)
PARKING PROV = 35 SPACES (5/1000)

INDUSTRIAL
BUILDING AREA = 96,000 SF
PARKING REQ = 134 SPACES (1.4/1000)
PARKING PROV = 176 SPACES (1.8/1000)

TOTAL MINIMUM REQUIRED PARKING BY THE CITY = 1,261 SPACES

TOTAL PROVIDED PARKING ON SITE = 1,351 SPACES

RIGHT OF WAY = 1.00 AC
(4TH STREET EXTENSION)

N
NO SCALE

SOURCE: Baysinger Partners Architecture PC

Marina Center Mixed-Use Project EIR . 205513

Figure VI-2
Reduced Footprint Alternative

in the study area as compared with the proposed project. Also, because of the significantly reduced daily traffic trips, noise levels would be decreased relative to the proposed project. In addition, the lesser size footprint could be expected to make it possible to avoid some wetland fill depending on specific site remediation requirements set for them by the Regional Water Quality Control Board. Otherwise this Alternative would not avoid or substantially lessen any of the other significant or potentially significant impacts identified in Chapter IV (see also Table VI-1). Specific conclusions are as follows:

- *Would the alternative reduce air quality impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts on air quality because it would contribute to non-attainment of PM emissions.

- *Would the alternative reduce biological resources impacts?*
  The Marina Center Reduced Footprint Alternative may lessen impacts on biological resources because, like the proposed project, it would involve temporary or permanent impacts on wetlands resources, albeit to a somewhat lesser degree.

- *Would the alternative reduce cultural resources impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts on cultural resources because, like the proposed project, it would occur in an area of a known or suspected cultural site.

- *Would the alternative reduce geology/seismicity impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts related to geology and seismicity because it would involve the construction of structures for human use or occupation.

- W*ould the alternative reduce hazardous materials impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts resulting from hazardous materials because it would involve the handling or disposal of hazardous or contaminated materials or soils.

- *Would the alternative reduce land use impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts on land use because it would not be consistent with the existing zoning and general plan.

- *Would the alternative reduce light or glare impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts from light or glare because it would involve more than only a minimal amount of low-level lighting, such as accent or street lighting.

- *Would the alternative reduce noise impacts?*
  The Marina Center Reduced Footprint Alternative would substantially lessen impacts from noise because traffic generation (a principal source of noise during project operation) would be approximately 40 percent less than under the proposed project.

- *Would the alternative reduce tsunami impacts?*
  The Marina Center Reduced Footprint Alternative would not substantially lessen impacts from tsunami inundation because it would involve development within a potential tsunami run-up zone.

- *Would the alternative reduce transportation/traffic impacts?*
  The Marina Center Reduced Footprint Alternative would substantially lessen impacts on traffic/transportation because it would reduce the traffic volumes about 40 percent. This would in turn reduce impacts at one or more intersections by a substantial degree (i.e., changing the level of service from unacceptable to acceptable).

Feasibility

To determine that the Marina Center Reduced Footprint Alternative is "feasible," the following questions would need to be answered in the affirmative:

- *Can the alternative be accomplished in a successful manner within a reasonable period of time?*
  The Marina Center Reduced Footprint Alternative could be accomplished within the same time frame as the Marina Center project; therefore, it is assumed that the alternative could be accomplished successfully in a reasonable period.

- *Are there economic, environmental, social, technological, and legal factors that would preclude development of the alternative?*
  The same factors that would affect the Marina Center project would also affect the Marina Center Reduced Footprint Alternative. Because the applicant has put forth the Marina Center project despite any potential economic, environmental, social, technological, and legal factors, it is assumed that the Marina Center Reduced Footprint Alternative could also be developed despite these factors.

- *Is the site suitable for the development contemplated under the alternative?*
  The site is the same site as proposed for the Marina Center project. Therefore, there is no difference in site suitability for the Marina Center Reduced Footprint Alternative.

- *Is the alternative economically viable?*
  It is likely that the Marina Center Reduced Footprint Alternative would not result in the same investment potential as the Marina Center project. Whether the Marina Center Reduced Footprint Alternative would be economically viable is speculative. It is presumed that the applicant has determined that the Marina Center project is economically viable, if not, the applicant would not have undergone the permit process. Whether a reduced project could be accomplished with a sufficient economic return on the investment is not known.

- *Is infrastructure available to serve the development?*
  Chapter IV has determined that infrastructure is available and adequate to serve the Marina Center project. The same infrastructure that is available to the Marina Center project would be available for the Marina Center Reduced Footprint Alternative; therefore, infrastructure is assumed to be available for the Marina Center Reduced Footprint Alternative.

- *Is the alternative consistent with the general plan, or other plans or regulations?*
  The Marina Center Reduced Footprint Alternative is not consistent with the general plan. Like the Marina Center project, the Marina Center Reduced Footprint Alternative would require a local coastal program amendment to change the zoning and general plan designations.

- *Is the project site located within the jurisdictional boundaries of the city?*
  The Marina Center Reduced Footprint Alternative would be located within the city limits.

- *Can the applicant attain site control?*
  Since the Marina Center Reduced Footprint Alternative would be located on the project site, the applicant could have control of the site.

Generally, all of the above questions can be answered in the affirmative, with the possible exception of whether the Marina Center Reduced Footprint Alternative is economically viable.

Limited Industrial Zoning Alternative

Under this alternative, a local coastal program amendment would change the zoning and general plan designation for the project site to Limited Industrial. The Limited Industrial zone district permits retail sales establishments with single-occupant floor areas of 40,000 square feet or larger. The Limited Industrial zone also allows offices as well as all other uses described in Eureka Municipal Code Section 156.077 (ML – Limited Industrial Districts). The Limited Industrial zone does not allow residential development, retail sales establishments with single-occupant floor areas of less than 40,000 square feet, or museums.

Prior to about 1984, when the property was zoned Public, the majority of the site was zoned General Industrial. The property is located on the Broadway Corridor adjacent to lands zoned Service Commercial, and it is close to Downtown and Old Town. Because the Limited Industrial zoning would facilitate uses more compatible with the uses along the Broadway Corridor and in Downtown and Old Town, it was chosen as an alternative over the previous General Industrial zoning of the site.

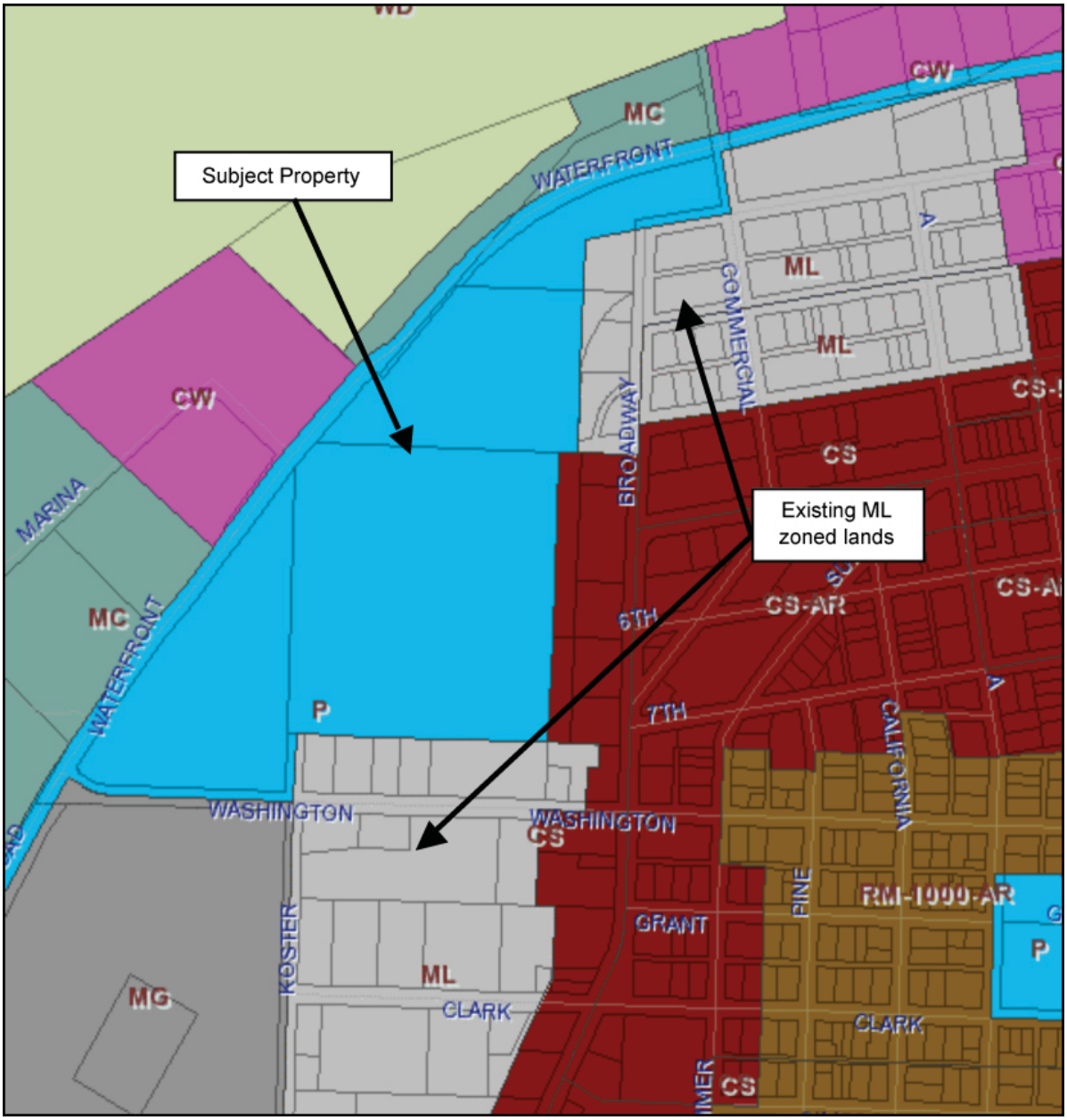
The Limited Industrial Zoning Alternative would create a continuous area of Limited Industrial-zoned lands by connecting the existing Limited Industrial-zoned lands south of the project site to the existing Limited Industrial-zoned lands east of the site. Figure VI-3 shows the existing zoning in the area and the relationship of the project site to the existing Limited Industrial-zoned areas to the south and east.

Figure VI-4 shows a conceptual site plan for the Limited Industrial Zoning Alternative. As shown in the figure, the alternative would provide for the extension of Second and Fourth Streets through the project site, along with development of 407,000 square feet of industrial buildings, 626 parking spaces, and loading docks for the larger industrial buildings.

Objectives

The Limited Industrial Zoning Alternative would meet most of the basic objectives.

- *Would the alternative strengthen Eureka as the retail and employment center of Humboldt County?*
  The Limited Industrial Zoning Alternative would construct 407,000 square feet of new industrial space that would provide new jobs to strengthen Eureka as the employment center of Humboldt County. The Limited Industrial Zoning Alternative would strengthen Eureka as the retail center of Humboldt County only if large scale retail use was included.



N

NO SCALE

SOURCE: City of Eureka

Marina Center Mixed-Use Project EIR . 205513

Figure VI-3

Existing Limited Industrial Zoning

SOURCE: Baysinger Partners Architecture PC

Marina Center Mixed-Use Project EIR . 205513

Figure VI-4
Limited Industrial Zoning Alternative

- *Would the alternative develop an economically viable mixed use project (e.g., retail, office, residential, industrial)?*
  The Limited Industrial Zoning Alternative would not be a mixed use project unless large scale retail and office uses were included.

- *Would the alternative facilitate brownfield redevelopment and urban infill development of property in the redevelopment area in the City of Eureka?*
  The Limited Industrial Zoning Alternative would require remediation of the site and would be infill development.

Significant Impacts

The Limited Industrial Zoning Alternative would avoid or substantially lessen several of the significant or potentially significant impacts that would result from the Marina Center project. Specific conclusions are as follows:

- *Would the alternative reduce air quality impacts?*
  The Limited Industrial Zoning Alternative would not lessen impacts on air quality because it would contribute to non-attainment of PM emissions.

- *Would the alternative reduce biological resources impacts?*
  The Limited Industrial Zoning Alternative may substantially lessen impacts on biological resources because, while it would involve temporary or permanent impacts on wetlands resources, there would be more opportunity to avoid wetland fill.

- *Would the alternative reduce cultural resources impacts?*
  The Limited Industrial Zoning Alternative would not substantially lessen impacts on cultural resources because, like the proposed project, it would occur in an area of a known or suspected cultural site.

- *Would the alternative reduce geology/seismicity impacts?*
  The Limited Industrial Zoning Alternative would not substantially lessen geology and seismicity impacts because it would involve the construction of structures for human use or occupation.

- W*ould the alternative reduce hazardous materials impacts?*
  The Limited Industrial Zoning Alternative would not substantially lessen impacts resulting from hazardous materials because it would involve the handling or disposal of hazardous or contaminated materials or soils.

- *Would the alternative reduce land use impacts?*
  The Limited Industrial Zoning Alternative would not substantially lessen impacts on land use because it would not be consistent with the existing zoning and general plan.

- *Would the alternative reduce light or glare impacts?*
  The Limited Industrial Zoning Alternative would not substantially lessen impacts from light or glare because it would involve more than only a minimal amount of low-level lighting, such as accent or street lighting.

- *Would the alternative reduce noise impacts?*
  The Limited Industrial Zoning Alternative would substantially lessen impacts from noise because traffic generation (the principal source of noise during project operation) would be 33 percent less than for the proposed project. However, some of the benefit would be offset by the greater noise impacts associated with trucks and other larger vehicles likely to be generated under this Alternative.

- *Would the alternative reduce tsunami impacts?*
  The Limited Industrial Zoning Alternative would not substantially lessen impacts from tsunami inundation because it would involve development within a potential tsunami run-up zone.

- *Would the alternative reduce transportation/traffic impacts?*
  The Limited Industrial Zoning Alternative would substantially lessen impacts on traffic/transportation because it would reduce the total traffic volumes by about 33 percent, although a greater proportion of those trips could be by larger vehicles, including delivery vans and semi-trucks, traveling along streets and highways and entering and exiting the property. Those vehicles would require greater turning radii at all intersections to accommodate the size of vehicles regularly entering/exiting the site and could result in accelerated deterioration of local streets. While peak traffic demands for the Limited Industrial Zoning Alternative would coincide with peak traffic on surrounding streets (a.m. and p.m. weekday peak hour), the significantly lower volume of trips generated under this Alternative could be reasonably expected to substantially lessen impacts to one or more study area intersections in terms of level of service as compared to the proposed project (Chapter IV.O, *Transportation*).

Feasibility

To determine that the Limited Industrial Zoning Alternative is "feasible," the following questions would need to be answered in the affirmative:

- *Can the alternative be accomplished in a successful manner within a reasonable period of time?*
  The Limited Industrial Zoning Alternative could be accomplished within the same time frame as the Marina Center project; therefore, it is assumed that it could be accomplished successfully in a reasonable period.

- *Are there economic, environmental, social, technological, and legal factors that would preclude development of the alternative?*
  The same factors that would affect the Marina Center project would also affect the Limited Industrial Zoning Alternative. Because the applicant has put forth the Marina Center project despite any potential economic, environmental, social, technological, and legal factors, it is assumed that the Limited Industrial Zoning Alternative could also be developed despite these factors.

- *Is the site suitable for the development contemplated under the alternative?*
  The site is located within the Westside Industrial area and the property is between Limited Industrial-zoned lands to the south and east. The site is therefore suitable for industrial use.

- *Is the alternative economically viable?*
  The Limited Industrial Zoning Alternative may not result in the same investment potential as the Marina Center project. Whether the Limited Industrial Zoning Alternative would be economically viable is speculative; it is not known whether an industrial project could be accomplished with an economic return on the investment.

- *Is infrastructure available to serve the development?*
  Chapter IV has determined that infrastructure is available and adequate to serve the Marina Center project. The same infrastructure that is available to the Marina Center project would be available for the Limited Industrial Zoning Alternative; therefore, the infrastructure is assumed to be available for the Limited Industrial Zoning Alternative.

- *Is the alternative consistent with the general plan, or other plans or regulations?*
  The Limited Industrial Zoning Alternative is not consistent with the general plan. Like the Marina Center project, the Limited Industrial Zoning Alternative would require a local coastal program amendment to change the zoning and general plan designations.

- *Is the project site located within the jurisdictional boundaries of the city?*
  The Limited Industrial Zoning Alternative would be located within the city limits.

- *Can the applicant attain site control?*
  Since the Limited Industrial Zoning Alternative would be located on the project site, the applicant could have control of the site.

Generally, all of the above questions can be answered in the affirmative, with the exception of whether the Limited Industrial Zoning Alternative is economically viable.

Off-Site Shoreline Property Alternative

The site of the Off-Site Shoreline Property Alternative is owned by CUE IV, LLC, which is managed by the same entity that manages CUE VI, LLC the applicant for the Marina Center project. The Shoreline property is located within the city limits of Eureka and is within the redevelopment area. It is approximately 30 acres in size and is, for the most part, zoned and planned for Commercial Waterfront uses with some Natural Resources zoning. The property is located adjacent to Humboldt Bay in the coastal zone and has about 16.5 acres of wetlands primarily around the outside edges of the property.

Access to the site would come from the north end of “T” Street, “V” Street, “X” Street, and “Y” Street, and from the east end of Waterfront Drive. Although urban-level services are available in the vicinity, they would need to be extended onto the property. The property is predominantly vacant land with some minor structures of some potential historical value. Figure VI-5 shows an aerial location map of the Shoreline property.

The Off-Site Shoreline Property Alternative assumes that the same uses proposed by the project would be developed on the Shoreline property.

SOURCE: CUE, VI, LL

Marina Center Mixed-Use Development Project . 205513

Figure VI-5
Shoreline Property Alternative Location Aerial

Objectives

The Off-Site Shoreline Property Alternative would meet all of the basic objectives of the project as follows:

- *Would the alternative strengthen Eureka as the retail and employment center of Humboldt County?*
  The Off-Site Shoreline Property Alternative would construct a new mixed use development that would provide new retail space and new jobs to strengthen Eureka as the retail and employment center of Humboldt County.

- *Would the alternative develop an economically viable mixed use project (e.g., retail, office, residential, industrial)?*
  The Off-Site Shoreline Property Alternative would develop a mixed-use development, Whether the Off-Site Shoreline Property Alternative would be economically viable is speculative and would depend on whether the applicant, or other developer was willing to invest in the development.

- *Would the alternative facilitate brownfield redevelopment and urban infill development of property in the redevelopment area in the City of Eureka?*
  The Off-Site Shoreline Property Alternative would require some remediation of the project site and would be in-fill development.

Significant Impacts

The Off-Site Shoreline Property Alternative would not avoid or substantially lessen any of the significant or potentially significant impacts that would result from the Marina Center project. Many of the environmental issues associated with the project site – including biological resources, cultural resources, and hazards and hazardous materials impacts – would also arise with development on the Shoreline property. The property is located in the coastal zone and would require a local coastal program amendment to change the zoning and general plan designation for at least part of the property. In general, the same, or practically the same, significant impacts that would result from development of the Marina Center project on the project site would result from development of the same project on the Shoreline property. Specific conclusions are as follows:

- *Would the alternative reduce air quality impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts on air quality because it would contribute to non-attainment of PM emissions.

- *Would the alternative reduce biological resources impacts?*
  The Off-Site Shoreline Property Alternative may substantially lessen impacts on biological resources because, while it would involve temporary or permanent impacts on wetlands resources, those wetlands are more concentrated on the project site periphery and thus more capable of being avoided and protected.

- *Would the alternative reduce cultural resources impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts on

cultural resources because it would occur in an area of a known or suspected cultural site. Although it is not known with certainty if cultural sites exist on the Shoreline Property, the site's proximity to the Humboldt Bay and Eureka Slough would suggest that it has a high potential for containing a cultural resources site (see Section IV.E, *Cultural Resources*).

- *Would the alternative reduce geology/seismicity impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen geology and seismicity impacts because it would involve the construction of structures for human use or occupation.

- W*ould the alternative reduce hazardous materials impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts resulting from hazardous materials because it would involve the handling or disposal of hazardous or contaminated materials or soils given its prior development history.

- *Would the alternative reduce land use impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts on land use because it would not be consistent with the existing zoning and general plan.

- *Would the alternative reduce light or glare impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts from light or glare because it would involve more than only a minimal amount of low-level lighting, such as accent or street lighting.

- *Would the alternative reduce noise impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts from noise because traffic generation (the principal source of noise during project operation) would be assumed to be comparable to that of the proposed project.

- *Would the alternative reduce tsunami impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts from tsunami inundation because it would involve development within a potential tsunami run-up zone.

- *Would the alternative reduce transportation/traffic impacts?*
  The Off-Site Shoreline Property Alternative would not substantially lessen impacts on traffic/transportation because it would not reduce the traffic volumes estimated for the project by 50 percent or more.

Feasibility

To determine that the Off-Site Shoreline Property Alternative is "feasible," the following questions would need to be answered in the affirmative:

- *Can the alternative be accomplished in a successful manner within a reasonable period of time?*
  Because the Off-Site Shoreline Property Alternative would require the same basic entitlements as the Marina Center project and would result in the same environmental impacts, it is assumed that the Off-Site Shoreline Property Alternative could be

accomplished within the same time frame as the Marina Center project. Therefore it is assumed that the alternative could be accomplished successfully in a reasonable period.

- *Are there economic, environmental, social, technological, and legal factors that would preclude development of the alternative?*
  The factors affecting the Off-Site Shoreline Property Alternative would be very similar to those affecting the Marina Center project. Although the significant impacts of this alternative would be similar to those of the Marina Center project, the mitigation would be different because the wetlands are more aggregated and primarily estuarine in nature. The mitigation measures that would be recommended for the Off-Site Shoreline Property Alternative have not been developed, and therefore it is not known whether there would be economic, environmental, social, technological, and legal factors that would preclude implementation of the mitigation and thus development of Off-Site Shoreline Property Alternative.

- *Is the site suitable for the development contemplated under the alternative?*
  The site has many of the same constraints as the project site. The primary constraints to development of the Shoreline property would be the presence of biological resources on the site and mitigation of traffic impacts. It is probable that the site is suitable for mixed-use development, although the site-specific issues have not been identified and mitigation measures to reduce potential impacts have not been developed.

- *Is the alternative economically viable?*
  It is not known if the Off-Site Shoreline Property Alternative is economically viable.

- *Is infrastructure available to serve the development?*
  The Shoreline property is immediately proximate to developed properties, and it is reasonable to assume that services and utilities could be readily extended to the site.

- *Is the alternative consistent with the general plan, or other plans or regulations?*
  The Off-Site Shoreline Property Alternative is not fully consistent with the general plan. Like the Marina Center project, the Off-Site Shoreline Property Alternative would require a local coastal program amendment to change the zoning and general plan designations for at least part of the property.

- *Is the project site located within the jurisdictional boundaries of the city?*
  The Off-Site Shoreline Property Alternative would be located within the city limits.

- *Can the applicant attain site control?*
  The property owner of the majority of the Off-Site Shoreline Property is CUE IV,LLC which is managed by the entity that manages CUE VI,LLC the project applicant. The remainder of the of the land that would make up the Off-Site Shoreline Property is owned by the City of Eureka Redevelopment agency that has expressed interest in negotiating a possible sale of it adjacent property to CUE IV, LLC.

Although many of the above questions cannot be answered fully in the absence of site-specific information, the questions generally can be answered in the affirmative. Therefore, it would appear that the Off-Site Shoreline Property Alternative is feasible.

G. Environmentally Superior Alternative

Identification of an environmentally superior alternative is required under CEQA. The purpose of identifying such an alternative is to examine ways to eliminate or substantially reduce significant adverse impacts of the proposed project.

The environmentally superior alternative is the No Project Alternative. When the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]). The environmentally superior alternative among the other alternatives is the Marina Center Reduced Footprint Alternative. Because this alternative would provide 76 percent of the building area proposed by the Marina Center project, it would result in some reduced impacts, although it would not avoid or substantially lessen all of the significant or potentially significant impacts of the project. The other two alternatives would not be the environmentally superior alternative because (1) the Limited Industrial Zoning Alternative, while reducing by about 33 percent the total number of traffic trips generated as compared to the proposed project, would likely result in some increased traffic impacts due to the larger size vehicles associated with that type of development, and (2) the Off-Site Shoreline Property Alternative would generally result in impacts similar to those of the proposed project.