



CITY OF HUNTINGTON BEACH

To: Honorable Mayor and City Council

CC: Travis Hopkins, City Manager
Lisa Lane Barnes, City Clerk

From: Jennifer Villaseñor, Director of Community Development

Date: September 2, 2025

Subject: **Item No. 15 September 2, 2025 City Council Agenda – Environmental Impact Report No. 25-003 (Pacific Airshow)**

For your review and consideration, staff has attached three documents as Late Communications to Item No. 15 on the September 2, 2025 agenda.

Revised Resolution No. 2025-54 (Attachment No. 1 to the RCA)

Resolution No. 2025-54 certifying EIR No. 25-003 has been updated to incorporate today's City Council meeting date. Additional minor clarifying edits were made to Sections 7 and 8 of the resolution. No other changes to the resolution were made.

Revised CEQA Findings of Fact and Statement of Overriding Considerations (Attachment No. 2 to the RCA)

The final paragraph on the last page (page 32) of the CEQA Findings of Fact and Statement of Overriding Considerations has been revised to add the following additional finding statement: "Additionally, the City of Huntington Beach finds that each of the listed Project benefits described above provides a separate and independent ground for its decision to adopt this Statement of Overriding Considerations and approve the Project." No other changes to the document were made.

Response to California State Lands Commission 8/22/25 Letter

Finally, the City received a letter from the State Lands Commission on August 22, 2025, regarding the Final EIR. A response to this letter is attached.

RESOLUTION NO. 2025-54

A RESOLUTION OF THE CITY COUNCIL OF THE
CITY OF HUNTINGTON BEACH CERTIFYING THE
ENVIRONMENTAL IMPACT REPORT (SCH#2024020006)
FOR THE PACIFIC AIRSHOW HUNTINGTON BEACH PROJECT

WHEREAS, Environmental Impact Report No. 25-003, State Clearinghouse #2024020006 ("EIR") was prepared by the City of Huntington Beach ("City") to address the environmental implications of the proposed Pacific Airshow Huntington Beach Project (the "Project"); and

- On February 1, 2024 a Notice of Preparation for the Project was distributed to the State Clearinghouse, other responsible agencies, trustee agencies and interested parties; and
- After obtaining comments received in response to the Notice of Preparation, the City completed preparation of the Draft EIR and filed a Notice of Completion with the State Clearinghouse on February 20, 2025; and
- The Draft EIR was circulated for public review and comment from February 20, 2025 to April 7, 2025 and was available for review at several locations including Community Development Department, Central Library, and the City's website; and
- On September 2, 2025 the City Council held a public meeting on the EIR and certified the EIR as adequate and complete; and

WHEREAS, public comments have been received on the Draft EIR, and responses to those comments have been prepared and provided to the City Council; and

WHEREAS, Public Resources Code 21092.5(a) requires that the City of Huntington Beach provide a written response to any public agency that commented on the Environmental Impact Report, and the Response to Comments included in the Final Environmental Impact Report satisfies this provision; and

WHEREAS, the City Council held a public meeting on the EIR on September 2, 2025 and received and considered public testimony.

NOW, THEREFORE, the City Council of the City of Huntington Beach does hereby resolve as follows:

SECTION 1. Consistent with CEQA Guidelines Section 15132, the Final EIR for the Project is comprised of the Draft EIR and Appendices, the comments received on the Draft EIR, the Responses to Comments (including a list of persons, organizations, and public agencies commenting on the Draft EIR), the Text Changes to the Draft EIR (bound together with the Responses to Comments) and all Community Development Department Staff Reports to the City Council, including all minutes, transcripts, attachments and references. All of the above

information has been and will be on file with the City of Huntington Beach Department of Community Development, 2000 Main Street, Huntington Beach, California 92648.

SECTION 2. The City Council finds and certifies that the Final EIR is complete and adequate in that it has identified all significant environmental effects of the Project and that there are no known potential environmental impacts not addressed in the Final EIR.

SECTION 3. The City Council finds that although the Final EIR identifies certain significant environmental effects that will result if the Project is approved, all significant effects which can feasibly be mitigated or avoided have been mitigated or avoided by the imposition of mitigation measures on the Project. All mitigation measures are included in the "Mitigation Monitoring Reporting Program" attached as Exhibit A to this Resolution and incorporated herein by this reference.

SECTION 4. The City Council finds that the Final EIR has described reasonable alternatives to the Project that could feasibly obtain the basic objectives of the Project. Further, the City Council finds that a good faith effort was made to incorporate alternatives in the preparation of the Draft EIR and in the review process of the Final EIR and ultimate decisions on the Project.

SECTION 5. The City Council finds that no "substantial evidence" (as that term is defined pursuant to CEQA Guidelines Section 15384) has been presented that would call into question the facts and conclusions in the EIR.

SECTION 6. The City Council finds that no "significant new information" (as that term is defined pursuant to CEQA Guidelines Section 15088.5) has been added to the Final EIR after circulation of the Draft EIR. The City Council finds that the minor refinements that have been made to the Project as a result of clarifications in the mitigation measures and EIR text do not amount to significant new information concerning the Project, nor has any significant new information concerning the Project become known to the City Council through the public hearings held on the Project, or through the comments on the Draft EIR and Responses to Comments.

SECTION 7. The City Council finds that the Mitigation Monitoring Reporting Program establishes a mechanism and procedures for implementing and verifying the mitigations pursuant to Public Resources Code 2108.6 and hereby adopts the Mitigation Monitoring Reporting Program. The mitigation measures shall be incorporated into the Project prior to or concurrent with Project implementation as defined in each mitigation measure. Compliance with the Mitigation Monitoring and Reporting Program shall be required as a condition of issuance of a specific event permit.

SECTION 8. The City Council finds that the Final EIR reflects the independent analysis and judgment of the City of Huntington Beach City Council, that the Final EIR was presented to the City Council, and that the City Council reviewed and considered the information contained in the Final EIR.

SECTION 9. The City Council finds that the Final EIR serves as adequate and appropriate environmental documentation for the Project. The City Council certifies that the Final EIR

prepared for the Project is complete, and that it has been prepared in compliance with the requirements of the California Environmental Quality Act and CEQA Guidelines.

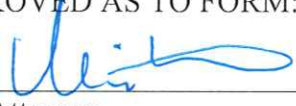
PASSED AND ADOPTED by the City Council of the City of Huntington Beach at a regular meeting thereof held on _____, 2025.

Mayor

ATTEST:

APPROVED AS TO FORM:

City Clerk

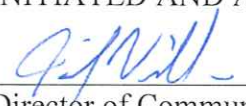


City Attorney

REVIEWED AND APPROVED:

INITIATED AND APPROVED:

City Manager



Director of Community Development

Exhibit A: Mitigation Monitoring Reporting Program

Mitigation Monitoring and Reporting Program

CEQA Requirements

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the Pacific Airshow (Airshow or Project) EIR (State Clearinghouse No. 2024020006). Mitigation measures are presented in the same order as they occur in the Draft EIR. Further, to ensure enforceability of the biological monitoring efforts, a Project Description feature voluntarily is included in the MMRP that requires biological monitoring before and during the Airshow. Because there are no significant impacts associated with the temporary Airshow activities on biological species, biological monitoring is not required as a mitigation measure.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, the City, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each task. Because the proposed project does not include a construction phase, the general schedule is summarized as either “prior to operation” and/or “during operation”.

MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PACIFIC AIRSHOW HUNTINGTON BEACH PROJECT

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Hazards and Hazardous Materials			
HAZ-1: A qualified avian biologist will conduct one Wildlife Hazard Site Visit (WHSV) prior to the start of the annual Airshow (beginning in 2024) following the protocol developed by the FAA in the <i>Protocol for the Conduct and Review of Wildlife Hazard Site Visits, Wildlife Hazard Assessments, and Wildlife Hazard Management Plans</i> (Federal Aviation Administration, Advisory Circular 150/5200-38, August 2018) to evaluate potential risk of wildlife strikes at airports, specifically for the proposed temporary aircraft landing pad on the beach during all future Airshow events. The WHSV shall include field observations conducted over one day at dawn, noon, and dusk from a variety of pre-determined locations to ensure complete visual coverage of the location of the temporary runway and immediate surroundings. All signs of birds, mammals, habitat attractants, and wildlife/habitat relationship observations shall be recorded. A wildlife hazard site visit memorandum shall be prepared and include a list of wildlife species or signs observed during the surveys, federal and state status of the species observed, habitat features that may encourage wildlife, natural and artificial wildlife attractants, strike data analysis, and recommendations to reduce wildlife hazards. Recommendations may include developing a long-term management strategy that includes wildlife hazard management and/or reduction in flights under 500 feet above ground level.	- Conduct one WHSV prior to the start of the annual Airshow prior to the start of the annual Airshow. - Conduct field observations over one day at dawn, noon, and dusk from a variety of pre-determined locations to ensure complete visual coverage of the location of the temporary runway and immediate surroundings prior to the start of the annual Airshow. - Record all signs of birds, mammals, habitat attractants, and wildlife/habitat relationship observations prior to the start of the annual Airshow. - Prepare a wildlife hazard site visit memorandum following the annual Airshow	Applicant	Prior to the start of the annual Airshow
HAZ-2: A qualified biological monitor will be on-site during event performances for the duration of the event (3-5 days) to document bird activity during aircraft flyovers and take-off and landing within the Show Center Area. Biological monitoring will also inform recommendations to reduce wildlife hazards. Based on monitoring observations, recommendations may include the following standard best management practices such as properly disposing of trash to avoid attracting wildlife to the Show Center Area and/or employing means of harassment (e.g., lasers) to disperse birds.	Monitor and document bird activity during aircraft flyovers and take-off and landing within the Show Center Area during the annual Airshow.	Applicant	During the annual Airshow
Noise			
NOI-1: The applicant shall implement the following measures for the duration of the event: - The nearest speaker shall be placed at least 475 feet away from any nearby sensitive receptor and any subsequent speakers shall be separated from other speakers by 25 feet parallel to Pacific Coast Highway. Speakers shall also be positioned in a manner that would not point directly towards any nearby sensitive receptor and, instead, face the beach/ocean. - A temporary noise barrier of at least 10 feet in height and constructed of plywood or using a sound blanket shall be installed on public property nearest to the sensitive receptors to the west of the proposed music festival area (Huntington Pacific Beach House Condo complex at 701 Pacific Coast Highway). The temporary noise barriers shall block the line-of-sight between	- Placement of the nearest speaker shall be placed at least 475 feet away from any nearby sensitive receptor and any subsequent speakers shall be separated from other speakers by 25 feet parallel to Pacific Coast Highway. Speakers shall also be positioned in a manner that would not point directly towards any nearby sensitive receptor and, instead, face the beach/ocean. - Placement of a temporary noise barrier shall be installed on public property nearest to the sensitive receptors to the west of the proposed music festival area (Huntington Pacific Beach House Condo complex at 701 Pacific Coast Highway).	Applicant	During the annual Airshow

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
the music festival attendees and similarly elevated ground-level noise-sensitive receptors.			
Project Design Feature			
Project Design Feature 1: The following will occur to ensure that potential impacts to nesting birds remain less than significant: - Pre-airshow activities would occur at least one week beyond the end of the identified nesting season for the California least tern and the western snowy plover and well beyond the end of the identified nesting season for the light-footed Ridgway's rail and general avian species. - Monitoring efforts will be conducted before and during the Airshow to survey for nests and provide measures to avoid potential impacts. - Daily briefings have and will continue to occur, although the outcome of those briefings cannot be guaranteed.	- Pre-airshow activities would occur at least one week beyond the end of the identified nesting season for the California least tern and the western snowy plover and well beyond the end of the identified nesting season for the light-footed Ridgway's rail and general avian species. - Monitoring efforts to be conducted prior and during the annual Airshow to survey for nests and provide measures to avoid potential impacts. - Daily briefings to occur prior to the start of the annual Airshow.	Applicant	Prior to the start of the annual Airshow and during the annual Airshow

California Environmental Quality Act Findings of Fact and Statement of Overriding Considerations for the Pacific Airshow Huntington Beach Project Final Environmental Impact Report

1.0 Introduction

Pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, Section 21081), the potential environmental effects of the proposed Pacific Airshow (Airshow or Project) have been analyzed in a Draft Environmental Impact Report (Draft EIR or EIR) (State Clearinghouse [SCH] No. 2024020006) prepared by the City of Huntington Beach (City) and published on February 20, 2025. In accordance with Section 15121 of the State CEQA Guidelines, the Draft EIR identifies the significant environmental effects associated with the Project and ways to minimize the significant environmental effects through mitigation measures or reasonable alternatives to the Project. A Final EIR has also been prepared by the City that consists of a list of persons, organizations, and public agencies commenting on the Draft EIR; comments received on the Draft EIR; responses to those comments; and corrections and additions made to the Draft EIR either in response to a comment or as initiated by City staff.

1.1 Statutory Requirements for Findings

CEQA and the State CEQA Guidelines (Guidelines, California Code of Regulations, Title 14, Section 15091) states that no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant effects of the project on the environment unless the public agency makes one or more written findings for each significant effect, accompanied by a brief explanation of the rationale of each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The City of Huntington Beach as the lead agency pursuant to CEQA for the Project has made specific written findings regarding each significant impact¹ associated with the Project, which is discussed, along with a presentation of facts in support of the findings, in Section 4, *Findings Required Under CEQA*. Section 5, *Evaluation of Alternatives*, provides written findings and facts in support of the findings for each of the alternatives addressed in Chapter 4, *Alternatives*, of the

¹ While not required by CEQA, the Findings (in Section 4.0) also address Findings of No Impact or Less Than Significant Impacts Prior to Mitigation.

Draft EIR. Section 6, *Findings Regarding the Final EIR*, presents findings on disposition of the comments received on the Draft EIR.

Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, of the Draft EIR describes the potential environmental impacts of the Project and recommends mitigation measures to reduce impacts, where feasible. As discussed in the Draft EIR, implementation of the Project would result in significant impacts related to air quality, hazards and hazardous materials, and noise even with implementation of feasible mitigation measures. For these environmental issues, impacts are considered significant and unavoidable. In accordance with Section 15093(b) of the State CEQA Guidelines, the City has prepared a Statement of Overriding Considerations that states the specific benefits of the Project that outweigh the unavoidable, adverse environmental impacts. Concurrent with the adoption of the Findings and Statement of Overriding Considerations, the City will also adopt the Mitigation Monitoring and Reporting Program (MMRP).

This document is organized as follows:

Section 1.0, Introduction, provides a brief overview of the Findings and Statement of Overriding Considerations.

Section 2.0, Procedural Compliance with CEQA, describes the EIR preparation process and the procedural steps that have been followed to comply with CEQA, including public meetings, public comment periods, noticing of the Draft and Final EIRs, and the location where these documents were available for review.

Section 3.0, Description of the Project, provides the Project location, the Project Purpose and Objectives, and a summary description of the Project. A complete description of the Project and requested approvals can be found in Chapter 2, *Project Description*, of the Draft EIR.

Section 4.0, Findings Regarding Environmental Impacts, provides the necessary findings to be made for Project-related impacts, including Findings of No Impact or Less Than Significant Impact in the Initial Study/ Notice of Preparation (Subsection 4.1), Findings of No Impact or Less Than Significant Impact in the Draft EIR (Subsection 4.2), Findings Regarding Impacts Determined to Be Mitigated to Less Than Significant Levels (Subsection 4.3), and Findings Regarding Impacts Determined to Be Significant and Unavoidable (Subsection 4.4).

Section 5.0, Findings Regarding Cumulative Impacts, provides the necessary findings to be made for cumulative impacts related to the Project.

Section 6.0, Findings Regarding Alternatives, provides the necessary findings to be made for the different Project alternatives, including a comparison with the Project and reasons for rejecting the alternatives.

Section 7.0, Findings Regarding the Final EIR, provides a determination regarding the Final EIR.

Section 8.0, Statement of Overriding Considerations, sets forth the City's specific economic, legal, social, technological, and other considerations that support approval of the Project notwithstanding the significant unavoidable impacts that could occur.

2.0 Procedural Compliance with CEQA

2.1 Public Participation Process

Notice of Preparation and Scoping

On February 1, 2024, in accordance with Sections 15082 of the State CEQA Guidelines, the City published a Notice of Preparation (NOP) of the Draft EIR, and circulated it to the State Clearinghouse, resources agencies, and interested parties. The NOP requested comments on the scope of the Draft EIR. The comment period extended from February 1, 2024, through March 4, 2024, for a period of 33 days. The NOP provided a description of the Project location, existing site conditions and surrounding land uses, land use and zoning designations, Project background, Project characteristics, historic and continued airshow activities and events, new airshow activities anticipated for 2024 through 2034, the airshow performer schedule, airshow performers, airport origin, airshow flight paths, and airshow performance duration, the show center area layout and event viewing, access, ingress/egress, road closures, and parking, airshow set up and site breakdown, event security and evacuation, utilities, and review and approvals.

On February 21, 2024, the City held an in-person public scoping meeting to obtain public comments and suggestions from interested parties on the scope of the Draft EIR. On February 22, 2024, the City held a virtual scoping meeting for public agencies. The in-person public scoping meeting was held at the Huntington Beach City Hall, Lower Level Rooms B-7 and B-8, 2000 Main Street, Huntington Beach, CA 92648. The virtual scoping meeting for agencies was held via Zoom. At the scoping meetings, a brief presentation and overview of the Project was provided. After the presentation, oral and written comments on the scope of the environmental issues to be addressed in the Draft EIR were accepted.

Notice of Availability of the Draft EIR

The Notice of Availability (NOA) of the Draft EIR was posted on the Project Site and with the County Clerk in Orange County on February 20, 2025. Copies of the Draft EIR were made available to the public at the following locations:

- City of Huntington Beach, Planning Division, 2000 Main Street, Huntington Beach, CA 92648.
- City of Huntington Beach Central Library, 7111 Talbert Avenue, Huntington Beach, CA 92648.
- City of Huntington Beach Website:
 - https://www.huntingtonbeachca.gov/departments/community_development/major_projects.php
 - https://www.huntingtonbeachca.gov/departments/community_development/environmental_reports.php

The Draft EIR was circulated for a 47-day public review from February 20, 2025, through April 7, 2025, as required by Section 21091 of the Public Resources Code.

Public Review of the Draft EIR

The City conducted required noticing and scoping for the Project in accordance with Sections 15083, 15086, and 15087 of the State CEQA Guidelines and Section 21083.9 of the California Public Resources Code, and conducted the public review for the Draft EIR in compliance with Section 15087 of the State CEQA Guidelines.

The City received 16 comment letters on the Draft EIR from agencies, organizations, and individuals through written correspondence and emails. The City has reviewed all comments and has determined that no new significant environmental effects or a substantial increase in the severity of previously identified significant effects have been identified, and all issues raised in the comments have been adequately addressed in the Draft EIR and/or in the responses to those comments and additions or corrections made to the Draft EIR either in response to a comment or as initiated by City staff.

2.2 Final EIR Certification and Approval

The Huntington Beach City Council has received, reviewed, and considered the information contained in the Final EIR, in addition to public testimony received on the Project during the scoping meeting, as well as the recommendations of City staff. The Huntington Beach City Council hereby makes findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Section 15091 and, in compliance with State CEQA Guidelines Section 15090, hereby certifies that:

1. The Final EIR has been completed in compliance with CEQA;
2. The Final EIR was presented to the Huntington Beach City Council as the decision-making body of the City and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Project; and
3. The Final EIR reflects the City's independent judgment and analysis.

2.3 Record of Proceedings and Custody of Documents

Pursuant to Public Resources Code Section 21081.6 and California Code of Regulations, Title 14, Section 15091, The City of Huntington Beach is the custodian of documents and other material that constitute the record of proceedings upon which the City's decision is based, and such documents and other material are located at the City of Huntington Beach Planning Division office 2000 Main Street, Huntington Beach, CA 92648.

3.0 Description of the Project

This section provides the Project location, the Project Purpose and Objectives, and a summary description of the Project. A complete description of the Project and requested approvals can be found in Chapter 2, *Project Description*, of the Draft EIR.

3.1 Project Location

Regionally, the Airshow is located in the City of Huntington Beach, which is in coastal Orange County in Southern California. The Show Center Area is the location where primary on-the-ground events and activities of the Airshow take place. Locally, the approximate boundaries of the Show Center Area from northwest to southeast are 7th Street and Pacific Coast Highway (State Route 1 or SR-1) to Beach Boulevard (State Route 39 or SR-39) and Pacific Coast Highway to the Pacific Ocean, including a portion of the Huntington Beach Pier landward of the State Lands Commission mean high tide line. The Airshow Performance Area, the primary area for civilian and military aircraft flybys and aerial acrobatics, is located adjacent to the Show Center Area over the Pacific Ocean with an east-west length of approximately 3,000 feet from the shoreline and a north-south length of approximately 12,000 feet. A majority of the civilian and military aircraft flybys and aerial acrobatics occur within approximately 500 and 1,500 feet from the shoreline. The Show Center Area and Airshow Performance Area collectively comprise of the Project Site. The Show Center Area consists of the beach, the Huntington Beach Pier, parking lots, commercial/restaurant uses, bicycle and walking trails along Pacific Coast Highway.

3.2 Project Purpose and Objectives

A statement of Project objectives and a description of the underlying purpose of the Project is required by CEQA Guidelines Section 15124. The Project objectives and underlying Project purpose are established to guide the lead agency in developing a reasonable range of alternatives to evaluate in the Draft EIR and aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.

The underlying purpose of the Project is to provide a spectacle-scale airshow in Huntington Beach that attracts attendees throughout the Southern California area and perhaps beyond.

The Project objectives include:

- Continue to provide a family-oriented, safe, educational, fun, and entertaining Airshow experience with an emphasis on outdoor lifestyle and popular culture elements.
- Continue to provide a gathering place where locals and visitors can come together to enjoy civilian and military aircraft flybys and aerial acrobatics, illustrations, displays, food, and music.
- Provide an event that promotes careers and opportunities in the Defense Forces and in aviation.
- Provide an event that promotes coastal access.
- Continue to promote awareness and use of the Huntington Beach Pier and beaches.
- Continue to promote awareness of the Huntington Beach hotels, restaurants, stores, and businesses across the City.
- Continue to promote Huntington Beach and Southern California as a welcoming global tourism destination.
- Create a net positive direct economic impact on the City and surrounding communities as a result of spending by incremental visiting attendees, the event organizer, and event sponsors.
- Increase in tax revenues (i.e., sales tax, transit occupancy tax, and property tax) to the City.

- Continue to provide temporary and full-time jobs associated with the Airshow.
- Provide an event that reduces potential impacts to the surrounding sensitive habitat including the Bolsa Chica Ecological Reserve, the Huntington Beach Wetlands, the Magnolia Marsh, and special-status wildlife species such as the federally endangered California least tern and western snowy plover.

3.3 Project Description

As permitted by the City's Specific Event Permit Process, the Airshow has been held annually in the City (Friday through Sunday), during the fall season. Future Airshows are anticipated to be held annually for three (3) days to up to five (5) days, generally Friday through Sunday or up to Wednesday through Sunday, with aircraft flight familiarization and flight practice flyovers beginning as early as Monday of the week of the Airshow.

The Airshow does not propose construction of new permanent development; instead, the Project consists of temporary event structures, all of which would be removed immediately following the conclusion of the Airshow. The Project would provide a spectacle-scale airshow in Huntington Beach that attracts attendees throughout the Southern California area (and perhaps beyond) and features civilian and military aircraft flybys and aerial acrobatics, air racing, helicopter and aircraft landing/runway displays comprised of temporary acrylonitrile butadiene styrene (ABS) foundation (stadium flooring) or wood or aluminum flooring, electric vehicle (EV) and drone displays with hangars and aerial competitions and drone shows, displays of other emerging aviation/mobility technology, and visitor-serving entertainment, services, and amenities (e.g., variety of viewing areas, vehicle and aircraft demonstrations and displays, illustrations, flight simulations, merchandise tents, concessions, food trucks, live music entertainment, wave pool surf competitions, skateboard and bicycle motocross (BMX) bowl competitions, sandcastle building competitions, art installations, and pyrotechnic shows). The Project would include an event program for the continuation of the Airshow for up to ten (10) additional years beginning from year 2024 through 2034 as permitted by the City's Specific Event Permit Process.

4.0 Findings Regarding Environmental Impacts

4.1 Findings of No Impact or Less Than Significant Impact in the Initial Study/ Notice of Preparation

The City of Huntington Beach circulated an Initial Study/Notice of Preparation in February 2024 to determine the potentially significant effects of the Project. In the course of this evaluation, it was determined the Project would result in no impact or less than significant impacts (without mitigation) related to several environmental issue areas. In many cases, the determinations of no impact or less than significant impacts were based on the fact the Airshow proposes no new permanent development. Instead, the Project consists of temporary event structures, all of which would be removed immediately following the conclusion of the Airshow. Following each future Airshow, the Project Site would be restored to pre-Project conditions.

The Initial Study for the Project is included as Appendix B of the Draft EIR and discusses why the Project would have no impact or less than significant impacts related to the specific

environmental issue areas that were not discussed in detail in the Draft EIR. The issue areas determined to have no impact or a less than significant impact in the Initial Study analysis are summarized below and require no specific Findings of Fact.

Aesthetics

Have a substantial adverse effect on a scenic vista (less than significant impact).

Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (less than significant impact).

In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality (no impact).

Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area (less than significant impact).

Agriculture and Forestry Resources

Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use (no impact).

Conflict with existing zoning for agricultural use, or a Williamson Act contract (no impact).

Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) (no impact).

Result in the loss of forest land or conversion of forest land to non-forest use (no impact).

Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use (no impact).

Air Quality

Conflict with or obstruct implementation of the applicable air quality plan (less than significant impact).

Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (less than significant impact [construction]; potentially significant impact [operations]).

Expose sensitive receptors to substantial pollutant concentrations (less than significant impact).

Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (less than significant impact).

Biological Resources

Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (no impact).

Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (no impact).

Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (no impact).

Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (no impact).

Cultural Resources

Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 (no impact).

Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (no impact).

Disturb any human remains, including those interred outside of dedicated cemeteries (no impact).

Energy

Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (less than significant impact).

Conflict with or obstruct a state or local plan for renewable energy or energy efficiency (less than significant impact).

Geology and Soils

Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (less than significant impact).*
- ii) Strong seismic ground shaking (less than significant impact).*

- iii) *Seismic-related ground failure, including liquefaction (less than significant impact).*
- iv) *Landslides (no impact).*

Result in substantial soil erosion or the loss of topsoil (no impact).

Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse (no impact).

Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (no impact).

Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water (no impact).

Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (no impact).

Greenhouse Gas Emissions

Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (less than significant impact).

Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (less than significant impact).

Hazards and Hazardous Materials

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (less than significant impact).

Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (less than significant impact).

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (no impact).

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment (no impact).

Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires (no impact).

Hydrology and Water Quality

Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (no impact).

Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (no impact).

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i) Result in substantial erosion or siltation on- or off-site (no impact).*
- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite (no impact).*
- iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (no impact).*
- iv) Impede or redirect flood flows (less than significant impact).*

In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation (less than significant impact).

Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (less than significant impact).

Land Use and Planning

Physically divide an established community (no impact).

Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (no impact).

Mineral Resources

Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state (no impact).

Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (no impact).

Noise

For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels (no impact).

Population and Housing

Induce substantial unplanned population growth in an area either directly or indirectly (no impact).

Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (no impact).

Public Services

Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- i) Fire protection (less than significant impact).*
- ii) Police protection (less than significant impact).*
- iii) Schools (no impact).*
- iv) Parks (no impact).*
- v) Other public facilities (no impact).*

Recreation

Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (less than significant impact).

Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (less than significant impact).

Transportation

Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (no impact).

Substantially increase hazards due to a geometric design feature or incompatible uses (no impact).

Utilities and Service Systems

Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (less than significant impact).

Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (less than significant impact).

Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (less than significant impact).

Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (less than significant impact).

Comply with federal, state, and local management and reduction statutes and regulations related to solid waste (less than significant impact).

Wildfire

Substantially impair an adopted emergency response plan or emergency evacuation plan (no impact).

Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (no impact).

Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (no impact).

Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (no impact).

4.2 Findings of No Impact or Less Than Significant Impact in the Draft EIR

The City of Huntington Beach, having reviewed and considered the information contained in the Final EIR, the Technical Appendices, and the administrative record, finds that the Project would have no impact or a less than significant impact for the following issue areas, which require no specific Findings of Fact: Biological Resources, Transportation, Tribal Cultural Resources.

Biological Resources

Impact 3.2-1: The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (less than significant impact). Refer to Draft EIR pages 3.2-39 through 3.2-41.

Impact 3.2-2: The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (less than significant impact). Refer to Draft EIR pages 3.2-42 through 3.2-45.

Transportation

Impact 3.5 1: The project would have a less than significant impact as it relates to VMT (less than significant impact). Refer to Draft EIR pages 3.5-12 through 3.5-13.

Impact 3.5-2: The project would not result in inadequate emergency access (less than significant impact). Refer to Draft EIR page 3.5-13.

Tribal Cultural Resources

Impact 3.6-1 1: The project would not result in a significant tribal cultural resources impact because it would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or*
- ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (no impact). Refer to Draft EIR pages 3.6-6 through 3.6-7.*

4.3 Findings Regarding Impacts Determined to Be Mitigated to Less Than Significant Levels

The City of Huntington Beach, having reviewed and considered the information contained in the Final EIR, the Technical Appendices, and the administrative record, finds, pursuant to California Public Resources Code 21081 (a)(1) and CEQA Guidelines 15091 (a)(1) that changes or alterations have been required in, or incorporated into, the Project, which would avoid or substantially lessen to below a level of significance the following potentially significant environmental effects identified in the Final EIR in the following category: Hazards and Hazardous Materials. The potentially significant adverse environmental impact that can be mitigated is summarized below. The City of Huntington Beach finds that this potentially significant adverse impact can be mitigated to a level that is considered less than significant after implementation of mitigation measures identified in the Final EIR.

Hazards and Hazardous Materials

Impact 3.3-1: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not result in a safety hazard or excessive noise for people residing or working in the project area (less than significant impact with mitigation). Refer to Draft EIR pages 3.3-11 through 3.3-12.

Most bird strike incidents occur during March through April and August through November when seasonal migration typically occurs. While birds are more likely to be struck during the day due to increased civilian aircraft flights during the day, seasonal migration is generally nocturnal. Airshow flights have historically occurred mid-day (between 10:00 AM and 5:00 PM.) which is when the majority of flights would occur. Therefore, because a majority of flights related to the Airshow are not planned to occur at night, the potential for impacts to aircraft from collisions with migratory birds are expected to be less than significant.

Although the Show Center Area is located over 2 miles from an airport and, therefore, occurs outside of an existing airport land use plan area, the Project is proposing the creation of a temporary aircraft landing pad within the Show Center Area in 2024. The aircraft movements associated with the temporary landing pad present a potential hazard to Project flight safety, and significantly increases the safety risk caused by bird strikes as compared to past years when the Airshow was only conducting fly-bys over 500 feet above ground level. As noted in the Draft EIR analysis of Impact 3.3-1, 74 percent of bird strikes occur at less than or equal to 500 feet above ground level, 19 percent from 501 to 3,500 feet above ground level, and 7 percent above 3,500 feet above ground level. This study also found that passerines, gulls/terns (Laridae), doves (Columbidae), and raptors (including vultures) were the species groups most frequently struck.

During the Airshow, most aircraft are expected to fly over 500 feet above ground level; however, select aircraft are planned to land on a temporary landing pad located within the Show Center Area requiring them to fly below 500 feet in altitude, which increases the potential for a bird strike. As identified in Draft EIR Table 3.3-1, common wildlife species that are high risk to flight safety, including mourning dove, killdeer, barn swallow, European starling, rock dove, and red-tailed hawk, were observed within the Wildlife Hazard Analysis (WHA) Study Area.² More specifically, various gull species were observed within the Show Center Area during 2023 biological monitoring prior to increased human activity resulting from the event. Since a temporary aircraft landing pad has never been installed along Huntington Beach, no wildlife strike data resulting from aircraft take-off and landing is available. Therefore, there is the potential for bird strike impacts to common species resulting in increased flight risk during take-off and landing. However, it is expected that a small number of aircraft would take-off and land on the temporary aircraft landing pad and 2023 biological monitoring demonstrated that increased human activity within the Show Center Area decreased the presence of wildlife on the beach. Additionally, Airshow flights have historically occurred midday (between 10 a.m. and 4:30 p.m.) when bird flight activity is lower than it would be at dawn or dusk. While impacts to aircraft may occur as a result of aircraft landing on the beach, with implementation of Mitigation Measures

² The Show Center Area and Airshow Performance Area are directly adjacent and collectively occur within the Wildlife Hazard Analysis (WHA) Study Area.

HAZ-1 and HAZ-2, impacts related to flight safety are anticipated to be less than significant as the proposed mitigation measures provide specific measures to reduce wildlife hazards.

Mitigation Measure HAZ-1: A qualified avian biologist will conduct one Wildlife Hazard Site Visit (WHSV) prior to the start of the annual Airshow (beginning in 2024) following the protocol developed by the FAA in the *Protocol for the Conduct and Review of Wildlife Hazard Site Visits, Wildlife Hazard Assessments, and Wildlife Hazard Management Plans* (Federal Aviation Administration, Advisory Circular 150/5200-38, August 2018) to evaluate potential risk of wildlife strikes at airports, specifically for the proposed temporary aircraft landing pad on the beach during all future Airshow events. The WHSV shall include field observations conducted over one day at dawn, noon, and dusk from a variety of pre-determined locations to ensure complete visual coverage of the location of the temporary runway and immediate surroundings. All signs of birds, mammals, habitat attractants, and wildlife/habitat relationship observations shall be recorded.

A wildlife hazard site visit memorandum shall be prepared and include a list of wildlife species or signs observed during the surveys, federal and state status of the species observed, habitat features that may encourage wildlife, natural and artificial wildlife attractants, strike data analysis, and recommendations to reduce wildlife hazards. Recommendations may include developing a long-term management strategy that includes wildlife hazard management and/or reduction in flights under 500 feet above ground level.

Mitigation Measure HAZ-2: A qualified biological monitor will be on-site during event performances for the duration of the event (3-5 days) to document bird activity during aircraft flyovers and take-off and landing within the Show Center Area. Biological monitoring will also inform the recommendations to reduce wildlife hazards. Based on monitoring observations, recommendations may include following standard best management practices such as properly disposing of trash to avoid attracting wildlife to the Show Center Area and/or employing means of harassment (e.g., lasers) to disperse birds.

Finding: The City finds that changes or alterations have been required in, or incorporated into, the Project that substantially lessens significant impacts related to flight safety as identified in the Final EIR. With the implementation of Mitigation Measures HAZ-1 and HAZ-2, impacts related to flight safety are anticipated to be less than significant.

4.4 Findings Regarding Impacts Determined to Be Significant and Unavoidable

The City of Huntington Beach, having reviewed and considered the information contained in the Final EIR, Technical Appendices, and the administrative record, finds that the Project would result in significant and unavoidable impacts even with implementation of all feasible mitigation measures for the following categories: Air Quality, Hazards and Hazardous Materials, and Noise.

Air Quality

Impact 3.1-1: The project would result in significant impact if it would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (significant and unavoidable). Refer to Draft EIR pages 3.1-21 through 3.1-23.

For informational purposes, the air quality emissions from existing Airshow vehicle miles traveled (VMT) forecasted for year 2024 and future year 2034 were estimated in the Draft EIR. Regional criteria pollutant emission calculations for volatile organic compounds (VOCs), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and fine particulate matter (PM₁₀ and PM_{2.5}, respectively) for the existing Airshow VMT mobile sources are presented in **Table 3.1-6** (below and on page 3.1-22 of the Draft EIR).

TABLE 3.1-6
ESTIMATED FORECASTED REGIONAL MOBILE SOURCE EMISSIONS FOR CONTINUATION OF EXISTING AIRSHOW
(POUNDS PER DAY)

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Forecasted Regional Mobile Source Emissions for Continuation of Existing Airshow – Year 2024	530	766	4,938	14	1,193	305
Forecasted Regional Mobile Source Emissions for Continuation of Existing Airshow – Year 2034	359	486	3,241	11	1,191	303

NOTE: Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C of the Draft EIR.

SOURCE: Data compiled by ESA, 2024.

Operational criteria pollutant emissions were calculated for future Project Airshow mobile sources associated with additional daily VMT from the expanded night concerts as compared to prior Airshows. The change in operational emissions is based on the additional daily VMT resulting from the expanded night concerts that would occur during the Project's future Airshows compared to prior Airshows without night concerts. The additional daily VMT as compared to prior Airshows are provided in Section 3.5, *Transportation*, of the Draft EIR, for the expanded night concerts. Additional details are provided in the Air Quality Calculations in Appendix C of the Draft EIR.

The results of the regional criteria pollutant emission calculations for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} for the Project's mobile sources are presented in **Table 3.1 7** (below and on page 3.1-22 of the Draft EIR). As shown in Table 3.1-7, the Project's operational-related mobile source daily emissions would exceed the South Coast Air Quality Management District (SCAQMD) thresholds of significance for VOC, NO_x, and CO. It is also noted that, as shown in Table 3.1-6 above, the operational-related mobile source daily emissions for the airshow (without the proposed expanded night concerts) already exceed the SCAQMD thresholds of significance for VOC, NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, the Project's net regional operational mobile emissions impacts would be potentially significant.

It is noted that the mobile source emissions from the additional VMT from the Project's night concerts would decline in future years as vehicle technology improves and older vehicles are replaced with newer vehicles that emit fewer pollutants.

TABLE 3.1-7
ESTIMATED MAXIMUM UNMITIGATED REGIONAL MOBILE SOURCE EMISSIONS FOR
EXPANDED NIGHT CONCERTS (POUNDS PER DAY)

Source	VOC	NO _x	CO	SO ₂	PM10	PM2.5
Night Concerts Mobile Source Emissions – Year 2024	59	85	550	2	133	34
Night Concerts Mobile Source Emissions – Year 2034	40	54	361	1	133	34
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceeds Thresholds?	Yes	Yes	Yes	No	No	No

NOTE: Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C of the Draft EIR.

SOURCE: Data compiled by ESA, 2024.

Finding: There are no feasible mitigation measures that would reduce operational VOC, NO_x, and CO emissions for vehicular sources to below the significance thresholds. Vehicles would be utilized by Project attendees and employees to future Project Airshow events and the Project has no ability to regulate the personal choices made by future Project attendees and employees who may purchase and use any vehicles legally sold to travel to and from the site. In addition, as stated in Draft EIR Section 3.5, *Transportation*, there are no additional feasible mitigation measures to further reduce Project VMT. Thus, there are no additional feasible mitigation measures that would reduce operational VOC, NO_x, and CO emissions and impacts related to regional VOC, NO_x, and CO operational emissions would remain significant and unavoidable.

Hazards and Hazardous Materials

Impact 3.3-2: The project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (significant and unavoidable impact related to emergency access). Refer to Draft EIR pages 3.3-12 through 3.3-16.

The Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zone and, therefore, would result in no impact to evacuation related to potential wildfire impacts.

The Project does not propose any change that would impair implementation of or physically interfere with the adopted Local Hazard Mitigation Plan (LHMP), published resources related to emergency preparedness (such as maps of Tsunami Evacuation Routes), or the Airshow Public Safety Plan. Therefore, the Project should be considered to result in less than significant impacts to evacuation related to hazards and hazardous materials.

However, due to the volume of people anticipated to gather on and near the beach during the Airshow, in the event of an emergency, ambient evacuation times would be increased and could affect emergency access. The circumstances resulting in the need to evacuate either the event area

or the City will differ based upon the nature and magnitude of the emergency (fire, earthquake, tsunami), the location of the emergency (local or regional), and the timing relative to the event (are people coming in or leaving). For example, if there was a sizeable earthquake in the region, then the authorities may prefer that Airshow attendees stay in place until the safety of the roadway infrastructure can be assessed. If there was a tsunami warning, with several hours of notice, then an evacuation process would be somewhat broad and deliberate. In the case of a man-made event (someone causing a threat), the evacuation conditions are more immediate and localized.

The population group that attends the event is difficult to identify, as there is limited formal ticketing (only the reserved grandstands and beach). While many people gather near the beach, attendees also view from rooftops/balconies, restaurants, and other venues throughout the City. The ambiguity around the event population (size and location), combined with the range of potential evacuation events, results in unquantifiable evacuation times.

As a large number of people walk or bicycle to the Airshow, the speed of these cyclists and pedestrians ability to evacuate may contribute to increased evacuation times depending on the emergency event. Those who are already in the City for reasons unrelated to the Airshow (residents and employees in particular) would likely experience some increase in evacuation times due to the added population from the Project, as the roadway infrastructure is fixed.

Finding: The increased population as a result of the Project, combined with all other population unrelated to the Project, including residents, employees, students, and visitors, would likely be all concurrently subject to evacuation orders in case of an emergency event. Given the wide range of possible emergency conditions, difficulty in quantifying the number and location of population added by the Project, the probable increase in evacuation times, and the lack of significance threshold to measure such effects, the Project should be considered to result in significant and unavoidable impacts to emergency access but can be reduced with the incorporation of measures at the discretion of the Community and Library Services Director, or their designees, as described below.

As a compliment to the LHMP, a more detailed evacuation plan could be developed for the major events in the City (US Open of Surfing, AVP Volleyball Tournament, Airshow). The plan should at minimum further define how the range of emergency scenarios in the LHMP would relate to these major events, identify the evacuation needs and capacities, and evaluate strategies to reduce evacuation risks by including the following considerations:

- Apply the LHMP emergency scenarios during the time of a major short-term event, such as the Airshow, for planning purposes. The plans for evacuation should be based upon the location and dynamics of the emergency scenarios. A detailed evacuation plan should consider scenarios applicable to the Project area and define parameters such as time and area of evacuation, evacuation routes, hazard event, evacuation population, evacuation destination, and relationship to existing plans (such as the LHMP).
- Assess the target population during an evacuation event to include community members and participants of special events or gatherings. The evacuation demand assessment should consider factors such as the time of day, automobile availability, route options, hazard

behavior, and the locations of evacuation shelters or hotels. Key actions of the assessment should include establishing evacuation areas, identifying populations with mobility challenges, estimating the number of evacuation vehicle trips, and preparing an evacuation trip origin-destination matrix by time periods throughout an evacuation event.

- Evaluate the capacity of roadways to accommodate evacuation of events at Huntington Beach and nearby communities with shared emergency access. Roadways within the City identified by the LHMP as potential evacuation routes are discussed in the City's Circulation Element of the General Plan, including their classification and traffic-carrying capacities under normal conditions. The evaluation should also consider the safety and viability of identified evacuation routes during emergency events.
- Identify strategies to reduce evacuation times. Strategies to meaningfully reduce estimated evacuation times may address the supply of transportation capacity (such as temporary one-way streets or specialized signal timing), improve the effectiveness of communication to the public before and during an emergency event, and special provisions for vulnerable populations.

Noise

Impact 3.4-1: The project would result in a significant impact if it would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (significant and unavoidable impact with mitigation). Refer to Draft EIR pages 3.4-21 through 3.4-25.

Noise levels from aircraft flyovers for the duration of the Airshow would generate a substantial temporary increase in ambient noise levels and thus result in a significant impact. However, the City's Municipal Code includes provisions for approval of a Noise Deviation Permit. While the approval of a Noise Deviation Permit would not eliminate the significant impact related to aircraft noise, it would allow the deviation to occur, thereby removing the conflict that would otherwise exist between the Noise Ordinance thresholds and requirements and the noise generated by the Project.

Municipal Code Section 8.40.130 states that the applicant must provide information in the Noise Deviation Permit application regarding actions taken to comply with the Noise Ordinance, reasons why compliance cannot be achieved, and a proposed method of achieving compliance if such method exists. The applicant must also demonstrate the need to deviate from the noise level and whether the deviation produces a greater benefit to the community that outweighs the temporary increase in noise level.

Due to the nature of the Project, compliance with the Noise Ordinance thresholds is not possible while maintaining the activities the Airshow has included since 2016. The Project provides Huntington Beach residents and visitors with an opportunity to enjoy a family event that is geared towards all ages. Activities, food, and area retail establishment products are available at the Airshow, enhanced by live entertainment. Traffic and crowd noise are natural consequences of this type of event and there is no way to achieve strict Noise Ordinance compliance while maintaining the established activities. The benefits to the community and visitors are evident from the success of the annual Airshow, which provides an opportunity for local merchants to

offer their services and wares to a larger audience. Therefore, the deviation produces a greater benefit to the community that outweighs the temporary exceedance from the once-a-year Airshow. Additionally, new Airshow activities discussed in Draft EIR Chapter 2, *Project Description*, such as air racing, nighttime flyovers, and helicopter landing within Main Hospitality Area, may result in similar noise levels as was measured during the 2023 Airshow. However, while noise impacts would remain significant, the Noise Deviation Permit would allow the exceedance to occur.

In addition, the Draft EIR determined that the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be less than 1 dBA³ Community Noise Equivalent Level (CNEL)⁴ along all roadway segments. This increase in noise level would be well below the “clearly noticeable” threshold increase of 5 dBA CNEL in an area characterized by normally acceptable noise levels that would remain below 55 dBA CNEL or “conditionally acceptable” threshold of noise levels that would remain below 70 dBA CNEL. Therefore, Project-related noise increases would be less than the applicable threshold and would be less than significant.

During the Airshow events, the competitions and art installations would be located within the Project Site and generally located away from noise-sensitive uses east of Pacific Coast Highway. The temporary event structures would be similar in scale and location to previous Airshows since 2016 (except in 2020, when there was no Airshow) and generally located away from noise-sensitive uses east of Pacific Coast Highway. The temporary Airshow pyrotechnic display would occur over water, similar to the City’s existing annual Fourth of July Fireworks Over the Ocean and would not result in permanent effects on the environment. The competitions, art installations, event structures, and pyrotechnic display would not generate a substantial increase in ambient noise in excess of established standards and existing conditions. Therefore, no further analysis of these issues was included in the Draft EIR.

However, the multi-day music festival would be located generally within the northernmost portion of the Show Center Area within Concert Area A or alternatively the southernmost portion of the Show Center Area within Concert Area E. The multi-day music festival would occur following the conclusion of the Airshow up to 11:00 p.m. over 3 days over the weekend directed towards the ocean. In addition, the music festival would require sound checks during the day/evening prior to the music festival. The music festival would include the use of amplified speakers, which would be directed toward the ocean and away from noise sensitive uses located on Pacific Coast Highway. Nonetheless, the multi-day music festival with the use of amplified speakers may result in a temporary net increase in noise as compared to past Airshows. As such, the Draft EIR determined that the Project’s music festival would result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the Project to be in excess

³ The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts on humans, sound is measured using an electronic filter that de-emphasizes the frequencies in a manner corresponding to the human ear’s decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency weighting and is typically applied to community noise measurements.

⁴ CNEL is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dB to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

of standards established by the City and impacts from the music festival would be potentially significant.

Mitigation Measure NOI-1: The applicant shall implement the following measures for the duration of the event:

- The nearest speaker shall be placed at least 475 feet away from any nearby sensitive receptor and any subsequent speakers shall be separated from other speakers by 25 feet parallel to Pacific Coast Highway. Speakers shall also be positioned in a manner that would not point directly towards any nearby sensitive receptor and, instead, face the beach/ocean.
- A temporary noise barrier of at least 10 feet in height and constructed of plywood or using a sound blanket shall be installed on public property nearest to the sensitive receptors to the west of the proposed music festival area (Huntington Pacific Beach House Condo complex at 701 Pacific Coast Highway). The temporary noise barriers shall block the line-of-sight between the music festival attendees and similarly elevated ground-level noise-sensitive receptors.

Finding: Mitigation Measure NOI-1 would be required to reduce noise levels. However, noise levels would still exceed the significance thresholds even with implementation of this mitigation. Since it would not be feasible to locate speakers further away from the sensitive receptors (towards the ocean) because this would impede beyond the mean high tide line, and the City does not have any jurisdiction beyond the mean high tide line, this impact is determined to be significant and unavoidable. While the Project would submit a Noise Deviation Permit application pursuant to Municipal Code requirements, which would allow the exceedance to occur, the proposed music festival would be a new source of noise in excess of standards. Furthermore, as the proposed music festival would be a new addition to the Airshow and prior Noise Deviation Permit applications have not included a music festival, this impact is determined to be significant and unavoidable. No additional feasible mitigation measures are available.

Impact 3.4-2: The project will result in a significant impact if it generates excessive groundborne vibration or groundborne noise levels. (significant and unavoidable impact with mitigation).
Refer to Draft EIR page 3.4-25 through 3.4-28.

Operation of the music festival would include typical commercial-grade mechanical and electrical equipment, such as amplified sound systems, which would produce groundborne vibration. Data regarding specific groundborne vibration levels from speakers that would be used at the proposed music festival is not available. For the purposes of this analysis, assuming a relatively-high groundborne vibration level equivalent to a sonic pile driver operating under typical conditions of 93 vibration velocity level (VdB) at 25 feet, at a distance of 95 feet, the vibration level would be approximately 81.4 VdB, which would exceed the significance threshold of 72 VdB at vibration-sensitive land uses. In the absence of specific data, the analytical assumption of using a groundborne vibration level equivalent to a sonic pile driver is anticipated to provide a reasonably conservative approach as sonic pile drivers represent equipment with the highest non-impact vibration level according to the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*. Therefore, it is determined that groundborne vibration and groundborne noise impacts from the music festival would be potentially significant.

Ground consisting of beach sand would have a dampening effect on groundborne vibration. Thus, increasing the separation distance between the speakers and vibration-sensitive land uses would reduce the vibration levels.

Findings: Mitigation Measure NOI-1, which maximizes the separation distance between the speakers and vibration-sensitive land uses, would be required to reduce the groundborne vibration and groundborne noise levels. At a distance of 475 feet, as specified in Mitigation Measure NOI-1, the vibration level would be reduced to approximately 67.4 VdB, given the above assumptions, which suggests impacts could be reduced to less than significant. Nonetheless, since data regarding specific groundborne vibration levels from speakers that would be used at the proposed music festival is not available, and since it would not be feasible to locate speakers further away from the sensitive receptors (towards the ocean) because this would impede beyond the mean high tide line and the City does not have any jurisdiction beyond the mean high tide line, this impact is conservatively determined to be significant and unavoidable. No additional feasible mitigation measures are available.

5.0 Findings Regarding Cumulative Impacts

As discussed in Draft EIR Subsection 3.7, *Cumulative Analysis*, CEQA requires that an EIR assess the cumulative impacts of a project with respect to past, present, and reasonably foreseeable future projects. CEQA Guidelines Section 15355, Cumulative Impacts, specifically provides the following definition of cumulative impacts:

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

CEQA Guidelines Section 15130(a), Discussion of Cumulative Impacts, further addresses the analysis of cumulative impacts:

- “(1) As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR;*
- (2) If the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR should briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall*

identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

- (3) *An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable."*

In summary, if the combined cumulative impact associated with the project's incremental effect and the effects of other projects is significant, the EIR must determine whether the project's incremental contribution is cumulatively considerable. If the project's incremental contribution is not cumulatively considerable, the cumulative impact is considered "not significant" pursuant to CEQA Guidelines 15130(a)(3).

Because the Airshow does not propose construction of new permanent development, and further, because it is a temporary event, the nature of this Project does not allow for the same manner of cumulative assessment as projects that lead to a permanent change or construction-related impacts that could combine with other projects spatially and/or temporarily, such as land use or transportation projects. Therefore, consistent with CEQA Guidelines Section 15130(a)(2), the Draft EIR provides facts and analyses supporting the Lead Agency's conclusion that the combined cumulative impacts associated with the Airshow project's incremental effect and the effects of other projects is not significant and is not discussed in detail in the Draft EIR. As part of the facts and analyses supporting the use of CEQA Guidelines Section 15130(a)(2), the City of Huntington Beach prepared a list of past, present, and reasonably future projects that were considered when making the conclusion that the Project, when considered with other cumulative projects, would not result in a cumulatively considerable contribution to a significant cumulative impact. The list of cumulative projects that were considered is provided in **Table 3.7-1** (below and on page 3.7-3 of the Draft EIR).

For Project-related impacts that result in no impact, the Project cannot combine to create an incremental, cumulatively considerable contribution to a significant cumulative impact. Therefore, consistent with CEQA Guidelines Section 15130(a)(1), "[A]n EIR should not discuss impacts which do not result in part from the project evaluated in the EIR." Accordingly, the cumulative impact analysis in the EIR does not address impact statements that are determined to result in no impact in either the Initial Study/Notice of Preparation or the EIR.

If the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR should briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR, as allowed by CEQA Guidelines Section 15130(a)(2).

**TABLE 3.7-1
RELATED PROJECT LIST**

No.	Project Name/Location	Description	Status
1.	Huntington's on the Pier (21 Main Street and 22 Main Street on the Pier)	Conversion of a former fishing supply building into a new restaurant and bar, with interior modifications and an addition of 530 sf to the existing 820 square-foot building, and conversion of a 409 square-foot existing public restroom into a public restroom building with employee changing room/restroom/locker area and restaurant storage areas.	Under review with construction anticipated to begin in 2025.
2.	414 Main Mixed Use	A four-story mixed use project consisting of 5,000 sf of retail space, 20 residential condominium units, with 46 on-site parking spaces mostly provided in a subterranean parking garage.	Under construction with occupancy late 2024.
3.	410 Main Mixed Use	Construct an approximately 42,000 square-foot mixed use building with 28 condominium residential units, 8,000 sf of ground floor retail space, and a subterranean parking garage.	Under review.
4.	Magnolia Tank Farm (21845 Magnolia Street)	Construct a 211,000 square-foot lodge with 175 guest rooms and guesthouse with 40 rooms, 19,000 sf of retail, 250 for sale dwelling units (at 15 dwelling units per acre), 2.8 acres of coastal conservation area to provide a buffer for the adjacent wetlands, and 2.8 acres of park.	Under review.
5.	AMG Residential (19431 and 19471 Beach Blvd)	Construct three residential buildings, each containing 7 stories of residential units, totaling in 222 units and 141,440 sf.	Under review.
6.	Seacliff at Huntington Beach Inspired Senior Living Facility (2120 Main Street)	Construct a 3-story, approximately 281,000 square-foot State-licensed assisted living and memory care facility with 226 guest rooms and a subterranean parking garage on an approximately 6.57-acre portion of the approximately 11.29-acre site.	Under construction through late 2025.
7.	ASCON Site (Southwest corner of Magnolia Street at Hamilton Avenue)	On-going remedial clean-up activities; no surface development expected to occur and the site will ultimately become permanent open space.	Approved and Ongoing
8.	Pacific Coast Highway (PCH) Caltrans Improvement Project	Construction of a continuous 10-mile long bicycle lane improvement project in both directions and associated safety features. Caltrans agreed, in conversation with the City, to identify the City's special events (i.e., including, but not limited to, the Pacific Airshow, U.S. Surf Open, AVP Volleyball, etc.) as "non-construction dates" for the PCH Caltrans Improvement Project. In addition, Caltrans will shut down construction activities between Memorial Day and Labor Day to avoid the busy, summer, beach season. Construction activities will likely begin in 2025 and last through 2026 given the various "non-construction dates."	Approved. Construction not yet started.

NOTES:

sf = square feet

SOURCE: City of Huntington Beach, 2024

Table 3.7-2 (below and on pages 3.7-5 through 3.7-6 of the Draft EIR) provides a summary of the Project-related impact conclusions and cumulative impact conclusions for each threshold evaluated in the EIR, including explanatory notes. Table 3.7-2 only identifies those thresholds carried forward for analysis in the Draft EIR, no matter the conclusion in the Draft EIR. As with the Draft EIR, the Initial Study/Notice of Preparation identifies thresholds that would result in no impact and, therefore, were not carried forward for analysis in the Draft EIR and, similarly, result in no cumulative impact. The full discussion of cumulative impacts can be found in Draft EIR Subsection 3.7, *Cumulative Analysis*.

TABLE 3.7-2
AIRSHOW PROJECT-RELATED AND CUMULATIVE IMPACT CONCLUSIONS

Impact Statement	Project-Related Impact Conclusion	Cumulative Impact Conclusion	Notes
Air Quality			
Consistency with the Current Air Quality Management Plan.	Not Applicable.	Project's incremental contribution is not cumulatively considerable.	SCAQMD allows a lead agency to determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project is consistent with the current AQMP (this is not a CEQA Appendix G Threshold for a Project-related impact; Impact 3.1-1 addresses the CEQA Appendix Threshold).
Impact 3.1-1: The Project would result in significant impact if it would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Significant and Unavoidable.	Cumulatively considerable contribution to a significant cumulative impact.	SCAQMD recommends that construction or operational Project emissions are considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.
Biological Resources			
Impact 3.2-1: The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	Less than Significant.	Project's incremental contribution is not cumulatively considerable to a significant cumulative impact.	
Impact 3.2-2: The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Less than Significant.	Project's incremental contribution is not cumulatively considerable to a significant cumulative impact.	
Hazards and Hazardous Materials			
Impact 3.3-1: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not result in a safety hazard or excessive noise for people residing or working in the project area.	Less than Significant with Mitigation.	Project's incremental contribution is not cumulatively considerable to a significant cumulative impact.	
Impact 3.3-2: The project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Significant and Unavoidable.	Project's incremental contribution is not cumulatively considerable to a significant cumulative impact.	

Impact Statement	Project-Related Impact Conclusion	Cumulative Impact Conclusion	Notes
Noise			
Impact 3.4-1 (On-Site Operational Noise): The Project would result in a significant impact from the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Significant and Unavoidable with Mitigation.	Cumulatively considerable contribution to a significant cumulative impact.	
Impact 3.4-1 (Off-Site Traffic Noise): The Project would result in a significant impact from the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less than Significant.	Project's incremental contribution is not cumulatively considerable to a significant cumulative impact.	
Impact 3.4-2: The Project would not generate excessive groundborne vibration or groundborne noise levels.	Significant and Unavoidable with Mitigation.	Cumulatively considerable contribution to a significant cumulative impact.	
Transportation			
Impact 3.5-1: The project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) (as it relates to VMT)	Less than Significant.	Project's incremental contribution is not cumulatively considerable.	
Impact 3.5-2: The project would not result in inadequate emergency access.	Less than Significant.	Project's incremental contribution is not cumulatively considerable.	

6.0 Findings Regarding Alternatives

Because the Project would result in significant and unavoidable environmental impacts after implementation of the mitigation measures, the City considered alternatives to the Project. In accordance with State CEQA Guidelines Section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The Project's objectives are provided above in Section 3.2, *Project Purpose and Objectives*. The State CEQA Guidelines emphasize that the selection of project alternatives should be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly"⁵ The State CEQA Guidelines further direct that the range of alternatives

⁵ CEQA Guidelines Section 15126.6(b).

be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.⁶

Based on the comparative alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.⁷

The EIR considers a total of five alternatives to the Project, two of which were considered but were not selected for further analysis including offsite location and avoidance of flying over Bolsa Chica, and the remaining three, including the No Project/No Airshow Alternative, are comprehensively evaluated in the EIR.

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR, and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives that would reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative to the Project’s impacts.

6.1 Alternatives Considered and Rejected

CEQA does not require that the alternatives be exhaustive, or require evaluation of alternatives that are not realistically feasible given the failure to meet project objectives or the availability of resources to support the alternatives. The following alternatives were rejected because implementation is considered remote and speculative or some of the goals and objectives would not be met.

Offsite Location

The Offsite Location Alternative would aim to be located further from sensitive biological resources. Sensitive habitat is located along the coastline including the Huntington Beach Wetlands, the Magnolia Marsh, and the Bolsa Chica Ecological Reserve (BCER). In order to be located away from the areas that contain more sensitive biological resources, the site would likely need to be at a more inland location, where there would be less space for attendees to congregate as well as fewer areas to view the Airshow compared to the Project Site. In addition, the likelihood of finding a location that would be able to accommodate the number of activities planned (Airshow, music festival, wave pool surf competitions, skateboard/BMX event, etc.) for the Airshow would be low.

⁶ Ibid., Section 15126.6(f).

⁷ Ibid., Section 15126.6(e) (2).

This Alternative was considered infeasible due to the fact that there are very few, if any, other locations within the City that are City-owned and would be able to provide the services and area for the Airshow to be conducted and viewed. The alternative site would need to be up to approximately 100 acres in size in order to accommodate the parking, viewing areas, and other activities. Per the CEQA Guidelines, the Offsite Location Alternative was rejected as infeasible using the criteria for off-site alternatives, including site suitability, economic viability, jurisdictional boundaries, whether the project proponent owns the site, and whether the project proponent can control site access.

Some of the alternative sites considered that would be large enough to accommodate the activities include Edison High School and Central Park located in the City. Edison was rejected because this site would be closer to the Huntington Beach wetlands complex, and therefore, not necessarily further from sensitive biological resources. Central Park was also rejected due to the sensitive habitat and species that are present throughout the Park. Central Park has three freshwater lakes that are used by waterfowl and other birds. Portions of Central Park are also located closer to the BCER. Therefore, due to the proximity of sensitive habitat and sensitive species at the two locations most appropriate to be considered as alternative sites, these locations would not reduce impacts to biological resources.

Avoidance of Flying over Bolsa Chica

The Avoidance of Flying over Bolsa Chica Alternative would involve having the Pacific Airshow LLC instruct the air traffic controllers to avoid flying over the BCER. The purpose of this Alternative would be to reduce noise over the BCER and to avoid potential impacts to biological resources in the BCER. However, noise from commercial and private aircraft and helicopter flights over the BCER, including helicopters regularly landing at the helipad located within the BCER, is an existing condition. In addition, the Project already has controls and measures in place to prevent incursion into the BCER including providing a daily formal briefing (each day of the Airshow) to all Airshow pilots on the location and nature of the BCER; requesting that pilots minimize or avoid overflight of the BCER to the greatest extent possible; requesting that when overflight of the BCER cannot be avoided that it be at 1,000 feet above ground level (AGL) or above; advising Southern California Terminal Radar Approach Control (TRACON) as well as Los Alamitos Army Airfield Tower on the location and nature of the BCER and request that they avoid directing Airshow pilots to overfly the area to the greatest extent possible; establishing routes in/out of Airshow airspace and supporting airfields to avoid overflight of the BCER to the greatest extent possible; coordinating with Southern California TRACON and Los Alamitos Army Airfield Tower regarding directing airshow aircraft transiting to/from supporting airfields to fly as directly as able into the Airshow's restricted airspace which, in most cases, will prevent overflight of the BCER; discussing and sharing any report of otherwise avoidable incursion will be at the daily briefing and discussing with air traffic control representatives in the ongoing effort to identify and implement solutions to avoid overflight; and instructing parachute demonstration teams to keep streamer drops in close to the site or to refrain from using them all together if conditions permit to prevent incursion into the BCER. Since these measures are already in place for the 2024 Airshow and all Airshow events moving forward, the potential noise and incursion into the BCER is already being minimized to the extent feasible. In addition, the Project includes

a measure where a biological monitor is recommended to conduct monitoring at the Bolsa Chica Ecological Reserve and protected plover and tern nesting areas to confirm debris does not move into these areas and that low flyovers do not occur within these areas. Also, important to note is that the Airshow is scheduled for after breeding season. Therefore, since the BCER is already being avoided by the activities and measures listed above, this Alternative is not analyzed in further detail.

6.2 Alternatives Considered in Detail

Alternative 1: No Project/No Airshow Alternative

CEQA Guidelines Section 15126.6(e) requires analysis of a No Project Alternative that (1) discusses existing site conditions at the time the NOP is prepared or the Draft EIR is commenced and (2) analyzes what is reasonably expected to occur in the foreseeable future based on current plans if the Project were not approved.

Under this Alternative, the Airshow and the associated activities are not occurring in 2024 or for the foreseeable future. Since the No Project Alternative assumes the Airshow would not take place, no new environmental impacts would occur under this Alternative.

Alternative 2: 2023 Airshow Alternative

Under the 2023 Airshow Alternative, the annual event would take place over 3 days, and would not include a music festival, helicopter and aircraft runway/display, skateboard/BMX competition, pyrotechnic shows, sandcastle building competition, and beach camping, among other activities/features noted in *New Airshow Activities Anticipated for 2024 through 2034* in Section 1.6, *Historic and Future Airshow Activities and Events Schedule*. The Airshow would continue to be held annually Friday through Sunday during the fall season with aircraft flight familiarization and flight practice flyovers beginning as early as Monday of the week of the Airshow.

Alternative 3: Reduced Project Alternative

The Reduced Project Alternative would include a reduced size of the Airshow with no military aircraft or equivalent noise-producing jets being included in the Airshow. Based on information received from the President of the International Council of Airshows, John Cudahy⁸, airshows without military performers have less than half of the attendance of shows that include military aircraft. In fact, in 2013, when the United States Department of Defense cancelled its participation in civilian airshows, attendance decreases of 75 percent to 80 percent occurred. In addition, without military aircraft, the noise impacts from the flyovers would be reduced. Therefore, the Reduced Project Alternative is aimed to reduce noise impacts due to the type of aircraft being used. Additionally, evacuation impacts would be reduced due to both a decreased number of employees and a decreased number of attendees.

⁸ John B. Cudahy, President, International Council of Air Shows. Letter correspondence dated March 25, 2024.

The Reduced Project Alternative would not meet the following Project objectives:

- Continue to provide a gathering place where locals and visitors can come together to enjoy civilian and military aircraft flybys and aerial acrobatics, illustrations, displays, food, and music.
- Prove an event that promotes careers and opportunities in the Defense Forces.

Since the Reduced Project Alternative would not include military flybys from military aircraft, the two above objectives would not be met in their entirety. In addition, since the Reduced Project Alternative would result in a decreased number of attendees, this alternative would also only partially meet the objectives of creating a net positive economic impact, increasing tax revenues, and continuing to provide jobs associated with the Airshow. With fewer attendees, it is anticipated that the positive economic impact, the potential tax revenues, tourism impact, quality level of show and the number of employees needed to staff the Airshow would all potentially be reduced.

6.3 Findings Regarding the Alternatives

Of the alternatives analyzed in the EIR, the No Project Alternative is considered the environmentally superior alternative as it would avoid or reduce most of the potential impacts associated with operation of the Project. However, it would not meet the objectives of the Project.

CEQA Guidelines require that, if the No Project Alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives. As such, the 2023 Airshow Alternative would result in the fewest environmental impacts as compared to the Project and is considered the Environmentally Superior Alternative. However, this alternative would not meet all of the Project Objectives. Furthermore, the 2023 Airshow Alternative would reduce the opportunity to gather since fewer events would be held over fewer days.

The 2023 Airshow Alternative would not meet the following Project objectives in their entirety or to the extent the Project would:

- Continue to provide a family-oriented, safe, educational, fun, and entertaining Airshow experience with an emphasis on outdoor lifestyle and popular culture elements.
- Continue to provide a gathering place where locals and visitors can come together to enjoy civilian and military aircraft flybys and aerial acrobatics, illustrations, displays, food, and music.
- Create a net positive direct economic impact on the City and surrounding communities as a result of spending by incremental visiting attendees, the event organizer, and event sponsors.
- Increase in tax revenues (i.e., sales tax and transit occupancy tax) to the City.
- Continue to provide temporary and full-time jobs associated with the Airshow.

Since the 2023 Airshow Alternative would not include a music festival, helicopter and aircraft runway/display, skateboard/BMX competition, pyrotechnic shows, sandcastle building competition, and beach camping, among other activities/features, fewer family-oriented events would be offered. With fewer activities, it is anticipated that the positive economic impact, the potential tax revenues, and the number of employees needed to staff the Airshow would each

potentially be reduced. In addition, without offering the events promoting the beach community, including beach camping and sandcastle building among others, there would be a reduced positive impact to the promotion of the Huntington Beach Pier and beaches.

In conclusion, the 2023 Airshow Alternative is the Environmentally Superior Alternative; however, it does not meet all the Project Objectives.

7.0 Findings Regarding the Final EIR

The Responses to Comments, provided as Chapter 3 of the Final EIR, includes the comments received during the public review period on the Draft EIR and the City's responses to these comments. The focus of the Responses to Comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088(c).

The purpose of the Final EIR is to respond to all comments received by the City regarding the environmental information and analyses contained in the Draft EIR. Corrections and Additions to the Draft EIR, provided as Chapter 4 of the Final EIR, includes any clarifications/corrections to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments or independently by the City. The City finds that comments made on the Draft EIR, the responses to these comments, and revisions to the Draft EIR clarify or update the analysis presented in the document but do not change the analysis or conclusions of the Draft EIR.

Accordingly, no significant new information, as described in State CEQA Guidelines Section 15088.5, was added to the EIR after the Draft EIR was made available for public review.

The comments, responses to comments, and the clarifications to the Draft EIR do not trigger the need to recirculate the EIR pursuant to State CEQA Guidelines Section 15088.5. These changes merely clarify or update the discussion but do not change the analysis or conclusions of the Draft EIR. Based on the analysis in the Draft EIR, the comments received, and the responses to these comments, no substantial new environmental issues have been raised that have not been adequately addressed in the Draft EIR. Also, no changes to the analysis or conclusions of the Draft EIR are necessary based on the comments, the responses to the comments, and the revisions to the Draft EIR noted above.

8.0 Statement of Overriding Considerations

The City finds on the basis of the Final EIR and the record of proceedings in this matter that the significant and unavoidable impacts of the Project are acceptable when balanced against the benefits of the Project. This determination is based on the following Project objectives and the substantial public, social, economic, and environmental benefits generated from the Project as identified in the Draft EIR, the Final EIR and the record of proceedings in the matter. The Project objectives include the following:

- Continue to provide a family-oriented, safe, educational, fun, and entertaining Airshow experience with an emphasis on outdoor lifestyle and popular culture elements.

- Continue to provide a gathering place where locals and visitors can come together to enjoy civilian and military aircraft flybys and aerial acrobatics, illustrations, displays, food, and music.
- Prove an event that promotes careers and opportunities in the Defense Forces and in aviation.
- Provide an event that promotes coastal access.
- Continue to promote awareness and use of the Huntington Beach Pier and beaches.
- Continue to promote awareness of the Huntington Beach hotels, restaurants, stores, and businesses across the City.
- Continue to promote Huntington Beach and Southern California as a welcoming global tourism destination.
- Create a net positive direct economic impact on the City and surrounding communities as a result of spending by incremental visiting attendees, the event organizer, and event sponsors.
- Increase in tax revenues (i.e., sales tax, transit occupancy tax, and property tax) to the City.
- Continue to provide temporary and full-time jobs associated with the Airshow.
- Provide an event that reduces potential impacts to the surrounding sensitive habitat including the Bolsa Chica Ecological Reserve, the Huntington Beach Wetlands, the Magnolia Marsh, and special-status wildlife species such as the federally endangered California least tern and western snowy plover.

Based on the analysis provided in Draft EIR Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, implementation of the Project will result in significant impacts that cannot be feasibly mitigated with respect to Air Quality, Hazards and Hazardous Materials, and Noise.

Considering the information contained in and related to the Final EIR, and pursuant to CEQA Guidelines Section 15092, the City of Huntington Beach finds that in approving the Project, it has eliminated or substantially lessened all significant and potentially significant effects of the Project on the environment where feasible as shown in these Findings. The City of Huntington Beach further finds that it has balanced the economic, social, technological, and other benefits of the Project against the remaining unavoidable environmental risks in determining whether to approve the Project and has determined that those benefits outweigh the unavoidable risks and that those risks are acceptable. Additionally, the City of Huntington Beach finds that each of the listed Project benefits described above provides a separate and independent ground for its decision to adopt this Statement of Overriding Considerations and approve the Project. The City of Huntington Beach makes this statement of overriding considerations in accordance with CEQA Guidelines Section 15093 in support of approval of the Project. Specifically, in the City's judgment, the benefits of the Project, as proposed, outweigh the significant and unavoidable impacts, and the Project should be approved.

Response to California State Lands Commission Comment Letter (dated August 22, 2025)

The City of Huntington Beach (City) received a letter from the California State Lands Commission (SLC) on August 22, 2025, in response to submittal of the Huntington Beach Airshow (Project) Final Environmental Impact Report (EIR) to all commenting public agencies, including the SLC..

The SLC references a video taken by the California Department of Fish and Wildlife (CDFW) staff of 2021 Airshow overnights at the Bolsa Chica Ecological Reserve (BCER) that was previously provided to the City, as well as new videos taken during the 2023 and 2024 Airshow, all of which are intended to document potential impacts on avian species. The videos provided at the link included in the SLC's letter show what appear to be aircraft associated with the Airshow along with birds flying over the BCER. The videos lack sufficient evidence to support a clear correlation between the aircraft flights and the avian response of birds because they are short recordings as the aircraft are flying overhead (IMG_115.mov, IMG_1129, TC_00045.mov, TC_00051.mov). The duration of the videos are very short (generally less than 30 seconds), and are not of sufficient length to provide accurate insight into avian behavior or confirmation of adverse impacts to avian species. This includes how species behaved prior to the overhead flight, as well as following aircraft departure, for an appropriate length of time to make a scientifically significant determination on how common and sensitive species are impacted. While it is reasonable that birds may have responded to noise from the aircraft by temporarily taking flight, no sufficient evidence is shown that the species did not eventually return to the locations and activities prior to aircraft overflights. Additionally, at the end of video TC_00045.mov, it appears the birds return to the ground adjacent to the location they were seen flying over. Avian species displaying occasional flushing and returning to resume activities within the BCER is consistent with what the City's biologists observed during 2023 monitoring activities. As noted in Table 3.2-2 of the Final EIR and described in Master Response C (Timing of the Airshow Relative to Bird Nesting Seasons), there are currently routine helicopter flights conducted by CDFW and the oil rig operators over the BCER, as well as daily overflights from private and commercial aircraft. These flights occur year-round, including during the active nesting season (March–September), without any documentation of significant impacts to nesting species on the BCER. Even in the absence of external factors, coastal avian species in particular, regularly relocate and return to locations as part of normal behavior (i.e., moving to a new foraging locations). For these reasons, it is likely that the behaviors shown in the videos are a regular occurrence at the BCER, in response to both ambient and external conditions (e.g. regular CDFW, commercial, and private fly-overs), including on a typical day when the Airshow is not occurring. The bird behaviors shown in the videos and observed during the 2023 biological monitoring activities (i.e. flushing and returning), is a result of adaptation to existing conditions at the BCER.

In addition to the pre-activity surveys, monitoring, and establishment of on-the-ground disturbance buffers proposed in the Final EIR as part of the project design features, a California Coastal Commission (CCC) Coastal Development Permit (CDP) was issued with the condition to develop and implement a Biological Monitoring Plan to measure noise levels and related impacts to biological resources, with an objective to empirically measure and determine potential and realized impacts to birds, and address whether the sound levels and behavioral disturbances are the same as ambient conditions during a typical day when the Airshow is not occurring. The CDP Permit includes specific requirements for data collected and monitoring metrics that will be reported within 60 days of completion of the Airshow, prepared by a qualified biologist and acoustician, to document, analyze, and explain whether the monitoring data demonstrates the Airshow

may or may not result in an impact to birds. The requirement for biological monitoring is included in both the Final EIR and is also required by the CCC as a requirement in the CDP.

If adverse impacts to birds are observed during monitoring activities, the biological monitor will consult with the City and Applicant and, as appropriate, the California Coastal Commission and/or California Department of Fish and Wildlife, to identify feasible measures to reduce or avoid any identified and empirically documented potential impacts.

The SLC requested a copy of the 2023 Biological Monitoring Report. This report can be found in Appendix D of the Draft EIR, which was made available for public review on February 20, 2025. However, as requested by the SLC, the City will send a copy of the 2023 Biological Monitoring Report along with the Final EIR, Mitigation Monitoring and Reporting Program, Notice of Determination, Resolution No. 2025-54 and the CEQA Findings of Fact and Statement of Overriding Considerations upon certification by the City Council.

Finally, it should be noted that the comments raised by the SLC after the Final EIR was published and distributed do not raise significant new information about the project or have the potential to result in a new significant environmental impact or substantially increase the severity of an environmental impact. As such, in accordance with Section 15088.5 of the CEQA Guidelines, recirculation of the EIR prior to certification is not required.