

## 7. Alternatives

This section addresses alternatives to the Proposed Project and describes the rationale for including them in the EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the Proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

### 7.1 INTRODUCTION

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

Pursuant to State CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to a proposed project or to a project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed project's objectives. State CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, State CEQA Guidelines Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to State CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this EIR section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the Proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the Proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (State CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (State CEQA Guidelines Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the Proposed Project;
- The extent to which the alternative could accomplish the objectives of the Proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the Proposed Project and potential alternatives to it; and
- The requirement of the State CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (State CEQA Guidelines Section 15126.6(e)).

Neither the CEQA statute, the State CEQA Guidelines, nor court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice” (State CEQA Guidelines 15126(f)).

## 7.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the Proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures. The analysis in Chapter 5.0, *Environmental Impact Analysis*, of this EIR determined that the Project would not result in any significant and unavoidable impacts.

## 7.3 PROJECT OBJECTIVES

The Project objectives are designed to ensure the Proposed Project develops a quality development. The Project objectives have been refined throughout the planning and design process for the Proposed Project, and are listed below:

- Increase the efficiency of goods movement in the POLA by providing off-terminal maritime support to help meet the demands of current and anticipated containerized cargo from the various San Pedro Bay port marine terminals;
- Provide a facility that will increase the efficiency of terminal operations by providing storage and staging of trucks and chassis in the POLA;
- Provide a facility that alleviates truck traffic congestion and illegal parking in the area by providing truck and chassis parking; and
- To develop an underutilized property that is conveniently located in vicinity to the I-110 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within Southern California.

## 7.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to State CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

**Alternate Site Alternative.** An alternate site for the Proposed Project was eliminated from further consideration. Based on a review of available sites for sale and the City of Los Angeles General Plan land use map, there are no other available, undeveloped properties of similar size (18.63 developable acres) that are zoned for industrial uses and within proximity to the POLA. There are no suitable sites within the control of the Project Applicant; however, in the event land could be purchased of suitable size, due to the built-out nature of the City of Los Angeles, development of a truck and chassis parking lot would likely

require demolition of structures and require similar, and potentially additional, mitigation. CEQA specifies that the key question regarding alternative site consideration is whether the basic Project objectives would be attained and if any of the significant effects of the Proposed Project would be avoided or substantially lessened by having the Proposed Project at another location. Given these reasons, it would be infeasible to develop and operate the Proposed Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.

**Four Story Building/Hotel Alternative.** A four-story building or hotel on the Project site was eliminated from further consideration. Based on the site configuration, a four-story building or hotel and an associated parking lot would not be feasible. In addition, the four-story building or hotel would not be feasible due to the geologic hazards on site. CEQA specifies that the key question regarding alternative site consideration is whether the basic Project objectives would be attained and if any of the significant effects of the Proposed Project would be avoided or substantially lessened by having the Proposed Project at another location. Given these reasons, it would be infeasible to develop a four-story building or hotel with fewer environmental impacts while meeting Project objectives. Therefore, the four-story building/hotel Alternative was rejected from further consideration.

## 7.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Three alternatives to the Proposed Project have been identified for further analysis as representing a reasonable range of alternatives. These alternatives have been developed based on the criteria identified in Section 7.1. The following alternatives are further described and analyzed in Section 7.6 through Section 7.8.

**Alternative 1: No Project/No Development Alternative.** This alternative consists of the Proposed Project not being approved, and the Project site remaining vacant and undeveloped.

**Alternative 2: No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative.** This alternative consists of the Proposed Project not being approved, and the Project site being fully developed based on the existing underlying POLA Port Master Plan (PMP) Land Use designation of Open Space for APNs 7440-016-002, 7440-016-003, and 7412-024-007. Thus, Alternative 2 would include development of 13.25 acres into an open space recreation area inclusive of walking paths, grass areas for active recreation, on-site parking lot with 30 parking spaces, a restroom, and landscaping. APN 7440-016-001 would be left vacant and undeveloped. Thus, 13.25 acres of the 18.63-acre Project site would be developed with an open space recreation area.

**Alternative 3: Reduced Project Alternative.** This alternative consists of development of the Project site in a manner similar to the Proposed Project, but with less paved acreage and parking spaces and reduced operational intensity. This alternative would develop 10 acres of the Project site with 196 parking spaces accommodating trucks and chassis with shipping containers up to 40 feet long. This alternative would require the same number of employees on site and same on-site operational equipment as the Proposed Project, but would result in 830 fewer trips per day. The reduced development acreage would result in the remaining 8.63 acres of the Project site to remain in its existing vacant and undeveloped condition. This alternative would also include intersection modifications, including installation of a northbound left turn pocket and signals to provide full access to the site. This alternative would still require a PMP Amendment to amend the designation of the 10 acres being developed from Open Space to Maritime Support; however, this alternative would not require a Coastal Development Permit from the City of Los Angeles as no development would occur within the City of Los Angeles parcel.

## 7.6 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Pursuant to State CEQA Guidelines Section 15126.6(e), this EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services [...] In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Project/No Development Alternative allows decisionmakers to compare the environmental impacts of approving the Proposed Project to the environmental impacts that would occur if the property were to be left in its existing conditions for the foreseeable future. Under the existing conditions, the Project site is undeveloped and vacant. See Section 4, *Environmental Setting*, for additional details and figures regarding the existing conditions at the Project site.

### 7.6.1 Environmental Impact Comparison

#### **Aesthetics**

Under this alternative, the Project site would remain in its existing condition, which includes undeveloped and vacant conditions. The visual character and quality of the site would be maintained, and no new pavement, restroom building, guard booth, or landscaping would be introduced. This alternative would reduce the visual height from truck and chassis parking on the lot and development of the site. This alternative would not create new sources of light and glare. Overall, this alternative would result in no impacts to aesthetics, and therefore, would result in fewer impacts than the Proposed Project.

#### **Agriculture and Forestry Resources**

Under this alternative, the Project site would remain in its existing condition, which includes undeveloped and vacant conditions. The Project site does not contain any farmland or forestry land and is not located within an agricultural land use or zoning designation. Although the site was historically used for agriculture between 1896 and 1923, it does not currently support agricultural uses and is surrounded by industrial development with existing container terminal facilities and operations (SCS Engineers, 2017a – EIR Appendix G). According to the California Department of Conservation (DOC) Important Farmland Map, the Proposed Project is located within Urban and Built-Up Land (DOC, 2018). Thus, this alternative would also result in no impacts to agriculture and forestry resources. Therefore, the No Project/No Development alternative would result in the same impacts as the Proposed Project.

#### **Air Quality**

Under this alternative no new development would occur on the Project site, and as such, no new stationary sources of air pollution would be introduced. Although both the Proposed Project and the No Project/No Development alternative would be consistent with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP), this alternative would avoid the Proposed Project’s less-than-significant impacts related to conflicting with the AQMP because no new development would occur under this alternative. In addition, although the Proposed Project’s construction and operational air quality emissions would be below applicable SCAQMD regional, local, and health risk thresholds, the alternative would not increase emissions of criteria pollutants or diesel particulate matter (DPM) over existing conditions. Therefore, this alternative would result in reduced impacts to regional air quality and sensitive receptors. This alternative would also avoid the Proposed Project’s less-than-significant impacts related to odors. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## **Biological Resources**

Under this alternative, no grading would occur, and there would be no potential impacts to special-status plants, animals, or sensitive vegetation communities in the Project site. Although mitigation measures required of the Proposed Project would reduce biological resource impacts to less-than-significant levels, this alternative would generate no impacts to biological resources as compared with the Proposed Project and would not require mitigation. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## **Cultural Resources**

Under this alternative, periodic disturbances related to weed abatement are expected to occur at the Project site, as well as other routine maintenance activities. No grading for construction would occur, and there would be no potential impacts to archaeological resources that may be buried below ground. Although mitigation measures required of the Proposed Project would reduce cultural resource impacts to less-than-significant levels, this alternative would avoid impacts to cultural resources associated with the Proposed Project and would not require mitigation. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## **Energy**

No construction activities would occur at the Project site or operation of the site that would increase consumption of energy sources under this alternative. As there are no existing occupied structures on site, there would be no consumption of electricity, natural gas, or gasoline. While this alternative would not generate an increase in electrical demand, it would also not provide upgraded energy efficient infrastructure, water efficient irrigation, or plumbing. While this EIR determined the Proposed Project's impacts to energy would be less than significant, this alternative would not use any energy, therefore, resulting in no impacts. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## **Geology and Soils**

No construction activities, including grading, would occur under this alternative. Thus, there would be no potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site. Additionally, as no grading activities would occur under this alternative, potential impacts from erosion, loss of topsoil, or to paleontological resources would not occur. While the Proposed Project impacts would be less than significant with mitigation incorporated, this alternative would result in no impacts and no mitigation measures would be required. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## **Greenhouse Gases**

No construction or operations would occur at the Project site, and no greenhouse gases (GHGs) would be generated under this alternative. Therefore, this alternative would result in no GHG emissions compared to the Proposed Project. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## **Hazards and Hazardous Materials**

No construction or operations would occur at the Project site that would generate or transport hazardous materials. The No Project/No Build Alternative would not include construction activities that would use typical construction-related hazardous materials. Thus, potential impacts related to use, disposal, and transport of hazardous materials would be avoided by this alternative. However, the existing contaminated soils would

remain on-site under this alternative. While this EIR determined that the Proposed Project's impacts related to hazards and hazardous materials would be less than significant with mitigation, this alternative would result in less impacts since no grading or construction would occur. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

### **Hydrology and Water Quality**

No changes to existing hydrology and drainage conditions would occur under this alternative. There are currently three concrete culverts that cross under the I-110 and outlet to the Project site. No stormwater improvements would be constructed under this alternative. Additionally, under this alternative, the stormwater leaving the site would not be treated to minimize waterborne pollutants and would continue to contain sediment and other potential pollutants, as occurs under existing conditions. However, this alternative would generate fewer sources of potential water-borne pollutants due to lack of on-site buildings, trucks, and chassis on site. Overall, hydrology and water quality impacts of the No Project/No Build Alternative would be less than significant, and neutral in comparison to the Proposed Project.

### **Land Use and Planning**

This alternative would not result in new development, and as such, there would be no potential for land uses to be introduced that would indirectly result in environmental impacts due to a conflict with an existing land use plan. Overall, this alternative would result in no impacts to land use and planning, and therefore, would be less than the Project's impacts.

### **Mineral Resources**

The Project site is located immediately adjacent to the Wilmington Oil Field. However, there are no mapped oil or gas wells on the Project site and there are no active mines located on the Project site or within the vicinity. Therefore, consistent with development of the Proposed Project, this alternative would result in no impacts to the availability of oil, gas, or mineral resources.

### **Noise**

Under this alternative, no development would occur on site, and no new sources of noise would be introduced at the Project site. Since no new development would occur and no traffic trips would be generated, this alternative would not increase in area-wide traffic noise levels. In addition, this alternative would not result in construction on site, and no construction noise or vibration would occur. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

### **Population and Housing**

This alternative would not result in new development, and as such, would not result in induced growth or displacement affecting population and housing. However, this alternative would also not result in the benefit of adding new employment opportunities, which would not bring in 6 new employment opportunities within the POLA. Therefore, while the Proposed Project's impacts would be less than significant upon implementation of standard conditions of approval, the alternative would result in the same impacts as the Proposed Project.

## Public Services

This alternative would not result in new development, and as such, would not result in increased demand for public services such as fire and police services, school services, library services, or health services that requires the new construction of public facilities. However, this alternative would also not result in the contribution of fees to the Los Angeles Unified School District pursuant to Senate Bill 50 or development impact fees. Therefore, while the Proposed Project's impacts would be less than significant through compliance with regulatory programs, the alternative would result in less impacts.

## Recreation

This alternative would not result in new development, and as such, would not result in increased demand for recreation. Therefore, the No Project/No Development alternative would result in no impacts which is the same as the Proposed Project.

## Transportation

This alternative would not result in new development, and as such, would not result in any trips, traffic, or vehicle miles traveled (VMT) associated with operation of the Project site. This alternative would not impact existing transit service and alternative transportation facilities within the Project site. As the Project site would not be developed and trips would not be generated, the alternative would generate fewer trips than the Proposed Project. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## Tribal Cultural Resources

Under this alternative, existing conditions would remain, and no new development would occur. Periodic disturbances related to weed abatement is expected to occur at the Project site, as well as other routine maintenance activities for property upkeep. No grading would occur and there would be no potential impacts to tribal cultural resources that may be buried below ground. This alternative would avoid impacts to tribal cultural resources and would not require mitigation similar to the Proposed Project. Therefore, the No Project/No Development alternative would result in the same impacts as the Proposed Project.

## Utilities and Service Systems

Under this alternative, existing conditions would remain, and no new development would occur. No additional domestic water, wastewater, stormwater drainage, electric power, or natural gas facilities would be needed under this alternative, and there would be no change in the demand for domestic water or wastewater treatment services. This alternative would also not result in increased demand for solid waste collection and disposal. Selection of this alternative would avoid all of the Proposed Project's impacts to utilities and service system providers. While the Proposed Project would result in less than significant impacts, this alternative would result in less impacts due to no change in demand of these service systems. Therefore, the No Project/No Development alternative would result in less impacts than the Proposed Project.

## Wildfire

Under this alternative, existing conditions would remain, and no new development would occur. The Proposed Project is not located within or near a wildfire hazard zone of State or Local Responsibility (CAL FIRE, 2023). Similar to the Proposed Project, this alternative would result in no impacts related to wildfire.

## 7.6.2 Conclusion

### Ability to Reduce Impacts

The No Project/No Development Alternative would result in continuation of the existing uses within the Project site, and development would not occur. This alternative would result in fewer impacts and would not require mitigation for biological resources, cultural resources, and hazards and hazardous materials. As a result, the mitigation measures that are identified in Chapter 5.0 of this EIR would not be required.

However, the environmental benefits of the Proposed Project would also not be realized such as disposing of contaminated on-site soil through a remediation plan.

### Ability to Achieve Project Objectives

As shown in Table 7-5 at the end of Section 7, the No Project/No Development Alternative would not meet any of the Proposed Project objectives. This alternative would not increase the efficiency of goods movement in the POLA as it would not develop the Project site. Additionally, a facility would not be provided that could increase efficiency of terminal operations or alleviate truck traffic congestion. Furthermore, an underutilized property would not be developed to accommodate the growing need for goods movement within Southern California.

## 7.7 ALTERNATIVE 2: NO PROJECT/BUILDOUT OF PORT OF LOS ANGELES MASTER PLAN DESIGNATION ALTERNATIVE

This No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative consists of the Proposed Project not being approved, and the Project site would be fully built out based on the existing underlying POLA PMP Land Use designation of Open Space for APNs 7440-016-002, 7440-016-003, and 7412-024-007. Thus, Alternative 2 would include development of 13.25-acres into a recreation area with walking paths, grass areas for active recreation, an on-site parking lot with 30 parking spaces, a restroom, and landscaping. APN 7440-016-001 would be left vacant and undeveloped. Thus, 13.25 acres of the 18.63-acre Project site would be developed with an open space recreation area. The proposed recreation area would be open from 6 a.m. to 10 p.m.

Areas planned for physical development on and offsite would be less than those proposed for development under the Proposed Project. This alternative would not require a POLA PMP Amendment to Maritime Support.

### 7.7.1 Environmental Impact Comparison

#### Aesthetics

Under this alternative, 13.25 acres of the Project site would be developed into an open space recreational area inclusive of walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping. The visual character and quality of the site would be improved through landscaping that would be introduced throughout the majority of the Project site. This alternative would reduce the visual change on site resulting from the height of truck and chassis parking on the site. This alternative would create new sources of light and glare from lights in the parking lot and along the walking paths. However, lighting would be shielded and directed away from the perimeter of the Project site. Thus, this alternative would result in less-than-significant impacts to aesthetics, and would visually enhance the area. Therefore, aesthetics impacts would be less than the Proposed Project's impacts and would remain less than significant.



## Agriculture and Forestry Resources

Under this alternative, the Project site would change from undeveloped and vacant conditions to an open space recreational area inclusive of walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping. The Project site does not contain any farmland or forestry land and is not located within an agricultural land use or zoning designation. Although the site was historically used for agriculture between 1896 and 1923, it does not currently support agricultural uses and is surrounded by industrial development with existing container terminal facilities and operations (SCS Engineers, 2017a). According to the California Department of Conservation (DOC) Important Farmland Map, the Proposed Project is located within Urban and Built-Up Land (DOC, 2018). Thus, this alternative would also result in no impacts to agriculture and forestry resources. Therefore, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would result in the same impacts as the Proposed Project.

## Air Quality

This alternative would develop 13.25 acres with a recreational area with walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping on the Project site. No new stationary sources of air pollution would be introduced; however, the alternative would result in trips to and from the site. Although both the Proposed Project and the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would be consistent with the SCAQMD AQMP, this alternative would reduce the Proposed Project's less-than-significant-impacts related to conflicting with the AQMP because less intensive development would occur under this alternative. In addition, although the Proposed Project's construction and operational air quality emissions would be below applicable SCAQMD regional, local, and health risk thresholds, the alternative would not increase emissions of criteria pollutants or DPM over existing conditions. Therefore, this alternative would result in reduced impacts to regional air quality and sensitive receptors. This alternative would also result in reduced impacts related to odors. Therefore, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would result in less impacts than the Proposed Project.

## Biological Resources

This alternative would develop 13.25 acres with an open space recreational area with walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping on the Project site. Under this alternative, minimal grading would occur, but the Project site would be landscaped. Therefore, there would be potential impacts to special status plants, animals, or sensitive vegetation communities in the Project site with removal of existing trees and shrubs. As such, this alternative would introduce new trees and potential habitat for migratory birds on site. Although mitigation measures required of the Proposed Project would reduce biological resource impacts to less-than-significant levels, this alternative would result in fewer impacts to biological resources compared with the Proposed Project and would require the same mitigation. Therefore, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would result in similar impacts to the Proposed Project and would remain less than significant with mitigation.

## Cultural Resources

This alternative would develop 13.25 acres with an open space recreational area with walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping on the Project site. Under this alternative, minimal grading would occur, but the Project site would be landscaped. Under this alternative, periodic disturbances related to landscaping maintenance such as weed abatement are expected to occur at the Project site, as well as other routine maintenance activities for property including restroom, trail, and parking lot. Minimal grading for construction would occur, and there would be no potential impacts to historical resources as the existing Project site is undeveloped and vacant. As this alternative would require minimal grading, the same cultural mitigation measure would be included for potential archaeological

resources that may be buried below ground. The same mitigation measures required of the Proposed Project would reduce cultural resource impacts to less-than-significant levels. Therefore, the No Project/Buildout of the Existing Land Use Alternative would result in the same impacts as the Proposed Project.

## **Energy**

Minimal construction activities would occur at the Project site, and operation of this alternative would include lighting and water for irrigation and restroom use, which would consume energy. The consumption of energy sources related to water use would be greater than the Proposed Project under this alternative due to the increased landscape area. However, this alternative would result in an overall reduced electrical demand, as the Proposed Project would operate 24 hours a day, seven days a week, and petroleum use would decrease as no trucks would visit the site. Therefore, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would result in fewer impacts than the Proposed Project and impacts would remain less than significant.

## **Geology and Soils**

Under this alternative, the Project site would require minimal grading to develop an on-site parking lot and restroom. Thus, potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Proposed Project. This alternative would also require a mitigation measure for preparation of a Paleontological Resources Impact Mitigation Plan and paleontological monitoring. This alternative would result in similar impacts as the Proposed Project and would remain less than significant with mitigation.

## **Greenhouse Gases**

Under this alternative, new sources of GHG emissions from construction would be introduced as development of a restroom building and paving of a parking lot would occur on site. Mobile sources of GHG emissions would decrease compared to the Proposed Project because this alternative would not introduce new trucks to the Project site. Therefore, GHG emission impacts under this alternative would be less than the Proposed Project.

## **Hazards and Hazardous Materials**

Under this alternative, the Project site would result in 13.25-acres of open space and recreational uses inclusive of walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping on the Project site. Minimal construction would occur under this alternative and would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. This alternative would require grading. Thus, the mitigation measure that requires a soil management plan to remove contaminated soils applicable to the Proposed Project would be applicable to this alternative. In addition, this alternative would not include the routine use or transport of hazardous materials during operation, including diesel particulate matter, as the Proposed Project. Thus, this alternative would result in less impacts than those associated with the Proposed Project but would remain less than significant with mitigation.

## **Hydrology and Water Quality**

Under this alternative, the Project site would result in 13.25-acres of open space and recreational uses. This alternative would result in less impermeable surfaces compared to the Proposed Project. The alternative would still require the preparation of a SWPPP and LID plan. Therefore, this alternative would result in similar less-than-significant impacts as the Project; and therefore, would be consistent with the Project's impact.

## Land Use and Planning

Under this alternative, the Project site would be developed as a recreational area pursuant to site's Open Space designation under the POLA PMP. As such, there would be no conflicts with applicable land use plans, policies, or regulations resulting in significant environmental effects. Thus, this alternative would be consistent with the land use policies within the POLA PMP and City of Los Angeles General Plan. With implementation of measures to address other environmental issues (e.g., transportation, etc.), potential impacts due to land use compatibility under both the Proposed Project and this alternative would remain less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would be less than significant; and therefore, would be consistent with the Project's impacts.

## Mineral Resources

The Project site is located immediately adjacent to the Wilmington Oil Field. However, there are no mapped oil or gas wells on the Project site and there are no active mines located on the Project site or within the vicinity. Therefore, consistent with development of the Proposed Project, this alternative would result in no impacts to the availability of oil, gas, or mineral resources.

## Noise

Under this alternative, the Project site would be developed with an open space and recreational area which would not result in an increase in on-site noise or noise from mobile sources. Roadway noise would decrease in comparison to the Proposed Project as well as decrease employee trips and truck trips. Therefore, this alternative would result in a decrease in roadway noise when compared to the Proposed Project. Short-term noise and vibration impacts would occur as implementation of this alternative would require construction of the on-site parking lot and restroom building. Therefore, this alternative would result in reduced impacts than those associated with the Proposed Project.

## Population and Housing

Under this alternative, the Project site would be fully built to the maximum extent allowed under the existing POLA PMP land use, resulting in 13.25-acres of recreational uses and open space. This alternative would not result in an increase in population which would not result in a need for additional housing. Thus, this alternative would not result in unplanned growth inducing impacts or displacement of population and housing. Therefore, this alternative would result in similar less-than-significant impacts as the Proposed Project.

## Public Services

Under this alternative, the Project site would be fully built out to the maximum extent allowed under the existing POLA PMP land use, resulting in 13.25-acres of recreational uses and open space. Construction of this alternative would result in reduced impacts based on reduced employees. The same fire and police stations would serve the alternative, and the decrease in employees on site would likely decrease the amount of service calls received by these public services compared to the Project. In addition, this alternative would also require the payment of development impact fees pursuant to the Port of Los Angeles and City of Los Angeles and Government Code Section 65995 et seq. Through implementation of regulatory requirements, impacts would be less than the Proposed Project and remain less than significant.

### Recreation

This alternative would develop a recreational area, and as such, would provide recreation for the existing residents. Therefore, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would result in no impacts which is the same as the Proposed Project.

### Transportation

Under this alternative, fewer trips would occur from developing the site with 13.25 acres of recreational uses. Under this alternative, development of 13.25 acres of the developable portion of the site would result in approximately 11 one-way trips per day during operation as shown in Table 7-1.

**Table 7-1: Alternative 2 Trip Generation**

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<b>Trip Rates</b>								
Public Park (411) <sup>1</sup>	Acres	0.78	0.01	0.01	0.02	0.06	0.05	0.11
<b>Total Project Trip Generation</b>	13.25 Acres	11	0	0	0	1	1	2

<sup>1</sup> Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 411- Public Park

This alternative would result in substantially fewer trips than the Proposed Project, which is calculated to generate 1,808 daily trips including 225 AM peak hour and 11 PM peak hour trips in the buildout (horizon) year. Additionally, development of this alternative would not result in daily truck trips. Thus, VMT and potential transportation conflicts under this alternative would be reduced in comparison to the Project, and impacts would be less than the Proposed Project.

### Tribal Cultural Resources

Under this alternative, the Project site would develop 13.25 acres with recreational uses. Potential tribal cultural resource impacts would be similar to the Proposed Project based on the ground disturbance necessary to construct the recreational uses and this alternative would not require mitigation. Therefore, impacts from this alternative would be similar to the Project and would be less than significant.

### Utilities and Service Systems

The level of development on site would be decreased under this alternative as compared to the Proposed Project. This alternative would develop the Project site with recreational uses which would require electricity for night lighting and water for drinking fountains. Impacts associated with the provision of such facilities would be reduced in comparison to the development of a parking lot and would be less than significant with compliance to existing regulatory requirements. The development under this alternative would be fully consistent with the growth assumptions under the POLA PMP, which are used by Los Angeles Department of Water and Power for long-term planning purposes. Similarly, LA Sanitation would have adequate capacity to treat wastewater generated under both the Project and this alternative; however, this alternative would generate less wastewater than the Proposed Project. In addition, this alternative would be subject to City and State solid waste regulations and the alternative would not result in the generation of solid waste in excess of Chiquita Canyon Sanitary Landfill and Sunshine Canyon Landfill capacity. Overall, this alternative would result in fewer impacts than the Proposed Project and would result in less-than-significant impacts related to utilities and service systems.

## Wildfire

Under this alternative, the Project site would be developed as an open space and recreational area. The Proposed Project is not located within or near a wildfire hazard zone of State or Local Responsibility (CAL FIRE, 2023). Similar to the Proposed Project, this alternative would result in the same impacts related to wildfire. The proposed construction activities, including equipment and materials staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the safe passage of persons and vehicles through/around any required temporary road restrictions in accordance with Section 503 of the California Fire Code (Title 24, CCR, Part 9). Similar to the Proposed Project, this alternative would result in no impacts related to wildfire.

### 7.7.2 Conclusion

#### Ability to Reduce Impacts

The No Project/Buildout of the Port of Los Angeles Master Plan Designation Alternative would develop the Project site consistent with the underlying POLA PMP land use designation of Open Space. This alternative would decrease impacts related to air quality, energy, greenhouse gas emissions, hazards, noise, public services, transportation, and utilities and service systems. In addition, this alternative would require the same mitigation measures as the Proposed Project (see Table 7-4).

#### Ability to Achieve Project Objectives

As shown in Table 7-5, below, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would not meet any of the Proposed Project objectives. This alternative would develop an underutilized property with areas for active recreation, walking paths, and landscaping. This alternative would not increase the efficiency of goods movement in the POLA as it would not develop a truck trailer and chassis parking lot on the Project site. Additionally, this alternative would not provide a facility that could increase efficiency of terminal operations or alleviate truck traffic congestion. Furthermore, an underutilized property would not be developed to accommodate the growing need for goods movement within Southern California.

## 7.8 ALTERNATIVE 3: REDUCED PROJECT ALTERNATIVE

This Reduced Project Alternative consists of developing a 10-acre truck and chassis parking lot with 196 parking spaces accommodating chassis with shipping containers up to 40 feet long and landscaping. Consistent with the Proposed Project, development of this alternative would include 39 percent landscaping coverage. Thus, 3.9 acres of the Project site would consist of landscaping. Development of the Project site under this alternative would be similar to the Proposed Project, but with a substantial reduction in square footage of the parking lot and operational intensity. Additionally, development under this alternative would result in a maximum of six employees during peak construction and a maximum of two employees would be on site at any given time during operations. The Reduced Project Alternative would reduce the Proposed Project footprint by approximately 54 percent. The remaining 8.63 acres of the developable portion of the Project site would be left in its existing vacant and undeveloped condition.

Infrastructure and circulation improvements would still be required to adequately serve the development; however, stormwater facilities would be sized smaller due to the decrease in impervious areas. This alternative would also include intersection modifications, including installation of a northbound left turn pocket and signals to provide full access to the site.

## 7.8.1 Environmental Impact Comparison

### Aesthetics

Under this alternative, the Project site would be developed with a 10-acre parking lot with approximately 196 parking spaces accommodating chassis with shipping containers up to 40 feet long. Development under the Reduced Project Alternative would reduce the Proposed Project footprint by approximately 54 percent. This alternative would develop parking spaces and landscaping on 10 acres of the 18.63-acre Project site. While the alternative would result in a smaller developed area, the alternative would be visually similar to the Proposed Project. This alternative would introduce new sources of light and glare but would also be subject to the Los Angeles Municipal Code. This alternative would result in less-than-significant impacts to aesthetics, and therefore, would result in similar impacts to the Proposed Project.

### Agriculture and Forestry Resources

Under this alternative, the Project site would change from undeveloped and vacant conditions to a 10-acre truck trailer parking lot. The Project site does not contain any farmland or forestry land and is not located within an agricultural land use or zoning designation. Although the site was historically used for agriculture between 1896 and 1923, it does not currently support agricultural uses and is surrounded by industrial development with existing container terminal facilities and operations (SCS Engineers, 2017a). According to the California Department of Conservation (DOC) Important Farmland Map, the Proposed Project is located within Urban and Built-Up Land (DOC, 2018). Thus, this alternative would also result in no impacts to agriculture and forestry resources. Therefore, the No Project/Reduced Project alternative would result in the same impacts as the Proposed Project.

### Air Quality

Under the Reduced Project Alternative, approximately 54 percent of the Project site would be developed with a parking lot and landscaping. Under this alternative, air quality impacts would be less than those under the Proposed Project due to the decrease in development footprint. This alternative's maximum peak construction and operational emissions would be less than significant. The Reduced Project Alternative would also result in emissions below SCAQMD thresholds. Therefore, this alternative would result in less-than-significant impacts to air quality but would result in less overall air quality impacts compared to the Proposed Project.

### Biological Resources

Under this alternative, approximately 54 percent of the Project site would be developed with a parking lot and landscaping. Although this alternative would result in a reduced development footprint, it would require removal of existing vegetation in open areas and could potentially impact special status plants, animals, or sensitive vegetation communities. As such, impacts to biological resources would be similar to the Proposed Project and require the same mitigation measures. These mitigation measures would also reduce potential impacts from this alternative to a less-than-significant level. This alternative would result in less-than-significant impacts to biological resources, and therefore, would be consistent with the Proposed Project's impact.

### Cultural Resources

Under this alternative, approximately 54 percent of the developable portion of the Project site would be developed with a parking lot and landscaping. Potential archaeological impacts would be similar to the Proposed Project due to grading and excavation required for development of the parking lot and require the same mitigation measures. Therefore, impacts from this alternative would be similar compared to the

Project, and mitigation measures would reduce potential impacts from this alternative to a less-than-significant level as with the Proposed Project. This alternative would result in less-than-significant impacts to cultural resources, and therefore, would be consistent with the Proposed Project's impact.

## Energy

Under the Reduced Project Alternative, approximately 54 percent of the Project site would be developed with a parking lot and landscaping. Energy use associated with this alternative would generally decrease due to the reduced intensity of development and this alternative would not result in wasteful energy use. This alternative would also be required to follow Title 24 requirements. Therefore, impacts to energy from the Reduced Project Alternative would be less than those associated with the Proposed Project, and remain less than significant. Therefore, while Proposed Project impacts to energy were determined to be less than significant, energy impacts from this alternative would be reduced.

## Geology and Soils

Under this alternative, 10 acres of the Project site would be developed with a parking lot and landscaping. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Proposed Project. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation measures regarding paleontological resources would be required for this alternative. The Reduced Project Alternative would result in less-than-significant impacts to geology and soils, and therefore, would be consistent with the Proposed Project's impact.

## Greenhouse Gases

Under the Reduced Project Alternative, approximately 54 percent less developable area would be developed with a parking lot and landscaping. Therefore, a reduced volume of construction activities and related production of GHG emissions would occur. In addition, the reduced amount of development would result in fewer stationary source emissions from on-site equipment, and fewer traffic-generated GHG emissions than the Proposed Project. Therefore, the overall amount of GHG emissions would be reduced compared to the Proposed Project. Due to the large decrease in developable area under the Reduced Project Alternative, emissions of GHG emissions would be reduced and would, like the Proposed Project, be below the 10,000 MTCO<sub>2e</sub> threshold set by SCAQMD. Therefore, this alternative would reduce the Proposed Project's GHG emissions but would remain less than significant. Therefore, impacts related to GHG emissions would be less than the Proposed Project.

## Hazards and Hazardous Materials

Under this alternative, 10 acres of the Project site would be developed with a parking lot and landscaping. Construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. In addition, this alternative would likely require the same utilization of hazardous materials during operation, including emissions of diesel particulate matter, as the Proposed Project. Like the Proposed Project, this alternative would require mitigation requiring a Soil Management Plan related to potentially hazardous materials including total petroleum hydrocarbons (TPH) volatile organic compounds (VOCs) and lead. Thus, this alternative would be consistent with the Proposed Project's less-than-significant impact with mitigation.

## Hydrology and Water Quality

Under this alternative, 10 acres of the Project site would be developed with a parking lot and landscaping. Due to the decrease in development footprint, this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Proposed Project. Construction of the alternative would still construct the identified stormwater drainage system as the Proposed Project but would require smaller sized chambers. In addition, preparation of a SWPPP and compliance with LID regulations would be required for development of this alternative. Therefore, the Reduced Project alternative would result in similar less-than-significant impacts as the Proposed Project; and therefore, would be consistent with the Proposed Project's impact.

## Land Use and Planning

Under this alternative, 10 acres of the 18.63-acre of the Project site would be developed with a parking lot and landscaping. As such, there would be no conflicts with applicable land use plans, policies, or regulations resulting in significant environmental effects. Both the Proposed Project and the Reduced Project Alternative would be fully consistent with the SCAG RTP/SCS. The alternative would be consistent with the M2 and M3 designation for the site and applicable City of Los Angeles General Plan Goals, Policies and Implementation Measures. Like the Proposed Project, this alternative would require a POLA PMP amendment. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the Reduced Project Alternative would be less than significant; and therefore, would be consistent with the Proposed Project's impacts.

## Mineral Resources

The Project site is located immediately adjacent to the Wilmington Oil Field. However, there are no mapped oil or gas wells on the Project site and there are no active mines located on the Project site or within the vicinity. Therefore, consistent with development of the Proposed Project, this alternative would result in no impacts to the availability of oil, gas, or mineral resources.

## Noise

Under this alternative, 10 acres of the Project site would be developed with a parking lot and landscaping. Roadway noise would increase as well from the increase in employee and truck trips compared to the existing condition. However, operation of this alternative would result in approximately 830 fewer daily trips in comparison to the Proposed Project. Therefore, this alternative would result in a decrease in roadway noise when compared to the Proposed Project. Short-term noise and vibration impacts would occur during construction. Like the Project, long-term operational noise would not expose nearby sensitive receivers to noise levels over the City of Los Angeles's daytime or nighttime noise standards; however, due to the less intense development on site under this alternative, impacts would be reduced under the Reduce Project Alternative as compared to the Proposed Project. Therefore, this alternative would result in fewer impacts than those associated with the Proposed Project.

## Population and Housing

Under this alternative, 10 acres of the Project site would be developed with a parking lot and landscaping. This alternative would result in a maximum of 20 employees during peak construction and a maximum of two employees would be on site at any given time during operations. A total of six employees would be on site per day. Thus, the number of employees would be the same as the Proposed Project. This employment increase would be within the SCAG growth projections from 2020 to 2045. Thus, this alternative would not result in unplanned growth inducing impacts or displacement of population and housing. Therefore, this alternative would result in similar less-than-significant impacts as the Proposed Project.



**Public Services**

Under this alternative, 10 acres of the 18.63-acre developable portion of the Project site would be developed with a parking lot and landscaping. Construction of this alternative would result in generally similar impacts based on the same employment generated. The same fire and police stations would serve the alternative, and the decrease in developed area would likely decrease the amount of service calls received by these public services compared to the Proposed Project. In addition, this alternative would also require the payment of development impact fees pursuant to the POLA and City of Los Angeles and Government Code Section 65995 et seq. Through implementation of regulatory requirements, impacts would less be significant under this alternative but would be less than the Proposed Project.

**Recreation**

This alternative would not result in a 10-acre truck parking lot, and as such, would not result in increased demand for recreation. Therefore, the No Project/Reduced Project alternative would result in no impacts which is the same as the Proposed Project.

**Transportation**

Under this alternative, fewer trips would be introduced from developing a 10-acre parking lot with landscaping. Under this alternative, development of 10 acres of with a truck and chassis parking lot would result in approximately 532 daily trips in the opening year and 978 daily trips in the build out horizon year as shown in Table 7-2 and Table 7-3.

**Table 7-2: Alternative 3 Trip Generation Opening Year**

Land Use	Units	Daily	Off Peak	AM Peak Hour PCE			PM Peak Hour PCE		
				In	Out	Total	In	Out	Total
<b><u>Total Vehicle Trip Generation</u></b>									
Proposed Reduced Trailer Storage Lot	10	Acre							
<b><u>Vehicle Mix<sup>1</sup></u></b>									
Employee Auto		10	2	2	2	4	2	2	4
Vendor Auto		4	4	0	0	0	0	0	0
Truck		518		28	35	63	15	14	29
<b>Total Trip Generation</b>		<b>532</b>		<b>30</b>	<b>37</b>	<b>67</b>	<b>17</b>	<b>16</b>	<b>33</b>

<sup>1</sup>Trip rates and vehicle mix from Los Angeles Harbor Department (LAHD), Goods Movement Division

**Table 7-3: Alternative 3 Trip Generation Horizon Year**

Land Use	Units	Daily	Off Peak			AM Peak Hour PCE			PM Peak Hour PCE		
			In	Out	Total	In	Out	Total	In	Out	Total
<b><u>Total Vehicle Trip Generation</u></b>											
Proposed Reduced Trailer Storage Lot	10	Acre									
<b><u>Vehicle Mix<sup>1</sup></u></b>											
Employee Auto		10	2	2	2	4	2	2	4		
Vendor Auto		4	4	0	0	0	0	0	0		
Truck		964		53	66	119	26	25	51		
Total Trip Generation		978		55	68	123	28	27	55		

<sup>1</sup>Trip rates and vehicle mix from LAHD, Goods Movement Division

This alternative would result in substantially fewer trips than the Proposed Project, which is calculated to generate 1,808 daily trips including 225 AM peak hour and 11 PM peak hour trips in the horizon year. With respect to VMT, this alternative would result in 830 fewer daily trips and would screen out of conducting a VMT analysis pursuant to the POLA’s screening criteria similar to the Proposed Project. Therefore, this alternative would result in less-than-significant impacts related to VMT. This alternative would result in fewer impacts in comparison to the Proposed Project.

**Tribal Cultural Resources**

Under this alternative, 10 acres of the developable portion of the Project site would be developed with a parking lot and landscaping. Potential tribal cultural resource impacts would be similar to the Proposed Project due to grading and excavation required for development of the parking lot and require the same mitigation measures. Therefore, impacts from this alternative would be similar compared to the Proposed Project, and no mitigation measures would be required. This alternative would result in less-than-significant impacts to tribal cultural resources, and therefore, would be consistent with the Proposed Project’s impact.

**Utilities and Service Systems**

The level of development on site would be decreased under this alternative as compared to the Proposed Project. Both the Proposed Project and this alternative would require the construction of water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities. Impacts associated with the provision of such facilities would be similar and would be less than significant with compliance to existing regulatory requirements. Similar to the Proposed Project, this Alternative proposes an amendment to the PMP, its water use demand would not be accounted for in the 2020 Urban Water Management Plan (UWMP). Water use from the proposed parking lot is anticipated to result in an increase in demand due to the restroom buildings onsite similar to the Proposed Project. In addition, this alternative would be subject to City and State solid waste regulations and the alternative would not result in the generation of solid waste in excess of Chiquita Canyon Sanitary Landfill and Sunshine Canyon Landfill capacity. However, this alternative would result in a decrease in developed area and would generate less solid waste than the Proposed Project. Overall, this alternative would result in less-than-significant impacts related to utilities and service systems but would result in a decrease in impacts in comparison to the Proposed Project.

## Wildfire

Under this alternative, the Project site would be developed as a truck trailer parking lot. The Proposed Project is not located within or near a wildfire hazard zone of State or Local Responsibility (CAL FIRE, 2023). The proposed construction activities, including equipment and materials staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the safe passage of persons and vehicles through/around any required temporary road restrictions in accordance with Section 503 of the California Fire Code (Title 24, CCR, Part 9). Similar to the Proposed Project, this alternative would result in no impacts related to wildfire.

## 7.8.2 Conclusion

### Ability to Reduce Impacts

The Reduced Project Alternative would develop a parking lot with landscaping on 10 acres of the Project site. Development under the Reduced Project Alternative would reduce the Project footprint by approximately 54 percent. This alternative would reduce impacts to air quality, energy, geology, greenhouse gas emissions, noise, public services, transportation, and utilities and service systems. However, mitigation measures would still be required for biological resources, cultural resources, paleontological resources, and hazards and hazardous materials.

### Ability to Achieve Project Objectives

As shown in Table 7-5, below, the Reduced Project Alternative would meet the Proposed Project objectives, but to a lesser extent compared to the Proposed Project. This alternative would develop an underutilized property by adding employment-generating uses and would attract new businesses and employment. Furthermore, the Reduced Alternative would reduce the need for the local workforce to commute outside of the Project vicinity. This alternative would develop a parking lot with landscaping in the Port of Los Angeles near port activities with close proximity to I-110. This alternative would meet the Proposed Project objectives but would not be able to support to help meet the demands of current and anticipated containerized cargo to the same degree as the Proposed Project because this alternative would reduce the number of parking stalls to 196.

## 7.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” when significant environmental impacts result from a Proposed Project. The Environmentally Superior Alternative for this Project would be Alternative 1: No Project/No Development. The No Project/No Development Alternative would avoid the less-than-significant impacts of the Project and would avoid implementation of the mitigation measures that are identified in Chapter 5.0 of this EIR that are related to biological resources, cultural resources, geology and soils, and hazards and hazardous materials.

Additionally, State CEQA Guidelines Section 15126.6(e)(2) states:

*The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Emphasis added.)*

Therefore, pursuant to CEQA, because the No Project/No Development Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be Alternative 2: No Project/Buildout of Port of Los Angeles Master Plan Designation, which would involve developing the Project site with a recreational area inclusive of walking paths, grass areas for active recreation, on-site parking lot, a restroom, and landscaping.

Alternative 2 would reduce impacts to 11 of the 20 environmental topics analyzed in this EIR. However, this alternative would be required to implement applicable mitigation measures regarding biological resources, cultural resources, geology and soils, and hazardous materials. Moreover, the Reduced Project Alternative would not meet any of the Project objectives.

CEQA does not require the Lead Agency (LAHD) to choose the environmentally superior alternative. Instead, CEQA requires LAHD to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the Proposed Project, and make findings that the benefits of those considerations outweigh the significant effects on the environment. Table 7-4 provides, in summary format, a comparison between the level of impacts for each alternative and the Proposed Project. Table 7-5 provides a comparison of the ability of each of the alternatives to meet the Project objectives.

**Table 7-4: Impact Comparison of the Proposed Project and Alternatives**

	<b>Proposed Project</b>	<b>Alternative 1 No Project / No Development</b>	<b>Alternative 2 No Project / Buildout of Port of Los Angeles Master Plan Designation</b>	<b>Alternative 3 Reduced Project</b>
<b>Aesthetics</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Agriculture and Forestry Resources</b>	No Impact	Same as Project	Same as Project	Same as Project
<b>Air Quality</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Biological Resources</b>	Less than significant with mitigation	Less than Project, and no mitigation	Same as Project	Same as Project
<b>Cultural Resources</b>	Less than significant with mitigation	Less than Project, and no mitigation	Same as Project	Same as Project
<b>Energy</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Geology and Soils</b>	Less than significant with mitigation	Less than Project, and no mitigation	Same as Project	Same as Project
<b>Greenhouse Gases</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Hazards and Hazardous Materials</b>	Less than significant with mitigation	Less than Project, and no mitigation	Same as Project	Same as Project
<b>Hydrology and Water Quality</b>	Less than significant	Less than Project	Same as Project	Same as Project
<b>Land Use and Planning</b>	Less than significant	Less than Project	Same as Project	Same as Project
<b>Mineral Resources</b>	No Impact	Same as Project	Same as Project	Same as Project
<b>Noise</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Population and Housing</b>	Less than significant	Less than Project	Same as Project	Same as Project
<b>Public Services</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Recreation</b>	No Impact	Same as Project	Same as Project	Same as Project
<b>Transportation</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Tribal Cultural Resources</b>	Less than significant	Less than Project	Same as Project	Same as Project
<b>Utilities and Service Systems</b>	Less than significant	Less than Project	Less than Project	Less than Project
<b>Wildfire</b>	No Impact	Same as Project	Same as Project	Same as Project
<b>Reduce Impacts of the Project?</b>		Yes	Yes	Yes
<b>Areas of Reduced Impacts Compared to the Project</b>		16	8	8

**Table 7-5: Comparison of the Proposed Project and Alternatives' Ability to Meet Objectives**

	<b>Proposed Project</b>	<b>Alternative 1 No Project / No Development</b>	<b>Alternative 2 No Project / Buildout of Port of Los Angeles Master Plan Designation</b>	<b>Alternative 3 Reduced Project</b>
1. Increase the efficiency of goods movement in the POLA by providing off-terminal maritime support to help meet the demands of current and anticipated containerized cargo from the various San Pedro Bay port marine terminals.	Yes	No	No	Yes, but to a lesser extent
2. Provide a facility that increases the efficiency of terminal operations by providing storage and staging of trucks and chassis in the POLA.	Yes	No	No	Yes, but to a lesser extent
3. Provide a facility that alleviates truck traffic congestion and illegal parking by providing trailer parking.	Yes	No	No	Yes, but to a lesser extent
4. Develop an underutilized property conveniently located in vicinity of the I-110 with access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within Southern California.	Yes	No	No	Yes, but to a lesser extent

## 7.10 REFERENCES

CAL FIRE (California Department of Forestry and Fire Protection). (2023). *Fire Hazard Severity Zone Viewer*. Accessed April 14, 2023, from: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>

DOC (Department of Conservation). (2018). *California Important Farmland Finder*. Accessed April 2023 from: <https://maps.conservation.ca.gov/DLRP/CIFF/>

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