

5.0

PROGRAM ALTERNATIVES

5.1 Introduction

This chapter presents a description of the alternatives to the proposed Program, evaluates their environmental impacts, and compares the impacts of each alternative to those of the other alternatives, including the proposed Program. The alternatives have been qualitatively analyzed in this Draft PEIR at a level that provides sufficient information about the environmental impacts of each alternative for comparative purposes and allows informed decision-making.

5.1.1 CEQA Requirements

CEQA Guidelines Section 15126.6 requires that an EIR present a range of reasonable alternatives to a proposed project or to the location of a project that could feasibly achieve a majority of the basic project objectives, but would avoid or substantially lessen one or more significant environmental impacts of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Rather, the alternatives should be limited to those meeting the project objectives, are ostensibly feasible, and would avoid or substantially lessen at least one of the significant environmental effects of the project (CEQA Guidelines Section 15126.6[f]). The EIR must identify the environmentally superior alternative, which cannot be the No Project (No-Program) Alternative. 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 or substantially lessen any significant environmental effects (CEQA Guidelines Section 15126.6[c]).

CEQA Guidelines explain that the evaluation of project alternative feasibility can consider “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.” The EIR is also not required to evaluate an alternative that has an effect that cannot be reasonably identified or that has remote or speculative implementation, and that would not achieve the basic proposed project objectives.

1 According to CEQA regulations, the alternatives section of an EIR is required to:

- 2 ■ Rigorously explore and objectively evaluate a reasonable range of alternatives;
- 3 ■ Include reasonable alternatives not within the lead agency’s jurisdiction or
4 Congressional mandate, if applicable;
- 5 ■ Include a “no-project” alternative;
- 6 ■ Develop substantial treatment to each alternative, including the proposed action, so
7 that reviewers may evaluate their comparative merits;
- 8 ■ Identify the environmentally superior alternative;
- 9 ■ Include appropriate mitigation measures (when not already part of the proposed
10 action or alternatives); and,
- 11 ■ Present the alternatives that were eliminated from detailed study and briefly discuss
12 the reasons for elimination.

13 5.1.2 Selection Criteria

14 This Draft PEIR presents a reasonable range of alternatives, pursuant to CEQA, that
15 are consistent with LAHD’s legal mandates under the Port of Los Angeles Tidelands
16 Trust (Los Angeles City Charter, Article VI, Section 601), its leasing policy (LAHD
17 2006), and the CCA (20 PRC 30700 *et seq.*). The selection, development, and
18 evaluation of alternatives analyzed in this Draft PEIR are in accordance with CCA
19 policies that identify the coastal zone as a distinct and valuable natural resource. The
20 Port is one of only five locations in the state identified in the CCA for the purposes of
21 international maritime commerce (PRC Sections 30700 and 30701). LAHD’s
22 mandates identify the Port and its facilities as a primary economic/coastal resource of
23 the state and an essential element of the national maritime industry for promotion of
24 commerce, navigation, fisheries, environmental preservation, and public recreation.

25 The alternative selection process considered the state’s basic goals for the coastal
26 zone, as codified in Section 30001.5 of the CCA, which are to: 1) protect, maintain,
27 enhance, and restore the quality of the coastal zone environment and its natural and
28 artificial resources; 2) assure orderly, balanced utilization and conservation of coastal
29 zone resources, taking into account the social and economic needs of the people of
30 the state; 3) maximize public access to and along the coast and public recreational
31 opportunities in the coastal zone, consistent with sound resource conservation
32 principles and the rights of private property owners; and, 4) assure priority for
33 coastal-dependent and coastal-related development over other development on the
34 coast.

35 The overall purpose of the PMPU is to create a consolidated planning document that
36 updates the existing PMP, as amended, with policies and guidelines that reflect
37 current community and environmental conditions and account for trends in foreign
38 and domestic waterborne commerce, navigation, and fisheries. LAHD identified
39 several selection criteria to develop reasonable alternatives that meet the majority of
40 the PMPU’s objectives. These criteria include a planning document that would:

- 1 ■ Allow the Port to develop in a manner that is consistent with federal, state, county,
2 and city laws, including the CCA and Charter of the City of Los Angeles;
- 3 ■ Integrate economic, engineering, environmental, and safety considerations into the
4 Port development process for measuring the long-term impact of varying
5 development options on the Port's natural and economic environment;
- 6 ■ Promote the orderly, long-term development and growth of the Port by establishing
7 functional areas for Port facilities and operations; and,
- 8 ■ Allow the Port to adapt to changing technology, cargo trends, regulations, and
9 competition from other U.S. and foreign ports.

10 5.1.3 Screening Process

11 LAHD conducted a screening process per CEQA Guidelines to determine which
12 alternatives would be evaluated in detail in the Draft PEIR and which would be
13 eliminated from further consideration. In screening the alternatives, LAHD
14 considered the following factors:

- 15 ■ Would the alternative achieve the Program objectives?
- 16 ■ Would the alternative avoid or reduce any significant environmental effects?
- 17 ■ Is the alternative feasible?

18 As discussed in Chapter 2.0, Program Description, the screening process reflects
19 input from Port stakeholders, including tenants, Port customers, government
20 agencies, and the community, provided during public workshops, tenant outreach,
21 and formal planning processes, such as the *Terminal Island Land Use Plan*. During
22 this process, LAHD received comments on a variety of issues including land use
23 designations, preservation of historic resources, implementation of environmental
24 conservation efforts, increasing cargo diversity, and providing public access
25 opportunities for the San Pedro and Wilmington communities. As part of the
26 Terminal Island Land Use Plan process, LAHD also assessed the land use and
27 facilities requests of commercial fishermen, the presence of historical properties, the
28 scrap metal industry, and demand for commercial boatyard facilities in the region.
29 LAHD considered this input as part of their alternatives screening process.

30 Alternatives consisting of minor changes to the land use plan were not considered
31 viable alternatives to the proposed Program. The PMPU uses a Port-wide approach
32 for achieving the planning objectives of minimizing conflicts, maximizing
33 accessibility, and allocating land uses to accommodate future trends in waterborne
34 commerce. LAHD considered the configuration of planning areas and land use
35 designations as the most effective approach for achieving the PMPU objectives.
36 Additionally, alternatives consisting of minor reassignments of land uses for
37 individual properties would not be expected to significantly reduce environmental
38 impacts. Other possible alternatives that would result in substantially different uses
39 for the Port, such as a residential land uses, would be inconsistent with legal
40 mandates under the Port of Los Angeles Tidelands Trust and CCA, which identify
41 the Port as an essential element of the national maritime industry for promotion of
42 commerce, navigation, fisheries, and harbor operations. In addition, land uses that do
43 not give highest priority to navigation, shipping, and necessary support and access

1 facilities to accommodate the demands of foreign and domestic waterborne
2 commerce would be inconsistent with the *Port of Los Angeles Strategic Plan 2012-*
3 *2017* and the Port’s Leasing Policy. Therefore, the Port does not consider land use
4 plans that would deviate from the Port’s legal mandate, strategic plan, and Leasing
5 Policy to be viable alternatives to the proposed Program.

6 **5.1.4 Alternatives Considered But Eliminated** 7 **From Further Consideration**

8 **5.1.4.1 Port Community Advisory Committee Port** 9 **Master Plan**

10 The Port Community Advisory Committee (PCAC) submitted proposed changes to
11 the PMP that focused on creating a “bridge to breakwater” non-industrialized
12 community area along the San Pedro and Wilmington waterfronts (PCAC 2004). The
13 proposed revisions consisted of boundary and land use designation changes,
14 including a focus on modifying PMP planning area boundaries to adequately define
15 the “bridge to breakwater” area and updating allowable land uses to ensure adequate
16 public access to the waterfront. Key elements of the PCAC plan were incorporated
17 into the PMPU, such as:

- 18 ■ Areas of the Port that are adjacent to the community of San Pedro would not allow
19 general cargo or liquid bulk land uses;
- 20 ■ The Wilmington Waterfront area is designated for recreational, commercial, and
21 institutional land uses. Cargo handling designations, including container, liquid
22 bulk, commercial fishing, dry bulk, and industrial would not be allowed;
- 23 ■ The Anchorage Soil Storage Site would be designated an open space land use;
- 24 ■ The existing Wilmington marinas would continue to be designated recreational
25 boating;
- 26 ■ Terminal Island would continue to focus on heavy cargo handling land use
27 designations, including container, liquid bulk, dry bulk, and institutional; and,
- 28 ■ Fish harbor would continue to be focused on commercial fishing land uses.

29 Other elements of the PCAC plan were inconsistent with Program objectives. In
30 particular, the alternative in the PCAC plan that would not allow liquid bulk land
31 uses near Wilmington was eliminated for the following reasons:

- 32 ■ This PCAC alternative would not avoid or reduce significant environmental
33 impacts. The RMP ensures that liquid bulk terminals located at the Port do not
34 overlap with vulnerable resources, including visitor serving areas. Terminals that
35 are not in compliance with the RMP must become consistent with the plan either
36 by making safety improvements, changing the commodity mix they handle, or by
37 relocating. Existing liquid bulk terminals, including those located in PMPU area,
38 are consistent with the RMP. Furthermore, the development of new liquid bulk
39 facilities would be consistent with the RMP;

- 1 ■ The PCAC recommendation to relocate liquid bulk uses to Terminal Island is
2 infeasible. Terminal Island is not a suitable relocation site since there is
3 insufficient berthing capacity. The majority of Terminal Island is held in long
4 term leases with cargo terminals. The only berthing opportunities for liquid bulk
5 ships would be at Berths 240 and 301. A berth is available at the southernmost
6 face of Pier 400, however it would be extremely costly to develop a marine oil
7 terminal there because the berth would be constructed in the Outer Harbor, and a
8 complex network of pipelines would be required to reach backlands that could
9 accommodate a tank farm; and,

- 10 ■ Another consideration is that it would economically infeasible for existing tenants
11 to relocate. Proposed relocations would require costly site remediation for their
12 current facilities, in addition to the cost of berth, pipeline, and storage tank
13 improvements. It would be extremely difficult for the LAHD to retain liquid bulk
14 tenants if relocations were forced upon them, because of the cost burden. This
15 could significantly impact the Port's ability to import liquid bulk commodities and
16 receive their associated revenues.

17 5.1.4.2 Other Alternatives

18 As discussed in Chapter 2.0, Program Description, the *Terminal Island Land Use*
19 *Plan* considered long-term land use and facility improvements for Terminal Island
20 (Cargo Velocity LLC 2012), and applicable portions of the plan were incorporated
21 into the PMPU. However, the Terminal Island Land Use Plan only considered
22 Terminal Island and it did not address other planning areas within the PMPU area.
23 Therefore, based on the relatively limited geographic scope the Terminal Island Land
24 Use Plan was not considered a viable Program alternative.

25 LAHD also considered a cargo specialization alternative that would develop
26 container and break bulk as the cargo handling facilities and phase out liquid bulk
27 and dry bulk operations at the Port. Visitor serving uses would remain, including
28 commercial, open space, and recreational boating. This alternative potentially would
29 streamline operations in the port; focus infrastructure spending on specialized cargo
30 uses; and reduce or eliminate environmental impacts associated with dry bulk and
31 liquid bulk operations. However, LAHD dismissed this alternative for the following
32 reasons: 1) the Port would be underutilized if demand for break bulk or container
33 dropped; and, 2) this alternative would not meet the needs of the state with regard to
34 liquid bulk and dry bulk cargo. Thus, this alternative would not fulfill the objective of
35 accommodating cargo diversity and trends in waterborne commerce and would not be
36 consistent with the state law objective regarding liquid bulk supplies.

37 The other program alternative considered by the LAHD is the No Fill Alternative,
38 which is carried forward for evaluation in this PEIR (Section 5.3, Alternative 2 – No
39 Fill Alternative).

40 5.1.5 Alternatives Carried Forward for Analysis

41 In addition to the No-Project (No-Program) Alternative, alternatives for an EIR
42 usually take the form of a reduced project size, different project design, or suitable

1 alternative project sites. Based on the screening analysis conducted by LAHD, two
2 alternatives to the proposed Program were carried forward for analysis:

- 3 ■ Alternative 1 – No-Program Alternative (Section 5.2); and,
- 4 ■ Alternative 2 – No Fill Alternative (Section 5.3).

5 Similar to the analysis of the proposed Program (Chapter 3.0, Environmental
6 Analysis), assessments of No-Program Alternative and the No Fill Alternative do not
7 include detailed analysis of the proposed appealable/fill projects because sufficient
8 project-specific information currently is not available. Analyses of individual
9 appealable/fill projects are deferred to future project-specific environmental
10 documents.

11 **5.2 Alternative 1 – No-Program Alternative**

12 **5.2.1 Alternative Description**

13 Under CEQA, the lead agency is required to evaluate a No-Project Alternative that
14 represents what would reasonably be expected to occur in the foreseeable future if the
15 proposed project (or Program) were not approved based on current plans and
16 consistent with available infrastructure and community services. CEQA Guidelines
17 Section 15126.6(e) states:

18 *“The specific alternative of “no project” shall also be evaluated along with its*
19 *impact. The purpose of describing and analyzing a no project alternative is to*
20 *allow decision makers to compare the impacts of approving the proposed project*
21 *with the impacts of not approving the proposed project. The no project*
22 *alternative analysis is not the baseline for determining whether the proposed*
23 *project’s environmental impacts may be significant, unless it is identical to the*
24 *existing environmental setting analysis which does establish that baseline.”*

25 *“When the project is the revision of an existing land use or regulatory plan,*
26 *policy or ongoing operation, the “no project” alternative will be the continuation*
27 *of the existing plan, policy or operation into the future. Typically this is a*
28 *situation where other projects initiated under the existing plan will continue*
29 *while the new plan is developed. Thus, the projected impacts of the proposed*
30 *plan or alternative plans would be compared to the impacts that would occur*
31 *under the existing plan.”*

32 The No-Program Alternative would not update the PMP, and land uses would remain
33 as specified in the existing (1980) PMP and certified amendments. The No-Program
34 Alternative would allow build-out of future projects that are consistent with the
35 existing PMP. For example, projects that could occur under the PMPU, including
36 construction and operation of container or marine oil terminals, could also occur
37 under the No-Program Alternative as long as the projects are consistent with the
38 PMP. In contrast, cut and fill projects are not consistent with the PMP and are not
39 included in the No-Program Alternative, as are changes to designated land uses.
40 However, it is possible that projects similar to the PMPU appealable/fill projects
41 could occur in the future, under an amended PMP scenario. Nevertheless, the only

1 differences between the proposed Program and the No-Program Alternative are the
2 anticipated projects with a cut/fill component and the associated land use changes
3 that are included in the proposed Program. Further, the assessment of impacts
4 associated with the No-Program Alternative does not consider project-specific and
5 related cumulative impacts associated with the approved and certified projects
6 because these impacts have been accounted for in the environmental documents
7 prepared for those projects.

8 **5.2.2 Impact Analysis**

9 **5.2.2.1 Aesthetics/Visual Resources**

10 Under the No-Program Alternative, future projects constructed and operated under
11 the existing PMP would be of the types that are already present in the Port, and
12 consistent in character with the array of existing Port features. Impacts that these
13 projects would have on aesthetics/visual resources would not be different from those
14 anticipated under the PMPU. Therefore, under the No-Program Alternative, no new
15 impacts would occur beyond those that presently exist under the PMP.

16 **5.2.2.2 Air Quality and Greenhouse Gases**

17 The No-Program Alternative would include future projects constructed and operated
18 under the existing PMP that would be expected to generate a range of significant
19 project-specific and cumulative air quality impacts. However, these impacts would be
20 similar to those associated with the PMPU, as evaluated in Section 3.2, Air Quality
21 and Greenhouse Gases, and other projects evaluated in Chapter 4.0, Cumulative
22 Analysis. Differences between the No-Program and proposed Program alternatives
23 would be associated with emissions from construction and operation of
24 appealable/fill projects and land use changes under the PMPU, although it is possible
25 that projects similar to the PMPU appealable/fill projects could occur in the future,
26 under an amended PMP scenario, and result in impacts comparable to those described
27 for the proposed Program. Therefore, under the No-Program Alternative, no new
28 impacts would occur beyond those that presently exist under the PMP.

29 **5.2.2.3 Biological Resources**

30 Under the No-Program Alternative, future projects constructed and operated under
31 the existing PMP would be expected to result in significant project-specific and
32 cumulative impacts to biological resources. These impacts would be similar to those
33 associated with the PMPU, as evaluated in Section 3.3, Biological Resources, and
34 other projects evaluated in Chapter 4.0, Cumulative Analysis. Differences between
35 the No-Program and proposed Program alternatives would be associated with the
36 appealable/fill projects and land use changes under the PMPU. In particular, the No-
37 Program Alternative would not result in the loss of EFH and marine habitat due to
38 project-related fills, although it is possible that projects similar to the PMPU
39 appealable/fill projects could occur in the future, under an amended PMP scenario,
40 and result in impacts comparable to those described for the proposed Program.

1 There would be an ongoing low potential for significant and unavoidable residual
2 impacts to biological resources associated with future increases in vessel calls (e.g.,
3 related to collisions with marine mammals) under the No-Program Alternative.
4 However, the Port's VSRP has the potential to reduce the incremental increase in
5 collision risk with marine mammals. Additionally, it is not possible to fully avoid the
6 potential for a significant impact to sensitive species or habitats from an oil spill,
7 even though the probability of occurrence is very low. However, similar to the
8 proposed Program, the incremental increased risk of introducing non-native, invasive
9 species into the Port (e.g., due to ballast water) that could disrupt local biological
10 communities cannot be fully avoided with current technology and would be significant
11 and unavoidable, although the low probability risk has the potential to become further
12 reduced as a result of recently enacted legislation and advances in technology.
13 Regardless, under the No-Program Alternative no new impacts to biological
14 resources would occur beyond those that presently exist under the PMP.

15 **5.2.2.4 Cultural Resources**

16 As discussed in Section 3.4, Cultural Resources, recorded and/or unknown
17 archaeological sites are potentially located within and adjacent to the PMPU area.
18 The PMPU area also includes various historical resources that are listed or eligible
19 for listing on a federal, state, or local register. In addition, recorded and/or unknown
20 paleontological resources are potentially located within and adjacent to the PMPU
21 area. Under the No-Program Alternative, future projects constructed and operated
22 under the existing PMP would be expected to result in potentially significant but
23 mitigable project-specific and cumulative impacts to cultural resources. These
24 impacts would be similar to those associated with the PMPU, as evaluated in Section
25 3.4, Cultural Resources, and other projects evaluated in Chapter 4.0, Cumulative
26 Analysis. Differences between the No-Program and proposed Program alternatives
27 would be associated with the proposed appealable/fill projects and land use changes
28 under the PMPU. Under the No-Program Alternative, potential impacts to cultural
29 resources associated with the proposed appealable/fill projects and land use changes
30 are not expected to occur, although it is possible that projects similar to the
31 appealable/fill projects could occur in the future, under an amended PMP scenario,
32 and result in impacts comparable to those described for the proposed Program.
33 Regardless, under the No-Program Alternative, no new impacts to cultural resources
34 would occur beyond those that presently exist under the PMP.

35 **5.2.2.5 Geology**

36 Under the No-Program Alternative, future projects constructed and operated under the
37 existing PMP would be expected to result in less than significant impacts to geology
38 that would be similar to those described for the proposed Program. Construction of
39 projects under the PMP would be subject to established building codes and LAHD
40 design criteria, including incorporation of modern construction engineering and safety
41 standards. As a result, impacts due to seismically-induced ground failure, land
42 subsidence/soil settlement, expansive soils, and unstable soil conditions would be less
43 than significant. Because the topography in the PMPU area is relatively flat and mostly
44 paved, projects that are approved and certified under the PMP would not be subject to
45 landslides or mudflows and no impacts would occur. Development under this
46 alternative would be susceptible to tsunami and seiche events. However, impacts would

1 be less than significant due to emergency response planning, similar to **MM GEO-1**.
2 Regardless, under the No-Program Alternative, no new impacts to geology would
3 occur beyond those that presently exist under the PMP.

4 **5.2.2.6 Groundwater and Soils**

5 Under the No-Program Alternative, future projects constructed and operated under
6 the existing PMP would be expected to result in less than significant impacts to
7 groundwater and soils that would be comparable to those described for the proposed
8 Program. Similar to the proposed Program, construction of projects approved and
9 certified under the PMP would adhere to LAHD lease measures (e.g., site
10 remediation and a contamination contingency plan) and comply with existing
11 government agency regulations. Under the No-Program Alternative, no new impacts
12 to groundwater and soils would occur beyond those that presently exist under the
13 PMP.

14 **5.2.2.7 Hazards and Hazardous Materials**

15 Under the No-Program Alternative, future projects constructed and operated under
16 the existing PMP would result in impacts that would be similar to the potential risks
17 associated with the proposed Program. Specifically, potential impacts associated with
18 the small but foreseeable risk of an accidental release of hazardous materials, with
19 subsequent adverse effects on sensitive environmental resources, would be
20 significant. However, residual impacts would be reduced to less than significant with
21 **MM HAZ-1** and **MM HAZ-2**. No new impacts from hazards and hazardous
22 materials would occur beyond those that presently exist under the PMP.

23 **5.2.2.8 Land Use**

24 The No-Program Alternative would not update the PMP, and land uses would remain
25 as specified in the existing PMP and certified amendments. The No-Program
26 Alternative would include build-out of projects already approved and certified under
27 the PMP, as well as other future and appealable projects that would not require a
28 PMP amendment. Construction activities associated with the projects approved and
29 certified under the PMP would not conflict with plans or policies adopted for the
30 purpose of avoiding environmental impacts. Furthermore, projects approved and
31 certified under the PMP would not conflict with the General Plan or adopted
32 environmental goals or policies contained in other applicable plans adopted for the
33 purpose of avoiding environmental impacts. Because the No-Program Alternative
34 would not result in any changes to the physical environment, other than those
35 addressed in the environmental documents for allowable approved and certified
36 projects, there would be no new impacts to land use.

37 **5.2.2.9 Noise**

38 Under the No-Program Alternative, noise and vibration impacts from construction
39 and operation of future projects under the PMP would be similar to those described
40 for the proposed Program. Given the absence of project-specific details to assess the
41 potential magnitude of these impacts, this analysis concludes that construction

1 activities under the No-Program Alternative would have the potential to result in
2 significant noise impacts. Residual impacts would depend on project-specific factors;
3 however, noise impacts during construction would be significant and unavoidable.
4 Operation of future projects under the No-Program Alternative would not result in a
5 substantial change in the noise environment within the PMPU area or result in
6 vibration that exceeds thresholds. Regardless, under the No-Program Alternative, no
7 new impacts to noise would occur beyond those that presently exist under the PMP.

8 **5.2.2.10 Public Services**

9 Under the No-Program Alternative, future projects constructed and operated under
10 the existing PMP would be expected to result in impacts to public services that would
11 be similar to those described for the proposed Program. Specifically, the No-Program
12 Alternative would have many of the same impacts to law enforcement and fire
13 protection as identified for the proposed Program. Therefore, impacts would be less
14 than significant with mitigation, such as **MM PS-1**, as described for the proposed
15 Program. Regardless, under the No-Program Alternative, no new impacts to public
16 services would occur beyond those that presently exist under the PMP.

17 **5.2.2.11 Recreation**

18 Under the No-Program Alternative, future projects constructed and operated under
19 the existing PMP would be expected to result in less than significant impacts to
20 recreational resources and would be similar to those described for the proposed
21 Program since there would be a comparable demand on recreational resources. Under
22 the No-Program Alternative, no new impacts to recreational resources would occur
23 beyond those that presently exist under the PMP.

24 **5.2.2.12 Transportation and Circulation**

25 For the No-Program Alternative, traffic growth associated with future projects
26 constructed and operated under the PMP would still occur. Even without the
27 appealable cut/fill projects and land use changes under the proposed Program, the
28 Port is expected to reach maximum throughput by 2035 through implementation of
29 various projects, some of which have already been approved and certified under the
30 PMP. Therefore, traffic and circulation impacts for the No-Program Alternative
31 would be comparable to those for the proposed Program and potentially significant.
32 Impacts to vessel traffic from construction and operation of the No-Program
33 Alternative would be less than significant. Regardless, under the No-Program
34 Alternative, no new impacts to traffic would occur beyond those that presently exist
35 under the PMP.

36 **5.2.2.13 Utilities**

37 Under the No-Program Alternative, future projects constructed and operated under
38 the existing PMP would be expected to result in less than significant impacts to
39 utilities. These impacts would be comparable to those described for the proposed
40 Program because utility demands (water, wastewater, storm drainage, solid waste,

1 gas, and electricity) would be similar. Under the No-Program Alternative, no new
2 impacts to utilities would occur beyond those that presently exist under the PMP.

3 **5.2.2.14 Water Quality, Sediments, and Oceanography**

4 Under the No-Program Alternative, impacts to water quality, sediments, or
5 oceanography from construction and operation of projects under the PMP would be
6 less than significant and similar to those described for the proposed Program.
7 However, the temporary and localized impacts from in-water construction and
8 operation of the cut/fills projects associated with the proposed Program would be
9 avoided, although it is possible that projects similar to the PMPU appealable/fill
10 projects could occur in the future, under an amended PMP scenario, and result in
11 impacts comparable to those described for the proposed Program. In the absence of
12 future fill projects under the PMP, impacts to surface water and water flow patterns
13 would be reduced slightly compared to the proposed Program.

14 Future changes to water and sediment quality and oceanography in the Port under the
15 No-Program Alternative would reflect factors related to the operations of existing
16 facilities or construction and operation of new projects, consistent with the existing
17 PMP. These impacts potentially would be offset by results achieved by the WRAP,
18 other Port policies related to water and sediment quality, and Port-specific and
19 watershed TMDLs that are expected to contribute to future improvements in water
20 and sediment quality throughout the Port. Regardless, under the No-Program
21 Alternative, no new impacts to water quality, sediments, or oceanography would
22 occur beyond those that presently exist under the PMP.

23 **5.3 Alternative 2 - No Fill Alternative**

24 **5.3.1 Alternative Description**

25 The No Fill Alternative would eliminate the cut/fill projects and associated land use
26 changes (container storage) associated with the fill projects under PMPU. All other
27 appealable projects (i.e., Berths 187-189 Liquid Bulk Relocation, Tri Marine
28 Expansion, 338 Cannery Street Adaptive Reuse, and Al Larson Marina) and land use
29 changes in the proposed Program would be included in the No Fill Alternative.

30 **5.3.2 Impact Analysis**

31 **5.3.2.1 Aesthetics/Visual Resources**

32 Under the No Fill Alternative, build-out of the other appealable projects and land use
33 changes would be similar to projects already present in the Port and consistent in
34 character with existing Port features. Because there would be no visual impacts, there
35 would be no inconsistency with applicable rules and regulations. Therefore, no
36 impacts to aesthetics/visual resources would occur under this alternative.

5.3.2.2 Air Quality and Greenhouse Gases

Under the No Fill Alternative, appealable projects other than the cut/fill projects and associated land use changes included in the proposed Program would generate a variety of project-specific and cumulative air quality impacts that would be similar to those for the proposed Program and other projects evaluated in Chapter 4.0, Cumulative Analysis.

Emissions from No Fill Alternative projects and land use changes would be lower than those associated with the proposed Program, due to the absence of contributions from container operations on fill land. Nevertheless, air quality and GHG impacts from construction and operation of the No Fill Alternative are expected to be significant and unavoidable because emissions, concentrations, and/or resultant health risks would exceed applicable standards or thresholds, similar to those discussed for the proposed Program.

Mitigation measures included for the proposed Program (**MM AQ-1 through MM AQ-18** and **MM GHG-1 through GHG-6**) would be applicable to the No Fill Alternative, but residual impacts would remain significant.

5.3.2.3 Biological Resources

The other appealable projects that could occur under the No Fill Alternative would not construct new upland areas out of open water (i.e., fill) and, therefore, no loss of EFH and marine habitat would occur. Impacts to marine mammals and other special status species from construction and operation of appealable projects and land use changes would be slightly less than for the proposed Program and would be less than significant with mitigation.

Increased vessel calls could increase the risk of introducing non-native invasive species. Although federal and state regulations substantially reduce the risk of invasive species introductions, no feasible mitigation is currently available to totally prevent introduction of invasive species due to lack of proven technologies. Consequently, operations under the No Fill Alternative could result in significant and unavoidable impacts on marine biological communities, and residual impacts would remain significant.

5.3.2.4 Cultural Resources

As discussed in Section 3.4, Cultural Resources, recorded and/or unknown archaeological and paleontological sites are potentially located within and adjacent to the PMPU area. The PMPU area also includes various historical resources that are listed or eligible for listing on a federal, state, or local register. Under the No Fill Alternative, impacts would be slightly less than those described for the proposed Program because the three small cut/fill areas would not be built and there would be less potential to impact in-water archaeological or ethnographic resources, historical resources and paleontological resources. The No Fill Alternative impacts to cultural resources would be less than significant with implementation of the following mitigation measures, as applicable: **MM CR-1, MM CR-2, MM CR-3, and MM CR-4.**

5.3.2.5 Geology

Under the No Fill Alternative, proposed appealable projects (i.e., Berths 187-189 Liquid Bulk Relocation, Tri Marine Expansion, 338 Cannery Street Adaptive Reuse, and Al Larson Marina) and land use changes would be implemented, whereas the cut/fill projects and associated land use changes that are included in the proposed Program would not occur. Therefore, impacts would be slightly less than those described for the proposed Program. Accordingly, impacts on geology would be less than significant with mitigation that incorporates emergency response planning (**MM GEO-1**).

5.3.2.6 Groundwater and Soils

Under the No Fill Alternative, construction and operation of appealable projects and land use changes allowable under this alternative would adhere to LAHD lease measures (e.g., site remediation and a contamination contingency plan). Impacts to groundwater and soils from this alternative would be less than significant.

5.3.2.7 Hazards and Hazardous Materials

Under the No Fill Alternative, the potential for accident conditions involving the release of hazardous materials into the environment and accidents related to development within methane zones during construction and operation of appealable projects and land use changes allowable under this alternative would be comparable to risks associated with the proposed Program. Accordingly, potential impacts associated with the small but foreseeable risk of an accidental release of hazardous materials, with subsequent adverse effects on sensitive environmental resources, would be significant. However, residual impacts would be reduced to less than significant with **MM HAZ-1** and **MM HAZ-2**.

5.3.2.8 Land Use

Under the No Fill Alternative, impacts to land use would be the same as those for the proposed Program. Construction activities associated with the proposed appealable projects under this alternative would not conflict with plans or policies adopted for the purpose of avoiding environmental impacts. Furthermore, the proposed appealable projects and land use changes would not conflict with the General Plan or adopted environmental goals or policies contained in other applicable plans adopted for the purpose of avoiding environmental impacts. Therefore, impacts would be less than significant.

5.3.2.9 Noise

The No Fill Alternative would involve four appealable projects, but no cut/fill projects. Compared to the proposed Program, this would reduce the potential for construction-related noise impacts. Nevertheless, as for the proposed Program, construction activities would likely involve noise levels that exceed standards at sensitive receptors, and impacts would be significant. Similar to the proposed Program, implementation of mitigation measures (**MM NOI-1 through MM NOI-11**) would be required during construction

1 activities. Residual impacts would depend on project-specific factors; however, noise
2 impacts during construction would be significant and unavoidable. Operation of
3 allowable projects under the No-Program Alternative would not result in a
4 substantive change in the noise environment within the PMPU area. Therefore, noise
5 impacts from operations would be less than significant. Construction activities under
6 the No Fill Alternative would not result in vibration that exceeds thresholds.

7 **5.3.2.10 Public Services**

8 Construction and operation of appealable projects and land use changes under the No
9 Fill Alternative would have impacts to public services that would be comparable to
10 those for the proposed Program. Specifically, the No Fill Alternative would have
11 many of the same impacts to law enforcement and fire protection as identified for the
12 proposed Program. Therefore, impacts would be less than significant with
13 implementation of mitigation measure **MM PS-1**.

14 **5.3.2.11 Recreation**

15 Construction and operation of the appealable projects and land use changes allowable
16 under the No Fill Alternative would have the same impacts to recreational resources
17 as described for the proposed Program. Therefore, impacts would be less than
18 significant.

19 **5.3.2.12 Transportation and Circulation**

20 The No Fill Alternative would generate slightly less traffic than the proposed
21 Program due to elimination of the cut/fill projects and associated container storage
22 areas. While the transportation and circulation impacts of the No Fill Alternative
23 would be less than the proposed Program, it is expected that they would be
24 sufficiently similar to result in the same significant and unavoidable impacts.

25 **MM TRANS-1** would be applicable to the No Fill Alternative but, as with the
26 proposed Program, **MM TRANS-1** may not reduce the impact to less than significant
27 levels. Therefore, residual impacts would remain significant and unavoidable if the
28 I-710 Corridor Project is not implemented by 2035. As described for the proposed
29 Program, impacts to vessel traffic would be less than significant.

30 **5.3.2.13 Utilities**

31 Under the No Fill Alternative, construction and operation of appealable projects and
32 land use changes would result in slightly less developed areas than the proposed
33 Program. With less developed areas, future increases in utility demands would be
34 comparatively less than the proposed Program, and impacts would be less than
35 significant.

36 **5.3.2.14 Water Quality, Sediments, and Oceanography**

37 Under the No Fill Alternative, impacts to water quality, sediments, and oceanography
38 would be less than significant when standard BMPs and other permit conditions

(Section 3.14, Water Quality, Sediments, and Oceanography) are applied. Overall, impacts to water quality, sediments, and oceanography would be less than significant.

5.4 Comparison of Alternatives and the Proposed Program

5.4.1 Summary of Alternatives Impact Analysis

Table 5.4-1 presents a summary of the results of the analysis for the resource areas for the proposed Program and alternatives.

As indicated, the proposed Program has a similar number of significant unavoidable impacts compared to the No Fill and No-Program Alternatives, although overall the impacts from these other alternatives would be somewhat less than described for the proposed Program.

Table 5.4-1. Summary of Impacts by Alternative

<i>Environmental Resource Area</i>	<i>Proposed Program</i>	<i>No-Program Alternative 1</i>	<i>No Fill Alternative 2</i>
Aesthetics/Visual Resources	N	N	N
Air Quality and Greenhouse Gases	S	S	S
Biological Resources	S	S	S
Cultural Resources	M	M	M
Geology	M	M	M
Groundwater and Soils	L	L	L
Hazards and Hazardous Materials	M	M	M
Land Use	L	N	L
Noise	S	S	S
Public Services	M	M	M
Recreation	L	L	L
Transportation and Circulation – Ground and Marine	S	S	S
Utilities	L	L	L
Water Quality, Sediments, and Oceanography	L	L	L
Notes: L = Less than Significant N = No Impact M = Significant but Mitigable S = Significant Unavoidable			

5.4.2 Resources with Significant Unavoidable Impacts

5.4.2.1 Proposed Program

1 The proposed Program would result in significant and unavoidable impacts to the
2 following resources:

- 3 ■ Air Quality and Greenhouse Gases;
- 4 ■ Biology;
- 5 ■ Noise; and,
- 6 ■ Transportation and Circulation.

7 **Air Quality and Greenhouse Gases.** As discussed in Section 3.2, Air Quality and
8 Greenhouse Gases, construction and operation of the proposed appealable/fill
9 projects and land use changes under the proposed Program would result in significant
10 and unavoidable impacts related to several impact criteria (Impacts AQ-1, AQ-2,
11 AQ-3, AQ-4, AQ-7, and GHG-1). **MM AQ-1 through MM AQ-18** and **MM GHG-**
12 **1 through GHG-6** would reduce the magnitude of impacts, but residual impacts
13 would remain significant.

14 **Biology.** As discussed in Section 3.3, Biological Resources, increased vessel calls
15 associated with the proposed appealable/fill projects and land use changes under the
16 proposed Program could increase the risk of introducing non-native invasive species.
17 Federal and state regulations substantially reduce the risk of invasive species
18 introductions by requiring seagoing vessels to comply with ballast water management,
19 marine biofouling, and sediment management requirements. While more vessels will
20 be required to comply with these requirements through 2016, treatment system
21 technologies have yet to be proven 100 percent effective. Consequently, it is not
22 possible to ensure that no non-native species are introduced to the harbor environment,
23 nor is it possible to ensure that introduced species are not invasive. Accordingly, it is
24 not possible to fully avoid the potential for invasive species introductions to disrupt
25 marine biological communities. No feasible mitigation is currently available to
26 completely prevent introduction of invasive species due to lack of proven technologies
27 and the phased schedule of vessel compliance with new regulations.

28 **Noise.** As discussed in Section 3.9, Noise, construction of the proposed
29 appealable/fill projects under the proposed Program would generate noise levels that
30 exceed thresholds associated with significant noise impacts (Impact NOI-1).
31 Mitigation measures (**MM NOI-1 through MM NOI-11**) would be implemented to
32 reduce noise levels where possible, but resulting noise levels would still exceed
33 thresholds, and residual impacts would remain significant.

34 **Transportation and Circulation.** As discussed in Section 3.12, Transportation and
35 Circulation, operation of the proposed appealable/fill projects under the proposed
36 Program (Impact TRANS-4) would result in significant traffic impacts to the I-710
37 freeway. **MM TRANS-1** would reduce potentials for traffic congestion. However,
38 implementation of **MM TRANS-1** may not reduce the impact to less than significant
39 levels. Therefore, residual impacts would remain significant if the I-710 Corridor
40 Project is not implemented by 2035.

41 5.4.2.2 Alternative 1 – No-Program Alternative

42 The No-Program Alternative would result in significant and unavoidable impacts to
43 the following resources:

- 1 ■ Air Quality and Greenhouse Gases;
- 2 ■ Biology;
- 3 ■ Noise; and,
- 4 ■ Transportation and Circulation.

5 In general, significant and unavoidable impacts from the No-Program Alternative to
6 air quality/GHGs, biology, and noise would be slightly less than those described for
7 the proposed Program, whereas transportation/circulation impacts would be
8 comparable.

9 **5.4.2.3 Alternative 2 – No Fill Alternative**

10 The No Fill Alternative would result in significant and unavoidable impacts to the
11 following resources:

- 12 ■ Air Quality and Greenhouse Gases;
- 13 ■ Biology;
- 14 ■ Noise; and,
- 15 ■ Transportation and Circulation.

16 In general, significant and unavoidable impacts from the No Fill Alternative to air
17 quality/GHGs, biology, and noise would be slightly less than those described for the
18 proposed Program, whereas transportation/circulation impacts would be comparable.

19 **5.4.3 Resources with Significant Impacts that** 20 **Can Be Mitigated to Less than Significant**

21 **5.4.3.1 Proposed Program**

22 The proposed Program would result in significant but mitigable impacts to the
23 following resources:

- 24 ■ Cultural Resources;
- 25 ■ Geology;
- 26 ■ Hazards and Hazardous Materials; and,
- 27 ■ Public Services.

28 Significant impacts on these resources from construction and operation of the
29 proposed appealable/fill projects and land use changes under the proposed Program
30 would be reduced to less than significant levels with implementation of mitigation
31 measures, as described in Chapter 3.0, Environmental Analysis.

5.4.3.2 Alternative 1 – No-Program Alternative

The No-Program Alternative would result in significant but mitigable impacts to the following resources:

- Cultural Resources;
- Geology;
- Hazards and Hazardous Materials; and,
- Public Services.

The magnitude of impacts on these resources from construction and operation of the proposed appealable projects under the No-Program Alternative would be comparable to those described for the proposed Program. Significant impacts on these resources would be reduced to less than significant levels with implementation of mitigation measures, as described in Chapter 3.0, Environmental Analysis.

5.4.3.3 Alternative 2 – No Fill Alternative

The No Fill Alternative also would result in significant but mitigable impacts to the following resources:

- Cultural Resources;
- Geology;
- Hazards and Hazardous Materials; and,
- Public Services.

The magnitude of impacts on these resources from construction and operation of the proposed appealable projects under the No Fill Alternative would be comparable to those described for the proposed Program. Significant impacts on these resources would be reduced to less than significant levels with implementation of mitigation measures, as described in Chapter 3.0, Environmental Analysis.

5.4.4 Resources with Less than Significant Impacts

5.4.4.1 Proposed Program

The proposed Program would result in less than significant impacts to the following resources:

- Groundwater and Soils;
- Land Use;
- Recreation;
- Utilities; and,

- Water Quality, Sediments, and Oceanography.

5.4.4.2 Alternative 1 – No-Program Alternative

The No-Program Alternative would result in less than significant impacts to the following resources:

- Groundwater and Soils;
- Land Use;
- Recreation;
- Utilities; and,
- Water Quality, Sediments, and Oceanography.

5.4.4.3 Alternative 2 – No Fill Alternative

The No Fill Alternative would result in less than significant impacts to the following resources:

- Groundwater and Soils;
- Land Use;
- Recreation;
- Utilities; and,
- Water Quality, Sediments, and Oceanography.

5.4.5 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative in an EIR. There is no established methodology for comparing the alternatives or determining the environmentally superior alternative under CEQA. Therefore, the environmentally superior alternative was determined based on a ranking system that assigned numerical scores comparing the impacts under environmental resource areas for each alternative with the proposed Program. Only resources with significant and unavoidable or significant and mitigable impacts were considered. The scoring system ranged from -2 if impacts are considered to be substantially reduced when compared to the proposed Program, to +1 if impacts are considered to be somewhat greater when compared with the proposed Program. Table 5.4-2 presents the scoring system and rankings for each alternative.

Based on the above analysis, the No-Program Alternative and No Fill Alternative would have similar impacts, and both would have fewer impacts than the proposed Program. However, CEQA Guidelines Section 15126.6(e)(2) requires that in cases where the No-Program Alternative is determined to be the environmentally superior alternative, another alternative must be identified as environmentally superior. Consequently, the No Fill Alternative would be the environmentally superior alternative because it would have less activity than the proposed Program.

Table 5.4-2. Comparison of Alternatives to the Proposed Program (with Mitigation)

<i>Environmental Resource Area</i>	<i>Alternative 1/ No-Program</i>	<i>Alternative 2/ No Fill</i>
Air Quality and Greenhouse Gases	-1	-1
Biological Resources	-1	-1
Cultural Resources	0	0
Geology	0	0
Hazards and Hazardous Materials	0	0
Noise	-1	-1
Public Services	0	0
Transportation and Circulation—Ground and Marine	0	0
Total	-3	-3
<p>Notes:</p> <p>Only environmental resources with unavoidable significant impacts or significant but mitigable impacts are included in this table and the analysis used to rank alternatives; the analysis includes project-level impacts, not cumulative effects.</p> <p>-2 = Impact considered to be substantially less when compared with the proposed Program</p> <p>-1 = Impact considered to be somewhat less when compared with the proposed Program</p> <p>0 = Impacts to be equal to the proposed Program</p> <p>1 = Impact to be somewhat greater when compared with the proposed Program</p> <p>2 = Impact to be substantially greater when compared with the proposed Program</p> <p>Where significant unavoidable impacts would occur across different alternatives, but there are impact intensity differences between alternatives, numeric differences are used to differentiate (i.e., in some cases, there are differences at the individual impact level, such as differences in the number of impacts or relative intensity).</p>		