

Chapter 1 Introduction

1.1 Introduction

Los Angeles Harbor Department (LAHD) proposes to construct and operate a chassis support facility on an approximately 89.2-acre site at the Port of Los Angeles (Port or POLA) on Terminal Island. The maritime support facility (MSF) would provide 73 acres of usable space for chassis/wheeled empty container storage for use by all 12 terminals located in the POLA and Port of Long Beach (POLB) and could be operated by multiple companies/tenants.

The Proposed Project would require approval and permits from the Los Angeles Board of Harbor Commissioners (Harbor Commission), permits from other City of Los Angeles departments, the State Water Resources Control Board (SWRCB), and approval by the California Coastal Commission of an amendment to the Port Master Plan (PMP). Prior to issuance of permits or other Project approvals, each of these decision-making bodies must consider the Proposed Project's environmental effects, which, in this case, are identified in this Environmental Impact Report (EIR).

This EIR has been prepared in accordance with the requirements of CEQA (Public Resources Code [PRC] §21000 et seq.) and the State California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). LAHD is the CEQA lead agency.

The Proposed Project and its alternatives are described in detail in Chapter 2, *Project Description*. Chapter 3 of this EIR, *Environmental Analysis*, describes the environmental resources which were previously determined through an Initial Study analysis (December 2023) as having potentially significant impacts, and evaluates in detail the potential impacts on those resources that are likely to occur as a result of constructing and operating the Proposed Project and alternatives. This EIR will be used to inform decision-makers and the public about the environmental effects of construction at the Project site and the operation of the proposed MSF.

1.2 Background

1.2.1. Project Location

LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, §601) and the California Coastal Act (PRC Division 20, §30700 et seq.), which identify the Port and its facilities as a primary economic and coastal resource of the State of California and an essential element of the national maritime industry for the promotion of commerce, navigation, fisheries, and harbor operations. Activities should be water-dependent, and LAHD must give highest priority to navigation, shipping, and necessary support and access facilities to accommodate the demands of foreign and domestic waterborne commerce. LAHD is chartered to develop and operate the Port to benefit maritime uses. It functions as a landlord by leasing Port properties to more than 300 tenants.

The Port encompasses 7,500 acres of land and 43 miles of waterfront and provides a major gateway for international goods and services. The Port comprises approximately 25 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities. In calendar year 2021, the Port handled approximately 222 million metric revenue tons of cargo (LAHD, 2022) and docked 1,863 vessels. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, and boat repair facilities, as well as recreational, community, and educational facilities.

The Project site is an 89.2-acre unoccupied parcel at 740 Terminal Way in San Pedro, CA 90731 on Terminal Island in the Port. The site is bounded by Navy Way to the east, Ferry Street to the west, Terminal Way to the south, and State Route (SR) 47 to the north. Formerly used for empty container storage, the site is now vacant and available for entitlements for temporary uses. Land uses in the vicinity of the Project site are primarily comprised of container operations. Los Angeles Fire Department Station 40 is located adjacent to the west of the Project site, east of Ferry Street. The Terminal Island Water Reclamation Plant is located to the west of the Project site, west of Ferry Street.

1.2.2. Project Overview

The Proposed Project would construct a new MSF over a period of approximately 24 months. Construction activities would include:

- installation of asphalt concrete to pave approximately 75 acres of the 89.2-acre site for backland storage use;
- installation of stormwater drainage and sewage systems in compliance with the City of Los Angeles Low Impact Development (LID) Ordinance and City of Los Angeles Bureau of Sanitation (LA Sanitation & Environment) requirements;
- installation of approximately 7,000 linear feet (lf) of chain-link fencing for the perimeter of the site (additional chain link fencing on k-rails would be required to separate areas for different operators, if necessary);
- installation of approximately 3,600 chassis stalls (e.g., parking spaces) at 90 degrees, plus chassis/bombcart wheeled storage stalls, and forklift and utility tractor rig (UTR) parking;

- 1 • installation of 40 high mast light poles (maximum height of 100 feet);
- 2 • as-needed installation of vaults, switchgears, transformers, associated concrete
- 3 pads/foundations, and conduit for electrical connections;
- 4 • installation of approximately 40 fire hydrants;
- 5 • installation of charging and fueling infrastructure;
- 6 • construction of a Los Angeles Department of Water and Power (LADWP)
- 7 substation;
- 8 • construction of up to two approximately 10-foot by 40-foot office/welfare
- 9 buildings;
- 10 • installation of up to four corrugated metal M&R canopies;
- 11 • construction of up to four approximately 30-foot tall, 16,000 sf, neutral tone steel
- 12 canopy structures above a concrete foundation for use as roadability canopies, an
- 13 accompanying roadability support area, up to four approximately 200-sf longshore
- 14 restrooms, and up to 12 approximately 300-sf guard booths; and
- 15 • interior modification (e.g., replace carpet, repair utilities, repaint interior, etc.) of
- 16 an approximately 2,900-square-foot (sf) office building at 750 Eldridge Street that
- 17 can be shared among multiple operating companies/tenants (existing potable
- 18 water connection, toilets, sinks, and sanitary sewer are available).

19 During Proposed Project operations, the chosen operating company/tenant(s) would
20 operate a chassis support facility, which could provide: chassis storage, maintenance, and
21 repair facilities; and/or wheeled empty container storage. Yard equipment to support
22 operations would include fourteen 30,000-pound forklifts, fourteen 10,000-pound
23 forklifts, and two UTRs. Operations under the Proposed Project are assumed to occur for
24 up to 25 years. See Chapter 2, *Project Description*, for a detailed description of the
25 Proposed Project. Alternatives are described below in Section 1.6, *Alternatives*.

26 1.3 CEQA and the Purpose of an EIR

27 CEQA was enacted by the California Legislature in 1970, with the intent that all agencies
28 of the state government that “regulate activities of private individuals, corporations, and
29 public agencies that are found to affect the quality of the environment shall regulate such
30 activities so that major consideration is given to preventing environmental damage while
31 providing a decent home and satisfying living environment for every Californian” (13
32 PRC 21000, Legislative Intent). Public agency decision-makers are required to consider
33 and document the environmental effects of their actions and, whenever possible, avoid
34 adverse effects on the environment. When a state or local agency determines that a
35 proposed project has the potential to result in significant adverse environmental impacts,
36 an EIR is prepared. The purpose of an EIR is to identify the significant effects of a
37 proposed project on the physical environment, identify alternatives to reduce the project’s
38 significant effects while achieving the project objectives, and indicate the manner in
39 which a project’s significant effects can be mitigated or avoided. A public agency must
40 mitigate or avoid significant environmental impacts of projects it carries out or approves
41 whenever feasible. In instances where significant impacts cannot be avoided or mitigated,
42 the project can nonetheless be carried out or approved if the approving agency finds that

1 economic, legal, social, technological, or other benefits outweigh the unavoidable
2 significant environmental effects. An EIR is intended to be a full disclosure document to
3 aid the public decision-making process.

4 **1.4 Scope and Content of the EIR**

5 The scope of this EIR was defined on the basis of a Notice of Preparation/Initial Study
6 (NOP/IS) prepared pursuant to CEQA (see Appendix A), and comments received during
7 the scoping process. The NOP/IS was posted on December 7, 2023, and an online public
8 scoping meeting was conducted on January 9, 2024. One speaker commented at the
9 public meeting and three comment letters were received during the scoping period
10 (December 7, 2023 to January 22, 2024).

11 **1.4.1. Scope of Analysis**

12 This EIR has been prepared in accordance with the State CEQA Guidelines (14 CCR
13 15000 et seq.) and includes all the sections required by CEQA. The criteria for determin-
14 ing the significance of environmental impacts in this EIR analysis are described in the
15 “Significance Criteria” sections of each resource topic in Chapter 3, *Environmental*
16 *Analysis*. The threshold of significance for a given environmental effect is the level at
17 which LAHD finds a potential effect of the Proposed Project or alternative to be signifi-
18 cant. Under CEQA, a “threshold of significance” can be defined as a “quantitative, quali-
19 tative or performance level of a particular environmental effect, non-compliance with
20 which means the effect will normally be determined to be significant by the agency and
21 compliance with which means the effect normally will be determined to be less than sig-
22 nificant,” (State CEQA Guidelines, §15064.7(a)). Except as noted in particular sections
23 of the document, LAHD has adopted the significance thresholds set forth in Appendix G
24 of the State CEQA Guidelines for purposes of this EIR.

25 The following resources are evaluated in this EIR:

- 26 • Air Quality and Health Risk
- 27 • Energy
- 28 • Greenhouse Gas Emissions
- 29 • Hazards and Hazardous Materials

30 The NOP/IS (see Appendix A) concluded that the Proposed Project would not result in
31 significant impacts to the following resources: Agriculture and Forest Resources, Aesthet-
32 ics, Biological Resources, Cultural Resources, Geology and Soil, Hydrology and Water
33 Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing,
34 Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and
35 Service Systems, and Wildfire. Per State CEQA Guidelines Section 15128, these
36 resources do not need to be evaluated in this EIR. This EIR has been prepared by Aspen
37 Environmental Group under contract to LAHD and has been reviewed independently by
38 LAHD staff. The scope of the document, methods of analysis, and conclusions represent
39 the independent judgment of LAHD. Staff members from LAHD and Aspen
40 Environmental Group who helped prepare this EIR are identified in Chapter 8, *List of*
41 *Preparers and Contributors*.

1.4.2. Scoping Comments

Table 1-1 summarizes key issues raised in the scoping comments received on the NOP/IS. The comments received from regulatory agencies and the public during the scoping process were acknowledged and addressed in the EIR.

Table 1-1: Summary of Key Scoping Comments

Commenter	Key Issues Raised	Sections Addressed
Abel Alvarez (S.A. Recycling)	Requests that Terminal Island remain as is for employment reasons, city benefits, and exportation of material.	Comment noted. Site is currently unused and therefore does not provide any employment or benefits.
Doug Corbett (Chassis Systems, Inc.)	Consider benefits of the Vertical Chassis storage system.	Comment noted. This technology could be considered by operator(s) but may require additional CEQA analysis.
South Coast Air Quality Management District	General guidance on preparing the air quality and greenhouse gas emissions analyses.	Section 3.1, <i>Air Quality and Health Risk</i> Section 3.3, <i>Greenhouse Gas Emissions</i>
Marcus Holguin	Address if an operator for this project has been identified.	Chapter 2, Project Description – No specific operators have been identified at this time.

1.4.3. Intended Uses of this EIR

This EIR has been prepared in accordance with applicable federal and state environmental regulations, policies, and laws to inform state and local decision-makers about the potential environmental impacts of the Proposed Project and alternatives. As an informational document, an EIR does not recommend approval or denial of a Project. The Draft EIR is provided to the public for review, comment, and participation in the planning process. After public review and comment on the Draft EIR, a Final EIR will be prepared, including responses to comments on the Draft EIR received from agencies, organizations, and individuals. The Final EIR will be distributed to provide the basis for decision-making by the CEQA lead agency (LAHD) and other concerned agencies. LAHD has jurisdictional authority over the Proposed Project primarily pursuant to the Tidelands Trust, California Coastal Act, and the Los Angeles City Charter. The Final EIR will be used by LAHD, as the lead agency under CEQA, in making a decision regarding the construction and operation of the Project and in informing agencies considering permit applications and other actions required to construct and operate the Project. LAHD's certification of the EIR, Notice of Completion, Findings of Fact, and Statement of Overriding Considerations (if necessary) would document their decision as to the adequacy of the EIR and inform subsequent decisions by LAHD whether to approve and construct the Project. Other agencies that may have jurisdiction over some part of the Project or a resource area affected by the Project are expected to use this EIR as part of their approval or permit processes as set forth in Table 2-1. Specific approvals that could be required for this Project include but are not limited to a Los Angeles Department of Building and Safety (LADBS) Building Permit, Los Angeles Department of Transportation (LADOT) B-Permit, a Construction General Permit and Industrial General Permit

from the SWRCB, a Port Master Plan Amendment by the Board of Harbor Commissioners with certification by the California Coastal Commission, an entitlement, Coastal Development Permit, and Engineer Permit by the Board of Harbor Commissioners, and approval of construction contracts by LAHD and Los Angeles City Council. Actions that could be undertaken by LAHD following preparation of the Final EIR include certification of the EIR, approval of the Project, completion of a PMP amendment for Coastal Commission approval, completion of final design for the facility, issuance of a Coastal Development Permit, approval of engineering permits, obtaining other agency permits and approvals, and approval of construction contracts.

1.4.4. EIR Organization

Table 1-2 contains a list of sections required under CEQA and references the specific chapter in this document where the specific information is located.

Table 1-2: Organization and Contents of the EIR

EIR Section	Description
Executive Summary	Summarizes the Proposed Project and alternatives, potential significant impacts and mitigation measures, the environmentally superior alternative, and unresolved issues and areas of controversy.
Chapter 1 Introduction	Summarizes the key Proposed Project features and elements, the intended uses of the document and authorizing actions, the purpose of CEQA, the Proposed Project’s relationship to existing plans and policies, the scope and content of the document, and the organization of the document. Describes Port of Los Angeles environmental programs and initiatives relevant to the Proposed Project. Identifies and describes Project alternatives initially considered but not carried forward for detailed review, and alternatives evaluated in the EIR at a detailed level.
Chapter 2 Project Description	Describes the Proposed Project; the objectives of the Project; CEQA baseline; and lists the lead, responsible, and trustee agencies that could rely on this EIR for issuance of a permit or other approval.
Chapter 3 Environmental Analysis	Describes the existing conditions for each environmental resource area, criteria for judging significance of an impact, impact assessment methodology, impacts that would result from the Proposed Project and each alternative, mitigation measures that would eliminate or reduce significant impacts, and the mitigation monitoring program.
Chapter 4 Cumulative Analysis	Summarizes significant cumulative impacts and whether the Proposed Project or any of the alternatives makes a cumulatively considerable contribution to those significant impacts.
Chapter 5 Comparison of Alternatives	Compares the environmental impacts of the Proposed Project and alternatives and identifies the Environmentally Superior Alternative.
Chapter 6 Significant Irreversible Changes	Describes the significant irreversible changes to the environment associated with the Proposed Project.
Chapter 7 Growth-Inducing Impacts	Discusses the extent to which the Proposed Project would result in growth-inducing impacts.
Chapter 8 List of Preparers and Contributors	Lists the individuals involved in preparing this EIR.

EIR Section	Description
Chapter 9 References	Identifies the materials and documents referenced in preparing this EIR.

1.5 Key Principles Guiding Preparation of this EIR

State CEQA Guidelines Section 21002.1(e) states that:

To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.

1.5.1. Forecasting

In this EIR, LAHD and the consultants have made their best efforts to predict and evaluate the reasonable, foreseeable, direct, indirect, and cumulative environmental impacts of the Proposed Project and alternatives. CEQA does not require LAHD to engage in speculation about impacts that are not reasonably foreseeable (State CEQA Guidelines Sections 15144 and 15145) or to conduct a worst-case analysis.

1.5.2. Reliance on Environmental Thresholds and Substantial Evidence

The identification of impacts as “significant” or “less than significant” is one of the important functions of an EIR. While impacts determined to be “less than significant” need only be acknowledged as such, an EIR must identify mitigation measures for any impact identified as “significant.” In preparing this document, LAHD has based its conclusions about the significance of environmental impacts on identifiable thresholds and has supported these conclusions with substantial scientific evidence. The criteria for determining the significance of environmental impacts in this analysis are described in each resource section in Chapter 3, *Environmental Analysis*. The “threshold of significance” under CEQA for a given environmental effect is the level at which LAHD finds a potential effect of the Proposed Project or alternative to be significant. “Threshold of significance” can be defined as a “quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant,” (State CEQA Guidelines Section 15064.7(a)).

1.5.3. Disagreement Among Experts

During preparation of the EIR, it is possible that evidence that might raise disagreements will be presented during the public review of the Draft EIR. Such disagreements will be noted and will be considered by the decision-makers during the public hearing process. However, to be adequate under CEQA, the EIR need not resolve all such disagreements. In accordance with the provisions of the State CEQA Guidelines, conflict of evidence and expert opinions on an issue concerning the environmental impacts of the Proposed Project—when LAHD is aware of these controversies—has been identified in this EIR. The EIR has summarized the conflicting opinions and has included sufficient information to allow the public and decision-makers to take intelligent account of the environmental consequences of their actions. In rendering a decision on a project where there is a disagreement among experts, the decision-makers are not obligated to select the most conservative, environmentally protective, or liberal viewpoint. Decision-makers might give more weight to the views of one expert than to those of another and need not resolve a dispute among experts. The decision-makers must consider the comments received and address any objections but need not follow said comments or objections so long as the decision-makers state the basis for their decision and that decision is supported by substantial evidence.

1.5.4. CEQA Baseline

State CEQA Guidelines Section 15125 requires EIRs to include a description of the physical environmental conditions in the vicinity of the Proposed Project that exists at the time of the NOP/IS. For the purposes of this EIR, the NOP/IS was released in December 2023. Therefore, the appropriate CEQA baseline has been determined to be the environmental setting and existing conditions occurring at the Project site during the calendar year of 2023 (i.e., January 2023 to December 2023). The CEQA baseline represents the setting at a fixed point in time, with no projected growth over time. Activities under the CEQA baseline are considered negligible in the foreseeable future as no future development has been permitted or approved.

1.5.5. Duty to Mitigate

According to State CEQA Guidelines Section 15126.4(a), each significant impact identified in an EIR must include a discussion of feasible mitigation measures that would avoid or substantially reduce the significant environmental effect. To reduce significant effects, mitigation measures must avoid, minimize, rectify, reduce, eliminate, or compensate for a given impact of the Proposed Project. Mitigation measures must satisfy certain requirements to be considered adequate. Mitigation should be specific and enforceable, define feasible actions that would demonstrably improve significant environmental conditions, and allow monitoring of their implementation. Mitigation measures that merely require further studies or consultation with regulatory agencies and are not tied to a specific action that would directly reduce impacts, or that defer mitigation until some future time, are not adequate. Effective mitigation measures clearly explain objectives and indicate how a given measure should be implemented, who is responsible for its implementation, and where and when the mitigation would occur. Mitigation measures must be enforceable, meaning that the lead agency must ensure that the measures would be imposed through appropriate permit conditions, agreements, or other legally binding instruments.

1 State CEQA Guidelines Section 15041 grants public agencies the authority to require
2 feasible changes (mitigation) that would substantially lessen or avoid a significant effect
3 on the environment associated with activities involved in a project. Public agencies,
4 however, do not have unlimited authority to impose mitigation. A public agency might
5 exercise only those express or implied powers provided by law, aside from those pro-
6 vided by CEQA. However, where another law grants discretionary powers to a public
7 agency, CEQA authorizes use of discretionary powers (State CEQA Guidelines §15040).
8 In addition to limitations imposed by CEQA, the U.S. Constitution limits the authority of
9 regulatory agencies. The Constitution limits the authority of a public agency to impose
10 conditions to those situations where a clear and direct connection (“nexus,” in legal
11 terms) exists between a project impact and the mitigation measure. Finally, a proportional
12 balance must exist between the impact caused by the project and the mitigation measure
13 imposed upon the project applicant. A project applicant cannot be forced to pay more
14 than its fair share of the mitigation, which should be roughly proportional to the impact(s)
15 caused by the project.

16 **1.5.6. Requirements to Evaluate Alternatives**

17 According to CEQA regulations, the alternatives section of an EIR is required to:
18 Rigorously explore and objectively evaluate a range of reasonable alternatives; Include
19 reasonable alternatives not within the jurisdiction or congressional mandate of the lead
20 agency, if applicable; Include the No Project Alternative; Develop substantial treatment
21 of each alternative, including the proposed action, so that reviewers could evaluate their
22 comparative merits; Identify the preferred alternative of the lead agency; Include appro-
23 priate mitigation measures (when not already part of the proposed action or alternatives);
24 and Present the alternatives that were eliminated from detailed study and briefly discuss
25 the reason(s) for elimination. State CEQA Guidelines Section 15126.6 requires that an
26 EIR describe a reasonable range of feasible alternatives to a proposed project, or to the
27 location of a proposed project that could feasibly attain most of the basic objectives of the
28 proposed project but would avoid or substantially lessen any significant environmental
29 impacts. According to State CEQA Guidelines, the EIR should compare merits of the
30 alternatives and determine an environmentally superior alternative. Section 2.7,
31 *Alternatives*, sets forth potential alternatives to the Proposed Project, and Section 5.3,
32 *Alternatives Comparison*, evaluates their suitability, as required by the State CEQA
33 Guidelines Section 15126.6. Alternatives for an EIR usually take the form of No Project
34 Alternative, reduced project size, different project design, or suitable alternative project
35 sites. The range of alternatives discussed in an EIR is governed by the “rule of reason”
36 that requires the identification of only those alternatives necessary to permit a reasoned
37 choice between the alternatives and a proposed project. An EIR need not consider an
38 alternative that would be infeasible. State CEQA Guidelines Section 15126.6 explains
39 that the evaluation of project alternative feasibility can consider “site suitability, econo-
40 mic viability, availability of infrastructure, general plan consistency, other plans or
41 regulatory limitations, jurisdictional boundaries, and whether the proponent can reason-
42 ably acquire, control or otherwise have access to the alternative site.” The EIR is not
43 required to evaluate an alternative whose effects could not be reasonably identified, or
44 whose implementation is remote, speculative, or would not achieve the basic purposes of
45 the Proposed Project.

1.6 Alternatives

1.6.1. Alternatives Evaluated in this EIR

According to State CEQA Guidelines Section 15126.6, an EIR need only examine in detail those alternatives that could reasonably meet most of the basic objectives of the Proposed Project. Only alternatives that would meet most of the objectives, as described in Section 2.3, *Project Objectives*, will be considered in the EIR. Those alternatives include the No Project Alternative (Alternative 1) and the Reduced Project Alternative (Alternative 2). Each of these alternatives is summarized below.

This section first presents a description of the alternatives that are carried forward in the detailed impact analysis and then describes the remaining alternatives that were considered but eliminated from further discussion (including the rationale for the decisions to eliminate the alternatives from detailed analysis). Because the Proposed Project is a development, State CEQA Guidelines Section 15126.6(e)(3)(B) is directly applicable to the Proposed Project:

If the project is...a development project on an identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

A more detailed description of each alternative, along with a general discussion of how the characteristics of the alternative would result in impacts different from those of the Proposed Project, is provided in Table 1-3.

1.6.1.1. Alternative 1 – No Project Alternative

The No Project Alternative (Alternative 1), which is required under State CEQA Guidelines Section 15126.6(e), represents what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not approved. Under this alternative, the Project site would remain unused. Conditions under this alternative would remain the same as baseline conditions, as no construction or operational activities would occur. No other proposed development at the site has been permitted or approved. The No Project Alternative (Alternative 1) would not meet any of the Project's objectives.

1.6.1.2. Alternative 2 – Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced by about half, from 89.2 acres to 52.7 acres (73 acres [usable space]/2 + 16.2 acres

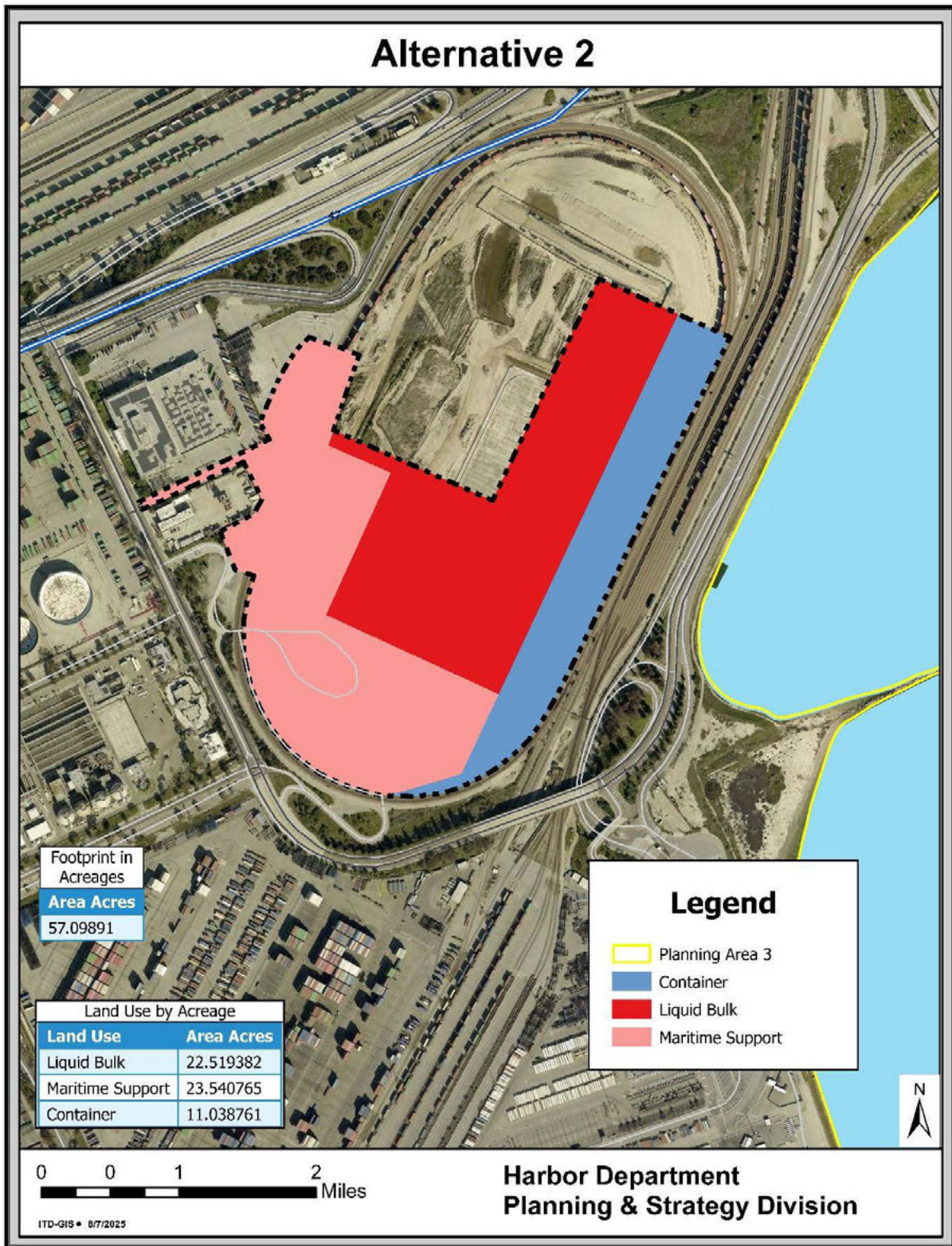
other/outside loop). The number of buildings and structures to be constructed and operated at the site would be reduced by half (Figure 1-1). This alternative would include the same modifications and use of the existing office building at 750 Eldridge Street and construction of the LADWP substation like the Proposed Project. Other construction and operational activities would be similar to the Proposed Project but with reduced intensity given the smaller area. For example, less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced footprint.

Table 1-3: Summary of Proposed Project and Alternatives at Full Buildout

Activity	2023	Full Buildout (Year 2046)		
	CEQA Baseline	Proposed Project	Alt 1: No Project	Alt 2: Reduced Project ¹
Construction workers	0	60	0	30 ²
Operational employees	0	105	0	53 ²
Total truck trips, one-way trips/day	0	6,838	0 ³	3,419
Acres Utilized	0	89.2	0	52.7
Chassis Stalls	0	3,600	0	1,800
High mast light poles	0	40	0	20
Re-grading export volume (CY)	0	270,000	0	135,000 ⁴

- 1- Values were extrapolated based on the reduced Project footprint.
- 2- Exact number of construction workers may vary depending on construction schedule of the Reduced Project Alternative (Alternative 2).
- 3- Under the No Project Alternative (Alternative 1), the number of truck trips is treated the same as the CEQA baseline and is therefore zero.
- 4- Exact re-grading export volume may vary depending on distribution of cut across the site under the Reduced Project Alternative (Alternative 2).

1 **Figure 1-1. Reduced Project Alternative (Alternative 2) Boundary and Existing PMP Land**
 2 **Use Designations**



3

1.6.2. Alternatives Considered But Not Further Evaluated

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agencies may make an initial determination as to which alternatives are ostensibly feasible and therefore merit in-depth consideration, and which are infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126(f)(2)). Under CEQA, alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or would not avoid or substantially reduce any significant environmental effects (State CEQA Guidelines Section 15126.6(c)). Various alternatives were considered based on comments received on the NOP/IS and during preparation of the EIR but were eliminated from further discussion and analysis because they would not meet most of the basic Project objectives, were deemed infeasible, or would be unable to avoid significant environmental impacts. (State CEQA Guidelines Section 15126.6(c)). Those alternatives were:

- Container Storage Only Alternative; and
- Half Peel-Off Alternative.

These alternatives are described in Chapter 5, *Comparison of Alternatives*, along with an explanation of the rationale leading to their elimination from further analysis.

1.7 Availability of the Draft EIR

The Draft EIR is being distributed directly to agencies, organizations, and interested groups and persons for comment in accordance with State CEQA Guidelines Section 15087. A 45-day comment period has been established, which begins on September 15, 2025, and ends on October 30, 2025. A printed document is available for review to interested parties at the Port of Los Angeles Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, California 90731.

Please contact Uriel de los Reyes at (310) 221-4780 to schedule an appointment for document review. In addition to printed copies of the Draft EIR, an electronic version is available in its entirety on the Port of Los Angeles website at:
<http://www.portoflosangeles.org/ceqa>.

Due to the size of the document, the electronic versions have been prepared as a series of PDF files to facilitate downloading and printing. Interested parties may provide written comments on the Draft EIR, which must be postmarked by October 30, 2025

Please address comments to:

Director of Environmental Management
Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

Written comments may also be sent via e-mail to ceqacomment@portla.org. Comments sent via e-mail should include the project title (Terminal Island Maritime Support Facility) in the subject line of the email. All comments received will become part of the public record for the Project.