

6

COMPARISON OF ALTERNATIVES

6.1 Introduction

This chapter compares the proposed Project to the six alternatives identified in Chapter 2, “Project Description.” Both CEQA and NEPA require analysis of a “reasonable range” of alternatives to the proposed Project. Various alternatives were considered during preparation of this draft EIS/EIR. Under NEPA, an EIS must devote “substantial treatment” to a reasonable range of alternatives considered in detail, including the proposed action, so that reviewers may evaluate the comparative merits (40 CFR 1502.14[b]). The Clean Water Act Section 404(b)(1) guidelines (40 CFR 230) require that the USACE only select the least environmentally damaging practicable alternative. Accordingly, this draft EIR/EIS co-equally analyzed the proposed action and four other alternatives that meet most of the proposed Project objectives and the purpose and need statement, along with the No-Federal-Action Alternative (NEPA baseline) and the No-Project Alternative (CEQA only), which are described fully in Section 2.5.1 and summarized in Table 2-6. This level of analysis is included to provide sufficient information and meaningful detail about the environmental effects of each alternative so that informed decision-making can occur. The six alternatives that were carried through the analysis of impacts in Chapter 3 are:

- Alternative 1—Alternative Development Scenario 1,
- Alternative 2—Alternative Development Scenario 2,
- Alternative 3—Alternative Development Scenario 3 (Reduced Project),
- Alternative 4—Alternative Development Scenario 4,
- Alternative 5—No-Federal-Action Alternative, and
- Alternative 6—No-Project Alternative.

The following alternatives were considered but eliminated from the analysis (see Section 2.5.2 for detailed descriptions and explanation of why these alternatives do not merit further consideration):

- 1 1. Cruise Ship Berthing Alternatives;
- 2 a. Cruise Ship Berth at Berths 66–67 (South of Warehouse No. 1),
- 3 b. Alternative Cruise Ship Berth at Berths 69–72 (Adjacent to Warehouse No.
- 4 1), and
- 5 c. Alternative Cruise Ship Berth at Berths 75–79 (Ports O’Call).

6 6.2 NEPA Evaluation of Alternatives

7 6.2.1 NEPA Requirements

8 NEPA’s requirements for an EIS to evaluate alternatives are described fully in
9 Chapter 1, Section 1.5.7. Briefly, NEPA (40 CFR 1502.14[a]) requires that an EIS
10 describe a range of reasonable alternatives to a project, or to the location of a project,
11 that could feasibly attain most of the basic objectives of the project but would avoid
12 or substantially lessen any significant environmental impacts. The Clean Water Act
13 Section 404(b)(1) Guidelines (40 CFR 230) also address alternatives, as described in
14 Chapter 1, Section 1.4.1, stating that no discharge of dredged or fill material will be
15 permitted if there is a practicable alternative to the proposed discharge that would
16 have a less-adverse impact on the aquatic ecosystem, so long as that alternative does
17 not have other significant adverse environmental consequences. Section 2.5 of this
18 draft EIS/EIR sets forth potential alternatives to the proposed Project, and Chapters 3,
19 4, and 5 evaluate their environmental impacts.

20 6.2.2 NEPA Alternatives Comparison

21 Table 6-1 summarizes the results of the NEPA significance analysis for each resource
22 area and identifies the alternatives that would result in significant unavoidable
23 impacts under NEPA, as discussed in Chapter 3 (the analysis includes project-level
24 impacts, not cumulative effects). Note that Alternative 5 is the No-Federal-Action
25 Alternative, which would not require a USACE permit (i.e., it represents what is
26 reasonably expected to occur at the project site absent a USACE permit). The
27 analysis of Alternative 5 evaluates what would occur if the federal portion of the
28 project were not approved. Because the No-Federal-Action Alternative is the same
29 as the NEPA baseline for this project, there are no NEPA impact conclusions relevant
30 to Alternative 5. Alternative 6 is the CEQA No-Project Alternative. Under this
31 alternative, there would be neither federal nor local approval of the project, action, or
32 permit. Because the No-Federal-Action alternative is evaluated under Alternative 5,
33 there would be no significance determinations under NEPA for Alternative 6. A
34 discussion of the resources with significant unavoidable impacts or significant
35 impacts that can be mitigated to less than significant is provided in Sections 6.4.1
36 and 6.4.2.

1 **Table 6-1.** Summary of NEPA Significance Analysis by Alternative

<i>Environmental Resource Area</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt. 5 No Federal Action</i>
Aesthetics	S	S	S	S	M	N
Air Quality	S	S	S	S	S	N
Biological Resources	S	S	S	S	S	N
Cultural Resources	M	M	M	M	M	N
Geology	S	S	S	S	S	N
Groundwater and Soils	M	M	M	M	M	N
Hazards and Hazardous Materials	M	M	M	M	M	N
Land Use and Planning	M	M	M	M	M	N
Noise	S	S	S	S	S	N
Recreation	S	S	S	S	S	N
Transportation and Circulation (Ground)	S	S	S	S	M	N
Transportation and Navigation (Marine)	L	L	L	L	L	N
Utilities and Public Services	M	M	M	M	M	N
Water Quality, Sediments, and Oceanography	S	L	S	L	L	N
Notes:						
Alternative 6 is not included; it does not involve federal action and is not applicable under NEPA.						
S = Unavoidable significant impact						
M = Significant but mitigable to less than significant impact						
L = Less than significant impact (not significant)						
N = No impact						

2

3 The proposed Project and Alternatives 1 through 4 have significant unavoidable
4 impacts in the areas of air quality, biological resources, geology, noise, and
5 recreation. The proposed Project and Alternatives 1 through 3 also have significant
6 unavoidable impacts on aesthetics (relative to the Inner Harbor parking structure) and
7 transportation and circulation (ground). The proposed Project and Alternative 2 also
8 have significant unavoidable impacts on water quality, sediments, and oceanography.
9 Significant impacts in the areas of cultural resources, groundwater and soils, hazards
10 and hazardous materials, land use and planning, and utilities and public services can
11 all be mitigated to less than significant for the proposed Project and Alternatives 1
12 through 4.

13 Table 6-2 summarizes the impact analysis of the analyzed alternatives compared to
14 the proposed Project, and Table 6-3 summarizes the impact analysis of the proposed
15 Project and its alternatives compared to the NEPA baseline (i.e., Alternative 5). The
16 ranking of the alternatives is based on the impact determinations under NEPA for

1 each resource and impact, as discussed in Chapter 3, and reflects differences between
 2 the levels of impact among alternatives, even if the alternatives result in impacts that
 3 are less than significant. This ranking also takes into consideration the relative
 4 number of significant impacts that are mitigated to a less-than-significant level and
 5 the number of impacts that remain significant after mitigation. Note that because no
 6 NEPA impact analyses were performed for Alternative 6 (because Alternative 6 does
 7 not apply to NEPA), this alternative was not compared to the no-federal-
 8 action/NEPA baseline and does not appear in Tables 6-2 and 6-3. Since Alternative 5
 9 is the No-Federal-Action Alternative, it is identical to the NEPA baseline and would
 10 have no impacts under NEPA.

11 **Table 6-2.** Comparison of Alternatives to the Proposed Project (NEPA Impacts with Mitigation)

<i>Environmental Resource Area*</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt. 5 No Federal Action</i>
Aesthetics	0	-1	-1	-1	-2	-2
Air Quality	0	-1	0	-1	-2	-3
Biological Resources	0	-1	0	-1	-1	-2
Cultural Resources	0	0	0	0	-1	-2
Geology	0	-1	0	-1	-2	-3
Groundwater and Soils	0	0	0	0	-1	-1
Hazards and Hazardous Materials	0	-1	0	-1	-2	-1
Land Use and Planning	0	0	0	0	0	-2
Noise	0	0	+1	0	-2	-3
Recreation	0	0	0	0	0	-1
Transportation and Circulation (Ground)	0	-2	+1	-1	-3	-3
Transportation and Navigation (Marine)	0	-1	0	-1	-2	-3
Utilities and Public Services	0	-1	0	-3	-2	-2
Water Quality, Sediments, and Oceanography	0	-1	0	-1	-2	-3
Total	0	-10	+1	-11	-22	-31

Notes:

* The analysis used to rank alternatives includes project-level impacts, not cumulative effects. Alternative 6 is not included because it has no impacts under NEPA.

(-3) = Impacts considered to be substantially reduced when compared with the proposed Project.

(-2) = Impacts considered to be moderately reduced when compared with the proposed Project.

(-1) = Impacts considered to be somewhat reduced when compared with the proposed Project.

(0) = Impacts considered to be equal to the proposed Project.

(+1) = Impacts considered to be somewhat increased when compared with the proposed Project.

(+2) = Impacts considered to be moderately increased when compared with the proposed Project.

(+3) = Impacts considered to be substantially increased when compared with the proposed Project.

12

1 **Table 6-3.** Comparison of Alternatives to the NEPA Baseline (NEPA Impacts with Mitigation)

<i>Environmental Resource Area*</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt. 5 No Federal Action</i>
Aesthetics	+3	+2	+2	+2	+1	0
Air Quality	+3	+2	+3	+2	+1	0
Biological Resources	+2	+1	+2	+1	+1	0
Cultural Resources	+1	+1	+1	+1	0	0
Geology	+3	+2	+3	+2	+1	0
Groundwater and Soils	+2	+2	+2	+2	+1	0
Hazards and Hazardous Materials	+3	+2	+3	+2	+1	0
Land Use and Planning	+2	+2	+2	+2	+2	0
Noise	+2	+2	+3	+2	+1	0
Recreation	+1	+1	+1	+1	+1	0
Transportation and Circulation (Ground)	+2	+1	+3	+1	0	0
Transportation and Navigation (Marine)	+3	+2	+3	+2	+1	0
Utilities and Public Services	+2	+1	+2	-1	+1	0
Water Quality, Sediments, and Oceanography	+3	+2	+3	+2	+1	0
Total	32	22	33	21	13	0
Ranking	4	3	5	2	1	0
Notes:						
* The analysis used to rank alternatives includes project-level impacts, not cumulative effects. Alternative 6 is not included because the CEQA No-Project Alternative is not applicable under NEPA.						
(-3) = Impacts considered to be substantially reduced when compared with the no-federal-action/NEPA baseline.						
(-2) = Impacts considered to be moderately reduced when compared with the no-federal-action/NEPA baseline.						
(-1) = Impacts considered to be somewhat reduced when compared with the no-federal-action/NEPA baseline.						
(0) = Impacts considered to be equal to the no-federal-action/NEPA baseline.						
(+1) = Impacts considered to be somewhat increased when compared with the no-federal-action/NEPA baseline.						
(+2) = Impacts considered to be moderately increased when compared with the no-federal-action/NEPA baseline.						
(+3) = Impacts considered to be substantially increased when compared with the no-federal-action/NEPA baseline.						

2

3 As shown in Table 6-2, when compared with the proposed Project, impacts under

4 NEPA would be slightly increased under Alternative 2 and incrementally reduced for

5 Alternatives 1, 3, 4 and 5, respectively.

6 The analysis summarizes which environmental resource areas are significant and

7 unavoidable (as shown in Table 6-1), and compares impacts of each alternative to the

8 NEPA baseline (Table 6-3). As shown in Table 6-3, Alternative 4 would have the

9 smallest increase in impacts when compared with the NEPA baseline, and this

10 alternative would be ranked 1. There would be an increase in impacts under

1 Alternative 3, followed by Alternative 1, the proposed Project, and Alternative 2,
 2 which are ranked 2, 3, 4, and 5 respectively. Since Alternative 5 is the No-Federal-
 3 Action Alternative, it is identical to the NEPA baseline and is therefore not ranked.

4 **6.3 CEQA Evaluation of Alternatives**

5 **6.3.1 CEQA Requirements**

6 CEQA's requirements for an EIR to evaluate alternatives are described fully in
 7 Chapter 1, Section 1.5.7. Briefly, the CEQA Guidelines, Section 15126.6, require
 8 that an EIR present a range of reasonable alternatives to a project, or to the location
 9 of a project, that could feasibly attain most of the basic project objectives, but would
 10 avoid or substantially lessen any significant effects of the project. Section 15126.6
 11 also requires an evaluation of the comparative merits of the alternatives. An EIR is
 12 not required to consider alternatives that are infeasible (see Section 2.5).

13 **6.3.2 CEQA Alternatives Comparison**

14 Table 6-4 summarizes the results of the CEQA significance analysis for each
 15 resource area, and identifies the alternatives that would result in unavoidable
 16 significant impacts under CEQA, as discussed in Chapter 3. A summary of the
 17 resources with unavoidable significant impacts or significant impacts that can be
 18 mitigated to less than significant is provided in Sections 6.4.1 and 6.4.2.

19 **Table 6-4.** Summary of CEQA Significance Analysis by Alternative

<i>Environmental Resource Area</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt. 5 No Federal Action</i>	<i>Alt. 6 No Project</i>
Aesthetics	S	S	S	S	S	S	N
Air Quality	S	S	S	S	S	S	N
Biological Resources	S	S	S	S	S	S	N
Cultural Resources	M	M	M	M	M	M	N
Geology	S	S	S	S	S	S	N
Groundwater and Soils	M	M	M	M	M	M	N
Hazards and Hazardous Materials	M	M	M	M	M	M	N
Land Use and Planning	M	M	M	M	M	M	N
Noise	S	S	S	S	S	S	N
Recreation	S	S	S	S	S	S	N

<i>Environmental Resource Area</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt. 5 No Federal Action</i>	<i>Alt. 6 No Project</i>
Transportation and Circulation (Ground)	S	S	S	S	S	S	N
Transportation and Navigation (Marine)	L	L	L	L	L	L	N
Utilities and Public Services	M	M	M	M	M	M	N
Water Quality, Sediments, and Oceanography	S	S	S	S	S	S	N
Notes: S = Unavoidable significant impact M = Significant but mitigable impact L = Less than significant impact (not significant) N = No impact							

1

2

3

4

5

The proposed Project and all alternatives, except the No-Project Alternative, have unavoidable significant impacts in the area of aesthetics, air quality, biological resources, geology, noise, recreation, transportation and circulation, and water quality, sediments, and oceanography.

6

7

8

9

10

11

12

13

14

15

16

17

Table 6-5 summarizes the environmental impacts of each alternative compared to the proposed Project, and Table 6-6 provides a summary of the impacts of each alternative compared to the CEQA baseline. Table 6-6 ranks the alternatives by comparing their environmental impacts with those of the CEQA baseline. The ranking is based on the significance determinations for each resource area, as discussed in Chapter 3, and reflects differences in the levels of impact among alternatives. This ranking also takes into consideration the relative number of significant impacts that are mitigated to a level below significance, and the number of impacts that remain significant after mitigation. Because Alternative 6, the No-Project Alternative, represents no action on behalf of LAHD and therefore would not require discretionary approvals triggering CEQA compliance, there would be no impact under CEQA.

18

Table 6-5. Comparison of Alternatives to the Proposed Project (CEQA Impacts with Mitigation)

<i>Environmental Resource Area</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt 5 No Federal Action</i>	<i>Alt 6 No Project</i>
Aesthetics	0	-1	-1	-1	-2	-2	-3
Air Quality	0	-1	0	-1	-2	-2	-3
Biological Resources	0	-1	0	-1	-1	-2	-3
Cultural Resources	0	0	0	0	-1	-1	-2

<i>Environmental Resource Area</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt 5 No Federal Action</i>	<i>Alt 6 No Project</i>
Geology	0	-1	0	-1	-1	-2	-3
Groundwater and Soils	0	0	0	0	0	-1	-2
Hazards and Hazardous Materials	0	-1	0	-1	-2	-1	-3
Land Use and Planning	0	0	0	0	0	+1	-3
Noise	0	0	+1	0	-1	-1	-3
Recreation	0	0	0	0	0	+1	-1
Transportation and Circulation (Ground)	0	-1	+1	-1	-2	-2	-3
Transportation and Navigation (Marine)	0	-1	0	-1	-2	-3	-3
Utilities and Public Services	0	-1	0	-2	-1	-1	-3
Water Quality, Sediments, and Oceanography	0	-1	0	-1	-1	-2	-3
Total	0	-9	+1	-10	-16	-18	-38
Notes:							
(-3) = Impacts considered to be substantially reduced when compared with the CEQA baseline.							
(-2) = Impacts considered to be moderately reduced when compared with the CEQA baseline.							
(-1) = Impacts considered to be somewhat reduced when compared with the CEQA baseline.							
(0) = Impacts considered to be equal to the CEQA baseline.							
(+1) = Impacts considered to be somewhat increased when compared with the CEQA baseline.							
(+2) = Impacts considered to be moderately increased when compared with the CEQA baseline.							
(+3) = Impacts considered to be substantially increased when compared with the CEQA baseline.							
Where significant unavoidable impacts would occur across different alternatives but there are impact intensity differences between those alternatives, numeric differences are used to differentiate alternatives (i.e., in some cases, there are differences at the individual impact level, such as differences in number of impacts or relative intensity).							

1

2 **Table 6-6.** Comparison of Alternatives to the CEQA Baseline (CEQA Impacts with Mitigation)

<i>Environmental Resource Area</i>	<i>Proposed Project</i>	<i>Alt. 1</i>	<i>Alt. 2</i>	<i>Alt. 3</i>	<i>Alt. 4</i>	<i>Alt 5 No Federal Action</i>	<i>Alt 6 No Project</i>
Aesthetics	+3	+2	+2	+2	+1	+1	0
Air Quality	+3	+2	+3	+2	+1	+1	0
Biological Resources	+3	+2	+3	+2	+2	+1	0
Cultural Resources	+2	+2	+2	+2	+2	+2	0

Geology	+3	+2	+3	+1	+1	+1	0
Groundwater and Soils	+2	+2	+2	+2	+2	+1	0
Hazards and Hazardous Materials	+3	+2	+3	+2	+1	+2	0
Land Use and Planning	+1	+1	+1	+1	+1	+2	0
Noise	+2	+2	+3	+2	+1	+1	0
Recreation	+2	+2	+2	+2	+2	+1	0
Transportation and Circulation (Ground)	+3	+2	+3	+2	+1	+1	0
Transportation and Navigation (Marine)	+3	+2	+3	+2	+1	0	0
Utilities and Public Services	+3	+2	+3	+1	+2	+2	0
Water Quality, Sediments, and Oceanography	+3	+2	+3	+2	+2	+1	0
Total	36	27	36	25	20	17	0
Ranking	5	4	5	3	2	1	0
Notes: (-3) = Impacts considered to be substantially reduced when compared with the proposed Project. (-2) = Impacts considered to be moderately reduced when compared with the proposed Project. (-1) = Impacts considered to be somewhat reduced when compared with the proposed Project. (0) = Impacts considered to be equal to the proposed Project. (+1) = Impacts considered to be somewhat increased when compared with the proposed Project. (+2) = Impacts considered to be moderately increased when compared with the n proposed Project. (+3) = Impacts considered to be substantially increased when compared with the n proposed Project.							

1
 2 As shown in Table 6-5, when compared with the proposed Project, impacts under
 3 CEQA would be slightly increased under Alternative 2 and incrementally reduced for
 4 Alternatives 1, 3, 4, 5, and 6, respectively.

5 As shown in Table 6-6, Alternative 5 would have the smallest increase in impacts
 6 when compared to the CEQA baseline, and this alternative would be ranked 1. There
 7 would be a slight increase in impacts under Alternative 4, followed by Alternatives 3
 8 and 1, and these alternatives would be ranked 2, 3, and 4 respectively. The proposed
 9 Project and Alternative 2 would have the greatest increase in impacts when compared
 10 with the CEQA baseline, and they would share a ranking of 5. Since Alternative 6 is
 11 the No-Project Alternative, it would have the fewest impacts and is not ranked.

12 6.4 Analysis of Impacts of Alternatives

13 Tables 6-1 and 6-4 identify the alternatives that would result in both unavoidable and
 14 mitigable significant impacts on the various resource areas, as discussed in Chapter 3.

1 This information is taken from summary tables included at the conclusion of each of
2 the 14 environmental resource sections in Chapter 3. For each of the 14
3 environmental resources analyzed in this draft EIS/EIR, Chapter 3 identifies
4 significant impacts associated with the proposed Project and each of the six
5 alternatives. Eight of the environmental resources evaluated (aesthetics; air quality;
6 biological resources; geology; noise; recreation; ground transportation; and water
7 quality, sediments, and oceanography) have unavoidable significant impacts for at
8 least one alternative. Five of the environmental resources evaluated (cultural
9 resources, groundwater and soils, hazards and hazardous materials, land use and
10 planning, and utilities and public services) have significant impacts that could be
11 mitigated to a less-than-significant level for all of the alternatives. Transportation
12 and navigation (marine) has no significant impacts associated with any alternatives.
13 The discussion below describes the significant impacts for each resource and
14 identifies to which alternative the impacts apply.

15 **6.4.1 Resources with Significant Unavoidable** 16 **Impacts**

17 **6.4.1.1 Aesthetics**

18 The proposed parking structure at the existing Inner Harbor cruise ship terminal
19 would block views to the Vincent Thomas Bridge from a short segment of Harbor
20 Boulevard, a locally designated scenic highway (Impact AES-1). Impacts would be
21 significant to this segment of Harbor Boulevard for the proposed Project and
22 Alternatives 1 through 5 under CEQA. Mitigation Measure MM AES-2 would
23 reduce visual impacts for Alternatives 4 and 5, but without an evaluation of the final
24 design, impacts are considered significant from this segment of the scenic highway
25 under CEQA. Impacts would also be significant to this segment of Harbor Boulevard
26 for the proposed Project and Alternatives 1 through 3 under NEPA. Impacts from
27 Alternatives 4 and 5 under NEPA would not be significant, as impacts from the
28 proposed Inner Harbor parking structure under these two alternatives would be the
29 same as the NEPA baseline.

30 As shown in Table 6-2, under NEPA, aesthetics impacts for Alternatives 1 through 3
31 would be the same as the proposed Project, while aesthetics impacts for Alternatives
32 4 and 5 would be less than the proposed Project because the number of parking
33 structures would be reduced to one. Likewise, as shown in Table 6-5, under CEQA,
34 aesthetics impacts for Alternatives 1 through 3 would be the same as the proposed
35 Project. Aesthetic impacts for Alternatives 4 and 5 would be reduced when
36 compared to the proposed Project and aesthetic impacts for Alternative 6 would be
37 substantially less than the proposed Project. Therefore, Alternatives 4 and 5 would
38 have the fewest visual impacts of all the development alternatives.

6.4.1.2 Air Quality

Emissions from proposed Project construction would increase relative to CEQA and NEPA baseline emissions for VOC, CO, NO_x, PM10, and PM2.5. After mitigation, the proposed Project and Alternatives 1, 2, and 4 would result in significant and unavoidable impacts for VOC, CO, NO_x, PM10, and PM2.5 emissions under CEQA and NEPA. Alternative 3 after mitigation would result in significant and unavoidable impacts for VOC, CO, NO_x, PM10, and PM2.5 emissions under CEQA, and for VOC, CO, NO_x, and PM2.5 emissions under NEPA. Alternative 5 would result in significant and unavoidable impacts for VOC, CO, NO_x, PM10, and PM2.5 after mitigation under CEQA only (as the No-Federal-Action Alternative, no NEPA impacts would occur for Alternative 5).

Construction of the proposed Project and Alternatives 1 through 5 would exceed the SCAQMD 1-hour NO₂ and 24-hour PM10 ambient thresholds. Therefore, construction emissions would result in significant and unavoidable impacts due to increased NO₂, PM10, and PM2.5 levels under CEQA for Alternatives 1 through 5, and impacts from Alternatives 1 through 4 would be significant under NEPA (as the No-Federal-Action Alternative, no NEPA impacts would occur for Alternative 5).

Peak daily emissions from the proposed Project and Alternatives 1 through 5 would increase relative to CEQA baseline emissions for VOC, CO, NO_x, SO_x, PM10, and PM2.5 during one or more project analysis years. The proposed Project and Alternatives 1 through 5 would result in significant and unavoidable impacts for VOC, NO_x, SO_x, and PM10 emissions under CEQA. Alternative 6 (unmitigated) would increase relative to CEQA baseline emissions for VOC, NO_x, SO_x, PM10, and PM2.5 during one or more project analysis years. The proposed Project and Alternatives 1 and 2 would increase relative to NEPA baseline emissions for all project analysis years for all analyzed pollutants. Alternative 3 (mitigated) would decrease relative to NEPA baseline emissions for all project analysis years for VOC, CO, and PM10. Alternative 4 (mitigated) would decrease relative to NEPA baseline emissions for all project analysis years for CO, SO_x, PM10, and PM2.5. Thus, emissions from the proposed Project and Alternatives 1 through 4 would result in significant and unavoidable impacts for NO_x under NEPA. No NEPA impacts would occur for Alternative 5.

Impacts from operation of the proposed Project and Alternatives 1 through 5 would result in significant and unavoidable impacts from exceeding SCAQMD ambient thresholds for NO₂, PM10, and PM2.5 levels under CEQA, and the proposed Project and Alternatives 1 through 4 would result in significant and unavoidable impacts under NEPA, with the exception of PM2.5 for Alternative 4. No NEPA impacts would occur for Alternative 5 as this is equivalent to the NEPA baseline.

Construction and operational emissions of TACs under the proposed Project and Alternatives 1 through 5 would not increase cancer risks from CEQA baseline levels to above the significance criterion of 10 in a million (10×10^{-6}) risk to offsite residential, occupational, sensitive, and recreational receptors. The construction and operational emissions of TACs under the proposed Project and Alternatives 1, 2, and 3 would increase cancer risks from NEPA baseline levels to above the significance

1 criteria to offsite residential, occupational, and recreational receptors. Impacts would
2 be significant and unavoidable under NEPA.

3 Construction and operational emissions of TACs from the proposed Project and
4 Alternatives 1 through 3 would increase acute non-cancer effects from CEQA
5 baseline levels to above the 1.0 hazard index significance criterion at occupational
6 and recreational receptors in proximity to the Project terminal. The proposed project
7 or Alternatives 1-4 would not increase acute non-cancer effects from NEPA baseline
8 levels to above the significance criterion at the analyzed receptors.

9 The proposed Project and Alternatives 1 through 5 would contribute to significant
10 and unavoidable impacts to global climate change under CEQA. No impacts to
11 global climate change would occur under NEPA.

12 As shown in Table 6-2, under NEPA, air quality impacts for Alternatives 1 and 3
13 would be reduced when compared to the proposed Project, and reduced further under
14 Alternative 4 followed by Alternative 5. Alternative 2 would result in the same level
15 of impact as the proposed Project. As shown in Table 6-5, under CEQA, air quality
16 impacts for Alternatives 1 and 3 would be reduced when compared to the proposed
17 Project, and reduced further under Alternatives 4 and 5. Alternative 2 would result in
18 the same level of impact as the proposed Project. Air quality impacts for Alternative
19 6 would be substantially reduced when compare to the proposed Project.

20 **6.4.1.3 Biological Resources**

21 Proposed project construction activities would affect several special aquatic sites in
22 the proposed project area, including a small mudflat at Berth 78–Ports O’Call,
23 mudflat and eelgrass habitat adjacent to the Cabrillo Beach Youth Camp and Salinas
24 de San Pedro Salt Marsh, and kelp outcroppings at Berths 68–69 and Berths 47–49 at
25 the proposed Outer Harbor Cruise Terminals (Impact BIO-2a). Construction
26 activities associated with expansion and enhancement of the mudflat and salt marsh
27 for the long-term benefit of the marsh (Mitigation Measure MM BIO-4) would result
28 in significant and unavoidable short-term impacts on the salt marsh and mudflat
29 habitat within the marsh for the proposed Project and Alternatives 1 through 4 under
30 CEQA, and the proposed Project and Alternatives 1 through 4 under NEPA.

31 Vessels entering the Port from beyond the Exclusive Economic Zone (EEZ) would be
32 subject to ballast water management regulations to minimize the risk of accidental
33 introductions of invasive species. However, adherence to these regulations would not
34 eliminate the risk of accidental introductions. Invasive species may enter the harbor
35 attached to a ship’s hull, anchor, or other equipment (Impact BIO-4b). Operation of
36 the proposed Project and Alternatives 1 through 6 would increase the number of
37 cruise ships visiting the Port over the CEQA baseline. The increase in vessel traffic
38 would incrementally increase the potential for invasive species introductions that
39 would disrupt biological communities, which would be a significant impact for the
40 proposed Project and Alternatives 1 through 5 under CEQA, and the proposed Project
41 and Alternatives 1 through 4 under NEPA (Alternative 5 would not result in impacts
42 under NEPA). No impacts would occur for Alternative 6 under CEQA, and impacts

1 for Alternative 6 are not applicable under NEPA. No feasible mitigation is currently
2 available to totally prevent introductions of invasive species via vessel hulls,
3 equipment, or ballast water, due to the lack of a proven technology. New
4 technologies are being explored, and if methods become available in the future, they
5 would be implemented as required at that time.

6 As shown in Table 6-2, under NEPA, impacts on biological resources for Alternative
7 2 would be the same as the proposed Project, while impacts on biological resources
8 for Alternatives 1, 3, and 4 would be somewhat reduced when compared with the
9 proposed Project. Impacts would be further reduced under Alternative 5 because
10 there would be no in-water or over-water construction. Likewise under CEQA, as
11 shown in Table 6-5, impacts on biological resources for Alternative 2 would be the
12 same as the proposed Project, while impacts on biological resources for Alternatives
13 1, 3, and 4 would be somewhat reduced when compared with the proposed Project.
14 Impacts on biological resources for Alternatives 5 and 6 would be further reduced.

15 **6.4.1.4 Geology**

16 The proposed Project and Alternatives 1 through 5 would result in increased
17 exposure of people and property to seismic hazards from a major or great earthquake
18 during construction and operation. Seismic activity along the Palos Verdes Fault
19 zone, or other regional faults, would potentially produce fault rupture, seismic
20 ground-shaking, liquefaction, or other seismically induced ground failure. Seismic
21 hazards are common to the Los Angeles region and are not increased by the proposed
22 Project. However, because the proposed project area is potentially underlain by
23 strands of the active Palos Verdes Fault and liquefaction-prone hydraulic fill, there is
24 a substantial risk of harm to people and structures resulting in seismic impacts
25 (Impacts GEO-1a and GEO-1b). Design and construction in accordance with
26 applicable laws and regulations pertaining to seismically induced ground movement
27 would minimize structural damage in the event of an earthquake. However,
28 increased exposure of people and property during construction to seismic hazards
29 from a major or great earthquake cannot be precluded even with incorporation of
30 modern construction engineering and safety standards. Therefore, impacts due to
31 seismically induced ground failure would be significant and unavoidable for the
32 proposed Project and Alternatives 1 through 5 under CEQA, and for the proposed
33 Project and Alternatives 1 through 4 under NEPA (Alternative 5 would not result in
34 impacts under NEPA).

35 The proposed Project and Alternatives 1 through 5 would expose people and
36 structures to tsunami and seiche hazards during construction and operations (Impacts
37 GEO-2a and GEO-2b). Portions of the proposed project site are at elevations lower
38 than the predicted tsunami wave heights, resulting in a substantial risk of coastal
39 flooding due to tsunamis and seiches. Designing new facilities based on existing
40 building codes may not prevent substantial damage to structures from coastal
41 flooding. Impacts due to tsunamis and seiches are typical for the entire California
42 coastline and would not be increased by construction or operation of the proposed
43 Project. Emergency planning and coordination between the existing and future Port
44 tenants and LAHD, as outlined in Mitigation Measure MM GEO-1, would contribute

1 to reducing onsite injuries during a tsunami. However, even with incorporation of
2 emergency planning and construction in accordance with current City and State
3 regulations, substantial damage and/or injury would occur in the event of a tsunami
4 or seiche. Raising the elevation of the site, or constructing a wall along the perimeter
5 of the site of sufficient height to mitigate the potentially damaging effects of a
6 tsunami, would be the only way to mitigate potential impacts. However, elevating
7 the approximately 400 acres within the site or building a wall around the entire
8 perimeter of the proposed project area would be cost-prohibitive and would
9 significantly impact existing infrastructure requiring extensive modification of
10 existing improvements. Mitigation of the tsunami risk would not be feasible. As a
11 result, impacts due to tsunami would be significant and unavoidable for the proposed
12 Project and Alternatives 1 through 5 under CEQA, and for the proposed Project and
13 Alternatives 1 through 4 under NEPA (Alternative 5 would not result in impacts
14 under NEPA).

15 As shown in Table 6-2, under NEPA, impacts related to geology for Alternative 2
16 would be the same as the proposed Project. Because of reduced exposure to risk
17 under Alternatives 1 and 3, there would be fewer impacts when compared to the
18 proposed Project, and impacts would be further reduced under Alternative 4. No
19 NEPA impacts would occur under Alternative 5. As shown in Table 6-5, under
20 CEQA, impacts related to geology for Alternative 2 would be the same as the
21 proposed Project. Impacts would be reduced under Alternatives 1, 3 and 4.
22 Alternative 5 would further reduce impacts. Impacts related to geology for
23 Alternative 6 would be substantially reduced when compared to the proposed Project.

24 **6.4.1.5 Noise**

25 The proposed Project and Alternatives 1 through 5 would result in significant noise
26 impacts during construction (Impact NOI-1). During construction, sensitive
27 receptors would experience an increase of over 5 dBA in ambient noise levels at
28 multiple locations. The inclusion of mitigation to reduce noise levels associated with
29 aspects of construction (Mitigation Measure MM NOI-1) would reduce impacts, but
30 not below the threshold. Therefore, noise impacts from construction of the proposed
31 Project and Alternatives 1 through 5 would be considered significant and unavoidable
32 under CEQA, and for the proposed Project and Alternatives 1 through 4 under NEPA
33 (Alternative 5 would not result in impacts under NEPA).

34 During operations of the proposed Project and Alternatives 1 through 5, additional
35 traffic on roadways surrounding the proposed Project would impact areas
36 surrounding the proposed project site due to the increase in traffic quantity and
37 resultant traffic noise (Impact NOI-3a). The proposed Project and Alternatives 1 and
38 3 would have significant impacts on some sensitive receptors located along Miner
39 Street and no mitigation would be feasible. Operations of Alternative 2 would cause
40 increases in traffic noise to sensitive receptors located along 22nd Street, Miner Street,
41 and Harbor Boulevard, and no mitigation would be feasible to reduce impacts to less-
42 than-significant levels. Therefore, noise impacts from operation of the proposed
43 Project and Alternatives 1 through 5 would be considered significant and unavoidable

1 under CEQA, and for the proposed Project and Alternatives 1 through 4 under NEPA
2 (Alternative 5 would not result in impacts under NEPA).

3 As shown in Table 6-2, under NEPA, noise impacts for Alternatives 1 and 3 would
4 be the same as the proposed Project, while noise impacts under Alternative 4,
5 followed by Alternative 5, would be further reduced. Alternative 2 would result in
6 slightly increased impacts when compared to the proposed Project because more
7 sensitive receptors would be affected. As shown in Table 6-5, under CEQA, noise
8 impacts for Alternatives 1 and 3 would be the same as the proposed Project, and
9 noise impacts would be reduced under Alternatives 4 and 5. As in the NEPA
10 analysis, Alternative 2 would result in slightly increased impacts when compared to
11 the proposed Project because more sensitive receptors would be affected. Noise
12 impacts for Alternative 6 would be substantially reduced from the proposed Project.

13 **6.4.1.6 Recreation**

14 Construction of the proposed Project and Alternatives 1 through 5 would result in a
15 substantial loss or diminished quality of recreational, educational, or visitor-oriented
16 opportunities, facilities, or resources (Impact REC-1a). Construction would affect
17 existing recreational facilities and recreators' experiences. While enhancements
18 would be beneficial in the long-term, short term impacts would be significant due to
19 the magnitude and duration of construction activities within the proposed project
20 area. Implementation of mitigation measures (MM REC-1, MM REC-2, MM REC-
21 3, MM REC-4, MM REC-5, MM REC-6, and MM REC-7) would reduce impacts,
22 but not to less-than-significant levels. Therefore, impacts to recreation from
23 construction would be considered significant and unavoidable for the proposed
24 Project and Alternatives 1 through 5 under CEQA, and for the proposed Project and
25 Alternatives 1 through 4 under NEPA (Alternative 5 would not result in impacts
26 under NEPA).

27 As shown in Table 6-2, under NEPA, impacts to recreation for Alternatives 1 through
28 4 would be the same as the proposed Project. Impacts would be reduced under
29 Alternative 5. As shown in Table 6-5, under CEQA, impacts to recreation for
30 Alternatives 1 through 4 would be the same as the proposed Project, while impacts to
31 recreation would increase for Alternative 5 and be reduced for Alternative 6 when
32 compared to the proposed Project.

33 **6.4.1.7 Transportation and Circulation (Ground)**

34 The proposed Project and Alternatives 1 through 5 would increase traffic volumes
35 and degrade level of services (LOS) at intersections within the proposed project
36 vicinity (Impact TC-2a). Mitigation measures would be implemented to address
37 intersection impacts identified through 2015 and 2037 (MM TC-2, MM TC-3, MM
38 TC-4, MM TC-5, MM TC-6, MM TC-7, MM TC-8, MM TC-9, MM TC-10, MM
39 TC-11, MM TC-12, MM TC-13, MM TC-14). Mitigation measures would fully
40 mitigate some impacts to less-than-significant levels in 2015 and 2037, but for the

1 remaining intersections, no feasible measures were identified that would fully
 2 mitigate the impact to less-than-significant levels due to existing physical constraints
 3 at those locations. Tables 6-7 and 6-8 show the significant and unavoidable impacts
 4 at local intersections in 2015 and 2037 for each alternative under CEQA and NEPA,
 5 respectively.

6 **Table 6-7.** Summary of Significant Unavoidable Transportation and Circulation Impacts under CEQA

Intersection	Proposed Project		Alt 1		Alt 2		Alt 3		Alt 4		Alt 5	
	2015	2037	2015	2037	2015	2037	2015	2037	2015	2037	2015	2037
5. Gaffey Street/9 th Street	X	X		X	X	X		X		X		X
6. Gaffey Street/7 th Street		X				X						
8. Gaffey Street/5 th Street		X		X		X						
9. Gaffey Street/1 st Street	X	X	X	X	X	X	X	X	X	X	X	X
21. Harbor Boulevard/Miner Street/Crescent Avenue		X	X	X	X	X	X	X				
22. Harbor Boulevard/7 th Street	X	X		X		X	X	X		X		X
23. Harbor Boulevard/6 th Street						X						
24. Harbor Boulevard/5 th Street		X				X						
25. Harbor Boulevard/1 st Street		X				X						
27. Harbor Boulevard/SR-47 westbound on-ramp		X		X		X						
28. Harbor Boulevard/Gulch Road			X	X	X	X	X	X				

7

1 **Table 6-8.** Summary of Significant Unavoidable Transportation and Circulation Impacts under NEPA

<i>Intersection</i>	<i>Proposed Project</i>		<i>Alt 1</i>		<i>Alt 2</i>		<i>Alt 3</i>	
	<i>2015</i>	<i>2037</i>	<i>2015</i>	<i>2037</i>	<i>2015</i>	<i>2037</i>	<i>2015</i>	<i>2037</i>
5. Gaffey Street/9 th Street		X				X		
6. Gaffey Street/7 th Street								
8. Gaffey Street/5 th Street								
9. Gaffey Street/1 st Street		X				X		
21. Harbor Boulevard/Miner Street/Crescent Avenue		X	X	X	X	X	X	X
22. Harbor Boulevard/7 th Street	X	X		X		X	X	X
23. Harbor Boulevard/6 th Street						X		
24. Harbor Boulevard/5 th Street		X				X		
25. Harbor Boulevard/1 st Street		X						
26. Harbor Boulevard/Swinford Street/SR-47 eastbound ramps		X				X		
27. Harbor Boulevard/SR-47 westbound on-ramp		X		X		X		X
28. Harbor Boulevard/Gulch Road			X	X	X	X	X	X
Notes: There are no significant unavoidable NEPA impacts for Alternative 4. Alternative 5 is the No-Federal-Action Alternative, so there are no impacts under NEPA.								

2

3

4

5

6

7

8

9

10

11

12

The LOS expected to result from the proposed Project and some of its alternatives at the two analysis neighborhood roadways would also reach significant levels (Impact TC-2b). The proposed Project and Alternatives 1 and 2 would result in significant impacts to West 17th Street between Centre and Palos Verdes by year 2037 under CEQA. Alternatives 1 and 2 would also result in significant impacts to this street segment by year 2015. No feasible mitigation is available to address the impacts short of the permanent closure of the street segment, which would not be acceptable since it serves adjacent land uses and carries substantial traffic volumes. Neither the proposed Project nor any of the alternatives would result in significant impacts to neighborhood street segments under NEPA.

13

14

15

16

17

18

19

As shown in Table 6-2, under NEPA, transportation and circulation (ground) impacts for Alternative 3 would be somewhat reduced when compared to the proposed Project, and would be further reduced under Alternative 1 followed by Alternatives 4 and 5. As with noise impacts, transportation impacts would increase under Alternative 2 when compared with the proposed Project. As shown in Table 6-5, under CEQA, transportation and circulation (ground) impacts for Alternative 2 would increase when compared to the proposed Project while impacts for Alternatives 1 and

1 3 would be somewhat reduced. Impacts would be reduced further under Alternatives
2 4 and 5, followed by Alternative 6.

3 **6.4.1.8 Water Quality, Sediments, and Oceanography**

4 The proposed Project and Alternative 2 would result in a significant unavoidable
5 impact from potential leaching of contaminants from vessel hulls under CEQA and
6 NEPA (Impact WQ-4d). Because the proposed Project and Alternative 2 would
7 result in a substantial increase in the amount of vessel traffic in the Main Channel and
8 the Outer Harbor (17 additional ships by 2015 and 29 additional ships by 2037),
9 higher mass loadings of contaminants such as copper that are leached from vessel
10 hull anti-fouling paints could occur. Portions of the Los Angeles Harbor are
11 impaired with respect to copper; therefore, increased loadings associated with
12 increases in vessel traffic relative to baseline conditions would likely exacerbate
13 water and sediment quality conditions for copper. Beyond legal requirements, there
14 are no available mitigations to eliminate the leaching of contaminants from anti-
15 fouling paint on vessel hulls. Additionally, Alternatives 1, and 3 through 5 would
16 result in significant unavoidable impacts under CEQA only (increase in 17 ships by
17 2015 and 2037). Alternatives 1, and 3 through 5 would not result in increases in
18 vessel calls to the Port compared to the NEPA baseline, and would therefore not
19 result in significant impacts due to potential hull leaching under NEPA.

20 As shown in Table 6-2, under NEPA, impacts to water quality, sediments, and
21 oceanography for Alternative 2 would be the same as the proposed Project, while
22 impacts for Alternatives 1 and 3 would be somewhat reduced when compared to the
23 proposed Project. Impacts would be further reduced under Alternative 4 followed by
24 Alternative 5. As shown in Table 6-5, under CEQA, impacts to water quality,
25 sediments, and oceanography for Alternative 2 would be the same as the proposed
26 Project, while impacts would be somewhat reduced for Alternatives 1, 3, and 4.
27 Impacts would be further reduced under Alternative 5 followed by Alternative 6.

28 **6.4.2 Resources with Significant Impacts That Can** 29 **Be Mitigated to Less than Significant**

30 **6.4.2.1 Cultural Resources**

31 Construction of the proposed Project and Alternatives 1 through 5 could disturb,
32 damage, or degrade known prehistoric and historic archaeological resources (Impact
33 CR-1). Specifically, areas formerly known as Mexican Hollywood are located within
34 the proposed project area and may be eligible for inclusion in the California Register
35 of Historical Resources and/or the National Register of Historic Places.
36 Implementation of Mitigation Measure MM CR-1 would reduce impacts to less-than-
37 significant levels under CEQA and NEPA. Should the identification and evaluation
38 efforts reveal that newly identified deposits are determined eligible for listing in the
39 California Register, implementation of Mitigation Measures MM CR-2a (preserve in

1 place) and/or MM CR-2b (data recovery) would be required and would reduce
2 impacts to less-than-significant levels. Mitigation Measures MM CR-3 (monitoring
3 ground disturbance) and MM CR-4 (stop work if cultural resources are discovered)
4 would also be required to address these, as well as any previously undiscovered,
5 archaeological resources.

6 Construction of the proposed Project and Alternatives 1 through 5 could also result in
7 the permanent loss of or loss of access to a paleontological resource under CEQA
8 (paleontological resources are not protected under NEPA; therefore, there would be
9 no NEPA impacts). The geologic assessment and literature review demonstrate that
10 excavation in association with development of the proposed Project has the potential
11 to impact significant nonrenewable fossil resources. Excavation into undisturbed
12 geologic deposits underlying the proposed project area would potentially impact
13 fossil resources. Implementation of Mitigation Measure MM CR-5 (paleontological
14 mitigation program) would reduce impacts to less-than-significant levels.

15 As shown in Table 6-2, under NEPA, impacts to cultural resources would be the
16 same as the proposed Project for Alternatives 1 through 3, and somewhat reduced
17 under Alternative 4 followed by Alternative 5 because the reduced footprint of the
18 Inner Harbor parking structure is the NEPA baseline. As shown in Table 6-5, under
19 CEQA, impacts to cultural resources would be the same as the proposed Project for
20 Alternatives 1 through 3, and reduced for Alternatives 4 and 5. Impacts for
21 Alternative 6 would be further reduced.

22 6.4.2.2 Groundwater and Soils

23 Construction activities for the proposed Project and Alternatives 1 through 5 would
24 potentially encounter toxic substances or other contaminants associated with
25 historical uses of the Port. Areas throughout the proposed project site are in various
26 stages of contaminant site characterization and remediation. Construction activities
27 would potentially result in short-term exposure to construction personnel and/or long-
28 term exposure to future site occupants (Impacts GW-1a, GW-2a, GW-1b, and GW-
29 2b). These impacts would be significant for the proposed Project and Alternatives 1
30 through 5 under CEQA, and the proposed Project and Alternatives 1 through 4 under
31 NEPA (there are no impacts for Alternative 5 under NEPA). LAHD would mitigate
32 contaminated soil and groundwater where necessary prior to or during demolition and
33 grading activities as required by Mitigation Measures MM GW-1, MM GW-1a,
34 MM GW-1b, and MM GW-1c for previously identified contaminated sites (including
35 the former GATX site, former oil wells, and the Navy fuel surge line in the North
36 Harbor area). In addition, LAHD would implement Mitigation Measure MM GW-2
37 to address the potential to encounter unanticipated contaminated soil and
38 groundwater during construction in areas outside currently identified contaminated
39 sites.

40 As shown in Table 6-2, under NEPA, impacts related to groundwater and soils would
41 be the same as the proposed Project for Alternatives 1 through 3, and impacts would
42 be reduced for Alternatives 4 and 5 as a result of less dredging and site disturbance.
43 As shown in Table 6-5, under CEQA, impacts related to groundwater and soils would

1 be the same as the proposed Project for Alternatives 1 through 4. There would be a
2 reduction in impacts for Alternative 5 and impacts for Alternatives 6 would be further
3 reduced when compared to the proposed Project.

4 **6.4.2.3 Hazards and Hazardous Materials**

5 Construction activities for the proposed Project and Alternatives 1 through 5 would
6 potentially increase the likelihood of an accidental spill, release, or explosion. Under
7 each of these alternatives, parking structures would be developed in the Inner Harbor
8 (two structures for the proposed Project and Alternatives 1 through 3, and one
9 structure for Alternatives 4 and 5). Additionally, Alternatives 1 through 3 would
10 include construction of the North Harbor between existing Berths 87 and 90, which
11 would require a 5.7-acre water cut. The areas proposed for the water cut and the
12 Inner Harbor parking structure(s) are currently occupied by an 18-inch Navy surge
13 pipeline. The abandonment and removal of the Navy fuel surge pipeline would be
14 required prior to construction of the North Harbor and the parking structure(s).
15 Impacts associated with abandonment and removal of the pipeline would be
16 significant if appropriate cleanup and disposal measures are not followed (Impact
17 RISK 5a). Impacts would be significant for the proposed Project and Alternatives 1
18 through 4 under NEPA (Alternative 5 would not result in impacts under NEPA), and
19 impacts would be significant under CEQA for the proposed Project and Alternatives
20 1 through 5. Implementation of Mitigation Measure MM GW-1c would reduce
21 impacts to less-than-significant levels under CEQA and NEPA for the proposed
22 Project and respective alternatives.

23 Implementation of the proposed Project and Alternatives 1 through 5 would result in
24 significant impacts under CEQA only due to Mike's fueling station operations in
25 proximity to the waterfront promenade (Impact RISK 1b). This facility handles
26 several different types of hazardous materials, including materials with flashpoints
27 below 140 degrees. Materials with flashpoints below 140 degrees are considered to
28 pose a significant risk and are deemed hazardous per the Port's RMP. Therefore, the
29 continued operation of Mike's fueling station next to the proposed waterfront
30 promenade is considered to pose a significant risk to vulnerable resources in
31 accordance with the Port's RMP. Implementation of Mitigation Measure MM RISK-
32 1 would reduce impacts to less-than-significant levels by removing all hazardous
33 materials with flashpoints below 140 degrees from Mike's fueling station prior to
34 opening the promenade in the affected area.

35 Implementation of Alternative 5 would also result in significant impacts under CEQA
36 that would not occur under any other alternative (Alternative 5 would not result in
37 impacts under NEPA). Under Alternative 5, the Jankovich fueling station would
38 remain at the current location at Berth 74 and the new fuel facility at Berth 240
39 would not be built or operated. The Jankovich fueling station would not be upgraded
40 and would continue to remain next to existing and proposed redevelopment in the
41 Ports O'Call area. This alternative would subject users of Ports O'Call to significant
42 safety risks associated with operations of the Jankovich fueling station in this
43 location due to the hazardous footprint that extends well into the Ports O'Call area.
44 This would increase the risk to vulnerable populations who use this area in the event

1 of a hazardous material explosion at the Jankovich fueling station. Implementation
2 of Mitigation Measure MM RISK-2 would reduce impacts to less-than-significant
3 levels by restricting development within the hazard footprint.

4 As shown in Table 6-2, under NEPA, impacts related to hazards and hazardous
5 materials would be the same as the proposed Project for Alternative 2. Alternatives 1
6 and 3 would result in slightly reduced risks, and reduced development proposed in
7 Alternative 4 would further lessen impacts related to hazards. Impacts for
8 Alternative 5 would be the same as Alternatives 1 and 3. As shown in Table 6-5,
9 under CEQA, impacts related to hazards and hazardous materials would be the same
10 as the proposed Project for Alternative 2. Impacts would be reduced under
11 Alternative 1, in part because of the reduced development in the Outer Harbor, and
12 the proposed decrease in the Ports O'Call development would contribute to a
13 reduction in impacts under Alternative 3. The reduced in-water components
14 proposed under Alternative 4 would further lessen potential impacts. Impacts for
15 Alternative 5 would be somewhat increased over Alternative 4 because Jankovich
16 fueling station would remain in place, and impacts for Alternative 6 would be
17 substantially reduced when compared to the proposed Project.

18 **6.4.2.4 Land Use and Planning**

19 As discussed in Section 3.7, Hazards and Hazardous Materials, impacts associated
20 with the operations of Mike's Main Channel fueling station in proximity to the
21 proposed waterfront promenade would result in significant impacts. These same
22 impacts would also occur under Land Use and Planning (Impacts LU-1 and LU-2)
23 with respect to consistency with adopted land use plans (Port Master Plan – Risk
24 Management Plan). This project element would be inconsistent with the objective of
25 the RMP of the PMP to locate vulnerable populations away from hazardous facilities.
26 This land use inconsistency could result in adverse physical environmental impacts to
27 vulnerable populations (i.e., public recreators) should Mike's fueling station ever
28 have an accidental release, spill, or explosion of the hazardous liquid bulk materials.
29 Therefore, this land use inconsistency is a significant impact under CEQA only for
30 the proposed Project and Alternatives 1 through 5. No impacts would occur under
31 NEPA since this project element is part of the NEPA baseline. Implementation of
32 Mitigation Measure MM RISK 1, identified in Section 3.7, "Hazards and Hazardous
33 Materials," would reduce impacts to less-than-significant levels.

34 As shown in Table 6-2, under NEPA, land use and planning impacts would be the
35 same as the proposed Project for Alternatives 1 through 4, and reduced under
36 Alternative 5 because Mike's fueling station is part of the NEPA baseline. As shown
37 in Table 6-5, under CEQA, land use and planning impacts would be the same as the
38 proposed Project for Alternatives 1 through 4. Alternative 5 would require additional
39 mitigation for hazards associated with the Jankovich fueling station, and thus impacts
40 for this alternative would increase. Impacts for Alternatives 6 would be substantially
41 reduced when compared to the proposed Project.

6.4.2.5 Utilities and Public Services

The proposed Project and Alternatives 1 through 5 would not increase the demand for additional law enforcement officers and/or facilities such that the USCG, LAPD, or Port Police would not be able to maintain an adequate level of service without additional facilities. However, proposed Project construction could have temporary impacts on emergency access to portions of the proposed project area (Impact PS-1); these impacts would be significant for Alternatives 1 through 5 under CEQA, and Alternatives 1 through 4 under NEPA. Implementation of Mitigation Measure MM PS-1 would reduce impacts to less-than-significant levels.

The proposed Project and Alternatives 1 through 5 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. However, proposed project construction might temporarily impact LAFD emergency access to portions of the proposed project area (Impact PS-2); these impacts would be significant for Alternatives 1 through 5 under CEQA, and Alternatives 1 through 4 under NEPA. Implementation of Mitigation Measure MM PS-1 would reduce impacts to less-than-significant levels.

The proposed Project and Alternatives 1 through 5 would not require or result in the construction or expansion of utility lines that would cause significant environmental effects. However, the promenade and the Ports O'Call could require upgrades or relocation of utility lines to accommodate the planned development. These upgrades and relocations could have negative impacts on traffic flows and circulation (Impact PS-3); these impacts would be significant for Alternatives 1 through 5 under CEQA, and Alternatives 1 through 4 under NEPA. Implementation of Mitigation Measures MM PS-1 and MM PS-2 would reduce impacts to less-than-significant levels.

The proposed Project and Alternatives 1 through 5 would result in increased water and solid waste service demands. Construction and demolition activities would generate debris that would require disposal in a landfill (Impact PS-4); these impacts would be significant for Alternatives 1 through 5 under CEQA, and Alternatives 1 through 4 under NEPA. Implementation of Mitigation Measures MM PS-2 (recycle construction materials), MM PS-3 (use materials with recycled content), and MM PS-4 (comply with AB 939) would reduce impacts on solid waste services to less-than-significant levels. Implementation of Mitigation Measure MM PS-5 (water conservation and wastewater reduction) would reduce impacts on water supply and wastewater service demands to less-than-significant levels.

The proposed Project and Alternatives 1 through 5 would result in increased energy demands (Impact PS-5). Diesel fuel and electricity would be used during construction and operation of the proposed Project and Alternatives 1 through 5. Energy demands during construction activities would be short-term and temporary; they are not anticipated to result in substantial waste or inefficient use of energy, because energy-efficiency and conservation strategies would be implemented throughout all construction stages. Project-related natural gas demands (space and water heating) would not be substantial because the increase in square footage is small compared to the existing square footage. The proposed Project would incorporate energy conservation measures in compliance with California's Building Code CCR

1 Title 24, which requires energy-efficient standards for new construction, including
2 requirements for new buildings, additions, alterations, and repairs to nonresidential
3 buildings. Incorporation of these design standards, as required by state law, would
4 reduce wasteful energy consumption. While incorporation of these design measures
5 would reduce impacts related to reducing energy consumption, impacts would remain
6 significant for Alternatives 1 through 5 under CEQA, and Alternatives 1 through 4
7 under NEPA. Implementation of Mitigation Measure MM PS-6 (energy conservation
8 measures) would reduce impacts on energy demands to less-than-significant levels.

9 As shown in Table 6-2, under NEPA, impacts on utilities and public services would
10 be the same as the proposed Project for Alternative 2. Impacts for Alternative 1
11 would be somewhat reduced and impacts for Alternative 3 would be substantially
12 reduced when compared to the proposed Project. Impacts for Alternatives 4 and 5
13 would be moderately reduced when compared to the proposed Project. As shown in
14 Table 6-5, under CEQA, impacts on utilities and public services would be the same
15 as the proposed Project for Alternative 2, and slightly reduced for Alternatives 1, 4,
16 and 5. Impacts under Alternative 3 would be moderately reduced when compared to
17 the proposed Project, and further reduced for Alternative 6.

18 **6.5 Environmentally Preferred and Superior** 19 **Alternatives**

20 NEPA requires that, where an EIS is prepared, the Record of Decision (ROD) specify
21 the alternative(s) that was considered to be environmentally preferable. CEQA
22 similarly requires identification of an environmentally superior alternative.

23 The environmentally preferable and superior alternatives were determined based on a
24 ranking system that assigned numerical scores comparing the impacts under each
25 resource area for each alternative with the NEPA and CEQA baselines. The scoring
26 system ranged from -3 if impacts are considered to be substantially reduced when
27 compared to the NEPA/CEQA baselines, to +3 if impacts are considered to be
28 substantially increased when compared with the NEPA/CEQA baselines. Tables 6-3
29 and 6-6 present the scoring system and rankings for each alternative under NEPA and
30 CEQA, respectively.

31 Under the NEPA analysis, Alternative 5, the No-Federal-Action Alternative, is the
32 environmentally preferable alternative because this alternative is identical to the
33 NEPA baseline and would have no impacts (Table 6-3). The No-Federal-Action
34 Alternative eliminates all of the project elements that would require a federal permit
35 or other substantial federal interest such as property or funding. The federal action
36 consists of all harbor cuts and dredging activities; removal of existing, and
37 construction of new, bulkheads, wharves, pilings, piers, rock slope protection,
38 floating docks, and promenades that cover waters of the United States; and ocean
39 disposal of dredge material. Additionally, the Outer Harbor Cruise Terminals and
40 associated parking, which directly depend on authorization of in-water activities at
41 the Outer Harbor, would be within the USACE's regulatory purview, and are
42 therefore not part of Alternative 5. Under this alternative, the existing supertanker

1 berth at Berth 45–47 could continue to be used on occasion by visiting cruise ships
2 and other large vessels, as occurs under existing conditions. Alternative 5 does
3 include the landside development components identified under the proposed Project,
4 and does account for some growth in cruise ships and passenger throughput at the
5 existing Inner Harbor cruise terminals.

6 When compared to the proposed Project (Table 6-2), Alternative 5 has the fewest
7 impacts under NEPA, resulting in reduced impacts for all environmental resource
8 areas.

9 Under the CEQA analysis, Alternative 6, the No-Project Alternative, is the
10 environmentally superior alternative because this alternative would not require
11 discretionary approvals triggering CEQA compliance and would, therefore, for
12 purposes of this EIS/EIR, have no impact under CEQA. Pursuant to the CEQA
13 Guidelines, if the No-Project Alternative is deemed to be environmentally superior,
14 then the lead agency must identify an alternative other than the No-Project
15 Alternative as environmentally superior. Alternative 5 ranked first in terms of the
16 least overall environmental impact when compared to the CEQA baseline (Table 66).
17 This alternative would result in the least impact on biological resources, groundwater
18 and soils, recreation, marine transportation, and water quality when compared to all
19 other alternatives. Alternative 5 would share the least impact for all other
20 environmental resource areas except air quality (Alternatives 1 and 3 would result in
21 the least impact), hazards and hazardous materials (Alternative 4 would result in the
22 least impact) land use (proposed Project and Alternatives 1 through 4 would result in
23 the least impact), and utilities and public services (Alternative 3 would result in the
24 least impact).