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COMPARISON OF ALTERNATIVES

6.1 Introduction

This chapter presents 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 each alternative considered in detail, including the proposed action, so that reviewers may evaluate the comparative merits (40 CFR 1502.14[b]). CEQA requires that an EIR present a range of reasonable alternatives to the proposed Project. Accordingly, the proposed action and five other alternatives that meet most of the proposed Project objectives and Purpose and Need Statement, which are described fully in Section 2.5.1 and summarized in Table 6-1, have been analyzed co-equally in this Draft EIS/EIR to provide sufficient information and meaningful detail about the environmental effects of each alternative, so that informed decision-making can occur. The five alternatives that were carried through the analysis of impacts in Section 3 are:

- Alternative 1 – No Project Alternative;
- Alternative 2 – Reduced Project: The Project without the 10-Acre Fill;
- Alternative 3 – Reduced Wharf;
- Alternative 4 – Omni Terminal; and
- Alternative 5 – Landside Improvements/CEQA No Project Variant

The following alternatives were considered but eliminated from the analysis (see Section 2.5.2 for detailed descriptions):

- Use of other ports;
- Expansion of terminals within Southern California but outside the Los Angeles Harbor District;
- Lightering;
- Off-site backland alternatives;

- 1 • Development of new landfills and terminals outside the Berths 136-147
- 2 Terminal area and the adjoining the West Basin area;
- 3 • Shallower dredge depth;
- 4 • Alternative shipping use of the terminal;
- 5 • Other sites within the Los Angeles Harbor District;
- 6 • Non-shipping use of the terminal;
- 7 • Harry Bridges Boulevard relocated to provide additional container storage area;
- 8 • Development and operation of a smaller terminal; and
- 9 • Alternative designs for the Harry Bridges Boulevard Buffer Area.

Table 6-1*. Summary of Proposed Project and Alternatives at Full Buildout (2025-2038[†])

	<i>Terminal Acres</i>	<i>Annual Ship Calls</i>	<i>Annual TEUs (in millions)</i>	<i>Cranes</i>	<i>Total Fill (cubic yards)</i>	<i>New Wharves (linear feet)</i>
Proposed Project	243	334	2.389	12	800,000	1,105
No Project Alternative 1	176	250	1.697	13 [#]	0	0
Reduced Project: Project Without the 10-Acre Fill Alternative 2	233	334	2.389	12	0	705
Reduced Wharf Alternative 3	233	300	2.035	12	0	0
Omni Terminal Alternative 4	202	83	0.566	13 [#]	0	0
Landside Improvements Alternative 5 ⁺	233	250	1.697	13 [#]	0	0
<p>*This table summarizes the major features of the proposed Project and alternatives. [†] Throughput is maximized at 2025 and remains static through 2038. [#] This number reflects the baseline conditions in December of 2003. Two 50-gauge cranes along Berths 145 and 146 were removed in the spring of 2007. ⁺ Alternative 5 functions as the No Federal Action Alternative.</p>						

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6.2 NEPA Evaluation of Alternatives

6.2.1 NEPA Requirements

NEPA's requirements for an EIS to evaluate alternatives are described fully in Chapter 1, Section 1.5.7. Briefly, NEPA (40 CFR 1502.14[a]) requires that an EIS describe a range of reasonable alternatives to a project, or to the location of a project, that could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant environmental impacts. The Clean Water Act Section 404(b)(1) also addresses alternatives, as described in Chapter 1, Section 1.4.1, stating that no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge that would have a less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences. Section 2.5 of this Draft EIS/EIR sets forth potential alternatives to the proposed Project, and Chapter 3 evaluates their suitability.

6.2.2 NEPA Alternatives Comparison

Table 6-2 summarizes the results of the NEPA significance analysis for each resource area and identifies the alternatives that would result in unavoidable significant impacts under NEPA, as discussed in Chapter 3 (the analysis includes project-level impacts, not cumulative effects). Note that NEPA impact analyses were not performed for alternatives that did not involve federal actions, i.e., alternatives 1, 4, and 5. Alternative 5 is a No Federal Action alternative, which would not require a USACE permit. Because there would be no federal action or permit, there would be no significance determinations under NEPA for this alternative. This alternative differs from the No Federal Action/NEPA baseline however, in that only the upland infrastructure components are constructed but no new backland area for container storage is added. Therefore, while throughput has the potential to grow due to operational changes, actual throughput growth is constrained in 2015 by significantly less acreage and lack of operational changes in this time frame. A discussion of the resources with unavoidable significant impacts or significant impacts that can be mitigated to become less than significant is provided in Sections 6.4.1 and 6.4.2.

Table 6-3 summarizes the impact analysis of the analyzed alternatives compared to the No Federal Action/NEPA Baseline. The ranking of the alternatives is based on the impact determinations under NEPA for each resource and impact, as discussed in Chapter 3, and reflects differences between the levels of impact among alternatives, even if the alternatives result in impacts that are less than significant. This ranking also takes into consideration the relative number of significant impacts that are mitigated to a less than significant level and the number of impacts that remain significant after mitigation. Note that because no NEPA impact analyses were performed for Alternatives 1, 4, and 5 (because there is no federal action for any of them), those alternatives were not compared to the No Federal Action/NEPA baseline and do not appear in Table 6-3.

Table 6-2. Summary of NEPA Significance Analysis by Alternative

<i>Environmental Resource Area*</i>	<i>Proposed Project</i>	<i>Alt. 2 Project Without 10-Acre Fill</i>	<i>Alt. 3 Reduced Wharf</i>
Air Quality/Meteorology	S	S	S
Biological Resources	S	S	S
Geology	S	S	S
Transportation/Circulation	M	M	M
<p><i>Notes:</i> * Only environmental resources with unavoidable significant impacts or significant but mitigable impacts are included in the table and the analysis used to rank alternatives; the analysis includes project-level impacts, not cumulative effects. Alternatives 1, 4, and 5 are not included because they have no impacts under NEPA. S = Unavoidable significant impact M = Significant but mitigable impact L = Less than significant impact (not significant) N = No impact</p>			

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Table 6-3. Comparison of Alternatives to the No Federal Action/NEPA Baseline

<i>Environmental Resource Area*</i>	<i>Proposed Project</i>	<i>Alt. 2 Project without 10-Acre Fill</i>	<i>Alt. 3 Reduced Wharf</i>
Air Quality/Meteorology	2	2	2
Biological Resources	2	2	2
Geology	2	2	2
Noise	1	1	1
Transportation/Circulation	1	1	1
Total	8	8	8
<p><i>Notes:</i> * Only environmental resources with unavoidable significant impacts or significant but mitigable impacts are included in the table and the analysis used to rank alternatives; the analysis includes project-level impacts, not cumulative effects. Alternatives 1, 4, and 5 are not included because they have no impacts under NEPA. No NEPA impacts for Alternatives 1, 4, and 5 means no comparison with the No Federal Action/NEPA Baseline (-2) = Impact considered to be substantially less when compared with the No Federal Action/NEPA Baseline. (-1) = Impact considered to be somewhat less when compared with the No Federal Action/NEPA Baseline. (0) = Impact considered to be equal to the No Federal Action/NEPA Baseline. (1) = Impact considered to be somewhat greater when compared with the No Federal Action/NEPA Baseline. (2) = Impact considered to be substantially greater when compared with the No Federal Action/NEPA Baseline. 2 points for significant unmitigable impact; 1 point to significant but mitigable or less than significant impacts; and 0 for no impacts</p>			

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1 On that basis, the Reduced Wharf Alternative (Alternative 3) is ranked highest in
2 terms of fewest overall environmental impacts when compared to the No Federal
3 Action/NEPA Baseline. The Project Without the 10-acre Fill (Alternative 2) ranked
4 below Alternative 3 in terms of environmental impacts, and the proposed Project,
5 with the highest impacts of any of the alternatives when compared to the No Federal
6 Action/NEPA baseline, ranked lowest.

7 **6.3 CEQA Evaluation of Alternatives**

8 **6.3.1 CEQA Requirements**

9 CEQA's requirements for an EIR to evaluate alternatives are described fully in
10 Chapter 1, Section 1.5.7. Briefly, the California Environmental Quality Act (CEQA)
11 Guidelines, Section 15126.6, require that an Environmental Impact Report (EIR)
12 present a range of reasonable alternatives to the proposed Project, or to the location
13 of the project, that could feasibly attain most of the basic project objectives, but
14 would avoid or substantially lessen any significant effects of the project. Section
15 15126.6 also requires an evaluation of the comparative merits of the alternatives. An
16 EIR is not required to consider alternatives that are infeasible (see Section 2.5).

17 **6.3.2 CEQA Alternatives Comparison**

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

23 The proposed Project and all alternatives have unavoidable significant impacts in the
24 areas of Air Quality/Meteorology and Geology. The proposed Project and all
25 alternatives except the No Project Alternative have unavoidable significant impacts
26 in the area of Noise (during construction). Although the No Project Alternative does
27 not have significant noise impacts, it does have significant, unavoidable impacts on
28 Land Use and Transportation/Circulation. The proposed Project, Alternative 1,
29 Alternative 2, and Alternative 3 have significant, unavoidable impacts on biological
30 resources as a result of the potential for invasive species. The Omni Terminal
31 Alternative is the alternative that reduces the amount of significant impacts the most
32 compared to the proposed Project for Air Quality/Meteorology and Geology, but it
33 still has significant, unavoidable impacts in those areas.

34 Table 6-5 ranks the alternatives on the basis of a comparison of their environmental
35 impacts with those of the proposed Project. The ranking is based on the significance
36 determinations for each resource area, as discussed in Chapter 3, and reflects
37 differences in the levels of impact among alternatives. This ranking also takes into
38 consideration the relative number of significant impacts that are mitigated to a level
39 below significance, and the number of impacts that remain significant after mitigation.

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

<i>Environmental Resource Area*</i>	<i>Proposed Project</i>	<i>Alt. 1 No Project</i>	<i>Alt. 2 Project Without 10-Acre Fill</i>	<i>Alt. 3 Reduced Wharf</i>	<i>Alt. 4 Omni Terminal</i>	<i>Alt 5 Landside Improvements</i>
Air Quality/Meteorology	S	S	S	S	S	S
Biological Resources	S	S	S	S	N	N
Cultural Resources	M	N	M	M	M	M
Geology	S	S	S	S	S	S
Land Use	L	S	L	L	L	L
Noise	S	N	S	S	S	S
Transportation/Circulation	M	S	M	M	L	M

Notes:
 * Only environmental resources with unavoidable significant impacts or significant but mitigable impacts are included in the table and the analysis used to rank alternatives; the analysis includes project-level impacts, not cumulative effects
 S = Unavoidable significant impact
 M = Significant but mitigable impact
 L = Less than significant impact (not significant)
 N = No impact

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Table 6-5. Comparison of Alternatives to the Proposed Project

<i>Environmental Resource Area*</i>	<i>Alt. 1 No Project</i>	<i>Alt. 2 Project Without 10-Acre Fill</i>	<i>Alt. 3 Reduced Wharf</i>	<i>Alt. 4 Omni Terminal</i>	<i>Alt 5 Landside Improvements</i>
Air Quality/Meteorology	2	0	0	-2	-2
Biological Resources	-1	0	-1	-2	-2
Cultural Resources	-1	0	0	0	0
Geology	0	-1	-1	0	0
Land Use	2	0	0	0	0
Noise	-2	0	-1	-2	-1
Transportation/Circulation	2	0	0	-2	-1
Total	0	-1	-3	-8	-6

Notes:
 (-2) = Impact considered to be substantially less when compared with the proposed Project.
 (-1) = Impact considered to be somewhat less when compared with the proposed Project.
 (0) = Impact considered to be equal to the proposed Project.
 (1) = Impact considered to be somewhat greater when compared with the proposed Project.
 (2) = Impact considered to be substantially greater when compared with the proposed Project.

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As shown in Table 6-4, the Omni Terminal Alternative is deemed to be the environmentally superior alternative under CEQA, although this alternative does not meet all Project objectives. Specifically, although its cargo-handling purpose is consistent with the project purpose and it would handle container cargo, the fact that only one-third of the proposed Omni Terminal would be used for container cargo (565,700 TEUs per year in 2025 through 2038) means that this alternative would not accommodate foreseeable containerized cargo volumes through the Port, increase

1 container handling efficiency and create sufficient backland area for container
 2 terminal operations, construct container ship berthing and infrastructure capacity to
 3 accommodate projected containerized cargo volumes through the Port, or provide on
 4 dock-rail capabilities to promote direct transfer of cargo between ship and rail. The
 5 Landside Improvements/ CEQA No Project Variant Alternative is rated somewhat
 6 lower in terms of environmental superiority, compared to the Project, than the Omni
 7 Terminal, and then the Reduced Wharf, Project Without 10-acre Fill, and No Project.

8 In accordance with the Port's projections of future growth in the volume of
 9 containerized cargo (Section 1.1.3), the project's goals (section 2.3) are focused on
 10 providing a portion of the additional container cargo capacity facilities needed to
 11 accommodate those future volumes. Although all of the alternatives would provide
 12 some increase in capacity, only the proposed Project, Alternative 2 (Project Without
 13 10-acre Fill), and Alternative 3 (the Reduced Wharf) would fulfill most of the
 14 project goals set forth in Section 2.3 because they would accommodate substantially
 15 more containerized cargo than baseline conditions.

16 **6.4 Analysis of Impacts of Alternatives**

17 For each of the 13 environmental resources analyzed in this Draft EIS/EIR, Chapter 3
 18 identifies significant impacts associated with each of the five alternatives. Five of the
 19 environmental resources evaluated (air quality; geology, land use, noise, and ground
 20 transportation) have unavoidable significant impacts for at least one alternative.
 21 Three of the environmental resources evaluated (biological resources, cultural
 22 resources, and water quality/sediments/oceanography) have significant impacts that
 23 could be mitigated to a less than significant level for all of the alternatives. The
 24 remaining resources have no potentially significant impacts associated with any
 25 alternatives. The discussion below describes the significant impacts for each
 26 resource and identifies to which alternative the impacts apply.

27 **6.4.1 Resources with Unavoidable Significant Impacts**

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 29 Tables 6-2 and 6-4 identify the alternatives that would result in both unavoidable and
 30 mitigable significant impacts to the various resource areas, as discussed in Chapter 3.
 31 This information is taken from summary tables included at the conclusion of each of
 32 the 13 environmental resource sections in Chapter 3.

33 **6.4.1.1 Air Quality and Meteorology**

34 The proposed Project and all of the alternatives except the No Project Alternative would
 35 have significant air quality impacts during construction. For the proposed Project, the
 36 Project Without the 10-Acre Fill Alternative, the Reduced Wharf Alternative, and the
 37 Landside Improvements/CEQA No Project Variant Alternative, implementation of
 38 mitigation measures would not reduce peak daily construction emissions of VOC, NO_x,
 39 SO_x, PM₁₀, and PM_{2.5} to below their respective significance thresholds (Section 3.2).

1 The Omni Terminal Alternative only has significant unavoidable impacts for NO_x. The
2 No Project Alternative has no construction air quality impacts as there is no construction
3 associated with this alternative.

4 All of the alternatives would have significant operational air quality impacts (Section
5 3.2). For the proposed Project and the Project Without the 10-Acre Fill Alternative,
6 implementation of identified mitigation measures would not reduce peak daily
7 operational emissions of NO_x, CO, PM_{2.5}, PM₁₀, VOC, or NO₂ to below their
8 respective SCAQMD significance thresholds during some or all of the future project
9 years. Alternative 3 (Reduced Wharf) has unavoidable significant impacts for NO₂,
10 NO_x, CO, NO_x, PM₁₀, and PM_{2.5}. The No Project Alternative has unavoidable
11 significant impacts for NO_x, PM₁₀, PM_{2.5}, and NO₂. The No Project Alternative has
12 the highest unavoidable significant air quality impacts during operations because the
13 No Project Alternative has no mitigation measures associated with it. The Omni
14 Terminal Alternative only has unavoidable significant impacts for NO₂. Operation of
15 Alternative 5, Landside Improvements, has unavoidable impacts for NO₂, NO_x, SO_x,
16 PM₁₀, and PM_{2.5}. These air quality impacts are considered significant, adverse, and
17 unavoidable under both CEQA and, for Alternatives 2 and 3, NEPA.

18 All of the alternatives would produce greenhouse gases (GHG) at levels above the
19 CEQA baseline (2003) despite mitigation measures, and those increases are
20 considered significant under CEQA. The proposed Project and Alternatives 2 and 3
21 would have GHG emissions exceeding the No Federal Action/NEPA Baseline. In
22 this document, however, the significance of GHG emissions under NEPA is not
23 evaluated (see Section 3.2.2.2). Greenhouse gases and the implications of project-
24 induced increases in GHG emissions are discussed in Section 3.2.2.2. GHG is
25 inherently a cumulative issue: emissions from a single project cannot by themselves
26 influence global climate change, but a single project may make a cumulatively
27 considerable incremental contribution to the global GHG load.

28 From an air quality perspective, the Omni Terminal Alternative is the environmentally
29 superior alternative under CEQA as it has only one significant impact associated with
30 it. The proposed Project and Alternatives 2, 3, and 5 are very similar in regards to
31 operational air quality impacts. The proposed Project has the highest short-term
32 construction impacts associated with it because it includes the 10-acre fill. The No
33 Project Alternative is the worst alternative from an air quality perspective because it
34 would not include mitigation measures.

35 The No Project Alternative is the only alternative that results in significant
36 unavoidable cancer risk impacts from toxic air contaminants (TACs) under CEQA,
37 but under NEPA the proposed Project and Alternative 2 would both produce
38 significant cancer risks after mitigation.

39 Construction and operation, in conjunction with construction and operation of other
40 related projects, would result in significant cumulative impacts to air quality.
41 Operation of the proposed Project would contribute to cumulative health risk
42 impacts. See Section 3.2 and Chapter 4.0 for more cumulative impact information.

6.4.1.2 Biological Resources

The proposed Project and all of the alternatives except 4 (Omni Terminal) and 5 (Landside Improvements) would have significant impacts on biological resources. Those impacts are the result of the possibility for the introduction of invasive species into the Southern California coastal marine ecosystem. The amount of ballast water discharged into the West Basin and, thus, the potential for introduction of invasive exotic species (LAHD 1999) could increase since more and larger container ships would use the Port as a result of the proposed Project and Alternatives 2 and 3. Approximately 40 percent of the vessels calling at the terminal would be loading cargo and thus would need to discharge ballast water. These vessels would come primarily from outside the EEZ and would be subject to regulations to minimize the introduction of non-native species in ballast water (see Section 3.3.3.8), such as not exchanging ballast water within ports or discharging to approved receivers. However, even with such regulations in place, there is a chance that exotic species may be introduced, and this impact remains significant and unavoidable under NEPA and CEQA.

Another potential source of invasive species is the fouling community (a variety of attached animals as well as algae) on the undersides of ships. As there are no feasible measures for preventing such organisms from entering the waters of the ports where international cargo vessels call, the potential for the introduction of invasive species represents a significant, unavoidable impact under both NEPA and CEQA for the proposed Project and Alternatives 2, and 3. From a biological perspective, Alternative 4 (Omni Terminal) is the environmentally superior alternative under CEQA and Alternative 3 (Reduced Wharf) is the environmentally preferable alternative under NEPA.

6.4.1.3 Geology

For the proposed Project and all alternatives except the No Project Alternative, design and construction in accordance with applicable laws and regulations pertaining to seismically induced ground movement would minimize structural damage in the event of an earthquake (Section 3.5). However, increased exposure of people and property during construction and operation to seismic hazards from a major or great earthquake cannot be precluded, even with incorporation of modern construction engineering and safety standards. Therefore, impacts due to seismically induced ground failure would remain significant under CEQA for the proposed Project and all of the proposed alternatives. It would also remain significant under NEPA for the proposed Project and all of the alternatives with the exception of the No Project Alternative, Omni Terminal Alternative and the Landside Improvements/CEQA No Project Variant Alternative.

From a geological perspective, Alternatives 2 (Project Without the 10-acre Fill) and 3 (Reduced Wharf) are the environmentally preferred alternatives because seismic retrofits would be implemented at the terminal and no additional land would be created (the geological impacts of the 5-acre fill are evaluated in the Channel Deepening document). The proposed Project introduces some additional seismic risk because an additional 10 acres of fill is added to the Terminal, even though the construction would be completed under current engineering requirements. Alternatives 1, 4, and 5 are ranked to be similar

1 to the proposed Project because none includes additional fill but the existing Terminal
2 would not be seismically retrofitted.

3 The proposed Project, in conjunction with other related projects, would result in
4 various improvements to terminals and their operations throughout the Port. Because
5 the risks of injury at each individual related project cannot be completely precluded
6 even with incorporation of modern design features and construction engineering and
7 safety standards, the proposed Project has the potential to result in significant
8 cumulative impacts related to unavoidable increases in risks of injury in the Port area.
9 See Section 3.5 and Chapter 4 for more cumulative impact information.

10 **6.4.1.4 Land Use**

11 The No Project Alternative would cause significant, unmitigable impacts under
12 CEQA because it would be inconsistent with the City of Los Angeles General Plan
13 Objective of accommodating the orderly and continued development of the Port so as
14 to meet the needs of maritime commerce, navigation, the commercial fishing
15 industry, and public recreational needs (Section 3.8). The proposed Project and
16 Alternatives 2, 3, 4, and 5 meet the City's and Port's plans and policies and would be
17 ranked similarly. From a land use perspective, Alternative 1 (No Project
18 Alternative), is the environmentally least desirable alternative because it has a
19 significant unavoidable impact associated with it. As the other alternatives rank
20 equally, there is no environmentally superior alternative under CEQA or NEPA.

21 **6.4.1.5 Noise**

22 Significant noise impacts under CEQA (but not NEPA) on sensitive receivers living in
23 marinas across the channel from Berths 200C-H) would occur during the construction
24 of the Pier A rail yard relocation under the proposed Project and Alternatives 2, 3, and
25 5. Under the Omni Terminal Alternative, the Pier A rail yard would not be relocated,
26 so there would be no construction-phase noise impacts from that activity.

27 The construction activities at the Harry Bridges Boulevard Buffer Area would cause
28 temporary and periodic noise levels substantially above existing ambient noise levels
29 in the Wilmington neighborhood north of "C" Street. Significant unavoidable short-
30 term noise impacts under CEQA would occur for the proposed Project and all of the
31 alternatives except the No Project Alternative.

32 None of the alternatives would generate operational phase noise that would create a
33 significant impact. On a cumulative basis, all of the alternatives, including the No
34 Project Alternative, would contribute to ambient noise levels in the harbor area, but
35 as Section 3.9.2 shows, port-related noise is not a dominant feature of the local noise
36 environment, and the cumulative contribution of the proposed project or alternatives
37 would, therefore, not be significant.

38 From a noise perspective, the No Project Alternative, followed by the Omni Terminal,
39 would be the environmentally preferable alternatives. After Alternatives 1 and 4, the
40 Landside Improvements/CEQA No Project Variant alternative and Reduced Wharf

1 Alternative would be ranked next in terms of environmental preferability, followed by
2 the Project Without the 10-Acre Fill Alternative. The proposed Project would be
3 ranked the worst from a noise perspective because it would require the most
4 construction activity (10-acre fill and 400-foot berth).

5 **6.4.1.6 Transportation/Circulation**

6 None of the alternatives would have significant traffic impacts during the
7 construction phase. During operations, the proposed Project, the No Project, the
8 Project without the 10-Acre Fill Alternative, and the Reduced Wharf Alternative
9 would have significant but mitigable transportation impacts at three of the study
10 intersections: Alameda Street/Anaheim Street, Figueroa Street/C-Street/I-110
11 Ramps, and Fries Avenue/Harry Bridges Boulevard. For all but the No Project
12 Alternative these impacts would be mitigated to a less than significant level with the
13 implementation of mitigation measures (see section 3.10). The No Project
14 Alternative would have no mitigation applied and thus would have significant
15 unavoidable impacts on the local transportation system.

16 The No Project Alternative is the environmentally least desirable alternative from a
17 ground transportation perspective. The proposed Project, the Project Without the 10-
18 acre Fill, the Reduced Wharf, and the Landside Improvements/CEQA No Project
19 Variant alternatives include mitigation measures that would reduce potentially
20 significant impacts to less than significant impacts (Section 3.10). The Omni Terminal
21 Alternative would result in less than significant impacts that would not need to be
22 mitigated. The Omni Terminal Alternative would be the environmentally preferable
23 alternative from a ground transportation perspective.

24 From a cumulative impact perspective, long-term operation of the proposed Project
25 and any of the alternatives, in combination with other projects (and in particular the
26 other West Basin Terminal projects) and other sources of local and regional growth,
27 would result in significant cumulative impacts by degrading the LOS at some
28 intersections to unacceptable levels (see Section 3.10 and Chapter 4).

29 **6.4.2 Resources with Significant Impacts that can** 30 **be Mitigated to Less than Significant**

31 **6.4.2.1 Cultural Resources**

32 Construction of the proposed Harry Bridges Boulevard Buffer Area, which would
33 occur under all alternatives except the No Project Alternative could encounter deposits
34 known to contain intact vertebrate fossils, which are considered of regional, if not state-
35 wide, significance due to their rarity. Project grading and excavations would have the
36 potential to expose and destroy these paleontological resources, which represents a
37 potentially significant impact. However, for all alternatives except No Project, this
38 impact would be mitigated to a less than significant level (see Section 3.4). The Harry

1 Bridges Buffer Area is well outside the Corps’s scope of analysis, so NEPA would not
2 apply for the proposed Project and all Alternatives.

3 From a cultural resources perspective, therefore, the No Project Alternative is the
4 environmentally preferable alternative; all of the other alternatives, because they
5 include construction of the Harry Bridges Buffer Area, rank equally.

6 **6.5 Environmentally Preferred and Superior** 7 **Alternatives**

8 Under the NEPA analysis, the Reduced Wharf Alternative is ranked the environmentally
9 preferred alternative in terms of the fewest overall environmental impacts when
10 compared to the No Federal Action/NEPA Baseline. The CEQA analysis determined
11 that the Omni Terminal Alternative is the environmentally superior alternative.

12 The Reduced Wharf Alternative would not avoid any of the significant impacts of the
13 proposed Project and Alternative 2 (the Project without the 10-Acre Fill), but those
14 impacts would be less severe. For example, the Reduced Wharf Alternative would have
15 fewer ship calls, thus reducing impacts on Biological Resources and possibly, Air
16 Quality, and would have fewer construction-related impacts because of the smaller scale
17 of in-water construction. The Reduced Wharf would meet the overall project objective
18 under NEPA to increase the cargo-handling efficiency and capacity of the Port (see
19 Section 2.3.2). However, it would not meet the need to optimize Port land and terminals
20 for future cargo volumes because the resulting terminal would be capable of handling less
21 cargo than the other two alternatives.

22 The Omni Terminal Alternative would eliminate the significant impacts that most of the
23 other alternatives would have on Air Quality, Biological Resources, and Transportation/
24 Circulation, and would have less severe impacts in most of the other resource areas.
25 However, the Omni Terminal alternative does not meet many of the project objectives
26 discussed in Chapter 2. Although its cargo-handling capabilities, particularly for
27 containerized cargo, would be consistent with the Project purpose, the fact that only one
28 third of the proposed Omni Terminal would be used for container cargo (565,700 TEUs
29 per year from 2025 through 2038) means that it would not meet the other project
30 objectives. The main objective of the Port is to accommodate the projected growth in the
31 volume of containerized cargo while mitigating the impacts of this growth on the local
32 communities and the Los Angeles region through adoption of all feasible mitigation (see
33 Section 2.3). This objective includes expanding and optimizing the cargo-handling
34 efficiency and capacity at Berths 136-147, which would not be accomplished by
35 converting the existing container terminal into an Omni Terminal.

36 Based on the current cargo forecast, only the proposed Project and the Project Without
37 the 10-Acre Fill Alternative fulfill the overall project purposes and goals of the Port as
38 discussed in Chapter 2.