

6.0

COMPARISON OF ALTERNATIVES

6.1 Introduction

The State *CEQA Guidelines* Section 15126.6 mandates that an EIR include a comparative evaluation of the proposed project with a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project while simultaneously avoiding or substantially lessening any of the significant effects of the project. Pursuant to Section 15126.6 (f)(1) of the State *CEQA Guidelines*, “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).” Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish the context against which “the rule of reason” is measured when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

Several sites within the Port of Los Angeles were considered for year-round mooring of the USS Iowa. The Port conducted a site alternatives analysis to explore the feasibility of a range of potential project site locations. Some of the sites considered were rejected as infeasible; these alternatives, and the reasons for their infeasibility, are discussed in Section 6.2.1 below. Three project scenarios were selected that were considered to be feasible, to be carried forward for detailed analysis in this document: the proposed Project (Section 2.0) and the three alternatives listed below and described in Section 6.2.

- Alternative 1 – SP Slip
- Alternative 2 – Berths 45-47
- Alternative 3 – No Project

6.2 Project Alternatives

Alternative 1 – S.P. Slip

This alternative would place the USS *Iowa* into the Southern Pacific Slip (S.P. Slip), an existing boat slip in the south part of the harbor between berths 72 and 74 that is home to an active commercial fishing fleet. This fleet remains in-tact after over 100 years of providing fresh fish to the US and Asian markets. Placing the USS *Iowa* at this location would displace a portion of the commercial fishing fleet, reducing fishing operations and hinder dockside work.

Initial Site Preparation (Phase 1)

Parking lots are adjacent to both sides of the SP Slip. The parking area to the north is used by visitors of the Ports O' Call Waterfront and Village dining and shopping areas. Several existing uses would need to be shut down and little to no structures would be demolished or reused.

Construction of Permanent Landside Structures (Phase 2)

The construction of a permanent landside structure would be possible, however, space is limited and some of the existing parking area may need to be repurposed

Alternative 2 – Berths 45-47

Berths 45-47 is a 15-acre site located in the Outer Harbor of the Port of Los Angeles on the peninsula between the East Channel and West Channel. This site is a former liquid bulk berth and has a terminal control building that is not usable in addition to an 800 foot long concrete wharf structure. The existing Berths 45–47 are used on occasion by visiting cruise ships and other large wharf vessels, such as the visiting U.S. Navy vessels on Armed Forces Day. This alternative would prevent cruise ships from loading and unloading at this site. In addition, this site is not located near any freeways and would result in significant impacts to traffic.

Initial Site Preparation (Phase 1)

The site would require grading and asphalt paving for the necessary parking spaces. Two of the adjacent uses are associated with railroad.

Construction of Permanent Landside Structures (Phase 2)

The site has two small existing structures that would be demolished for the new landside Visitor Center, unless they are reused.

Alternative 3 – No Project Alternative

The No Project alternative would assume that the USS Iowa does not get relocated by tugboat to the Port of Los Angeles. The USS Iowa would be removed from the Port of Richmond as a result of the Obama Administration's commitment to clean up the environment to protect the unique ecosystem of the bay; however the fate of the battleship would be unknown. Most of the ships in the Suisun Bay Reserve Fleet are slated for disposal.

6.2.1 Alternatives Considered But Rejected

The State *CEQA Guidelines* Section 15126.6(c) mandates that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Berths 180-181 or 187-190

Berths 180-181 and 187-190 are located in the north harbor near the east basin of the main channel. These berths are currently leased from the Port of Los Angeles and are being used to ship cargo. These alternative site locations were rejected due to conflicts with cargo operations because a cargo shipping facility would need to be closed in order to implement the Project at this location. Therefore, this alternative is not economically viable. Losses in revenue resulting from the closure of a cargo shipping facility would greatly exceed the revenue generated by the USS *Iowa*.

Berths 180-181 are located near the intersection of Pier A Street and S Fries Avenue, and currently occupied by the Pasha Stevedoring & Terminals (PST). PST's breakbulk and container terminal in the Port of Los Angeles has become the preferred terminal for general, project, heavy lift and specialized cargo of all shapes and sizes. This facility operates three, 40-ton capacity cranes, contains on-dock warehouses and specializes in on-dock rail service.

Berths 187-190 are located in Slip No. 5 near the intersection of Canal Street and Yacht Street, and are currently leased by Vopak, whose lease does not expire until 2023. Vopak is a liquid bulk facility that stores and transports chemicals and refined petroleum products through a 37-ac (10.3 ha) site. This facility contains 66 storage tanks with total capacity of 700,000 barrels and an additional 22 storage tanks with 1,700,000 barrels capacity. In addition, the facility contains a bulk cement distribution facility with a 86,000 sq. ft. warehouse.

Initial Site Preparation (Phase 1)

Existing landside structures would need to be removed/demolished for placement of the temporary structures listed in Alternative 1. Building reuse would be possible at both sites; however, this site and the adjacent sites are very industrialized and not visitor-friendly. Locating the tourist attraction in this part of the Harbor would make for less accessibility and visitor traffic could interfere with other existing uses within the Harbor.

Construction of Permanent Landside Structures (Phase 2)

The construction of permanent landside structures is dependent on if the existing structures are demolished.

Berths 52-53 or 61

Berths 52-53 and 61 are located in the east channel of the southern portion of the San Pedro Waterfront Project Area, which leads to the Outer Harbor area. These alternative site locations were rejected due to navigational impacts.

Berths 70-71 or Ports O'Call

Berths 70-71 are located adjacent to the Westway Terminal on the Main Channel, in the southern portion of the San Pedro Waterfront Project Area. Westway Terminal, located on Signal Street on approximately 14.3 acres, was formerly used as liquid bulk storage facility, and contains the Westway/Pan-American Oil Company Pump House, which has been determined to be eligible for the National Register of Historic Places. Considered a hazardous cargo facility under the Port's Risk Management Plan (RMP), this facility closed in 2009. Berths 70 and 71 are included in existing redevelopment project boundaries for the Marine Research Center Project, which is currently in the planning phase. Just south of the Westway Terminal are the Port of Los Angeles Pilot Station and Warehouse No. 1. Warehouse No. 1 is listed on the National Register of Historic Places, and is currently used by LAHD and the Crescent Warehouse Company for warehouse storage and periodically for filming.

The Ports O'Call area is located slightly south of berths 70-71, between the harbor's Main Channel and Sampson Way from Berths 75 to 83. This approximately 10-acre commercial/retail complex contains approximately 150,000 square feet of restaurant and retail space, and is used as a staging area for various annual festivals, including the Lobster Festival and the Tall Ship Festival. In addition to commercial retail and restaurant uses, existing uses within the Ports O'Call area include sport fishing at Berth 79, helicopter site seeing operations, marina, and harbor cruise operations at Berths 79 and 77.

At the southern end of Ports O'Call is the Jankovich fueling station at Berth 74. This facility currently contains six aboveground storage tanks, including a 100,000-gallon fixed-roof tank within an approximately 2,500-square-foot diked area that is used to store diesel fuel. The other five tanks are located within a separate diked area, and include four 25,000-gallon fixed-roof tanks that are used to store diesel fuel and one 15,000-gallon tank used to store gasoline.

These alternative site locations were rejected due to conflicts with existing Port plans for redevelopment within the area.

6.2.2 CEQA Requirements for Alternatives

CEQA Guidelines Section 15126.6 require that an EIR, describe a range of reasonable alternatives to a proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any significant environmental impacts. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. According to CEQA Guidelines, the EIR should compare merits of the alternatives and determine an environmentally superior alternative. LAHD defines a reasonable range of alternatives in light of its legal mandates under the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Sec. 601), the California Coastal Act (PRC Div 20 S30700 et seq.), and LAHD's leasing policy. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

The lead agencies may make an initial determination as to which alternatives are feasible and therefore merit in-depth consideration, and which alternatives are infeasible. Per CEQA 15126.6(C) alternative sites that were considered but rejected for alternatives analysis as infeasible are listed and reason for rejection briefly explained.

6.2.3 CEQA Alternatives Comparison

Table 6.0-1 summarizes the results of the CEQA significance analysis for each resource area, and identifies the alternatives that would result in unavoidable significant impacts under CEQA, as discussed in Chapter 3. A summary of the resources with unavoidable significant impacts or significant impacts that can be mitigated to less than significant is provided in Section 6.3, below.

Table 6.0-1. 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 No Project</i>
<i>Aesthetics</i>	L	M	L	N
<i>Air Quality/GHG</i>	S	S	S	N
<i>Traffic and Circulation¹</i>	M	M	M	N
Notes: S = Unavoidable significant impact M = Significant but mitigable impact L = Less than significant impact (not significant) N = No impact ¹ = Traffic impacts were analyzed for the Proposed Project only; therefore, the results of the preferred Project are assumed to be similar to those of each alternative.				

Regarding Air Quality/GHG impacts, as discussed in Section 3.2, *Air Quality and Greenhouse Gas Emissions*, short-term emissions from the transport of Iowa would result in significant and unavoidable impacts. Transport emissions would exceed thresholds for NO_x in the Bay Area AQMD, San Luis Obispo Air Pollution Control District (APCD), Ventura County APCD, and the SCAQMD. Emissions would also exceed the San Luis Obispo APCD thresholds for PM. The tug operations associated with arrival activities (transporting the USS *Iowa* within the Port and placing the ship at Berth 87) would be subject to Mitigation Measure AQ-1, which requires the project to comply with CAAP Control Measure HC1. Therefore, emissions resulting from arrival activities within the Port (and within the SCAQMD's jurisdiction) would be reduced; however, NO_x emissions would still exceed SCAQMD's daily NO_x threshold. This is reflected in Table 6.0-1 above.

Table 6.0-2, *Comparison of Alternatives to the Proposed Project (CEQA Impacts with Mitigation)*, summarizes the environmental impacts of each alternative compared to the proposed Project, and Table 6.0-3, *Comparison of Alternatives to the CEQA Baseline (CEQA Impacts with Mitigation)*, provides a summary of the impacts of each alternative compared to the CEQA baseline.

Table 6.0-2. 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 No Project</i>
<i>Aesthetics</i>	0	0	-2	-3
<i>Air Quality/GHG</i>	0	0	0	-3
<i>Traffic and Circulation¹</i>	0	+1	+1	-3
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 proposed Project. (+3) = Impacts considered to be substantially increased when compared with the proposed Project. ¹ = Traffic impacts were analyzed for the Proposed Project only; therefore, the results of the preferred Project are assumed to be similar to those of each alternative.				

Table 6.0-3 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 3, 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.

Table 6.0-3. 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 No Project</i>
<i>Aesthetics</i>	+2	+1	+1	0
<i>Air Quality/GHG</i>	+1	+1	+1	0
<i>Traffic and Circulation¹</i>	+1	+1	+1	0
<p>Notes:</p> <p>(-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.</p> <p>¹ = Traffic impacts were analyzed for the Proposed Project only; therefore, the results of the preferred Project are assumed to be similar to those of each alternative.</p> <p>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).</p>				

As shown in Table 6.0-2, when compared with the proposed Project, impacts under CEQA would be slightly increased under Alternative 1. Also, Air Quality and Greenhouse Gas emissions would remain the same as the project would not change, just the location. Variations in traffic impacts mirror the number of impacted intersections and existing parking conditions.

As shown in Table 6.0-3, Alternatives 1 and 2 would have a slight increase in impacts, however, also have the smallest increase in impacts when compared to the CEQA baseline, and these alternatives would be ranked 1st and 2nd. The proposed Project would have the greatest increase in impacts when compared with the CEQA baseline, and would be ranked 3rd. Since Alternative 3 is the No Project alternative, it would have the fewest impacts and is not ranked.

6.3 Analysis of Impacts of Alternatives

The Proposed Project and other feasible site alternatives (Alternatives 1 and 2) include the year-round mooring of the battleship for use as a tourist attraction and a Visitor Center. While Alternatives 1 and 2 are feasible, Alternative 1 would displace an existing commercial fishing fleet, and Alternative 2 would displace cruise ship loading/unloading.

6.4 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative. The environmentally superior alternative was determined based on a ranking system that assigned numerical scores comparing the impacts under each resource area for each alternative with the CEQA baseline. The scoring system ranged from -3 if impacts are considered to be substantially reduced when compared to the CEQA baseline, to +3 if impacts are considered to be substantially increased when compared with the CEQA baseline. Tables 6.0-2 and 6.0-3 present the scoring system and rankings for each alternative under CEQA.

Alternative 3 is the environmentally superior alternative because it is the No Project alternative. Pursuant to the CEQA Guidelines, if the No Project alternative is deemed to be environmentally superior, then the lead agency must identify an alternative other than the No Project alternative as environmentally superior. Alternatives 1 and 2 ranked first and second in terms of the least overall environmental impact when compared to the CEQA Baseline. These alternatives would result in the least impacts on aesthetic resources when compared to the other alternatives.

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