

# Chapter 1 Introduction

## 1.1 Introduction

Los Angeles Harbor Department (LAHD) proposes to construct and operate a chassis support facility on an approximately 89.2-acre site at the Port of Los Angeles (Port or POLA) on Terminal Island. The maritime support facility (MSF) would ~~pave approximately 73 acres and~~ provide ~~73~~ 71 acres of usable space (~~73 acres of paved area~~) for chassis/wheeled empty container storage for use by all 12 terminals located in the POLA and Port of Long Beach (POLB) and could be operated by multiple companies/tenants.

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

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

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

## 1.2 Background

### 1.2.1. Project Location

LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, §601) and the California Coastal Act (PRC Division 20, §30700 et seq.), which identify the Port and its facilities as a primary

1 economic and coastal resource of the State of California and an essential element of the  
2 national maritime industry for the promotion of commerce, navigation, fisheries, and  
3 harbor operations. Activities should be water-dependent, and LAHD must give highest  
4 priority to navigation, shipping, and necessary support and access facilities to accommo-  
5 date the demands of foreign and domestic waterborne commerce. LAHD is chartered to  
6 develop and operate the Port to benefit maritime uses. It functions as a landlord by  
7 leasing Port properties to more than 300 tenants.

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

15 The Project site is an 89.2-acre unoccupied parcel at 740 Terminal Way in San Pedro, CA  
16 90731 on Terminal Island in the Port. The site is bounded by Navy Way to the east, Ferry  
17 Street to the west, Terminal Way to the south, and State Route (SR) 47 to the north.  
18 Formerly used for empty container storage, the site is now vacant and available for  
19 entitlements for temporary uses. Land uses in the vicinity of the Project site are primarily  
20 comprised of container operations. Los Angeles Fire Department Station 40 is located  
21 adjacent to the west of the Project site, east of Ferry Street. The Terminal Island Water  
22 Reclamation Plant is located to the west of the Project site, west of Ferry Street.

## 23 1.2.2. Project Overview

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

- 26 • installation of asphalt concrete to pave approximately ~~75~~73 acres of the 89.2-acre  
27 site for backland storage use;
- 28 • installation of stormwater drainage and sewage systems in compliance with the  
29 City of Los Angeles Low Impact Development (LID) Ordinance and City of Los  
30 Angeles Bureau of Sanitation (LA Sanitation & Environment) requirements;
- 31 • installation of approximately 7,000 linear feet (lf) of chain-link fencing for the  
32 perimeter of the site (additional chain link fencing on k-rails would be required to  
33 separate areas for different operators, if necessary);
- 34 • installation of approximately 3,600 chassis stalls (e.g., parking spaces) at 90  
35 degrees, plus chassis/bombcart wheeled storage stalls, and forklift and utility  
36 tractor rig (UTR) parking;
- 37 • installation of 40 high mast light poles (maximum height of 100 feet);
- 38 • as-needed installation of vaults, switchgears, transformers, associated concrete  
39 pads/foundations, and conduit for electrical connections;
- 40 • installation of approximately 40 fire hydrants;
- 41 • installation of charging and fueling infrastructure;

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

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

## 21 1.3 CEQA and the Purpose of an EIR

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

## 1.4 Scope and Content of the EIR

The scope of this Final EIR was defined on the basis of a Notice of Preparation/Initial Study (NOP/IS), a Draft EIR, and a Partially Revised and Recirculated Draft EIR prepared pursuant to CEQA (see Final Appendix A), and comments received during the scoping and public review processes. The NOP/IS was posted on December 7, 2023, and an online public scoping meeting was conducted on January 9, 2024. One speaker commented at the public meeting and three comment letters were received during the scoping period (December 7, 2023 to January 22, 2024). A 45-day Draft EIR public review period ran from September 15, 2025 to October 30, 2025 and one virtual public hearing was held on October 1, 2025. Five comment letters were received during the public review period, and no comments were made at the public hearing. In response to comments received during the Draft EIR public review period, a Partially Revised and Recirculated Draft EIR was prepared using updated methodologies for the calculation of Project emissions. This Partially Revised and Recirculated Draft EIR was made available for public review from January 26, 2026 to March 11, 2026, resulting in one additional comment letter.

### 1.4.1. Scope of Analysis

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

The following resources are evaluated in this EIR:

- Air Quality and Health Risk
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

The NOP/IS (see Final Appendix A) concluded that the Proposed Project would not result in significant impacts to the following resources: Agriculture and Forest Resources, Aesthetics, Biological Resources, Cultural Resources, Geology and Soil, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Per State CEQA Guidelines Section 15128, these resources do not need to be evaluated in this EIR. This EIR has been prepared by Aspen Environmental Group under contract to LAHD and has been reviewed independently by LAHD staff. The scope of the document, methods of analysis, and conclusions represent

the independent judgment of LAHD. Staff members from LAHD and Aspen Environmental Group who helped prepare this EIR are identified in Chapter 8, *List of Preparers and Contributors*.

### 1.4.2. Scoping Comments

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

**Table 1-1: Summary of Key Scoping Comments**

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

### 1.4.3. Intended Uses of this EIR

This Final EIR has been prepared in accordance with applicable federal and state environmental regulations, policies, and laws to inform state and local decision-makers about the potential environmental impacts of the Proposed Project and alternatives. As an informational document, an EIR does not recommend approval or denial of a Project. The Draft EIR ~~is~~ was provided to the public for review, comment, and participation in the planning process. After public review and comment on the Draft EIR, a Partially Revised and Recirculated Draft EIR was prepared to address agency comments on the Draft EIR. Following public review of the Partially Revised and Recirculated Draft EIR, this Final EIR ~~was~~ will be prepared, including responses to comments on both the Draft EIR and Partially Revised and Recirculated Draft EIR received from agencies, organizations, and individuals. This Final EIR will be distributed to provide the basis for decision-making by the CEQA lead agency (LAHD) and other concerned agencies. LAHD has jurisdictional authority over the Proposed Project primarily pursuant to the Tidelands Trust, California Coastal Act, and the Los Angeles City Charter. This Final EIR will be used by LAHD, as the lead agency under CEQA, in making a decision regarding the construction and operation of the Project and in informing agencies considering permit applications and other actions required to construct and operate the Project. LAHD’s certification of the Final EIR, Notice of Completion, Findings of Fact, and Statement of Overriding Considerations ~~(if necessary)~~ would document their decision as to the adequacy of the Final EIR and inform subsequent decisions by LAHD whether to approve and construct

the Project. Other agencies that may have jurisdiction over some part of the Project or a resource area affected by the Project are expected to use this EIR as part of their approval or permit processes as set forth in Table 2-1. Specific approvals that could be required for this Project include but are not limited to a California Department of Transportation, Los Angeles Department of Building and Safety (LADBS) Building Permit, Los Angeles Department of Transportation (LADOT) B-Permit, a Construction General Permit and Industrial General Permit from the SWRCB, a Port Master Plan Amendment by the Board of Harbor Commissioners with certification by the California Coastal Commission, an entitlement, Coastal Development Permit, and Engineer Permit by the Board of Harbor Commissioners, and approval of construction contracts by LAHD and Los Angeles City Council. Actions that could be undertaken by LAHD following preparation of this Final EIR include certification of the EIR, approval of the Project, completion of a PMP amendment for Coastal Commission approval, completion of final design for the facility, issuance of a Coastal Development Permit, approval of engineering permits, obtaining other agency permits and approvals, and approval of construction contracts.

### 1.4.4. EIR Organization

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

**Table 1-2: Organization and Contents of the EIR**

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

| EIR Section   | Description  |
|---|--|
| Chapter 7<br>Growth-Inducing<br>Impacts                     | Discusses the extent to which the Proposed Project would result in growth-inducing impacts.  |
| Chapter 8<br>List of Preparers<br>and Contributors          | Lists the individuals involved in preparing this EIR.  |
| Chapter 9<br>References                                     | Identifies the materials and documents referenced in preparing this EIR.   |
| <u>Chapter 10</u><br><u>Responses to</u><br><u>Comments</u> | <u>Presents the comment letters received on the Draft EIR and Partially Revised and Recirculated Draft EIR, along with detailed responses to comments.</u> |

## 1.5 Key Principles Guiding Preparation of this EIR

State CEQA Guidelines Section 21002.1(e) states that:

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

### 1.5.1. Forecasting

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

### 1.5.2. Reliance on Environmental Thresholds and Substantial Evidence

The identification of impacts as “significant” or “less than significant” is one of the important functions of an EIR. While impacts determined to be “less than significant” need only be acknowledged as such, an EIR must identify mitigation measures for any impact identified as “significant.” In preparing this document, LAHD has based its conclusions about the significance of environmental impacts on identifiable thresholds and has supported these conclusions with substantial scientific evidence. The criteria for determining the significance of environmental impacts in this analysis are described in each resource section in Chapter 3, *Environmental Analysis*. The “threshold of significance” under CEQA for a given environmental effect is the level at which LAHD finds a

1 potential effect of the Proposed Project or alternative to be significant. “Threshold of  
2 significance” can be defined as a “quantitative, qualitative or performance level of a  
3 particular environmental effect, non-compliance with which means the effect will  
4 normally be determined to be significant by the agency and compliance with which  
5 means the effect normally will be determined to be less than significant,” (State CEQA  
6 Guidelines Section 15064.7(a)).

### 7 **1.5.3. Disagreement Among Experts**

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

### 25 **1.5.4. CEQA Baseline**

26 State CEQA Guidelines Section 15125 requires EIRs to include a description of the  
27 physical environmental conditions in the vicinity of the Proposed Project that exists at the  
28 time of the NOP/IS. For the purposes of this EIR, the NOP/IS was released in December  
29 2023. Therefore, the appropriate CEQA baseline has been determined to be the  
30 environmental setting and existing conditions occurring at the Project site during the  
31 calendar year of 2023 (i.e., January 2023 to December 2023). The CEQA baseline  
32 represents the setting at a fixed point in time, with no projected growth over time.  
33 Activities under the CEQA baseline are considered negligible in the foreseeable future as  
34 no future development has been permitted or approved.

### 35 **1.5.5. Duty to Mitigate**

36 According to State CEQA Guidelines Section 15126.4(a), each significant impact identi-  
37 fied in an EIR must include a discussion of feasible mitigation measures that would avoid  
38 or substantially reduce the significant environmental effect. To reduce significant effects,  
39 mitigation measures must avoid, minimize, rectify, reduce, eliminate, or compensate for a  
40 given impact of the Proposed Project. Mitigation measures must satisfy certain require-  
41 ments to be considered adequate. Mitigation should be specific and enforceable, define  
42 feasible actions that would demonstrably improve significant environmental conditions,  
43 and allow monitoring of their implementation. Mitigation measures that merely require

1 further studies or consultation with regulatory agencies and are not tied to a specific  
2 action that would directly reduce impacts, or that defer mitigation until some future time,  
3 are not adequate. Effective mitigation measures clearly explain objectives and indicate  
4 how a given measure should be implemented, who is responsible for its implementation,  
5 and where and when the mitigation would occur. Mitigation measures must be enforce-  
6 able, meaning that the lead agency must ensure that the measures would be imposed  
7 through appropriate permit conditions, agreements, or other legally binding instruments.  
8 State CEQA Guidelines Section 15041 grants public agencies the authority to require  
9 feasible changes (mitigation) that would substantially lessen or avoid a significant effect  
10 on the environment associated with activities involved in a project. Public agencies,  
11 however, do not have unlimited authority to impose mitigation. A public agency might  
12 exercise only those express or implied powers provided by law, aside from those pro-  
13 vided by CEQA. However, where another law grants discretionary powers to a public  
14 agency, CEQA authorizes use of discretionary powers (State CEQA Guidelines §15040).  
15 In addition to limitations imposed by CEQA, the U.S. Constitution limits the authority of  
16 regulatory agencies. The Constitution limits the authority of a public agency to impose  
17 conditions to those situations where a clear and direct connection (“nexus,” in legal  
18 terms) exists between a project impact and the mitigation measure. Finally, a proportional  
19 balance must exist between the impact caused by the project and the mitigation measure  
20 imposed upon the project applicant. A project applicant cannot be forced to pay more  
21 than its fair share of the mitigation, which should be roughly proportional to the impact(s)  
22 caused by the project.

## 23 **1.5.6. Requirements to Evaluate Alternatives**

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

1 regulatory limitations, jurisdictional boundaries, and whether the proponent can reason-  
2 ably acquire, control or otherwise have access to the alternative site.” The EIR is not  
3 required to evaluate an alternative whose effects could not be reasonably identified, or  
4 whose implementation is remote, speculative, or would not achieve the basic purposes of  
5 the Proposed Project.

## 6 **1.6 Alternatives**

### 7 **1.6.1. Alternatives Evaluated in this EIR**

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

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

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

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

**1.6.1.1. Alternative 1 – No Project Alternative**

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

**1.6.1.2. Alternative 2 – Reduced Project Alternative**

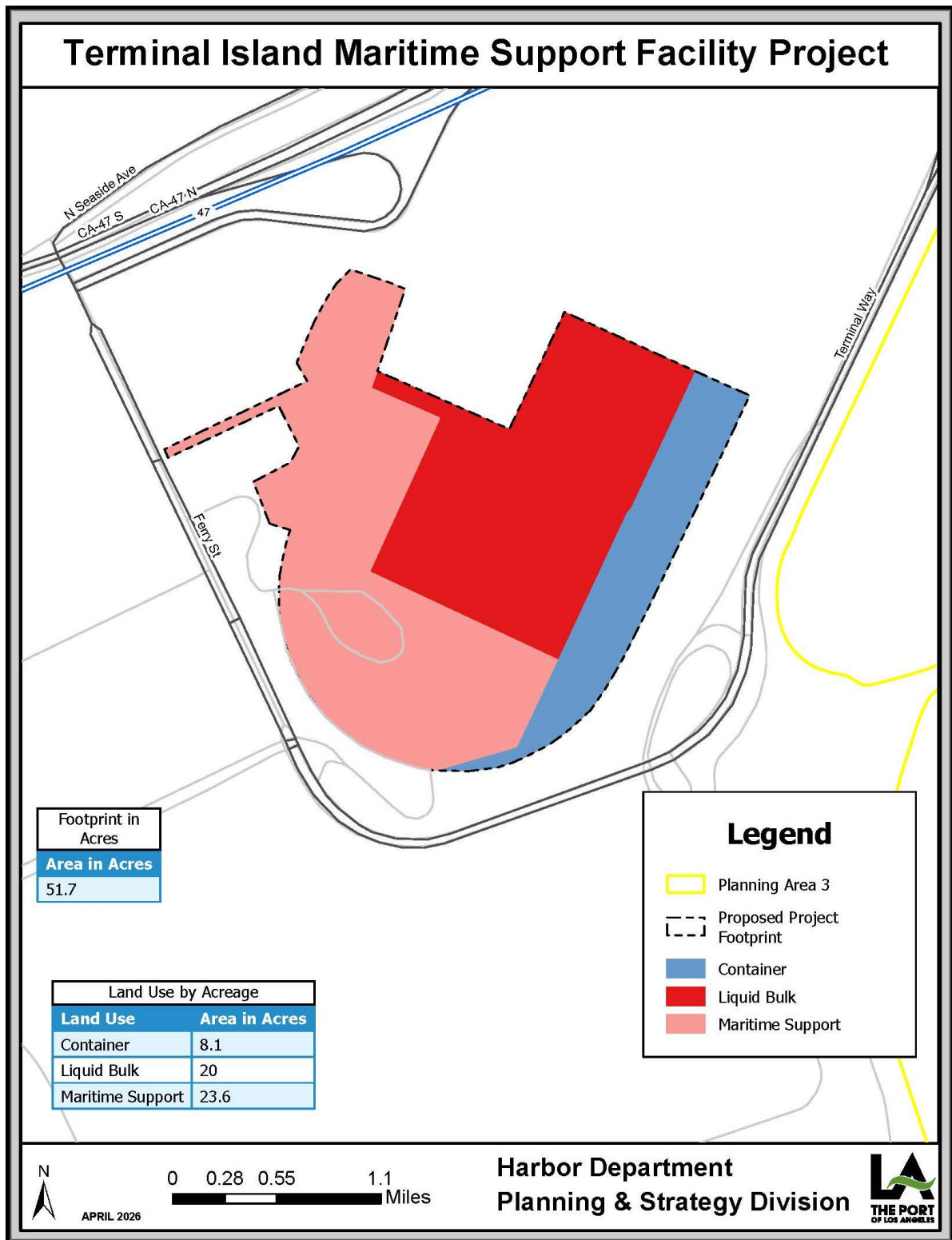
Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced by about half, from 89.2 acres to 51.7 acres (~~73~~- ~~71~~ acres [usable space]/2 + 16.2 acres other/outside loop). The number of buildings and structures to be constructed and operated at the site would be reduced by half (Figure 1-1). This alternative would include the same modifications and use of the existing office building at 750 Eldridge Street and construction of the LADWP substation like the Proposed Project. Other construction and operational activities would be similar to the Proposed Project but with reduced intensity given the smaller area. For example, less asphalt concrete, stall striping, lighting, and fencing would be installed due to the reduced footprint.

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

| Activity                             | 2023          | Full Buildout (Year <del>2049</del> <u>2046</u> ) |                   |                                     |
|--------------------------------------|---------------|---|-------------------|-------------------------------------|
|                                      | CEQA Baseline | Proposed Project                                  | Alt 1: No Project | Alt 2: Reduced Project <sup>1</sup> |
| Construction workers                 | 0             | 60  | 0                 | 30 <sup>2</sup>                     |
| Operational employees                | 0             | 105   | 0                 | 53 <sup>2</sup>                     |
| Total truck trips, one-way trips/day | 0             | 6,838   | 0 <sup>3</sup>    | 3,419                               |
| Project Site (Acres) Utilized        | 0             | 89.2  | 0                 | <del>52.7</del> <u>51.7</u>         |
| Chassis Stalls                       | 0             | 3,600   | 0                 | 1,800                               |
| High mast light poles                | 0             | 40  | 0                 | 20                                  |
| Re-grading export volume (CY)        | 0             | 270,000   | 0                 | 135,000 <sup>4</sup>                |

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

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



Note: Boundaries and associated acreages presented are approximate and based on a conceptual design only.

3  
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## 1.6.2. Alternatives Considered But Not Further Evaluated

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

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

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

## 1.7 Availability of the Draft EIR and Partially Revised and Recirculated Draft EIR

The Draft EIR ~~is being~~ was distributed directly to agencies, organizations, and interested groups and persons for comment in accordance with State CEQA Guidelines Section 15087. A 45-day comment period ~~has been~~ was established, ~~which begins~~ on September 15, 2025, and ~~ends~~ on October 30, 2025. A printed document ~~is was~~ made available for review to interested parties at the Port of Los Angeles Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, California 90731. In addition to printed copies of the Draft EIR, an electronic version was made available in its entirety on the Port's website: <http://www.portoflosangeles.org/ceqa>.

Additionally, the Partially Revised and Recirculated Draft EIR was distributed directly to agencies, organizations, and interested groups and persons for a 45-day review period beginning on January 26, 2026 and ending on March 11, 2026. A hard copy of the Partially Revised and Recirculated Draft EIR was made available for review at the Port of Los Angeles Environmental Management Division located at 425 South Palos Verdes Street, San Pedro, California 90731, and an electronic version was made available on the Port's website.

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

1                   ~~Due to the size of the document, the electronic versions have been prepared as a series of~~  
2                   ~~PDF files to facilitate downloading and printing. Interested parties may provide written~~  
3                   ~~comments on the Draft EIR, which must be postmarked by October 30, 2025~~  
4                   Please address comments to:  
5                   Director of Environmental Management  
6                   Los Angeles Harbor Department  
7                   425 South Palos Verdes Street  
8                   San Pedro, CA 90731  
9                   ~~Written comments may also be sent via e-mail to [ceqacomments@portla.org](mailto:ceqacomments@portla.org). Comments~~  
10                  ~~sent via e-mail should include the project title (Terminal Island Maritime Support~~  
11                  ~~Facility) in the subject line of the email. All comments received will become part of the~~  
12                  ~~public record for the Project.~~