Chapter 5
Comparison of Alternatives

5.1 Introduction

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) present a reasonable range of feasible alternatives to a proposed project. Section 15126.6(a) of the State CEQA Guidelines requires that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." This chapter presents a comparison of the Proposed Project to the alternatives considered (Section 5.2) which meet the initial screening criteria set forth in State CEQA Guidelines Section 15126.6(c) (Section 5.3).

As the alternatives are intended to avoid or substantially lessen one or more of the significant adverse effects of the Proposed Project, this chapter focuses on the comparative merits of the alternatives with respect to those environmental resource areas which may be significantly impacted by the Proposed Project. As such, this comparison is based on the environmental resources analyzed in Chapter 3 of this EIR.

The alternatives in this EIR have been analyzed in Chapter 3 at a level that provides sufficient information about the environmental effects of each alternative for comparative purposes and to allow for informed decision-making. Several other alternatives were considered, but because they were rejected from further consideration (Section 5.2.3) they are not included in the comparison of alternatives.

5.2 Project Alternatives

Section 2.3, *Project Objectives*, forms the basis for developing alternatives to the Proposed Project. The Proposed Project's objectives include issuing a Term Permit (or Permits) for the operations of a chassis support facility for up to 25 years; optimizing the use of existing land to support chassis storage; reducing inefficient chassis trips; providing a full-service depot increasing efficiency of terminal operations; and advancing the Port's zero emissions cargo-handling equipment goals by January 1, 2030.

The alternatives to the Proposed Project are:

- Alternative 1 – No Project; and
- Alternative 2 – Reduced Project.

Table 5-1 presents the main components of each alternative and how they differ from those of the Proposed Project.

Table 5-1: Summary of Proposed Project and Alternatives at Full Buildout (Year ~~2046~~2049)

Activity	Alternative		
	Proposed Project	Alt 1: No Project	Alt 2: Reduced Project [1]
Construction workers	60	0	30[2]
Operational employees	105	0	53
Total truck trips, one-way trips/day	6,838	0[3]	3,419
Project Site (Acres) ~~Utilized~~	89.2	0	~~52.7~~ 51.7
Container stalls	3,600	0	1,800
High mast light poles	40	0	20
Re-grading export volume (CY)	270,000	0	135,000[4]

1- Values were extrapolated based on the reduced Project footprint (acres utilized).
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).

5.2.1. 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 for the foreseeable future. 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.

5.2.2. Alternative 2 – Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 2), the Project site area would be reduced by about half, from 89.2 acres to ~~52.7~~ 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. 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.

5.2.3. Alternatives Considered But Not Further Evaluated

Two alternatives were considered based on comments received during the public scoping period (December 7, 2023 – January 22, 2024) and in coordination with LAHD but were eliminated from further consideration because they would not meet most of the basic Project objectives, were deemed infeasible, or would be unable to avoid or substantially lessen one or more of the significant environmental impacts of the Proposed Project (State CEQA Guidelines Section 15126.6(c)).

5.2.3.1. Container Storage Alternative

Description of Alternative

Under this alternative, only full cargo containers would be stored at the Project site. Full cargo containers are transported more frequently than empty containers. Additional pieces of equipment would be needed, including more top handlers and utility tractor rigs. No chassis storage, maintenance, or repair activities would occur.

Analysis and Rationale for Elimination

This alternative would partially meet the Project objectives by optimizing the use of existing land, although for a different purpose, and increasing on-terminal efficiency for Port operations by providing a centralized location for storing full cargo containers. However, storage of full cargo containers requires higher-intensity operations compared to the Proposed Project, which would involve chassis storage, maintenance, and repair facilities, and/or wheeled empty containers storage. Full containers experience higher turnover compared to empty containers, which are generally stored for longer periods of time; therefore, truck trips would be more frequent. With more truck trips, there would be more greenhouse gas (GHG) emissions and air quality impacts compared to the Proposed Project. Furthermore, because this alternative would not include any chassis depot operations, it would not reduce inefficient chassis trips, reduce double-handling of empty containers, or provide a full-service depot to increase the efficiency of terminal operations. Therefore, this alternative would not substantially reduce the impacts of the Proposed Project and has been eliminated from further analysis.

5.2.3.2. Half Peel-Off Alternative

Description of Alternative

Under this alternative, half of the Project site would be operated as a chassis depot with ancillary storage of wheeled empty containers, as described for the Proposed Project in the Project Description (Section 2.5.3, *Operations*), and the other half would be operated as a "peel-off" site. Peel-off operations include the storage of full containers and moving stacked full containers in order from top to bottom. This alternative would improve the efficiency of terminal operations by reducing truck waiting and idling times by moving full containers at the top of a stack rather than reaching for specific containers that may be buried at the bottom of a stack. Additional electrical conduit would need to be installed for charging infrastructure to support the increased operational equipment required.

Analysis and Rationale for Elimination

This alternative would partially meet the Project objectives by optimizing the use of existing land, although for a different purpose, and increasing on-terminal efficiency for Port operations by providing a centralized location for chassis storage and peel-off operations. Although this alternative could reduce some air quality and GHG impacts from reduced idling times at the Project site, truck trips would be more frequent due to the increased turnover of full containers for peel-off operations compared to the storage of chassis and wheeled empty containers. The increased number of truck trips would result in overall greater air quality/GHG impacts and energy consumption during operations and would not substantially reduce other impacts of the Proposed Project. Therefore, this alternative has been eliminated from further analysis.

5.3 Alternatives Comparison

5.3.1. CEQA Alternatives Comparison

This section summarizes and compares the environmental issues and impacts of the Proposed Project and alternatives as analyzed in Chapter 3. This section is intended to provide decision-makers with information about the merits and disadvantages of each of the alternatives. This will assist decision-makers as they consider approval or denial of the Proposed Project and to assist the public in understanding the differences between the alternatives.

Table 5-2 presents a summary matrix of the environmental impacts associated with the Proposed Project (as analyzed in Chapter 3) and the alternatives. Impacts are presented in more detail in Table ES-1 and the summary tables in each resource section in Chapter 3.

The matrix provided in Table 5-2 is organized by environmental issue area, for those issue areas analyzed in detail within this EIR (Section 1.5.1, *Scope of Analysis*, for other issue areas identified to not result in significant impacts). Significance conclusions are denoted as “Significant” for significant unavoidable impacts, “LTS” for less-than-significant impacts, and “LTS-M” for less-than-significant impacts with incorporation of mitigation measures.

The No Project Alternative (Alternative 1) would have no significant impacts to any resource areas.

Table 5-2: Summary of Impacts

Issue Area	Impact Title	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Project
Air Quality and Health Risk	**AQ-1:** Result in emissions that exceed the SCAQMD regional thresholds of significance for construction emissions	LTS	No Impact	LTS
	AQ-2: Result in off-site ambient air pollutant concentrations that exceed the SCAQMD thresholds of significance	LTS	No Impact	LTS
	AQ-3: Result in operational emissions that exceed SCAQMD peak day regional emission thresholds of significance	Significant and Unavoidable	No Impact	~~LTS~~Significant and Unavoidable
	AQ-4: Result in off-site ambient air pollutant concentrations that exceed SCAQMD thresholds of significance	LTS	No Impact	LTS
	AQ-5: Expose receptors to significant levels of TACs	LTS	No Impact	LTS
	AQ-6: Conflict with or obstruct implementation of an applicable air quality plan	LTS	No Impact	LTS
Energy	**EN-1:** Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	LTS	No Impact	LTS
Greenhouse Gas Emissions	**GHG-1:** Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	LTS-M	No Impact	LTS
	GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	No Impact	LTS
Hazards and Hazardous Materials	**HAZ-1:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment	LTS-M	No Impact	LTS-M

5.3.2. Environmentally Superior Alternative

In accordance with CEQA requirements, an "environmentally superior alternative" must be identified among the alternatives analyzed in the EIR. The environmentally superior alternative is the alternative found to have an overall environmental advantage compared to the other alternatives based on the impact analysis in the EIR. Based on the above comparison, the No Project Alternative (Alternative 1) would have no impacts and is deemed to be the environmentally superior alternative. Under CEQA, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from the other alternatives (State CEQA Guidelines Section 15126.6(e)(2)). ~~As such, the environmentally superior alternative would be t~~

As discussed in Section 5.3.1, the Proposed Project would have significant unavoidable operational air quality impacts related to NOx emissions at full buildout (2049) and would result in significant GHG emission impacts without mitigation. The Reduced Project Alternative (Alternative 2)~~. This alternative~~ would result in approximately half the construction emissions, construction workers, operational employees, container stalls, lighting, and exported material due to the reduced footprint compared to the Proposed Project resulting in less than significant GHG emission impacts~~ and~~, although it would not avoid the significant and unavoidable operational air quality impact from NOx emissions ~~during operations~~ at full buildout (~~2046~~2049). Due to these reduced impacts and despite the remaining significant unavoidable impact, the Reduced Project Alternative (Alternative 2) is deemed to be the environmentally superior alternative. However, the Reduced Project Alternative (Alternative 2) does not provide the same amount of operational capacity as the Proposed Project due to the reduced acreage, which would accommodate half the number of chassis and/or wheeled empty containers compared to the Proposed Project. The Reduced Project Alternative (Alternative 2) would ~~satisfy~~ accommodate the Project objectives to a lesser degree, as it would reach capacity faster than the Proposed Project and would have a reduced ability to decrease container dwell time for empty containers at the marine terminal, inefficient chassis trips, double-handling of empty containers, and increase on-terminal efficiency by having sufficient readily available chassis. Improving efficiencies reduces the wasteful use of nonrenewable resources (e.g., fossil fuel), number of truck trips, and GHG emissions; therefore, the greater long-term operational efficiency of the Proposed Project would offset the Project-specific NOx emissions and greater short-term construction impacts making the Proposed Project the "~~e~~Environmentally ~~s~~Superior ~~a~~Alternative."