V. Alternatives

1. Introduction

The identification and analysis of alternatives to the Project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and feasible alternatives which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a), as follows:

> *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. 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. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

The CEQA Guidelines indicate that the selection of project alternative should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if those alternatives would impede to some degree the attainment of project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *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 (projects with a regionally significant impact should consider the*

regional context), 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). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.2(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives' analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project/No Build Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered.

2. Project Summary

As set forth in Section II, Project Description, of this Draft EIR, the Project involves the construction and operation of 340,298 square feet (including 25,000 square feet mezzanine) of industrial uses with up to 40,000 square feet of office, within a one-story, 53-foot tall building in lieu of the otherwise permitted 45 feet. The Project includes a total of 194 automobile surface parking spaces, 32 bicycle parking spaces, 36 dock high truck loading positions, and up to 71 parking stalls for truck trailers. All loading and unloading would be located within a fully-screened yard at the rear (north side) of the proposed building, adjacent to the railroad right-of-way to the north and out of sight from public sidewalks.

3. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that the statement of objectives should include the underlying purpose of the project." As set forth in the CEQA Guidelines, the Project's specific objectives have been refined throughout the planning and design process for the proposed Project and are listed below:

- Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and in proximity to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.
- Provide for the development of warehouse uses that are responsive to and support local, regional, national, and international trade demands and commerce.
- Provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.
- Improve pedestrian access, connectivity, and safety along the project site, in proximity to residences and schools.

- Enhance the Project Site's visual aesthetics through redevelopment of a vacant and underutilized property.

4. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of the Project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result in significant project-level and cumulative impacts that cannot be feasibly mitigated with regard to Air Quality (consistency with the AQMP and operational-related impacts). Accordingly, the following alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project (see Section II, *Project Description*, of this Draft EIR, and Subsection 5, below), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative A: No Project/No Build Alternative—This alternative assumes that the Project would not be implemented, no development would occur, and the existing site would be maintained. Therefore, the physical conditions of the Project Site would remain as they are today.

- Alternative B: Existing Zoning Alternative—This alternative considers development 150,000 square feet of retail uses on the Project Site in accordance with its existing land use designation and zoning.

- Alternative C: Reduced Project Alternative—This alternative would include the same use proposed by the Project (warehouse/manufacturing/high-cube warehouse/distribution center) while reducing the building square footage by approximately 25 percent. Specifically, the proposed building would be reduced from 340,298 square feet to 255,224 square feet of floor area.

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are discussed below.

5. Alternatives Considered and Rejected as Infeasible

As set forth in the CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid

significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include the following:

Alternative Project Site: Project Applicant already has control over the Project Site and its location is conducive to its operation in close proximity to I-110, which provides direct access to the Ports of Los Angeles and Long Beach. In the City's General Plan, the Project Site is located within the Harbor Gateway Community Plan, which designates the property for Light Industrial land uses industrial zoning. The surrounding properties include a mix of residential, commercial, light industrial, open space, and institutional uses. This includes the California Waste Services Station for open air transfer and recycling services located northeast of the Project Site. The land use designation on the Project Site allows for uses that serve as a beneficial transitional buffer between the existing surrounding land uses and the open-air transfer and recycling facility. Additionally, development of the Project at an alternative site could potentially lead to the Project being located closer to sensitive uses or produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared to the Project. Lastly, the close proximity of the Project Site to I-110 promotes goods movement in a location with superior access to freeways, thereby reducing truck traffic and associated emissions along local streets. During the NOP comment period, a commenter suggested locating the site within Harbor Gateway along Figueroa Street north of Rosecrans Avenue. However, the Project Applicant cannot reasonably acquire, control, or access an alternative site of similar size within the Harbor Gateway along Figueroa Street north of Rosecrans Avenue area. Given its location in an urbanized setting, an alternative site within the Harbor Gateway area would result in the same significant and unavoidable impacts associated with air quality. Additionally, a change in location that could potentially be closer to sensitive uses could result in greater environmental impacts when compared to the Project. Therefore, an alternative site is not considered feasible as the Project Applicant does not own or control another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not avoid the Project's significant impacts. Thus, this alternative was rejected from further consideration.

- **Alternative Land Use:** During the NOP comment period, several comments were received to consider an alternative use for the Project, including, but not limited to, Apartments Plus Open Space, Mixed Use Plus College, Mixed-Use Plus Small Warehouse, and Governmental facilities. However, as the Project Site is zoned for M2 Light Manufacturing uses, by-right development of the site is primarily limited to certain commercial and industrial land uses. Alternative land uses, including, but not limited to, residential uses and mixed-use residential developments, are not permitted within the zone. Schools or certain government facilities are only permitted if approved through a discretionary entitlement process. Furthermore, the alternative land uses identified above do not meet the main project objectives to Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and in proximity to the Ports of Long

Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region; and provide the development of warehouse uses that are responsive to and support local, regional, national, and international trade demands and commerce;. (see Section II, Project Description, of this Draft EIR). Thus, this alternative was rejected from further consideration.

- **Alternative to Reduce Building Height.** As demonstrated in Section IV.A, Aesthetics, of this Draft EIR, the Project would not result in a significant aesthetic impact, and reducing building height would not eliminate or substantially reduce other significant environmental impacts of the project. Second, the proposed building would be 53 feet in height. If developed, the proposed structure would be comparable in height with other surrounding buildings (e.g., Gardena Professional Medical Plaza and the Hustler Casino, approximately 61 and 53 feet in height, respectively). Lastly, as shown in Figure II-6, *View A*, the building is not overbearing to pedestrians and is not a disruptive structure in the public right-of way. Thus, this alternative was rejected from further consideration.

- **Alternative to Restrict Operations to 12 hours per day to reduce noise impacts.** As demonstrated in Section IV.I, Noise, in this Draft EIR, the Project would not result in significant operational related noise impacts due to increased traffic (including truck trips), mechanical equipment, or loading dock activity. Further, the Project would incorporate several project design features to reduce operational noise impacts, including; (1) utilize other safety means (no back-up beepers) for vehicles between the hours of 10:00 p.m. and 7:00 a.m. (Project Design Feature N-PDF-3); and (2) prohibit loading and unloading within 300 feet of any existing residential building between the hours of 10:00 p.m. and 7:00 a.m. (Project Design Feature N-PDF-4. Therefore, this alternative would not reduce a significant environmental impact, and this alternative was rejected from further consideration.

- **Alternatives to Eliminate Significant Air Quality Impacts.** The Project would result in a significant unavoidable impact due to the exceedance of the NOx emissions threshold during Project operation, as determined in Section IV.B, Air Quality, of this Draft EIR. The source of NOx emissions is mainly due to mobile source emissions from truck trips, which account for approximately 131 lbs per day of the 135 total lbs per day of NOx emitted from all project sources after mitigation. The only way to reduce the operational air quality impact to less than significant and allow for similar industrial warehouse uses, consistent with the City's zoning, would be to reduce the building size and associated total daily truck trips. In order to reduce the Project-related NOx emissions from 135 pounds per day (which represents the Project's mitigated emissions; see Table IV.B-14 of this Draft EIR) below SCAQMD's regional operation significance threshold of 55 pounds per day, the Project would need to be reduced by 60 percent. A 60-percent reduction of the Project would not support the Project's main objectives to the same degree as the Project, including the following: provide for the development of warehouse uses that are responsive to and support local, regional, national, and international trade demands and commerce; and provide local economic benefits such as the creation of new employment

opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.

6. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project as measured against the baseline (existing conditions). Furthermore, each alternative is evaluated to determine whether the Project's basic objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[1] The evaluation of each of the alternatives follows the process described below.

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project area compared for each environmental issue area as follows:

   - Less: Where the impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is stated to be "less."

   - Greater: Where the impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is stated to be "greater."

   - Similar: Where the impact of the alternative and the Project would be roughly equivalent, the comparative impact is stated to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purposes and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided below in Table V-1, *Summary of Comparison of Alternatives to the Project*. A summary matric that compares the Project and alternatives with each project objectives is provided below in Table V-2, *Summary of Project Objectives Comparison of Alternatives to the Project*.

[1] *State of California, CEQA Guidelines Section 15126.6(c).*

Table V-1
Summary of Comparison of Alternatives to the Project

Impact Area	Project– Warehouse (340,398 square feet)	No Project/ No Build– (No development)	Existing Zoning– Retail (150,000 square feet)	Reduced Project– Warehouse (255,224 square feet)
A. Aesthetics	LTS	No Impact (greater)	LTS (similar)	LTS (similar)
B. Air Quality				
Regional				
Construction	LTS/M	No Impact (less)	LTS/M (less)	LTS/M (less)
Operation	SU	No Impact (less)	LTS (less)	SU (less)
Local				
Construction	LTS	No Impact (less)	LTS/M (less)	LTS/M (less)
Operation	LTS	No Impact (less)	LTS (less)	LTS (less)
C. Cultural Resources (Archeological Resources)	LTS	No Impact (less)	LTS (similar)	LTS (similar)
D. Energy	LTS	No Impact (less)	LTS (less)	LTS (less)
E. Geology and Soils (Paleontological Resources)	LTS	No Impact (less)	LTS (similar)	LTS (similar)
F. GHG Emissions	LTS	No Impact (less)	LTS (greater)	LTS (less)
G. Hazards and Hazardous Materials				
Construction	LTS	No Impact (greater)	LTS (similar)	LTS (similar)
Operation	LTS	No Impact (less)	LTS (similar)	LTS (similar)
H. Hydrology and Water Quality	LTS	No Impact (greater)	LTS (similar)	LTS (similar)
I. Noise				
Construction				
On-Site Noise	LTS	No Impact (less)	LTS (less)	LTS (less)
Off-Site Noise	LTS	No Impact (less)	LTS (similar)	LTS (similar)
Operation				
On-Site Stationary Noise	LTS	No Impact (less)	LTS (less)	LTS (similar)
Off-Site Traffic Noise	LTS	No Impact (less)	LTS (less)	LTS (less)
J. Transportation	LTS	No Impact (less)	LTS (greater)	LTS (similar)
K. Tribal Cultural Resources	LTS	No Impact (less)	LTS (similar)	LTS (similar)

LTS= Less than Significant; SU= Significant and Unavoidable; LTS/M; Less than Significant with Mitigation

Table V-2
Summary of Project Objectives Comparison of Alternatives to the Project

Project Objectives	No Project/ No Build	No Project/ Existing Zoning	Reduced Project Alternative
Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and in proximity to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.	Not met	Not met	Met
Provide for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce.	Not met	Not met	Partially met
Provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway	Not met	Met	Partially met
Improve pedestrian access, connectivity, and safety in proximity to residences and schools.	Not met	Met	Met
Enhance the Project site's visual aesthetics through redevelopment of a vacant and underutilized property.	Not met	Met	Met

VI. Alternatives

A. Alternative A: No Project/No Build Alternative

1. Description of the Alternative

In accordance with CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstances under which a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) sates that "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative A: No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. The physical conditions of the Project Site would generally remain as they are today, consisting of vacant, disturbed land. The Project Site would remain unoccupied, surrounded by a chain link fence with three large concrete slab foundations, and paved with asphalt and concrete in poor condition. No new construction would occur.

2. Environmental Impacts

a. Aesthetics

The Project Site is currently a vacant, underutilized lot in an urbanized area. The Project Site is currently unoccupied, surrounded by a chain link fence with three large concrete slab foundations. Most of the areas surrounding the slabs are paved with asphalt and concrete in fair to poor condition. The existing conditions are heavily underutilized, and the property is littered with trash and surrounded by a chain link fence. Under the No Project/No Build Alternative, the visual character and quality of the site would remain in its current condition. No structures would be introduced on the Project Site under this alternative, including the proposed warehouse buildings, lighting, or landscaping. Therefore, the existing conditions would not be replaced with improved sidewalks, landscaping, including 165 trees, and an industrial center that adheres to the Framework Element Urban Form and Neighborhood Design. Under the No Project/No Build Alternative, the Project Site would continue to have the same lighting conditions, which generally consists of a moderate level of existing ambient nighttime light from surrounding uses. Although the No Project/No Build Alternative would result in no changes to the Project Site, the visual character and quality of the site would not benefit from the Project's improvements, which were determined to be less than significant. Accordingly, the No Project/No Build Alternative would result in no impact related to aesthetics but would be greater when compared to the less than significant impacts of the Project.

b. Air Quality

(1) Construction

The No Project/No Build Alternative would not alter the existing uses or require any construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under this alternative, and impacts would be less than the Project's impacts, which are less than significant with mitigation for regional emissions and less than significant for localized emissions.

Since construction activities would not occur on the Project Site, the No Project/No Build Alternative would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). Therefore, no impacts associated with the release of TACs would occur under this alternative. As such, TAC impacts under the No Project/No Build Alternative would be less when compared to the less than significant impacts of the Project.

Under the No Project/No Build Alternative, no impacts related to air quality during construction would occur, which would be less when compared to the less than significant impacts of the Project for localized emissions and less than significant with mitigation for regional emissions.

(2) Operation

The No Project/No Build Alternative would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of energy. Therefore, no operational air quality impacts associated with regional and localized emissions would occur under this alternative, which was determined to be significant and unavoidable for NO_X emissions under the Project.

The No Project/No Build Alternative would not result in new development or increase the intensity of the existing uses on the Project Site. Therefore, no new increase in mobile source emissions and their associated TACs would occur. No operational impacts associated with TACs would occur under the No Project/No Build Alternative, and such impacts would be less when compared to the less than significant impacts of Project.

Under the No Project/No Build Alternative, no impacts related to air quality during operation would occur, which would be less when compared to the significant and unavoidable impacts of the Project's NO_X emissions.

c. Cultural Resources

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, there are no historical resources on the Project Site. In addition, no demolition, grading, or other earthwork activities that could potentially affect adjacent or nearby historical resources would occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under the No Project/No Build Alternative, and impacts would be less than the Project. Additionally, there

would be no potential for this alternative to uncover subsurface archaeological resources. As such, no impacts to archaeological resources would occur, and impacts would be less when compared to the Project, which would be less than significant with mitigation.

d. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

a. Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, this alternative would not generate a short-term demand for energy during construction, and construction-related impacts to energy would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less than significant impacts of the Project.

b. Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, this alternative would not increase the long-term energy demand on the Project Site and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. As such, impacts under the No Project/No Build Alternative would be less when compared to the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project/No Build Alternative would not involve any new development. As such, the Project/No Build Alternative would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less than significant impacts of the Project.

e. Geology and Soils

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, the No Project/No Build Alternative would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, involving fault rupture, strong seismic shaking, seismic-related ground failure, and site stability, which could result in substantial adverse effects. As such, no impacts to geology and soils would occur under the No Project/No Build Alternative, and impacts would be less than the less than significant impacts of the Project.

With regard to paleontological resources, the No Project/No Building Alternative would not result in new development that would require grading or earthwork activities. Therefore, there would be no potential for this alternative to uncover subsurface paleontological resources. As such, no

impacts to paleontological resources would occur, and impacts would be less when compared to the Project, which would be less than significant.

f. Greenhouse Gas Emissions

The No Project/No Build Alternative would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated under this alternative, and new impacts associated with global climate change would not occur. As such, no impact associated with GHG emissions under the No Project/No Build would occur, and impacts would be less when compared to the less than significant impacts of the Project.

g. Hazards and Hazardous Materials

(1) Construction

The No Project/No Build Alternative would not result in any grading or development of the Project Site. There would be no potential for hazards to workers or the public due to construction materials and waste, underground storage tanks, or impacted soils and concrete. Therefore, no construction-related impacts with regard to hazards and hazardous materials would occur under this alternative. However, under the Project, impacts associated with hazardous materials during grading and site preparation activities were determined to be less than significant with implementation of regulatory requirements and compliance with the soil management plan (Project Design Features HAZ-PDF-1 and HAZ-PDF-2). This alternative would not result in remediation of the Project Site. Consequently, impacts would be greater than those of the Project, which would be less than significant.

(2) Operation

Under the No Project/No Build Alternative, the Project Site would remain vacant, and there would be no impact associated with building operations due to the routine transport, use, disposal, or upset and accident conditions. No impacts related to the implementation of any emergency response or evacuation plans would occur. Therefore, no impacts associated with hazardous materials under the No Project/No Build Alternative would occur, and impacts would be less when compared to the less than significant impacts of the Project with compliance with regulatory requirements.

h. Hydrology and Water Quality

(1) Construction

The No Project/No Build Alternative would not result in any grading or development of the property. There would be no potential erosion issues associated with grading and site preparation activities and no soil would be disturbed. As such, no impact associated with hydrology and water quality under the No Project/No Build Alternative would occur, and impacts would be less when

compared to the less than significant impacts of the Project., which would comply with an erosion control plan and soil management plan.

(2) Operation

The No Project/No Build Alternative would result in no grading or development of the property; therefore, no impacts to hydrology or water quality would occur. However, no drainage improvements or water quality features would be installed and runoff would continue to flow, untreated, into a Los Angeles County Flood Control District 93-inch storm drain adjacent to the northeast corner of the Project Site.

Therefore, water quality impacts, including erosion and sedimentation would be greater under this alternative because the site would not receive benefit from the stormwater drainage and water quality filtration features that would be constructed by the Project. Accordingly, no impact under this alternative would occur. However, this alternative would not result in beneficial water quality improvements, therefore, impacts associated with hydrology and water quality would be greater when compared to the less than significant impacts of the Project.

i. Noise

(1) Construction

Construction activities would not occur on the Project Site under the No Project/No Build Alternative. Therefore, no construction-related noise or vibration would be generated on-site or off-site. No impact associated with construction noise and vibration would occur under this alternative, and such impacts would be less when compared to the less than significant impacts of the Project.

(2) Operation

The No Project/No Build Alternative would not develop new uses on the Project Site, and no changes to the existing vacant site would occur. Therefore, no new stationary or mobile noise sources and vibration sources would be introduced to the Project Site. As such, no impacts associated with on-site or off-site operational noise and vibration would occur under this alternative, and impacts would be less than the Project, which are less than significant.

j. Transportation

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, this alternative would not generate any additional vehicle miles traveled (VMT) or alter existing access or circulation within the Project Site. Therefore, no impacts would occur with respect to potential conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; hazardous design features; and emergency access. As such, no impact would occur under the No Project/No Build Alternative, and impacts would be less when compared to the Project, which would be less than significant.

k. Tribal Cultural Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, there would be no potential for this alternative to uncover subsurface tribal cultural resources. As such, no impact to tribal cultural resources would occur, and impacts would be less when compared to those of the Project, which would be less than significant.

3. Comparison of Impacts

As evaluated above and shown in Table V-1, above, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impact with respect to operational-related air quality for NO_X emissions. Furthermore, this alternative would eliminate the Project's significant cumulative impact with respect to air quality. The No Project/No Build Alternative would also avoid the Project's remaining less than significant impacts, including archeological resources, energy, paleontological resources, GHG emissions, noise, transportation, and tribal cultural resource, as no changes to the existing conditions would occur. However, impacts associated with aesthetics; construction-related hazards and hazardous materials; and hydrology and water quality would be greater than the Project because it would not redevelop a vacant, underutilized site and the visual character and quality of the site would not benefit from the Project's improvements, Additionally, the Project would not result in hazardous materials remediation of the Project Site or result in improvements to surface water runoff quality by installing stormwater drainage and water quality filtration features.

4. Relationship of the Alternative to Project Objectives

As summarized in Table V-1, above, the No Project/No Build Alternative would not meet any of the underlying purpose of the Project or the Project Objectives. Specifically, this alternative would not meet the following objectives:

- Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and in proximity to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.
- Provide for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce.
- Provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.
- Improve pedestrian access, connectivity, and safety in proximity to residences and schools.

- Enhance the Project Site's visual aesthetics through redevelopment of a vacant and underutilized property

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy.

B. Alternative B: Existing Zoning Project

1. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative, analyzed above, may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines Section 15126.6(e)(3)(B) state that "If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this "no project" consequence should be discussed . . . and the analysis should identify the practical result of the project's non-approval…" CEQA Guidelines Section 15126(e)(3)(C) further states that the No Project Alternative should project "what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services." Based on this guidance, the Existing Zoning Alternative, considers development of the Project Site in accordance with the parameters set forth by the existing zoning on the Project Site.

The existing M2 zoning allows for industrial and commercial uses, which include retail uses. This alternative analyzes the construction of up to 150,000 square feet of retail uses under the M2 zoning requirements. Square footage for retail usage was determined based on a building coverage of approximately 25 percent of the net acreage of the site to allow for adequate parking.

2. Environmental Impacts

a. Aesthetics

The Existing Zoning Alternative would allow for the development of a 150,000 square foot retail development. As with the Project, this alternative would require approval of a conditional use permits (CUP), including a Major Development CUP, and site plan review to allow for the construction and operation of development exceeding 50,000 square feet of non-residential floor area. The impact area would be similar to that of the Project; although building square footage would be reduced, total lot coverage would be similar due to an increased area necessary for parking. The height would be reduced from the Project under this alternative (53 feet to 45 feet) and would be consistent with Framework Element Urban Form and Neighborhood Design. Additionally, this alternative, as with the Project would improve existing on-site conditions, which

are currently vacant and underutilized. Under the Existing Zoning Alternative, the Project site would have similar lighting and glare characteristics to those of the Project, which were determined to be less than significant. Therefore, aesthetic impacts associated with the Existing Zoning Alternative would be less than significant and similar to the Project's less than significant impacts.

b. Air Quality

(1) Construction

As with the Project, construction of the Existing Zoning Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under the Existing Zoning Alternative, the overall amount of building construction would be reduced in comparison to the Project because the building size would be reduced by approximately 56 percent. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the Project, which would be less than significant with mitigation and less than significant, respectively.

As with the Project, construction of the Existing Zoning Alternative would generate diesel particulate matter (DPM) emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to TAC emissions. Overall construction emissions generated by the Existing Zoning Alternative would be less than significant, and impacts would be less than the less than significant impacts of the Project because this alternative would require less overall construction.

(2) Operation

For the purpose of comparing the air quality impacts of the Existing Zoning Alternative to the Project, Linscott, Law & Greenspan Engineers calculated trip generation and VMT for this alternative (see Appendix I2 of this Draft EIR). The Existing Zoning Alternative would generate an increase in total daily trip ends of 5,663 daily trip ends with 141 in the a.m. peak hour, and 572 in the p.m. peak hour, resulting in 3,897 additional daily trip ends with a decrease of 97 trips in the a.m. peak hour and an increase of 358 trips in the p.m. peak hour compared to the Project. With

respect to VMT, the Existing Zoning Alternative would result in a decrease in total VMT by approximately 23 percent, from 43,444 with the Project to 34,444 with this alternative.

Similar to the Project, operational regional air pollutant emissions associated with the Existing Zoning Alternative would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. The Existing Zoning Alternative would result in a decrease VMT by approximately 23 percent when compared to the Project due to the proposed change in use from industrial warehouse to retail development and associated reduction in truck trips. As vehicular emissions depend on VMT, vehicular sources would result in a decrease in air emissions when compared to the Project. The Existing Zoning Alternative would also result in an overall square footage reduction compared to the Project, thereby reducing demand for electricity and natural gas when compared to the Project.[2] The reduction in emissions associated with the reduction in VMT, mobile source truck trips,[3] and building operation, would reduce NOx emissions below the NO_X regional significance threshold of 55. Therefore, impact associated with regional operational emissions would be less than that of the Project and would eliminate a significant and unavoidable impact.

With regard to on-site localized area source and stationary source emissions, the Existing Zoning Alternative would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with this alternative would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed above, the peak-hour intersection traffic volumes would be greater than the Project. Therefore, although impacts would remain less than significant, they would be greater than the less than significant impacts under the Project.

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include DPM emissions from delivery trucks. As this alternative would be smaller in size and would entail a retail development rather than an industrial warehouse, the number of delivery trucks would also be reduced in comparison to the Project. Similar to the Project, this alternative would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under the Existing Zoning Alternative would be less than significant, and less than the less than significant impacts of the Project.

Under the Existing Zoning Alternative, impacts related to air quality during operation would be less than significant and would eliminate the significant unavoidable impacts resulting from the Project's regional emission of NO_x, and, as such, impacts would be less than the significant unavoidable impacts of the Project.

[2] Based on CalEEMod rate for "Strip Mall or Shopping Center" compared to "General Light Industry."
[3] See Table IV.B-14 in Section IV.B, Air Quality, of this Draft EIR.

c. Cultural Resources

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, there are no historical resources on the Project site. Therefore, as with the Project, impacts to historical resources would not occur under the Existing Zoning Alternative, and impacts would be the same as the Project. With regard to archeological resources, the Existing Zoning Alternative would have a similar development footprint to that of the Project, resulting in the same construction impact area. Therefore, the potential for this alternative to uncover subsurface archaeological resources would be the same when compared to that of the Project. Nevertheless, this alternative would comply with the same regulatory requirements and conditions of approval as the Project in the event archeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant and would be similar to the Project, which would also be less than significant.

d. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

a. Construction

Similar to the Project, construction activities associated with the Existing Zoning Alternative would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources because construction of the Existing Zoning Alternative would comply with all applicable requirements relating to energy use. Therefore, short-term construction impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant under this alternative and less than the less than significant impacts of the Project with respect to the use and consumption of energy.

b. Operation

As with the Project, operation of the Existing Zoning Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. The Existing Zoning Alternative would result in an approximate 56-percent reduction in building size compared to that of the Project and result in a change in use from industrial warehouse to retail development. Therefore, the reduced size and change in proposed use would result in a lower net increase in electricity and natural gas consumption[4], and it is anticipated that

[4] Based on CalEEMod rate for "Strip Mall or Shopping Center" compared to "General Light Industry."

the existing energy distribution facilities in the Project Site area would have the capability to serve this alternative given the fact that existing service lines in the Project Site area would have sufficient capacity to serve the Project. Furthermore, the Existing Zoning Alternative would implement the same Project Design Features AQ-PDF-3 through AQ-PDF-6 as the Project to reduce energy usage. In terms of petroleum-based fuel usage, the total VMT generated by this alternative would be less in comparison to the Project due to the change in use from industrial to retail uses. However, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because operation of the Existing Zoning Alternative would comply with all applicable requirements relating to energy use. Therefore, operational impacts associated with the wasteful, inefficient, and unnecessary use of energy under this alternative would be less than significant and less than the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.D, Energy, of this Draft EIR, the current City's Green Building Code requires compliance with the CALGreen Code and California's Building Energy Efficiency Standards (Title 24). As with the Project, the Existing Zoning Alternative would comply with the City's Green Building Code, including the CALGreen Code and State energy standards under Title 24. The Existing Zoning Alternative would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans would be less than significant under the Existing Zoning Alternative, and impacts would be similar when compared to the less than significant impacts of the Project.

e. Geology and Soils

Under the Existing Zoning Alternative, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, seismic-related ground failure, and site stability would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type of land use proposed. As such, impacts related to geology and soils under this alternative would be less than significant and similar to the impacts of the Project, which are less than significant.

With regard to paleontological resources, the Existing Zoning Alternative would have a similar development footprint to that of the Project, resulting in the same construction impact area. Therefore, the potential for the Existing Zoning Alternative to uncover subsurface paleontological resources would be the same when compared to that of the Project. Nevertheless, this alternative would comply with the same regulatory requirements and conditions of approval as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant and would be the same as the Project's less than significant impact .

f. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated, VMT, and energy consumption from proposed land uses. As discussed above, the Existing Zoning Alternative would include a 150,000 square foot retail development. Therefore, under this alternative, the total energy and water consumption would decrease compared to the Project based on an approximate 56-percent reduction in square footage. Additionally, as discussed below, the number of vehicle trips and VMT generated by this alternative would be less than the Project. Thus, the amount of GHG emissions generated by the Existing Zoning Alternative would be less than the amount generated by the Project. As with the Project, this alternative would incorporate Project Design Features AQ-PDF-1 through AQ-PDF-6 to reduce GHG emissions and would be designed to comply with the CARB Scoping, SCAG's RTP/SCS, LA's Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. As such, impacts would be less than significant similar to the less than significant impacts of the Project.

g. Hazards and Hazardous Materials

The Existing Zoning Alternative would develop the site for retail uses and would use similar, if not the same, types of hazardous materials for the construction and operation as the Project. Similarly, the use and storage of hazardous materials would be regulated by the same federal, State, and local laws and permitting requirements as the Project. In addition, this alternative would include remediation of contaminated soils that exist on the Project Site during construction activities and would be required to implement a soils management plan (Project Design Features HAZ-PDF-1 and HAZ-PDF-2). With regard to emergency response plans, similar to the Project, the Existing Zoning Alternative would not require the closure of any public or private streets during construction or operation and would not impede emergency vehicle access to the Project Site or surrounding area. Therefore, as with the Project, this alternative would also result in less than significant impacts with implementation of regulatory requirements and Project Design Features HAZ-PDF-1 and HAZ-PDF-2, and impacts would be similar to the Project.

h. Hydrology and Water Quality

The Existing Zoning Alternative would reduce the total building square footage; however, the area of impervious surfaces would be the same as the proposed Project. Therefore, this alternative would result in similar runoff and potential for impacts to drainage, erosion, and water quality. As with the Project, this alternative would introduce new sources of water pollutants from construction and operation activities through the redevelopment of the Project Site. Clearing, grading, excavation, and construction activities would have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in stormwater runoff, while urban runoff can be generated from buildings and parking lots during operation. As with the Project, this alternative would be required to include storm drain facility improvements, source control, site design, and treatment control BMPs; comply with LID requirements; and implement the soil

management plan as identified in Project Design Features HAZ-PDF-1 and HAZ-PDF-2. Therefore, the Existing Zoning Alternative would result in impacts to hydrology and water quality that would be less than significant and similar to those that would occur from the Project, which were determined to be less than significant.

i. Noise

(1) Construction

The Existing Zoning Alternative would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation). The Existing Zoning Alternative would also require the same amount of excavation and soil export due to the required removal of the existing paving and foundations and remediation activities. Therefore, the Existing Zoning Alternative would have the same development impact area as the Project. However, the building construction and finishing phases would be reduced under the Existing Zoning Alternative to the Project because of an approximate 56-percent reduction in building size. As with the Project, construction of this alternative would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Due to the reduction in building size, the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under this alternative when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. The Existing Zoning Alternative would comply with the same applicable regulatory requirements and implement the same Project Design Features N-PDF-2 and N-PDF-6 as the Project to on-site noise and vibration levels during construction. The Existing Zoning Alternative would result in less than significant construction-related noise impacts less than the Project's less than significant impacts.

As discussed in Section IV.I, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation/demolition phase. As previously stated, the overall number of construction haul trucks and trips would be the same under this alternative; therefore, the maximum number of daily truck trips would be similar to the Project. Thus, it can be reasonably concluded that temporary noise impacts from off-site construction traffic generated by this alternative would be less than significant and similar to the Project.

(2) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of operational noise include (a) on-site stationary noise sources, such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the parking facilities, and truck loading dock operations, and truck and automobile movements across the Project Site; and (b) off-site mobile (roadway traffic) noise sources. Under the Existing Zoning Alternative, operational noise from loading docks would be

reduced as truck operations for retail uses would be less extensive than that for industrial uses. In addition, under this alternative, the proposed loading dock and trash collection areas would be located at the rear of buildings, screened from off-site noise sensitive receptors, and out of sight from public sidewalks. Similar to the Project, on-site mechanical equipment used during operation of the Existing Zoning Alternative would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). Thus, noise impacts from mechanical equipment and loading docks would be similar to the Project. There would be an increase in required parking spaces, under this alternative, which would result in a slight increase in parking lot activities. However, the overall stationary source noise levels generated by the Existing Zoning Alternative would be substantially similar to the less than significant impacts of the Project.

There would be a reduction in noise associated with the reduction in truck trips under the Existing Zoning. However, as discussed above, even though this alternative would increase all vehicle trips (truck and passenger) by 186 percent (from 1,975 to 5,663), it would result in 773 less truck trips (790 from to 17), which are higher noise generators. Therefore, off-site operational noise impacts would remain less than significant and less than the less than significant impacts of the Project.

j. Transportation

As with the Project, the Existing Zoning Alternative would be consistent with the City's Transportation Assessment Guidelines (TAG) aimed to address safety, sustainability, smart growth, and the reduction of GHG emissions in addition to traditional mobility considerations for the City of Los Angeles. As with the Project, this alternative would implement improvements to Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue to comply with Mobility Plan 2035's roadway standards and make the necessary dedications. Additionally, this alternative would improve access to the property and construct new pedestrian sidewalks along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue by including a 30-foot curb radius and standard access ramp in compliance with ADA requirements at the intersections of Vermont Avenue at Redondo Beach Boulevard and Redondo Beach Boulevard at Orchard Avenue. Loading zones would be situated similar to the Project at the rear of the buildings. Furthermore, this alternative would provide the required parking stalls, which would increase for the alternative, in addition to including electric vehicle spaces and bicycle parking stalls (short-term and long-term). Therefore, the Existing Zoning Alternative would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

With respect to VMT, the proposed uses under the Existing Zoning Alternative would result in 9.9 daily work VMT per employee (see Appendix I2 of this Draft EIR), which would not exceed the Harbor APC threshold of 12.3; however, this would be higher than the 9.7 daily work VMT per employee for the Project. Nonetheless, employee VMT impacts would be less than significant similar to the Project's less than significant impacts.

The Existing Zoning Alternative would have the same access as the Project. Similar to the Project, truck traffic would be diverted away from automobile traffic via two separate access driveways off of Vermont Avenue and Orchard Avenue. In addition, this alternative does not propose substantial changes to the street network surrounding and supporting the Project Site, such as the redesign or closure of major streets or increase hazards or impact emergency access due to design features. Therefore, the Existing Zoning Alternative would result in less than significant impacts related to hazardous design features and emergency access and would be similar to the less than significant impacts of the Project.

k. Tribal Cultural Resources

The Existing Zoning Alternative would have a similar development footprint to that of the Project, resulting in the same construction impact area. Therefore, the potential for this alternative to uncover subsurface tribal cultural resources would be the same when compared to that of the Project. Nevertheless, this alternative would implement the same City standard condition of approval as the Project in the event that tribal cultural resources are inadvertently uncovered during site grading activities. Therefore, impacts to tribal cultural resources would remain less than significant and would be similar to Project's less than significant impacts.

3. Comparison of Impacts

As evaluated above and shown in Table V-1, above, the Existing Zoning Alternative would eliminate the Project's significant and unavoidable operational air quality impact related to the exceedance of the regional significance threshold for NO_x. Air quality, GHG emissions, energy, and construction on-site noise and operational noise impacts would be less than the Project due to a shorter construction duration and a reduction the size of the building proposed under this alternative. Impacts associated with the remaining environmental issues, including aesthetics, cultural resources, , geology and soils, hazards and hazardous materials, hydrology and water quality, construction-related off-site noise, and tribal cultural resources, would be similar to the Project, while transportation impacts would be greater under the Existing Zoning Alternative due to additional VMTs generated by the retail use.

4. Relationship of the Alternative to Project Objectives

The Existing Zoning Alternative would develop the site with 150,000 square feet of retail uses, which is a 56-percent reduction in building size and operations. The Existing Zoning Alternative would not meet a majority of the Project's objectives. Specifically, this alternative would not:

- Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and relatively close to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.

- Provide for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce.

However, this alternative would meet some of the Project objectives, including:

- Provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.
- Improve pedestrian access, connectivity, and safety in proximity to residences and schools.
- Enhance the Project site's visual aesthetics through redevelopment of a vacant and underutilized property.

C. Alternative C: Reduced Project Alternative

1. Description of the Alternative

The Reduced Project Alternative would develop the same warehouse/manufacturing/ high-cube warehouse/distribution center, but the development would be reduced by approximately 25 percent. Specifically, under this alternative, the proposed building would be reduced from 340,298 square feet to 255,224 square feet with similar improved area for parking spaces and landscaped area. Vehicular access to the Project Site would remain the same with one right-in/right-out driveway on Vermont Avenue, one right-in/right-out driveway at Redondo Beach Boulevard, and two full access driveways at Orchard Avenue. Truck access would continue to occur at Vermont Avenue and the northerly Project driveway at Orchard Avenue.

This alternative would implement a similar building design and height and implement similar lighting, signage, vehicular and pedestrian access, and sustainability features as those proposed for the Project. This alternative would require the same discretionary approvals as the Project. Due to the reduced amount of construction, the duration of construction would be less than the Project.

2. Environmental Impacts

a. Aesthetics

The Reduced Project Alternative would allow for the development of a 255,224-square-foot warehouse/manufacturing/high-cube warehouse/distribution center with a 53-foot tall building. As with the Project, this alternative would require approval of two CUPs, including a Major Development CUP and a Commercial Corner Development CUP; site plan review; and zoning administrator's adjustment to allow for the construction and operation of industrial uses. The Reduced Project Alternative would have a smaller building footprint; however, as with the Project, this alternative would be consistent in height with the surrounding buildings and would be

consistent with the Framework Element. This alternative would also improve existing on-site conditions, which are currently vacant and underutilized. Under the Reduced Project Alternative, the Project Site would have similar lighting and glare characteristics similar to those of the Project, which were determined to be less than significant. Therefore, aesthetic impacts associated with the Reduced Project Alternative would be less than significant and similar to the Project's less than significant impacts.

b. Air Quality

(1) Construction

As with the Project, construction of the Reduced Project Alternative has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.B, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under the Reduced Project Alternative, the overall amount of building construction would be reduced in comparison to the Project because the building size would be reduced by 25 percent. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the Project, which has less than significant with mitigation and less than significant impacts, respectively.

As with the Project, construction of the Reduced Project Alternative would generate DPM emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would result in less than significant impacts with regard to TAC emissions. Overall construction emissions generated by the Reduced Project Alternative would be less than those of the Project because this alternative would require less overall construction. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under the Reduced Project Alternative would be less when compared to the less than significant impacts of the Project. Overall construction emissions generated by the Reduced Project Alternative would be less than significant, and impacts would be less than the less than significant impacts of the Project because this alternative would require less overall construction.

(2) Operation

Similar to the Project, operational regional air pollutant emissions associated with the Reduced Project Alternative would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. The Reduced Project Alternative would result in fewer daily trips and

VMT than the Project. As vehicular emissions depend on the number of trips, vehicular sources would result in a reduction in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. However, even with a 25-percent reduction in mitigated emissions (with implementation of Mitigation Measures AQ-MM-3 through AQ-MM-6), this alternative's operational phase emissions would result in approximately 137 pounds per day of NO_X[5], which would still exceed the regional significance threshold of 55 pounds per day. Therefore, impacts associated with regional operational emissions would be less than the Project but would remain significant and unavoidable.

With regard to on-site localized area source and stationary source emissions, as with the Project, the Reduced Project Alternative would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with this alternative would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. As discussed further below, the number of net new peak-hour trips generated with the Reduced Project Alternative would be less than the Project. Therefore, impacts would be less than significant and less than the Project's less than significant impacts.

As discussed in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include DPM emissions from transport trucks. As this alternative would be smaller in size, the number of transport trucks would also be reduced in comparison to the Project. Similar to the Project, this alternative would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under the Reduced Project Alternative would be less than significant and less than the less than significant impacts of the Project.

Under the Reduced Project Alternative, impacts related to air quality during operation would be significant and unavoidable from the Project's regional emission of NO_x, and impacts would be similar to those of the Project.

c. Cultural Resources

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, there are no historical resources on the Project site. Therefore, as with the Project, impacts to historical resources would not occur under the Reduce Project Alterative, and impacts would be the same as the Project. With regard to archeological resources, the Reduced Project Alternative would construct a smaller building but would have the same construction impact area. Therefore, the potential for the Reduced Project Alternative to uncover subsurface archaeological resources would be the same when compared to that of the Project. Nevertheless, this alternative would comply with the same

[5] *Air Quality and Greenhouse Gas Emissions Technical Modeling, PlaceWorks, February 17, 2020*

regulatory requirements and conditions of approval as the Project in the event archeological resources are uncovered during site grading activities. Therefore, impacts to archeological resources would remain less than significant and would be similar to the Project, which would also be less than significant.

d. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

a. Construction

Similar to the Project, construction activities associated with the Reduced Project Alternative would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Furthermore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources because construction of the Reduced Project Alternative would comply with all applicable requirements relating to energy use. Therefore, short-term construction impacts associated with the wasteful, inefficient, and unnecessary use of energy would be less than significant under this alternative and similar to the less than significant impacts of the Project.

b. Operation

As with the Project, operation of the Reduced Project Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based fuels compared to existing conditions. The Reduced Project Alternative would result in a 25-percent reduction in building size compared to that of the Project. Therefore, the reduced size would result in a lower net increase in electricity and natural gas consumption, and it is anticipated that the existing energy distribution facilities in the Project Site area would have the capability to serve this alternative given the fact that existing service lines in the Project Site area would have sufficient capacity to serve the Project. Furthermore, the Reduced Project Alternative would implement the same Project Design Features AQ-PDF-3 through AQ-PDF-6 as the Project to reduce energy usage. In terms of petroleum-based fuel usage, the total VMT generated by this alternative would be less in comparison to the Project due to the reduction in square footage. As with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under this alternative would not be wasteful, inefficient, or unnecessary because operation of the alternative would comply with all applicable requirements relating to energy use. Therefore, operational impacts associated with the wasteful, inefficient, and unnecessary use of energy under this alternative would be less than significant and similar to the less than significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.D, Energy, of this Draft EIR, the current City's Green Building Code requires compliance with the CALGreen Code and California's Building Energy Efficiency Standards (Title 24). As with the Project, the Reduced Project Alternative would comply with the City's Green Building Code, including the CALGreen Code and State energy standards under Title 24. The Reduced Project Alternative would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans would be less than significant under the Reduced Project Alternative, and impacts would be similar when compared to the less than significant impacts of the Project.

e. Geology and Soils

Under the Reduced Project Alternative, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, seismic-related ground failure, and site stability would be similar to those under the Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type of land use proposed. As such, impacts related to geology and soils under this alternative would be less than significant and similar to the impacts of the Project, which are less than significant.

With regard to paleontological resources, the Reduced Project Alternative would have the same development impact area as the Project. Therefore, the potential for the Reduced Project Alternative to uncover subsurface paleontological resources would be the same when compared to that of the Project. Nevertheless, this alternative would comply with the same regulatory requirements and conditions of approval as the Project in the event paleontological resources are uncovered during site grading activities. Therefore, impacts to paleontological resources would remain less than significant and would be the same as the Project's less than significant impact.

f. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated, VMT, and energy consumption from proposed land uses. As discussed above, the Reduced Project Alternative would include the same use with a 25-percent reduction in building size. Therefore, under this alternative, the total energy and water consumption would be reduced proportionally compared to the Project. Additionally, as discussed below, the number of vehicle trips and VMT generated by this alternative would be less than the Project. Thus, the amount of GHG emissions generated by the Reduced Project Alternative would be less than the amount generated by the Project. As with the Project, this alternative would incorporate Project Design Features AQ-PDF-1 through AQ-PDF-6 to reduce GHG emissions and would not conflict with the CARB Scoping, SCAG's RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Thus, impacts related to GHG emissions under this alternative would be less than the significant, and impacts would be less than the Project's less than significant impacts.

g. Hazards and Hazardous Materials

The Reduced Project Alternative would develop the Project Site for warehouse/manufacturing/high-cube warehouse/distribution center, and, therefore, the same type of hazardous materials typically used for construction and operation of the proposed Project would be used under the Reduced Project Alternative. Similarly, the use and storage of hazardous materials would be regulated by the same federal, State, and local laws and permitting requirements as the Project. In addition, this alternative would include remediation of contaminated soils that exist on the Project Site during construction activities and would be required to implement the same soils management plan (Project Design Features HAZ-PDF-1 and HAZ-PDF-2). With regards to emergency response plans, similar to the Project, the Reduced Project Alternative would not require the closure of any public or private streets during construction or operation and would not impede emergency vehicle access to the Project Site or surrounding area. Therefore, as with the Project, this alternative would also result in less than significant impacts with implementation of regulatory requirements and Project Design Features HAZ-PDF-1 and HAZ-PDF-2, and impacts would be similar to the Project.

h. Hydrology and Water Quality

The Reduced Project Alternative would reduce the total building square footage; however, the area of impervious surfaces would be similar when compared to the proposed Project. Therefore, this alternative would result in similar runoff and potential for impacts to drainage, erosion, and water quality. As with the Project, this alternative would introduce new sources of water pollutants from construction and operation activities through the redevelopment of the Project Site. Clearing, grading, excavation, and construction activities would have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in stormwater runoff, while urban runoff can be generated from buildings and parking lots during operation. Additionally, as with the Project, this alternative would be required to include storm drain facility improvements, source control, site design, and treatment control BMPs; comply with LID requirements; and implement the soil management plan as identified in Project Design Features HAZ-PDF-1 and HAZ-PDF-2. Therefore, the Reduced Project Alternative would result in impacts to hydrology and water quality that would be less than significant and are similar to those that would occur from the Project, which were determined to be less than significant.

i. Noise

(1) Construction

The Reduced Project Alternative would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation). The Reduced Project Alternative would also require the same amount of excavation and soil export due to the required removal of the existing paving and foundations and remediation activities. Therefore, the Reduced Project Alternative would have the same general development impact area as the Project. However, the building construction and finishing phases would be

reduced under the Reduced Project Alternative compared to the Project because of a 25-percent reduction in building size. As with the Project, construction of this alternative would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Due to the reduction in building size, the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under this alternative when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. The Reduced Project Alternative would comply with the same applicable regulatory requirements and implement the same Project Design Features N-PDF-2 and N-PDF-6as the Project to on-site noise and vibration levels during construction. The Reduced Project Alternative would result in less than significant construction-related noise impacts less than the Project's less than significant impacts.

As discussed in Section IV.I, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation/demolition phase. As previously stated, the overall number of construction haul trucks and trips would be the same under this alternative, therefore, the maximum number of daily truck trips would be similar to the Project. Thus, it can be reasonably concluded that temporary noise impacts from offsite construction traffic generated by this alternative would be less than significant and also similar to the Project.

(2) Operation

As described in Section IV.I, Noise, of this Draft EIR, sources of operational noise include (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the parking facilities, and truck loading dock operations, and truck and automobile movements across the Project Site; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of the Reduced Project Alternative would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). In addition, under this alternative, the proposed loading dock and trash collection areas would be located in the same general location and screened from off-site noise sensitive receptors. As with the Project, this alternative requires all loading and unloading at the Project site to occur at the rear of the building, along the north side of the Project Site adjacent to the Union Pacific Railroad right-of-way and out of sight from public sidewalks. Thus, noise impacts from mechanical equipment and loading docks would also be similar to the Project. There would be a proportional reduction in parking spaces, under this alternative, which would result in a slight reduction in parking lot activities. However, the overall noise levels generated by the Reduced Project Alternative would be substantially similar to the Project. As such, on-site noise impacts under this alternative would be less than significant and similar to the less than significant impacts of the Project.

As discussed further below, the Reduced Project Alternative would result in approximately 25-percent fewer daily vehicle trips than the Project. Accordingly, off-site noise impacts associated with traffic would be less than significant, and impacts would be less than the Project's-less-than significant impacts.

j. Transportation

Similar to the Project, the Reduced Project Alternative would improve access to the property by providing roadway dedications and physical improvements along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue. This alternative would also construct new pedestrian sidewalks along Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue by including a 30-foot curb radius and standard access ramp in compliance with ADA requirements at the intersections of Vermont Avenue at Redondo Beach Boulevard and Redondo Beach Boulevard at Orchard Avenue.

As with the Project, the Reduced Project Alternative would be consistent with the City's TAG aimed to address safety, sustainability, smart growth, and the reduction of greenhouse gas emissions in addition to traditional mobility considerations for the City of Los Angeles. This alternative would implement improvements to Vermont Avenue, Redondo Beach Boulevard, and Orchard Avenue to comply with Mobility Plan 2035's roadway standards and make the necessary dedications. Loading docks would be situated similar to the Project at the rear of building with no curb-side passenger loading zone(s). Furthermore, this alternative would provide the required parking stalls, including electric vehicle spaces and bicycle parking stalls (short-term and long-term). Therefore, the Reduced Project Alternative would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be similar to the Project.

With respect to VMT, the proposed uses under the Reduced Project Alternative would result in a similar daily work VMT per employee of 9.7, because VMT and employees would be reduced by approximately 25 percent. Therefore, VMT impacts would not exceed the Harbor APC threshold of 12.3. Employee VMT impacts would be less than significant similar to the Project's less than significant impacts.

The Reduced Project Alternative would have the same access as the Project. Similar to the Project, truck traffic would be diverted away from automobile traffic via two separate access driveways off of Vermont Avenue and Orchard Avenue. In addition, this alternative does not propose substantial changes to the street network surrounding and supporting the Project Site, such as the redesign or closure of major streets or increase hazards or impact emergency access due to design features. Therefore, the Reduced Project Alternative would result in less than significant impacts related to hazardous design features and emergency access and would be similar to the less than significant impacts of the Project.

k. Tribal Cultural Resources

The Reduced Project Alternative would construct a smaller building but would have the same construction impact area. Therefore, the potential for this alternative to uncover subsurface tribal cultural resources would be the same when compared to that of the Project. Nevertheless, this alternative would implement the same City standard condition of approval as the Project in the event that tribal cultural resources are inadvertently uncovered during site grading activities. Therefore, impacts to tribal cultural resources would remain less than significant and would be similar to Project's less than significant impacts.

3. Comparison of Impacts

As evaluated above and shown in Table V-1, above, the Reduced Project Alternative would lessen the Project's significant and unavoidable impacts with respect to operational-related air quality but would not eliminate the Project's significant and unavoidable impact related to the exceedance of the regional significance threshold for NO_x. This alternative would also lessen impacts associated with construction-related regional and localized and operational localized air quality, energy, GHG emissions, and construction related on-site and operational off-site traffic noise due to a shorter construction duration and a reduction the size of the building proposed under this alternative. Impacts associated with the remaining environmental issues, including aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, construction related off-site and operational on-site stationary noise, transportation, and tribal cultural resources would be similar to the Project.

4. Relationship of the Alternative to Project Objectives

The Reduced Project Alternative would develop the site with 255,224 square feet of warehouse/manufacturing/high-cube warehouse/distribution center uses provided by the Project, which is a 25-percent reduction in building size and operations. As such, the Reduced Project Alternative would meet the Project's underlying objective to redevelop a vacant, underutilized property into a warehouse/manufacturing/high-cube warehouse/distribution center that provides jobs to the Harbor Gateway Community and provides goods to the regional economy, although to a lesser extent than the Project. In addition, with reduced development, the Reduced Project Alternative would meet the following objectives to a lesser degree than the Project:

- Provide for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce.
- Provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.

The Reduced Project Alternative would, however, meet the following objectives to the same extent than the Project:

- Develop a warehouse/manufacturing/high-cube warehouse/distribution center that is adjacent to nearby transportation infrastructure, such as Interstate 110 (I-110 or Harbor Freeway) and relatively close to the Ports of Long Beach and Los Angeles, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.
- Improve pedestrian access, connectivity, and safety in proximity to residences and schools.
- Enhance the Project site's visual aesthetics through redevelopment of a vacant and underutilized property.

D. Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should the No Project Alternative be the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining Alternatives.

Table V-1 provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above.

Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the alternatives indicates that the No Project/No Build and Existing Zoning Alternatives are environmentally superior. However, these alternatives satisfy the "no project" alternative under CEQA Guidelines 15126.6(e)(3). As stated above, should the No Project Alternative be the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining Alternatives. Therefore, in accordance with the CEQA Guidelines, the Reduced Project Alternative is the Environmentally Superior Alternative. This alternative represents a reduced density development that is in accordance with existing zoning and land use designations allowed within the Project Site. However, the Reduced Project Alternative would reduce, but not eliminate, the Project's significant and unavoidable operational air quality impact. All other impacts would be less than or similar to those of the Project.

Although the Reduced Project Alternative would reduce the Project's significant environmental impacts, it would not eliminate the Project's significant and unavoidable impact. In addition, Reduced Project Alternative would only partially meet the Project's objectives to provide the entitlements and framework for the development of warehouse uses that are responsive to local, regional, national, and international trade demands and commerce; and provide local economic benefits such as the creation of new employment opportunities and property tax revenues within the City of Los Angeles and Harbor Gateway.