
SECTION 5.0 ALTERNATIVES

5.1 INTRODUCTION

In compliance with CEQA Guidelines Section 15126.6(a), an EIR describes a range of reasonable alternatives to a proposed project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant environmental impacts identified for the Project. EIRs are also required to evaluate the comparative merits of the alternatives that are carried forward for consideration. This chapter of the EIR describes and evaluates project alternatives as required in the CEQA Guidelines.

Key provisions of the CEQA Guidelines on alternatives (Sections 15126.6[b], 15126.6(e) and 15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in this EIR.

- The discussion of alternatives shall focus on alternatives to the proposed project or its location which are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the proposed project objective, or would be more costly (Section 15126.6[b]);
- The specific alternative of “no project” shall also be evaluated along with its impact (Section 15126.6[e][1]);
- The “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the Draft EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6[e][2]);
- The range of alternatives required in a Draft EIR is governed by the “rule of reason” that requires the Draft EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. Of those alternatives, the Draft EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the proposed project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (Section 15126.6[f]);
- [For alternative locations,] only locations that would avoid or substantially lessen any of the significant effects of the proposed project need be considered for inclusion in the Draft EIR (Section 15126.6[f][2][A]);
- If the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the

Draft EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (Section 15126.6[f][2][B]); and

- A Draft EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the Project is considered and evaluated in this EIR. These alternatives were developed during project planning and environmental review. The discussion in this section provides the following:

- A description of alternatives considered;
- A comparative analysis of the alternatives under consideration and the Project. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the Project to a less than significant level; and
- An analysis of whether the alternatives meet most of the objectives of the Project.

5.2 PROJECT OBJECTIVES

As described originally in Chapter 3 of this EIR, the Project is being proposed to meet the following objectives:

- OBJ-1: Provide a state of the art, secure storage solution that would meet the increased demand in the Long Beach area, especially for secure, RV storage.
- OBJ-2: Develop the Project Site in an environmentally sensitive manner, including through the implementation of current codes and building standards that require water efficiency and energy efficiency, as well as through the implementation of water quality best management practices, native drought tolerant landscaping, and other water conservation standards.
- OBJ-3: Develop the Project Site in a manner that improves existing site conditions through the implementation of a Response Plan, under the California Land Reuse and Revitalization Act of 2004 (CLRRA), to address historical site contamination from metals, total petroleum hydrocarbons, and volatile organic compounds, which includes the preparation of a Soil Management Plan and construction of an engineered surface cap to prevent future exposure to hazardous materials, install of building protection systems under the Project's buildings and installation of subsurface venting systems, (passive with the capability of making active) beneath the Project's buildings and parking areas, to mitigate potential exposure to methane and soil vapor, and installation of groundwater monitoring wells and perimeter soil vapor probes to monitor subsurface conditions.
- OBJ-4: Construct and operate a self-storage building and self-storage units in order to adequately serve the increased demand in the Long Beach area.
- OBJ-5: Locate the Project near the I-405 freeway in order to provide adequate vehicular access to the Project Site and to reduce vehicular travel through residential neighborhoods or heavily trafficked City roadways.
- OBJ-6: Provide sufficient parking to accommodate long-term RV storage stalls and an onsite private car wash for the recreational vehicles and other customer vehicles.
- OBJ-7: Provide short-term and long-term employment opportunities and generate tax and other revenue for the City.

- OBJ-8: Develop the Project Site with a project that is economically feasible.

5.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the Project objectives, listed above, while reducing one or more of the significant and unavoidable impacts of the Project. Based on the analysis contained in Sections 4.1 through 4.17 of this EIR, all potential impacts related to Project implementation would be reduced to less than significant levels; no significant and unavoidable impacts would occur.

5.4 SELECTION OF ALTERNATIVES

The range of alternatives and methods for selection is governed by CEQA and applicable CEQA case law. As stated in the CEQA Guidelines Section 15126.6(a), the lead agency is responsible for selecting a range of alternatives and must disclose its reasoning for selecting those alternatives. This chapter includes the range of project alternatives that have been selected by the City as lead agency for examination, as well as its reasoning for selecting these alternatives.

As stated in Section 15126.6(a) of the CEQA Guidelines, there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. This rule is described in Section 15126.6(f) of the CEQA Guidelines and requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. As defined in Section 15126.6(f), the rule of reason limits alternatives analyzed to those that would avoid or substantially lessen one or more of the significant effects of a project. Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other relevant provisions in the CEQA Guidelines state that EIRs do not need to consider every conceivable alternative to a project, nor are they required to consider alternatives that are infeasible.

5.4.1 ALTERNATIVES CONSIDERED BUT REJECTED

The CEQA Guidelines require that an EIR identify alternatives that were considered by the lead agency but rejected as infeasible along with a brief explanation of the reasons underlying this determination. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are:

1. Failure to meet most of the basic project objectives,
2. Infeasibility, or
3. Inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6(c)).

In accordance with 15126.6(c) of the CEQA Guidelines, alternatives were considered by the City but rejected from further analysis due to one or more of the above reasons. A description of each alternative and the rationale for it being rejected from further consideration is provided below.

Parkland Alternative

The City considered the potential for a Parkland Alternative, which would involve most or all of the Project Site being developed as public open space. Conceptually, this alternative would involve development of the Project Site with recreational uses including active and passive park facilities such as trails, picnic areas, playgrounds and tot lots, landscaped areas, and natural open

space. The Project Site would need to be remediated prior to being developed for open space recreational use.

In April 2021, the City of Long Beach City Manager's Office developed the City of Long Beach Park Acquisition Feasibility Report (Feasibility Report) to study the feasibility of acquiring open space for park development along the LA River consistent with the 2007 Long Beach Riverlink Plan and the 2007 Lower LA River Master Plan (City of Long Beach 2021) (both discussed in Section 4.10, Land Use and Planning). The Feasibility Report ultimately determined that the Project Site is not recommended for parkland development (City of Long Beach 2021). The Feasibility Report concluded that the Project Site's "location in terms of access, contamination and surrounding land uses (freeways, the river, Metro light rail tracks) renders it an auto-oriented property that prevents pedestrian compatibility by default" (City of Long Beach 2021). Moreover, the Feasibility Report identified that "eminent domain would likely be needed to create a public park as the property is not listed for sale [;] should eminent domain be the process by which the property is acquired, many grant funding sources would be unavailable, as many of them prohibit using grant funds for eminent domain." (City of Long Beach 2021). No public agency at this time has identified sufficient funding sources to acquire and remediate the Project Site, which was and remains a privately owned property, nor has the City or any other public agency sought to acquire the Project Site. Accordingly, development of the Project Site for public open space is infeasible at the Project Site at this time. Therefore, the Parkland Alternative is not feasible.

Additionally, objectives of the Project involve the development of a storage facility which would thereby support the increased demand for such facilities in the City. The lack of future development would not support key Project Objectives. Specifically, the Parkland Alternative would not support the following six out of the eight Project Objectives to the same degree as the Project:

- OBJ-1: Provide a state of the art, secure storage solution that would meet the increased demand in the Long Beach area, especially for secure, RV storage.
- OBJ-4: Construct and operate a self-storage building and self-storage units in order to adequately serve the increased demand in the Long Beach area.
- OBJ-5: Locate the Project near the I-405 freeway in order to provide adequate vehicular access to the Project Site and to reduce vehicular travel through residential neighborhoods or heavily trafficked City roadways.
- OBJ-6: Provide sufficient parking to accommodate long-term RV storage stalls and an onsite private car wash for the recreational vehicles and other customer vehicles.
- OBJ-7: Provide short-term and long-term employment opportunities and generate tax and other revenue for the City.
- OBJ-8: Develop the Project Site with a project that is economically feasible.

In summary, the Parkland Alternative is not feasible at this time, and the Parkland Alternative would also not meet six out of eight Project Objectives. Therefore, further analysis of the Parkland Alternative is not provided in this EIR.

Alternative Project Site Alternative

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the Project Site. As stated in Section 15126.6(f)(2)(A), the first step in analyzing alternative sites is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid

or substantially lessen any of the significant effects of the project need to be considered in the EIR. Given that there are no significant and unavoidable impacts associated with the Project, the Alternative Site would not substantially lessen or avoid the impacts of the Project. According to a GIS review conducted by the City in 2023, there are sites within the City of approximately equivalent size to the Project Site that could be developed or redeveloped as a self storage and RV storage project; however, the Project Applicant does not own or control other sites within the City of comparable land area. One of the factors for feasibility of an alternative is “whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (CEQA Guidelines Section 15126.6(f)(1)).” As such, obtaining another site of a similar size is not considered feasible.

Moving the Project to an alternative site also would not support key Project Objectives. Specifically, the Alternative Site would not support the following objectives to the same degree as the Project:

- OBJ-2: Develop the Project Site in an environmentally sensitive manner, including through the implementation of current codes and building standards that require water efficiency and energy efficiency, as well as through the implementation of water quality best management practices, native drought tolerant landscaping, and other water conservation standards.
- OBJ-3: Develop the Project Site in a manner that improves existing site conditions through the implementation of a Response Plan, under the California Land Reuse and Revitalization Act of 2004 (CLRRA), to address historical site contamination from metals, total petroleum hydrocarbons, and volatile organic compounds, which includes the preparation of a Soil Management Plan and construction of an engineered surface cap to prevent future exposure to hazardous materials, install of building protection systems under the Project’s buildings and installation of subsurface venting systems, (passive with the capability of making active) beneath the Project’s buildings and parking areas, to mitigate potential exposure to methane and soil vapor, and installation of groundwater monitoring wells and perimeter soil vapor probes to monitor subsurface conditions.
- OBJ-5: Locate the Project near the I-405 freeway in order to provide adequate vehicular access to the Project Site and to reduce vehicular travel through residential neighborhoods or heavily trafficked City roadways.
- OBJ-8: Develop the Project Site with a project that is economically feasible.

As noted, there are numerous benefits of locating the Project on the Project Site, including that the Project Site will be remediated after decades of environmental contamination, will be developed in an environmental responsible manner, will be appropriately located near the I-405 freeway to minimize Project trips on City roadways, and will develop the Project Site in an economically feasible manner. For these reasons, the Alternative Site is not carried forward for further consideration.

5.4.2 ALTERNATIVES CARRIED FORWARD FOR CONSIDERATION

Pursuant to Section 15126.6 of the CEQA Guidelines, the City selected a reasonable range of alternatives to the Project that might avoid or substantially lessen one or more of the effects of the Project. The two alternatives are described below in sufficient detail to allow for meaningful evaluation, analysis, and comparison of the alternatives with the Project.

No Project Alternative

As required by CEQA Guidelines Section 15126.6(e)(1), a No Project Alternative was considered. The No Project Alternative assumes no further development would occur on the Project Site. The Project Site would continue to exist under existing conditions, which involve continued use as undeveloped land. As discussed in Section 2.0, Introduction, and Section 3.0, Project Description, a 60,000 sf Surcharge Pile was created on the Project Site using 12,000 cy of imported clean soil. The creation of this Surcharge Pile, including earth disturbance and use of construction equipment, is assumed as part of the No Project Alternative. Under operation of the No Project Alternative, the Project Site would remain as it currently exists under existing conditions; the Surcharge Pile would remain in place and no future remediation activities as detailed in the RP would occur.

The No Project Alternative is feasible as it involves no change to the Project Site; however, the No Project Alternative would not meet any of the Project Objectives that are outlined above.

Comparison of the Effects of the No Project Alternative to the Project

Aesthetics

Under the No Project Alternative, the Surcharge Pile located at the Project Site would not be altered from its existing condition. Due to the limited height of the Surcharge Pile and the setbacks from public viewpoints, the No Project Alternative would not substantially detract from scenic vistas of the San Gabriel Mountains as seen from the I-405. Therefore, the No Project Alternative does not have potential to result in a substantial adverse effect on a scenic vista or to substantially damage scenic resources. Furthermore, the No Project Alternative would occur at the Project Site, which is not located near a State scenic highway; as such, the No Project Alternative would not damage scenic resources within a State scenic highway. The No Project Alternative would not involve the installation of nighttime lighting and would not result in a substantial increase in lighting in the area and would not have adversely affected nighttime views. Although no significant and unavoidable impacts were identified for the Project, the No Project Alternative would reduce impacts regarding aesthetics when compared to the Project because no further development would occur.

Air Quality

While the No Project Alternative would not involve future construction or related remediation activities, the No Project Alternative would involve the previously completed soil import and ground disturbance related to creation of the Surcharge Pile which resulted in a portion of the calculated air emissions associated with the Surcharge or Site Preparation phase as discussed in Section 4.2, Air Quality. No additional soil disturbance or construction activities would occur, and therefore there would be no additional air emissions associated with Project construction since no future development would occur under the No Project Alternative. Based on previous implementation of mitigation, which required the use of a combination of Tier 3 and Tier 4 engine emission standards for construction equipment during the Site Preparation phase, short-term construction impacts would be less than significant for the No Project Alternative.

Additionally, there would be no impact related to operational impacts because the No Project Alternative would not involve additional vehicular trips or land uses such as energy source emissions, landscape maintenance equipment, consumer products, or architectural coatings that would emit air emissions. The No Project alternative would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. Therefore, because the duration of construction-related emissions would be reduced, the No Project

Alternative would result in similar construction impacts over a shorter period of time, but reduced operational impacts when compared to the Project, which was found to have less than significant impacts with mitigation related to this resource topic.

Biological Resources

The No Project Alternative would involve the previously completed soil import and ground disturbance related to creation of the Surcharge Pile which impacted approximately 1,275 southern tarplant individuals on 1.7 acres on the Project Site, resulting in a significant impact requiring mitigation. As detailed in Section 4.3, Biological Resources, the Project would implement mitigation to reduce impacts to southern tarplant to less than significant levels. However, under the No Project Alternative, no further actions, including implementation of future mitigation, would occur and the impacts related to the loss of southern tarplant would be significant and unavoidable, which would be increased when compared to the Project.

Cultural Resources

The No Project Alternative would occur on the same site as the Project. As described in Section 4.4, Cultural Resources, of this EIR, the Project Site does not contain historic resources or known archaeological resources or human remains. During the Surcharge Activities, mitigation was implemented to reduce potential impacts of previously undiscovered resources. This mitigation reduced impacts to less than significant levels during the Surcharge Activities. The No Project Alternative would not require future grading within the Project Site or ground disturbance; therefore, there would be no potential to encounter or impact these resources under the No Project Alternative. Therefore, the No Project Alternative would have reduced impacts when compared to the Project which would have less than significant impacts with mitigation.

Energy

The Project Site is currently undeveloped and does not contain any energy intensive land uses. The Surcharge Activities involved energy consumption which represent a portion of the overall energy consumption required for construction of the Project, as evaluated in Section 4.5, Energy. The No Project Alternative would not require any future construction and would not introduce new infrastructure that would result in future energy demand at the Project Site. A nominal amount of energy consumption would continue related to the small number of existing trips associated with security activities at the Project Site; these trips would continue as part of the No Project Alternative. Therefore, the No Project Alternative would result in reduced Energy impacts compared to the Project, which would require energy use associated with the construction and operation of the Project and would result in less than significant impacts related to this resource topic.

Geology and Soils

The No Project Alternative would occur on the same site as the Project. As described in Section 4.6, Geology and Soils, of this EIR, the Project Site is located within the Southern California region, which is subject to secondary effects from earthquake; however, the Project Site itself is not located within an earthquake fault zone or above an active fault. The Project Site is subject to liquefaction and lateral setting. The No Project Alternative involved the import of soil to create the Surcharge Pile which is designed to mimic the weight of a multi-story structure; however, no additional grading or ground disturbance would occur. As such, since no future grading or ground disturbance would occur under the No Project Alternative, as well as because the No Project Alternative would not add new structures, it would have reduced impacts when compared to the

Project related to geology and soils, which would result in less than significant impacts with mitigation incorporated.

Greenhouse Gas Emissions

The Project Site is currently undeveloped. Construction activities associated with the Surcharge Pile emitted GHG emissions, which represent a portion of the overall emissions required for construction of the Project, as evaluated in Section 4.7, Greenhouse Gas Emissions. The No Project Alternative would not require any future construction and would not introduce new infrastructure that would result in future GHG emissions at the Project Site. A nominal amount of GHG emissions would continue related to the small number of existing trips associated with security activities at the Project Site; these trips would continue as part of the No Project Alternative. Therefore, the No Project Alternative would result in reduced impacts compared to the Project, which would result in GHG emissions associated with the construction and operation of the Project and would result in less than significant impacts related to this resource topic.

Hazards and Hazardous Materials

The No Project Alternative would occur at the same Project Site as the proposed Project. As stated in Section 4.8, Hazards and Hazardous Materials, the Project Site and surrounding areas, including adjoining properties, have been historically used for oil development activities including oil production wells, evaporation and treatment ponds (sumps), and above ground storage tanks (ASTs) and an RP has been developed to remediate the Project Site. With the No Project Alternative, the RP would not be implemented and the Project Site would not be remediated.

Specifically, under the No Project Alternative, the engineered cap would not be constructed and none of the associated response actions would occur. As such, remediation activities would not be completed, and therefore impacts associated with hazards and hazardous materials would not be mitigated as they are with the Project, which determined to be less than significant with mitigation incorporated. Accordingly, the No Project Alternative would increase the impacts from hazards and hazardous materials with regard to this topic.

No future construction activities would occur under the No Project Alternative; therefore, additional hazardous materials typically used during construction beyond those used for the Surcharge Pile creation would not be required for this alternative and would not need to be handled, stored, or used on the Project Site.

The No Project Alternative would not involve future operations that would impair or interfere with an adopted emergency response plan or emergency evacuation plan, nor would it result in effects related to construction traffic or detours which could have a potential to affect emergency response. Additionally, the No Project would not increase hazards related to wildfire.

Because the No Project Alternative does not involve remediation of the Project Site, the No Project Alternative would result in increased impacts related to hazards and hazardous materials.

Hydrology and Water Quality

Like the Project, the No Project Alternative would include the creation of the Surcharge Pile, and a SWPPP was prepared and implemented during this activity which reduced impacts related to water quality to less than significant levels. Because the Surcharge Pile would remain onsite as part of the No Project Alternative, BMPs are required to be maintained and would remain in place in the future, and the non-structural BMPs, water quality monitoring, and other measures required by the SWPPP have been and would continue to be implemented. Although the nature of the

construction impacts would be similar to the Project, the quantity of impacts would be reduced due to the shortened construction timeframe and limited construction equipment that was used. For future operations, the No Project Alternative would not involve further site alteration beyond existing conditions and would not implement additional features related to stormwater retention and drainage improvements, including construction of the permanent LID system; therefore, the improvements associated with the Project would not be implemented.

The No Project Alternative would result in increased impacts related to Hydrology and Water Quality.

Land Use and Planning

The No Project Alternative would maintain the Project Site as an existing undeveloped area, which is surrounded by undeveloped land and industrial land uses; other uses in the vicinity include residential, park, and an elementary school. The Project Site does not serve as an access route between residential uses or other communities; therefore, no impacts related to this physical division of an established community would result from the No Project Alternative. Also, aside from the creation of the Surcharge Pile, the No Project Alternative would not alter any aspects of the Project Site, so there would be no new potential conflicts with any applicable land use plans or policies that could result from the No Project Alternative. The Surcharge Pile, which is intended to remain on-site, does not conflict with any land use plans or policies. However, the No Project Alternative would not assist in achieving any of the City's goals and policies related to economic development and remediation of contaminated sites. The Project was found to have less than significant impacts related to consistency with land use plans and policies. The No Project Alternative would not implement any remediation activities, which would be inconsistent with Goal 1.5, Policy 1.4 of the City's Open Space and Recreation Element and Development Goals 1, 3, 4 and 10, Protection Goals 3 and 4, and Remedial Action Goals 1 and 2 of the Public Safety Element. Therefore, the No Project Alternative would have an increased impact related to consistency with related plans and programs.

Noise

The No Project Alternative includes no future construction or operational activities; therefore, this alternative would not generate any future temporary or permanent increase in ambient noise levels in excess of established standards. As such, the No Project Alternative would result in reduced impacts related to temporary construction noise impacts and permanent operational impacts when compared to the Project which would result in less than significant impacts with mitigation incorporated related to this resource topic.

Population and Housing

The Project Site does not contain any housing; therefore, consistent with the Project, the No Project Alternative would not displace residents or necessitate new housing elsewhere. Under existing conditions, a limited number of staff are employed to provide security services that would continue with the No Project Alternative. Unlike the Project, the No Project Alternative would not create any additional jobs; therefore, the No Project Alternative would not create an increased demand for housing. However, as detailed in Section 4.12, Population and Housing, the increase in housing demand, population, and employment associated with the Project would be within local and regional projections. Given neither the Project nor the No Project Alternative would induce substantial unplanned population growth and would not displace substantial numbers of people or housing, these alternatives would have similar impacts related to this resource topic.

Public Services

Under the No Project Alternative, the Long Beach Fire Department, and Long Beach Police Department would continue to provide services consistent with existing conditions and there would likely not be any increase in calls for service. The Project would result in a minor increase in Fire Department and Police call volumes, responses, and may potentially increase response times. Additionally, development of the Project would result in a minor increase in non-emergency services provided by the Fire Department such as inspections, plan check, and community relations. However, given the number of employees for the Project, these increases would not create the need for new or expanded Fire or Police facilities. Similarly, since the Project does not propose housing and only a small number of jobs, the Project also has no impact on demand for schools, parks, or libraries. Therefore, the No Project Alternative would result in similar impacts related to public services when compared to the Project, which would result in less than significant impacts related to this resource topic.

Recreation

The existing Project Site contains undeveloped land. The No Project Alternative would involve no alterations or intensification of uses at the Project Site. Given that the No Project Alternative would not involve the addition of residential units, there would be no increase in the demand for or use of existing neighborhood and regional parks. However, unlike the Project, the No Project Alternative would not set aside an easement to provide public access to the L.A. River in the future if and when the neighboring LACFCD property is developed in the future as open space and/or recreation areas. The No Project Alternative would not create the potential for improved recreational use in the future. Therefore, the No Project Alternative would increase impacts related to recreation when compared to the Project, which would result in less than significant impacts related to this resource topic.

The No Project Alternative would result in increased impacts.

Transportation

The No Project Alternative would involve no alterations or intensification of uses at the Project Site, which currently generates a nominal number of daily trips and associated vehicle miles traveled, associated with security and maintenance operations. The No Project Alternative would not modify the existing transportation system; therefore, it would not result in any conflicts with programs, plans, ordinances, or policies addressing the circulation system, nor would this alternative result in any hazards related to geometric design features or incompatible uses. The existing Project Site would be served by existing driveways and parking facilities within the Project Site under the No Project Alternative. Emergency access is currently provided to the Project Site via an access driveway, which is adequate to allow for emergency access. Operation of the No Project Alternative would not conflict with programs, plans, or policies, nor would it change the land uses on the Project Site, or emergency access to the Project Site. Therefore, the No Project Alternative would not result in any transportation impacts. When compared to the Project, which would have less than significant impacts, the No Project Alternative would result in reduced impacts related to transportation.

Tribal Cultural Resources

The No Project Alternative would occur on the same site as the Project. As described in Section 4.16, Tribal Cultural Resources, of this EIR, the Project Site does not contain known tribal cultural resources. Nevertheless, during the Surcharge Activities, mitigation was implemented to reduce potential impacts of previously undiscovered resources. This mitigation reduced impacts to less

than significant levels during the Surcharge Activities. The No Project Alternative would not require future grading within the Project Site or ground disturbance; therefore, there would be no future potential to encounter or impact these resources under the No Project Alternative. Therefore, the No Project Alternative would have reduced impacts when compared to the Project which would have less than significant impacts with mitigation.

Utilities and Service Systems

The No Project Alternative would not require the installation of any new utilities that are proposed as part of the Project (Water, Wastewater, and Electricity/Telecommunications, Stormwater Detention Basin). As such, the No Project Alternative would not require or result in the relocation or construction of new or expanded utility systems. Also, the No Project Alternative would maintain existing waste generation rates from the Project Site and would not generate future construction and demolition debris. The Project would result in an increased demand for utilities which would require connection to existing utilities and construction of new utilities onsite. Overall, the No Project Alternative would result in reduced impacts related to utilities and service systems when compared to the Project which would result in less than significant impacts.

Conclusions

Avoid or Substantially Less the Significant Impacts of the Project

The No Project Alternative, when compared to the Project, would result in reduced impacts related to aesthetics, air quality, cultural resources, energy, geology and soils, GHG, noise, transportation, tribal cultural resources, and utilities and service systems; and the No Project Alternative, when compared to the Project, would result in increased impacts related to biology, hazards and hazardous materials, hydrology and water quality, land use, and recreation.

Attainment of Project Objectives

The No Project Alternative would not support any of the Project Objectives. Specifically, the No Project Alternative would not support the following objectives:

- OBJ-1: Provide a state of the art, secure storage solution that would meet the increased demand in the Long Beach area, especially for secure, RV storage.
- OBJ-2: Develop the Project Site in an environmentally sensitive manner, including through the implementation of current codes and building standards that require water efficiency and energy efficiency, as well as through the implementation of water quality best management practices, native drought tolerant landscaping, and other water conservation standards.
- OBJ-3: Develop the Project Site in a manner that improves existing site conditions through the implementation of a Response Plan, under the California Land Reuse and Revitalization Act of 2004 (CLRRA), to address historical site contamination from metals, total petroleum hydrocarbons, and volatile organic compounds, which includes the preparation of a Soil Management Plan and construction of an engineered surface cap to prevent future exposure to hazardous materials, install of building protection systems under the Project's buildings and installation of subsurface venting systems, (passive with the capability of making active) beneath the Project's buildings and parking areas, to mitigate potential exposure to methane and soil vapor, and installation of groundwater monitoring wells and perimeter soil vapor probes to monitor subsurface conditions.

- OBJ-4: Construct and operate a self-storage building and self-storage units in order to adequately serve the increased demand in the Long Beach area.
- OBJ-5: Locate the Project near the I-405 freeway in order to provide adequate vehicular access to the Project Site and to reduce vehicular travel through residential neighborhoods or heavily trafficked City roadways.
- OBJ-6: Provide sufficient parking to accommodate long-term RV storage stalls and an onsite private car wash for the recreational vehicles and other customer vehicles.
- OBJ-7: Provide short-term and long-term employment opportunities and generate tax and other revenue for the City.
- OBJ-8: Develop the Project Site with a project that is economically feasible.

Alternative 1 – Development According to Existing Land Use Designations Alternative

Alternative 1 would involve the maximum allowable development under the existing land use designations. The Project Site has a General Plan PlaceType (land use designation) of Neo-Industrial (NI) and a zoning designation of Light Industrial (IL). The NI General Plan land use designation allows for light industrial, clean manufacturing and offices; commercial uses accessory to creative business endeavor(s); and repurposed buildings with live/work artist studios. While a maximum height of 65 feet (ft) is allowed within the NI land use designation, MAP LU-8, Heights, within the City's General Plan Land Use Element identifies the maximum height of the existing Project Site as 40 ft (City of Long Beach 2019). Light Industrial (IL) zoning allows for a variety of land uses, including but not limited to urban agriculture uses, manufacturing uses, wholesale trade uses, laundry, cleaning and garment services, and professional office and institutional uses. A detailed description of all uses allowed within areas of the City zoned for IL can be found in Chapter 21.33.060 of the City's Municipal Code. Among other requirements, IL zoning development standards impose a minimum lot size of 15,000 square feet (sf); a maximum lot coverage of 55%; a maximum building height of 4 stories or 60 ft, whichever is more restrictive; and a maximum non-building structure height of 45 ft.

Under Alternative 1, the Project Site would be developed with up to 618,552 sf of light industrial uses in a maximum four-story, 40 ft tall structure that would not exceed 55% coverage, or 7.81 acres of the Project Site. Based on an average unit size of 120 square feet, Alternative 1 would contain approximately 5,154 units. Alternative 1 would also include a surface parking area to accommodate the approximate parking requirement for the land use of 2 spaces per 1,000 sf-GFA) (ORD 16-0025 Section 1, 2016, ORD-15-0010 Section 3, 2015), or approximately 1,238 parking spaces¹.

Comparison of the Effects of Alternative 1 to the Project

Aesthetics

Alternative 1 would construct a maximum 40 ft tall structure, resulting in similar visual impacts to the 44 ft tall self-storage building and associated RV storage proposed by the Project. Consistent with the proposed Project, the Project Site is not located near a State scenic highway and would not result in impacts to a resource within a State scenic highway. Also consistent with the Project, Alternative 1 would not result in a substantial adverse effect on a scenic vista or substantially damage scenic resources. Alternative 1 would be located in an urbanized area already subject to existing sources of night lighting; as such, night lighting would be similar to that under existing

¹ "Manufacturing, processing, packing, assembly and the like" use utilized to quantify parking requirements.

conditions and that proposed by the Project. Therefore, Alternative 1 would have similar impacts than the Project that would result in less than significant impacts.

Air Quality

Based on buildout of 618,552 sf of light industrial uses, Alternative 1 would construct a building that is approximately 3 times larger than the Project, thus requiring a longer or more intense construction phasing than the proposed Project. This would involve more equipment and longer durations than the Project, resulting in increased construction emissions when compared to the Project.

According to the Traffic Impact Analysis (TIA), prepared by Psomas, dated March 2024 (Psomas 2024), the self-storage building proposed as part of the Project would generate 300 vehicle trips. Given that Alternative 1 would construct a building that is approximately 3times larger, it is expected that additional vehicle trips would result. These additional trips would result in increased operational air quality impacts from mobile emissions sources when compared to the Project. Consistent with the Project, this alternative would not likely result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. Therefore, at minimum, Alternative 1 would result in increased construction air quality impacts and increased operational air quality impacts compared to the Project, which was found to have less than significant impacts with mitigation incorporated related to this resource topic. Moreover, given the scale of a 618,552 sf structure and the construction equipment and operational mobile source emissions associated with it, and because the IL zoning allows for more intensive industrial uses than the proposed CS zoning, it is possible that air quality emissions from Alternative 1 could be significant and unavoidable.

Biological Resources

Alternative 1 would involve the previously completed soil import and ground disturbance related to creation of the Surcharge Pile which impacted approximately 1,275 southern tarplant individuals on 1.7 acres on the Project Site, resulting in a significant impact requiring mitigation. Consistent with the Project, Alternative 1 would implement mitigation, as detailed in Section 4.3, Biological Resources, to reduce impacts to southern tarplant to less than significant levels. Further, it is assumed Alternative 1 would comply with all regulatory requirements related to construction activities proximate to nesting birds. Therefore, Alternative 1 would result in similar impacts when compared to the Project.

Cultural Resources

Alternative 1 would occur on the same site as the Project. As described in Section 4.4 of this EIR, the Project Site does not contain historic resources or known archaeological resources or human remains. During the Surcharge Activities, mitigation was implemented as part of Alternative 1 to reduce potential impacts of previously undiscovered resources. This mitigation reduced impacts to less than significant levels during the Surcharge Activities. Consistent with the Project, there is the possibility that undiscovered intact archaeological deposits may be present in undisturbed soil on the site. Alternative 1 would require grading within the Project Site and substantial ground disturbance; therefore, consistent with the Project, there would be potential to encounter or impact these resources and mitigation requiring monitoring during ground disturbing construction activities would be required to reduce impacts to less than significant levels. Similar to the Project, Alternative 1 would result in less than significant impacts with mitigation incorporated related to this resource topic.

Energy

The Project Site is currently undeveloped. Construction activities associated with the Surcharge Pile previously implemented as part of Alternative 1 involved energy consumption which represents a portion of the overall energy consumption required for construction of the Project, as evaluated in Section 4.5, Energy.

Based on buildout of 618,552 sf of light industrial uses, Alternative 1 would construct a building that is approximately 3 times larger than the Project and would require longer or more intense construction phasing than the proposed Project. This would involve more equipment or longer durations than the Project, resulting in increased energy consumption when compared to the Project.

Alternative 1 would result in increased daily trips during operational activities when compared to the Project. These additional trips would result in increased energy consumption when compared to the Project. Additionally, the substantially larger building would require more energy to sustain daily operations when compared to the Project. Therefore, Alternative 1 would result in increased construction impacts and increased operational impacts than the Project, which was found to have less than significant impacts related to this resource topic.

Geology and Soils

Alternative 1 would occur on the same site as the Project. As described in Section 4.6, Geology and Soils, of this EIR, the Project Site is located within the Southern California region, which is subject to secondary effects from earthquake; however, the Project Site itself is not located within an earthquake fault zone or above an active fault. Alternative 1 would be subject to the same potential impacts associated with liquefaction and lateral spreading as the Project; as such, similar mitigation would be required to reduce impacts to a less than significant level. Alternative 1 would involve substantial grading and ground disturbance, consistent with that of the proposed Project. As such, Alternative 1 would have similar impacts to the Project related to geology and soils, which would result in less than significant impacts with mitigation incorporated.

Greenhouse Gas Emissions

Based on buildout of 618,552 sf of light industrial uses, Alternative 1 would construct a larger building than the Project and would require longer or more intense construction phasing than the proposed Project. This would involve more equipment over longer durations than the Project, resulting in increased GHG emissions when compared to the Project.

Alternative 1 would result in increased daily trips during operational activities when compared to the Project. These additional trips would result in increased GHG emissions when compared to the Project. Additionally, the substantially larger building would require more energy and generate additional solid waste, resulting in increased operational GHG emissions to sustain daily operations when compared to the Project. Therefore, Alternative 1 would result in increased construction impacts and increased operational impacts than the Project, which was found to have less than significant impacts related to this resource topic.

Hazards and Hazardous Materials

Alternative 1 would occur at the same location as the proposed Project. As stated in Section 4.8, Hazards and Hazardous Materials, the Project Site and surrounding areas, including adjoining properties, have been historically used for oil development activities including oil production wells, evaporation and treatment ponds (sumps), and above ground storage tanks (ASTs) and an RP

has been developed to address remediation activities. Consistent with the Project, Alternative 1 involved the creation of the Surcharge Pile, similar to the Project. Like the Project, Alternative 1 would involve the implementation of the RP and defined remedial activities which would reduce impacts related to existing hazardous materials conditions.

Future construction activities would occur under Alternative 1, similar to the Project, and would involve the continued handling, transport, use, and storage of hazardous materials typically used during construction. Alternative 1 would also not involve future operations that would impair or interfere with an adopted emergency response plan or emergency evacuation plan, nor would it result in effects related to construction traffic or detours which could have a potential to affect emergency response. Additionally, Alternative 1 would not increase hazards related to wildfire.

Overall, Alternative 1 would have similar impacts related to hazards and hazardous materials when compared to the Project, which would result in less than significant impacts with mitigation incorporated.

Hydrology and Water Quality

Similar to the proposed Project, under Alternative 1 construction-related impacts to water quality would be minimized through implementation of structural and non-structural BMPs and preparation and implementation of a LID plan. Alternative 1 would generate additional runoff compared to the existing conditions, which would be managed on-site by a required LID plan consistent with the City's MS4 permit. This system would be sized appropriately and may include features similar to the Project, such as a stormwater detention system, which would prevent flooding on- or offsite and ensure the capacities of existing storm drains would not be exceeded. Although anticipated impacts would be similar to the Project, the number of improvements would be similar when compared to the Project; therefore, impacts would be similar when compared to the Project, which resulted in less than significant impacts.

Land Use and Planning

Alternative 1 would be constructed in the same location as the Project, which is surrounded by undeveloped land and industrial land uses; other uses in the vicinity include residential, park, and an elementary school. The Project Site does not serve as an access route between residential uses or other communities; therefore, no impacts related to this physical division of an established community would result from Alternative 1. Also, Alternative 1 would be consistent with the Project Site's PlaceType and zoning, and no new potential conflicts with any applicable land use plans or policies would result from Alternative 1, and no General Plan amendment or Zone Change would be needed as with the Project. The Project was found to have less than significant impacts related to consistency with land use plans and policies. Similarly to the Project, Alternative 1 would provide an easement for future pedestrian use, consistent with that proposed by the Project. As such, consistent with the Project, Alternative 2 would not conflict with the City of Long Beach General Plan, City of Long Beach Zoning Code, 2021-2029 Housing Element Update, Connect SoCal, Lower LA River Revitalization Plan, Los Angeles River Revitalization Master Plan (2007), LA River Master Plan (1996), LA River Master Plan (2022), Los Angeles County 2016 Parks Need Assessment, Los Angeles County 2022 Parks Needs Assessment Plus, Parks, Recreation and Marine Strategic Plan (2003), Parks, Recreation and Marine Strategic Plan (2022-2032), Riverlink, I-710 Corridor Community Livability Plan, The West Beach Livability Implementation Plan, City of Long Beach Open Space Acquisition Study, Bicycle Master Plan, and CX3 Pedestrian Plan. Although Alternative 1 would also result in less than significant impacts related to this threshold, Alternative 1 would not require the same approvals as detailed in Section 3.0, Project Description, when compared to the Project, however, this is not considered to be a

significant impact of the Project; therefore, impacts would be similar when compared to the Project.

Noise

Alternative 1 would involve construction that would generate noise that would be audible at nearby sensitive receptors and may be temporarily annoying in the absence of mitigation. Consistent with the Project, mitigation measures would be required to limit the noise from construction activities to nearby sensitive receptors and would reduce construction noise impacts to less than significant; however, construction noise would likely occur over a longer duration due to the increase in development with Alternative 1. Alternative 1 would generate an increased volume of daily trips when compared to the Project, therefore traffic noise generated by Alternative 1 would be increased when compared to traffic noise associated with the Project.

Population and Housing

The Project Site does not contain any housing; therefore, consistent with the Project, Alternative 1 would not displace residents or necessitate new housing elsewhere. Based on the development of up to 1,360,812 sf of light industrial uses, Alternative 1 would likely require additional employees when compared to the Project. The anticipated amount of employment may not exceed local or regional projections related because Alternative 1 would be consistent with its General Plan designation and zoning, the employment, population, and housing and would not result in a significant impact; however, the increase in employment, population, and housing would be greater when compared to the Project.

Public Services

Under Alternative 1, the Long Beach Fire Department, and Long Beach Police Department would continue to provide services at the Project Site. Under Alternative 1, new development would be introduced at the Project Site, resulting in a minor increase in fire protection and police protection, similar to the increase in demand associated with the Project. These increases in demand for services would be increased when compared to the Project. Consistent with the Project, Alternative 1 would not involve construction of housing, and would not result in increased demand for school services from Long Beach Unified School District, and indirectly generate increased demand for local or regional parks or libraries.

Recreation

Although Alternative 1 would not involve construction of housing, due to the anticipated increase in employment which would likely impact population in the City, it would indirectly result in increased demand for recreational facilities, including local or regional parks. These increases in demand for services would be increased when compared to the Project.

Transportation

Alternative 1 would generate increased daily trips, which would result in an increased amount of vehicle miles traveled (VMT) than is associated with the Project and an increased impact when compared to the Project. The number of vehicles accessing the site would be increased when compared to the Project, therefore, the City may require improvements to the existing access routes along Pacific Place or Ambeco Road; but it is expected that Alternative 1 would not result in any conflicts with programs, plans, ordinances, or policies addressing the circulation system, nor would this alternative result in any hazards related to geometric design features or

incompatible uses. Emergency access is currently provided to the Project Site via Pacific Place, and would continue to be provided via Pacific Place.

Tribal Cultural Resources

Alternative 1 would occur on the same site as the Project. As described in Section 4.16, Tribal Cultural Resources, the Project Site does not contain known tribal cultural resources. During the Surcharge Activities, mitigation was implemented as part of Alternative 1 to reduce potential impacts of previously undiscovered resources. This mitigation reduced impacts to less than significant levels during the Surcharge Activities. Consistent with the Project, there is the possibility that undiscovered resources may be present in undisturbed soil on the site. Alternative 1 would require grading within the Project Site and substantial ground disturbance; therefore, consistent with the Project, there would be potential to encounter or impact these resources and mitigation requiring monitoring during ground disturbing construction activities would be required to reduce impacts to less than significant levels. Both Alternative 1 and the Project would result in less than significant impacts with mitigation incorporated related to this resource topic.

Utilities and Service Systems

Based on buildout of 618,552 sf of light industrial uses, Alternative 1 would construct a larger building than the Project and would result in a higher demand for utilities than the proposed Project, including for water, wastewater, storm water drainage, electricity, natural gas, and landfills, beyond the existing condition. Consistent with the Project, new utility demands would be met through connections to existing utilities and implementation of sustainable sources including solar panels. Additionally, Alternative 1 would increase existing waste generation rates when compared to the Project and would potentially generate increased amounts of construction and demolition debris when compared to the Project, but would comply with all regulatory requirements regarding recycling and waste reduction, similar to the Project.

Conclusions

Avoid or Substantially Less the Significant Impacts of the Project

Alternative 1, when compared to the Project, would not result in reduced impacts related to any of the resources categories. Alternative 1, when compared to the Project, would result in increased impacts related to air quality, energy, GHG, operational noise, population and housing, public services, recreation, transportation, and utilities.

Attainment of Project Objectives

Alternative 1 would involve development of the site according to the current land use designation and zoning, which would support the majority of the identified Project Objectives. However, Alternative 1 would not specifically meet the identified demand for general storage or RV storage. Specifically, Alternative 1 would not support the following objectives:

- OBJ-1: Provide a state of the art, secure storage solution that would meet the increased demand in the Long Beach area, especially for secure, RV storage.
- OBJ-4: Construct and operate a self-storage building and self-storage units in order to adequately serve the increased demand in the Long Beach area.
- OBJ-6: Provide sufficient parking to accommodate long-term RV storage stalls and an onsite private car wash for the recreational vehicles and other customer vehicles.

Alternative 2 – Reduced RV Storage Alternative

Alternative 2 would involve development of the self storage building and associated parking lot, similar to the Project, but a reduced RV parking component. Alternative 2 would involve development of a four-story, 206,756-sf self-storage building consisting of approximately 1,681 self-storage units on four levels, same as for the Project. Ancillary uses would include one lobby, approximately 900 sf of leasing office, and two unisex restrooms on the first floor. Parking would include 27 standard automobile parking stalls and 5 ADA compliant stalls. Alternative 2 would develop the balance of the site with 350 RV parking spaces, approximately 65% of the spaces proposed by the Project, to increase the ease of circulation throughout the site as compared to the Project. All RV spaces would be pull-through and the spaces and drive aisles would be wider than the Project. No car wash would be developed as part of Alternative 2.

Similar to the Project, utility connections would occur and Low Impact Development (LID) plan features would be constructed. As part of the construction process, Alternative 2 would also implement the Response Plan as detailed in Section 3.0, Project Description, and Section 4.8, Hazards and Hazardous Materials. Therefore, it is assumed that Alternative 2 would result in full site disturbance.

Comparison of the Effects of Alternative 1 to the Project

Aesthetics

Alternative 2 would construct a 40-foot-tall structure with an additional 4-foot parapet, same as the Project, and would involve construction of the RV parking area and associated canopies. Therefore, although the amount of development is reduced because of the reduction in the number of RV parking spaces, the entire site would be disturbed and the overall height of development would be the same as with the Project. Visual impacts would therefore be similar to impacts associated with the Project, which were determined to be less than significant. Consistent with the proposed Project, the Project Site is not located near a State scenic highway and would not result in impacts to a resource within a State scenic highway. Also consistent with the Project, Alternative 2 would not result in a substantial adverse effect on a scenic vista or substantially damage scenic resources. Alternative 2 would be located in an urbanized area already subject to existing sources of night lighting; as such, night lighting would be similar to existing conditions and what is proposed by the Project. Alternative 2 would have similar impacts when compared to the Project, which would result in less than significant impacts.

Air Quality

Alternative 2 would construct a self-storage building similar to the Project, a reduced number of RV parking spaces, and would not include construction of a car wash. The reduction in overall development would require shorter or less intense construction phasing than the proposed Project. This would involve fewer pieces equipment and shorter durations than the Project, resulting in reduced construction emissions when compared to the Project.

Although vehicle trips would be the same for the self-storage building, the reduction in RV parking spaces would reduce the number of trips associated with that portion of the site when compared to the Project. This reduction in daily trips would result in reduced operational air quality impacts from mobile emissions sources, and specifically diesel emissions associated with the RV parking area, when compared to the Project. Consistent with the Project, this alternative would not likely result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. Therefore, Alternative 2 would result in reduced construction air quality impacts

and reduced operational air quality impacts compared to the Project, which was found to have less than significant impacts with mitigation incorporated related to this resource topic.

Biological Resources

Alternative 2 would involve the previously completed soil import and ground disturbance related to creation of the Surcharge Pile which impacted approximately 1,275 southern tarplant individuals on 1.7 acres on the Project Site, resulting in a significant impact requiring mitigation. Consistent with the Project, Alternative 2 would implement mitigation, as detailed in Section 4.3, Biological Resources, to reduce impacts to southern tarplant to less than significant levels. Further, it is assumed Alternative 2 would comply with all regulatory requirements related to construction activities proximate to nesting birds. Therefore, Alternative 2 would result in similar impacts when compared to the Project.

Cultural Resources

Alternative 2 would occur on the same site as the Project. As described in Section 4.4 of this EIR, the Project Site does not contain historic resources or known archaeological resources or human remains. During the Surcharge Activities, mitigation was implemented as part of Alternative 2 to reduce potential impacts of previously undiscovered resources. This mitigation reduced impacts to less than significant levels during the Surcharge Activities. Consistent with the Project, there is the possibility that undiscovered intact archaeological deposits may be present in undisturbed soil on the site. Alternative 2 would require grading within the Project Site and substantial ground disturbance; therefore, consistent with the Project, there would be potential to encounter or impact these resources and mitigation requiring monitoring during ground disturbing construction activities would be required to reduce impacts to less than significant levels. Both Alternative 2 and the Project would result in less than significant impacts with mitigation incorporated related to this resource topic. Alternative 2 would result in similar impacts.

Energy

The Project Site is currently undeveloped. Construction activities associated with the Surcharge Pile previously implemented as part of Alternative 2 involved energy consumption which represents a portion of the overall energy consumption required for construction of the Project, as evaluated in Section 4.5, Energy.

Based on buildout of the 206,756-sf self-storage building and a reduced RV parking area, overall development would be reduced for Alternative 2 when compared to the Project and would require shorter or less intense construction phasing than the proposed Project. This would involve a reduced number and type of equipment or shorter durations than the Project, resulting in reduced energy consumption when compared to the Project.

Alternative 2 would result in fewer daily vehicle trips during operational activities due to the reduction of RV parking spaces. The reduction in trips would result in reduced energy consumption when compared to the Project. Therefore, Alternative 2 would result in reduced construction impacts and reduced operational impacts than the Project, which was found to have less than significant impacts related to this resource topic. Alternative 2 would result in reduced impacts.

Geology and Soils

Alternative 2 would occur on the same site as the Project. As described in Section 4.6, Geology and Soils, of this EIR, the Project Site is located within the Southern California region, which is

subject to secondary effects from earthquake; however, the Project Site itself is not located within an earthquake fault zone or above an active fault. Alternative 2 would be subject to the same potential impacts associated with liquefaction and lateral spreading as the Project; as such, similar mitigation would be required to reduce impacts to a less than significant level. Alternative 2 would involve substantial grading and ground disturbance, consistent with that of the proposed Project. As such, Alternative 2 would have similar impacts to the Project related to geology and soils, which would result in less than significant impacts with mitigation incorporated.

Greenhouse Gas Emissions

Based on buildout of the 206,756-sf self-storage building and a reduced RV parking area, overall development would be reduced for Alternative 2 when compared to the Project and would require shorter or less intense construction phasing than the proposed Project. This would involve a reduction in equipment number over shorter durations than the Project, resulting in reduced GHG emissions when compared to the Project.

Alternative 2 would result in fewer daily trips during operational activities due to the reduction of RV parking spaces. The reduction in trips would result in reduced operational GHG emissions when compared to the Project. Therefore, Alternative 2 would result in reduced GHG emissions than the Project, which was found to have less than significant impacts with mitigation incorporated related to this resource topic.

Hazards and Hazardous Materials

Alternative 2 would occur at the same location as the proposed Project. As stated in Section 4.8, Hazards and Hazardous Materials, the Project Site and surrounding areas, including adjoining properties, have been historically used for oil development activities including oil production wells, evaporation and treatment ponds (sumps), and above ground storage tanks (ASTs) and an RP has been developed to address remediation activities. Consistent with the Project, Alternative 2 would involve the creation of the Surcharge Pile. Like the Project, Alternative 2 would involve the implementation of the RP and defined remedial activities which would reduce impacts related to existing hazardous materials conditions.

Future construction activities would occur under Alternative 2, similar to the Project, and would involve the continued handling, transport, use, and storage of hazardous materials typically used during construction. Alternative 2 would also not involve future operations that would impair or interfere with an adopted emergency response plan or emergency evacuation plan, nor would it result in effects related to construction traffic or detours which could have a potential to affect emergency response. Additionally, Alternative 2 would not increase hazards related to wildfire.

Overall, Alternative 2 would have similar impacts related to hazards and hazardous materials when compared to the Project, which would result in less than significant impacts with mitigation incorporated.

Hydrology and Water Quality

Similar to the proposed Project, under Alternative 2 construction-related impacts to water quality would be minimized through implementation of structural and non-structural BMPs and preparation and implementation of a LID plan. Alternative 2 would generate additional runoff compared to the existing conditions, which would be managed on-site by a required LID plan consistent with the City's MS4 permit. This system would be sized appropriately and may include features similar to the Project, such as a stormwater detention system, which would prevent flooding on- or offsite and ensure the capacities of existing storm drains would not be exceeded.

Because the same area would be subject to development, it is anticipated that the required stormwater system would be similar in size and capacity than what is proposed for the Project. Anticipated impacts would be similar to the Project, which would result in less than significant impacts.

Land Use and Planning

Alternative 2 would be constructed in the same location as the Project, which is surrounded by undeveloped land and industrial land uses; other uses in the vicinity include residential, park, and an elementary school. The site does not serve as an access route between residential uses or other communities; therefore, no impacts related to the physical division of an established community would result from Alternative 2. Alternative 2 would require similar approvals from the City of Long Beach and other Responsible Agencies, similar to the Project. The Project was found to have less than significant impacts related to consistency with land use plans and policies. Alternative 2 would develop similar land uses to the Project and would provide an easement for future pedestrian use, consistent with that proposed by the Project. As such, consistent with the Project, Alternative 2 would not conflict with the City of Long Beach General Plan, City of Long Beach Zoning Code, 2021-2029 Housing Element Update, Connect SoCal, Lower LA River Revitalization Plan, Los Angeles River Revitalization Master Plan (2007), LA River Master Plan (1996), LA River Master Plan (2022), Los Angeles County 2016 Parks Need Assessment, Los Angeles County 2022 Parks Needs Assessment Plus, Parks, Recreation and Marine Strategic Plan (2003), Parks, Recreation and Marine Strategic Plan (2022-2032), Riverlink, I-710 Corridor Community Livability Plan, The West Beach Livability Implementation Plan, City of Long Beach Open Space Acquisition Study, Bicycle Master Plan, and CX3 Pedestrian Plan. Alternative 2 would require the same approvals as detailed in Section 3.0, Project Description, when compared to the Project Alternative 2 would also result in less than significant impacts related to this threshold.

Noise

Alternative 2 would involve construction that would generate noise that would be audible at nearby sensitive receptors and may be temporarily annoying in the absence of mitigation. Although the construction duration may be reduced when compared to the Project due to the reduction in RV parking area, mitigation measures would be required to limit the noise from construction activities to nearby sensitive receptors and would reduce construction noise impacts to less than significant, similar to the Project. Alternative 2 would generate a reduced volume of daily trips when compared to the Project, therefore traffic noise generated by Alternative 2 would be reduced when compared to traffic noise associated with the Project, which would result in less than significant impacts.

Population and Housing

Under Alternative 2, the same site would be developed as with the Project. The Site does not contain any housing; therefore, consistent with the Project, Alternative 2 would not displace residents or necessitate new housing elsewhere. Based on the development of a self-storage building and reduced RV parking area, Alternative 2 may require a slightly reduced number of employees when compared to the Project. Consistent with the Project which would result in less than significant impacts, the anticipated amount of employment would not exceed local or regional projections related.

Public Services

Under Alternative 2, the Long Beach Fire Department, and Long Beach Police Department would continue to provide services at the Project Site. Under Alternative 2, new development would be

introduced at the Project Site resulting in a minor increase in fire protection and police protection, similar to the Project which identified a less than significant impact. Due to the reduced RV parking component, these increases in demand for services might be slightly reduced when compared to the Project which identified a less than significant impact. Consistent with the Project, Alternative 2 would not involve construction of housing and would not result in an impact related to schools, parks, or libraries.

Recreation

Although Alternative 2 would not involve construction of housing, the Project would result in a nominal increase in employment and related population growth in the City. As such, Alternative 2 would not result in a significant impact related to the in demand for recreational facilities, including local or regional parks. Consistent with the Project, Alternative 2 would result in a less than significant impact.

Transportation

Alternative 2 would result in fewer daily trips during operational activities due to the reduction of RV parking spaces which would result in a reduced amount of vehicle miles traveled (VMT) than is associated with the Project and a reduced impact when compared to the Project, which would result in a less than significant impact. Consistent with the Project, Alternative 2 would not require alterations to the existing transportation system; therefore, it would not result in any conflicts with programs, plans, ordinances, or policies addressing the circulation system, nor would this alternative result in any hazards related to geometric design features or incompatible uses. Emergency access is currently provided to the Project Site via Pacific Place and would continue to be provided via Pacific Place.

Tribal Cultural Resources

Alternative 2 would occur on the same site as the Project. As described in Section 4.16, Tribal Cultural Resources, the Project Site does not contain known tribal cultural resources. During the Surcharge Activities, mitigation was implemented as part of Alternative 2 to reduce potential impacts of previously undiscovered resources. This mitigation reduced impacts to less than significant levels during the Surcharge Activities. Consistent with the Project, there is the possibility that undiscovered resources may be present in undisturbed soil on the site. Alternative 2 would require grading within the Project Site and substantial ground disturbance; therefore, consistent with the Project, there would be potential to encounter or impact these resources and mitigation requiring monitoring during ground disturbing construction activities would be required to reduce impacts to less than significant levels. Both Alternative 2 and the Project would result in less than significant impacts with mitigation incorporated related to this resource topic.

Utilities and Service Systems

Based on buildout of the 206,756-sf self-storage building and a reduced RV parking area, Alternative 2 may result in a reduced demand for utilities when compared to the proposed Project, including for water, wastewater, storm water drainage, electricity, natural gas, and landfills, beyond the existing condition. Additionally, Alternative 2 would reduce increase waste generation rates over existing conditions, but overall waste generation and construction and demolition debris would be reduced when compared to the Project, which would result in less than significant impacts.

Conclusions

Avoid or Substantially Less the Significant Impacts of the Project

Alternative 2, when compared to the Project, would result in reduced impacts related to air quality, energy, GHG, noise, transportation, and utilities.

Attainment of Project Objectives

Alternative 2 would involve development of the site with self-storage and RV parking, which would support the majority of the identified Project Objectives. However, Alternative 2 would not specifically meet the identified demand for RV storage to the same extent as the Project. Specifically, Alternative 1 would not support the following objectives to the same extent as the Project:

- OBJ-1: Provide a state of the art, secure storage solution that would meet the increased demand in the Long Beach area, especially for secure, RV storage.
- OBJ-6: Provide sufficient parking to accommodate long-term RV storage stalls and an onsite private car wash for the recreational vehicles and other customer vehicles.

5.4.3 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 it be determined that the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

A comparative summary of the environmental impacts associated with each alternative is provided in Table 5-1, Comparison of Alternatives. As shown, the No Project Alternative would be the environmentally superior alternative, and Alternative 2 would be the environmentally superior build alternative. Although the Project has no significant and unavoidable impacts, the No Project Alternative and Alternative 2 would result in no new environmental impacts and would avoid or reduce some of the Project’s impacts. However, the No Project Alternative would not attain any of the Project Objectives, and Alternative 2 would not fully attain OBJ-1 and OBJ-6 of the Project, related to RV storage.

**TABLE 5-1
COMPARISON OF ALTERNATIVES**

Impact Area	Project	No Project Alternative	Alternative 1	Alternative 2
Aesthetics	Less Than Significant Impact	Reduced Impact	Similar Impact	Similar Impact
Air Quality	Less Than Significant Impact	Reduced Impact	Increased Impact	Reduced Impact
Biological Resources	Less Than Significant Impact With Mitigation	Increased Impact	Similar Impact	Similar Impact
Cultural Resources	Less Than Significant Impact	Reduced Impact	Similar Impact	Similar Impact
Energy	Less Than Significant Impact	Reduced Impact	Increased Impact	Reduced Impact
Geology and Soils	Less Than Significant Impact With Mitigation	Reduced Impact	Similar Impact	Similar Impact
Greenhouse Gas Emissions	Less Than Significant Impact	Reduced Impact	Increased Impact	Reduced Impact
Hazards and Hazardous Materials	Less Than Significant Impact	Increased Impact	Similar Impact	Similar Impact
Hydrology and Water Quality	Less Than Significant Impact	Reduced Impact	Similar Impact	Similar Impact
Land Use and Planning	Less Than Significant Impact	Increased Impact	Similar Impact	Similar Impact
Noise	Less Than Significant Impact	Reduced Impact	Similar Impact	Reduced Impact
Population and Housing	Less Than Significant Impact	Similar Impact	Increased Impact	Similar Impact
Public Services	Less Than Significant Impact	Reduced Impact	Increased Impact	Similar Impact
Recreation	Less Than Significant Impact	Increased Impact	Increased Impact	Similar Impact
Transportation	Less Than Significant Impact	Reduced Impact	Increased Impact	Reduced Impact
Tribal Cultural Resources	Less Than Significant Impact	Reduced Impact	Similar Impact	Similar Impact
Utilities and Service Systems	Less Than Significant Impact	Reduced Impact	Increased Impact	Reduced Impact

5.5 REFERENCES

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