

CHAPTER 6 Alternatives to the Proposed Plan

6.1 INTRODUCTION

The purpose of this chapter is to describe and comparatively evaluate a reasonable range of potentially feasible alternatives to the proposed plan. To meet the requirements of CEQA, a reasonable range of feasible alternatives must be considered. Those alternatives must be intended to reduce or eliminate some or all of the significant or potentially significant adverse environmental effects of the proposed plan, while still meeting most of the basic plan objectives.

6.1.1 California Environmental Quality Act Requirements

An EIR must evaluate the comparative merits of a reasonable range of alternatives to the proposed project, or to the location of the proposed project that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project (CEQA Guidelines Section 15126.6). An EIR need not evaluate the environmental effects of alternatives at the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project. The CEQA Guidelines provide the following language for discussing alternatives to a proposed project:

The specific alternative of the “no project” shall also be evaluated along with its impacts. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125) (CEQA Guidelines, Section 15126.6 subd. (e)(1)).

The “no project” alternative shall discuss ... existing conditions ... as well as what would be reasonably 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. ... When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan (CEQA Guidelines, Section 15126.6 subds. (e)(2)–(3)(A)).

If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines, Section 15126.6 subd. (e)(2)).

The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the proposed objectives, or would be more costly (CEQA Guidelines, Section 15126.6 subd. (b)).

If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines, Section 15126.6 subd. (d)).

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. ... The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. ... An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines, Section 15126.6 subd. (f)).

The requirement that an EIR evaluate alternatives to the proposed project or alternatives that address the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed project. The EIR need examine in detail only the alternatives that could feasibly attain most of the basic objectives of the project. Alternatives that fail to meet fundamental project purpose need not be addressed in detail in an EIR (In re *Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1165–1167). The Public Resources Code and the CEQA Guidelines direct that the EIR need “set forth only those alternatives necessary to permit a reasoned choice.” The CEQA Guidelines provide a definition for “a range of reasonable alternatives” and, thus, limit the number and type of alternatives that need to be evaluated in a given EIR. According to the CEQA Guidelines (Section 15126.6(b)):

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.

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 (CEQA Guidelines Section 15126.6(f)(1)). Notably, alternatives analyzed in an EIR need not be “actually feasible,” but rather need only be “potentially feasible.” (CEQA Guidelines Section 15126.6(a).) Whether alternatives are “actually feasible” is a determination ultimately made by a lead agency’s decision-making body (e.g., City Council) at the time of action on a proposed project based on a variety of factors, including how well, in the decision makers’ assessment, alternatives meet stated project objectives. A decision-making body can reject alternatives on policy grounds provided that its adopted findings addressing feasibility embody a reasonable balancing of competing economic, social, environmental, and other considerations supported by substantial evidence. (Refer to *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

Because the proposed plan would not result in a substantial number of significant adverse impacts, the range of alternatives analyzed in this EIR is necessarily comparatively small and is focused on those alternatives that could achieve most of the project objectives and reduce the significant impacts of the proposed plan.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative” (Section 15126.6(f)(2)(3)).”

The proposed San Pedro Community Plan is a comprehensive revision of the existing San Pedro Community Plan. The proposed plan is designed to accommodate the 2030 population, housing, and

employment projections based on assumptions about the level of development that can reasonably be expected to occur during the life of the Community Plan, given the CPA's land use designations and policies.

The proposed San Pedro Community Plan seeks to:

- Focus growth into Framework-identified Centers and corridors while preserving single-family neighborhoods, and open space.
- Accommodate projected growth by providing for a range of housing options, mixed uses, and commercial space for future employment opportunities.
- Maximize development opportunities around existing and future transit systems while minimizing adverse impacts.
- Improve the function, design, and economic vitality of the commercial and industrial areas.
- Preserve and enhance the positive characteristics of existing land uses.
- Preserve and strengthen commercial developments to provide a diverse job-producing economic base, provide neighborhood services, and enhance the appearance of these areas.
- Encourage the protection, enhancement, and conservation of valuable community resources (natural, historic, and cultural) and community identity and identify appropriate mitigation measures to minimize development impacts.
- Provide for the development of civic, cultural, religious, education, and other community uses such as libraries, fire stations, community centers, police facilities, parks, schools, etc.
- Enhance the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Preserve and strengthen industrial areas and support environmentally sensitive industrial and employment centers that provide local and regional jobs and bolster the community's economic and physical condition.

6.1.2 Significant and Unavoidable Impacts

The following are the significant and unavoidable impacts of the proposed plan that have been identified in this Draft EIR. The significant unavoidable impacts of the proposed plan are relatively limited given the fully urbanized existing character of the San Pedro Community Plan Area (CPA) and the policies of the plan. All but one of them result from construction-related activities, which often cannot be mitigated to less-than-significant levels despite being temporary in character. One significant impact relates to increased traffic throughout the CPA. These impacts would occur notwithstanding the various policies in the proposed plan intended to reduce per capita vehicle miles traveled. The alternatives presented in this chapter were considered in light of these significant effects.

■ Aesthetics

- > Implementation of the proposed plan could have a substantial adverse effect on a scenic vista.
- > Implementation of the proposed plan could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- > Implementation of the proposed plan could substantially degrade the existing visual character or quality of the site and its surroundings.

- > Implementation of the proposed plan could create a new source of substantial light or glare, which could adversely affect day- or nighttime views in the area.
- > Implementation of the proposed plan could result in development of structures that would shade shadow-sensitive uses for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

■ **Air Quality**

- > Implementation of the proposed plan could violate air quality standards or contribute substantially to an existing or projected air quality violation.
- > Implementation of the proposed plan would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- > Implementation of the proposed plan would expose sensitive receptors to substantial pollutant concentrations.

■ **Greenhouse Gas Emissions**

- > Implementation of the proposed plan would result in development that could contribute substantial emissions of greenhouse gases.
- > Project emissions of greenhouse gases would have the potential to conflict with the implementation of AB 32.

■ **Noise**

- > Construction of development pursuant to the proposed plan could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- > Construction of development pursuant to the proposed plan could generate or expose persons or structures to excessive groundborne vibration.
- > Construction of development pursuant to the proposed plan could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

■ **Traffic**

- > The volume-weighted average V/C ratio under the proposed plan would substantially exceed that of existing traffic conditions, and the number of roadway segments projected to operate at unsatisfactory levels of service would substantially exceed that of existing traffic conditions.
- > Implementation of the proposed plan could result in inadequate emergency access during construction.
- > Implementation of the proposed plan could conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

■ **Utilities/Services Systems**

- > The proposed plan could impact water supplies that serve the CPA. While water supply is expected to be adequate, LADWP is looking at a number of strategies to serve citywide growth, including additional conservation measures, use restrictions, recycling programs, and regulatory changes that may occur over the life of the plan.

6.2 REQUIREMENTS AND CONSIDERATIONS FOR IDENTIFICATION OF ALTERNATIVES

The City's effort to identify, describe, and evaluate a reasonable range of feasible alternatives focused on (1) achieving full compliance with CEQA requirements and (2) informing the public and decision-makers of the comparative effects of alternatives that address concerns expressed by the public during the outreach process for the development of the plan. Consistent with the CEQA Guidelines, primary consideration was given to alternatives that would reduce one or more of the significant impacts of the proposed plan, while still meeting most of the basic project objectives. Because CEQA encourages cities and counties, when conducting environmental review for major planning projects such as general plan updates, to integrate mitigation measures directly into proposed plan policies, often the only significant effects shown in an EIR for such a planning project are the significant, unavoidable impacts that cannot feasibly be addressed through policy language. Here, then, the City has focused on the relatively few significant unavoidable effects of the proposed plan in formulating alternatives.

Traditionally under CEQA, EIRs for plan updates identify an array of significant environmental impacts that are caused by large increments of new growth projected to occur over the typical 20-year planning horizon of a general, community, or specific plan. In typical EIRs, those effects often include increased traffic congestion, increased air pollution, substantial increases in water demand, loss of farmland or natural habitats, and the like. In light of those types of adverse effects, the EIRs typically include alternatives that describe substantially reduced amounts of future new land use because such alternatives typically reduce on an across-the-board basis the type of impacts caused by the new land uses allowed under the updated plan.

In the case of this EIR, there are two major factors that have affected the identification and consideration of alternatives in the EIR: (1) the type and extremely limited number of significant impacts that would be caused by the proposed plan, and (2) the limited changes that are proposed in the new San Pedro Community Plan, which are primarily to focus future development in identified transit-oriented corridors, correct inconsistencies with the General Plan Framework and zoning, change nomenclature to coincide with General Plan Land Use Designations, provide guidelines and standards for development projects, and expand and refine design guidelines, in part to protect historic resources and existing residential neighborhoods. Compared to existing conditions, the proposed plan would accommodate population, housing, and employment growth. However, as noted in Section 4.11 (Population, Housing, and Employment), this growth would be consistent with the Southern California Association of Governments (SCAG) regional forecasts for San Pedro as well as the City of Los Angeles as a whole, and would not result in growth that has not been reasonably anticipated. These issues are discussed further below.

6.2.1 Types of Significant Impacts

The proposed plan would create a sustainable integrated system of land use and transportation that would avoid the vast majority of environmental consequences that are typically caused by these types of plans in the region and across the state. Nevertheless, some unavoidable significant impacts of the proposed plan, described in Chapter 4 and listed in the subsection above, cannot be completely avoided by any reduction in the levels of land use change in the proposed plan other than essentially prohibiting all new construction in the CPA over the next 20 years.

The EIR identifies a limited range of unavoidable effects that would or could be associated with the proposed plan, including (1) construction activities that would be caused by essentially any material level of land use change and (2) addition of even the smallest amount of incrementally increased impact when added to existing or future baseline conditions that are created by existing land uses and projected future growth outside the CPA. For example, the EIR identifies the potential for unavoidable significant impacts from construction noise and construction air quality; these impacts could only be avoided by essentially prohibiting any substantial outdoor construction projects in the CPA over the next 20 years. A further example is that the EIR identifies that the volume-weighted average V/C ratio under the proposed plan would substantially exceed that of existing traffic conditions, and the number of roadway segments projected to operate at unsatisfactory levels of service would substantially exceed that of existing traffic conditions. Because these impacts would occur with or without the project, small, moderate, or even large reductions in the amount of new land use allowed under the proposed plan would continue to create significant unavoidable effects on traffic, and none of these reductions would create noticeable changes in the level of congestion.

6.2.2 Displaced Growth

In recent years, statewide and regional planning laws, regulations, and policies have caused lead agencies to view such alternatives from a new perspective that takes into account the regional implications of alternatives in addition to the specific, localized effects. Recently enacted laws such as AB 32 and SB 375 have an implied or explicit emphasis on the need to reduce per capita resource consumption, greenhouse gas (GHG) generation. Assuming that the population of the state and its major urban regions are going to continue to grow over the coming decades, reduced density alternatives near the state's urban cores are seen to potentially contribute to furthering sprawl on the suburban edge. These types of actions are now often seen as being inconsistent with statewide or regional efforts to increase development densities in order to reduce per capita pollution and resource consumption.

In this case, a reduced development alternative would allow for less development than the proposed plan, and in doing so would proportionally reduce potential localized effects related to increased population and development intensity, including congestion, air emissions, demands on public services and utilities, increased water demand and wastewater generation, as well as construction noise and other related effects. For the most part, the localized effects of the project would be reduced in proportion to the reduction in new land use developable under the proposed plan; in general, the greater the reduction in new land use development, the greater the potential effects avoided or reduced. However, the plan land use and circulation policies are specifically designed to provide increased affordable and workforce housing, greater amounts of open space, connecting street networks, transportation demand

management strategies, and specific protections for neighborhoods and historic structures that would not be in place under a substantially reduced development alternative. Additionally, the reduced development alternative would not meet the City's objectives to focus growth in urban centers and along corridors served by transit.

Growth in the southern California region, including the greater Los Angeles basin, is projected based on long-term trends in natural reproduction, immigration, and changes in demographic patterns. For the most part, because the specific land use policies of a local jurisdiction, like the City of Los Angeles, tend to affect the nature of growth in that particular community, they are not believed to have a material effect on the overall population of a major region. However, it is not reasonable to assume that adoption of a new land use element that materially reduced growth within the City would result in materially less growth in the region; rather, the growth in population and/or employment would likely occur elsewhere in the region. To the extent that the City of Los Angeles is, on a regional scale, central and close to the densest core of jobs and housing in southern California, it is reasonable to conclude that growth that is anticipated to occur in the City, if redirected elsewhere, would result in pressure for more growth in portions of the region that are located further from the regional core, including Southern California's developing fringe and exurbs. While the San Pedro CPA is located on the periphery of the City, to the far south, it is directly connected to major transportation networks in the dense Southern California region. In general, the impacts of growth on the periphery of a major urban area tend to be more severe than the impacts of densification in areas closer to the core of such a major urban area, as growth in such areas typically involves greenfield development and longer commute trips, with attendant proportionate increases in traffic, air pollution, and greenhouse gas emissions.

The State of California requires that cities plan for changes in population, housing demand and employment. If growth is anticipated, each city must accommodate a share of the region's projected population. These projections are developed by the City of Los Angeles in concert with SCAG, the Metropolitan Planning Organization (MPO) for the six-county region. SCAG is comprised of local governments and agencies in the region. SCAG is mandated by federal and state governments to prepare the Regional Transportation Plan (RTP), a 20-year transportation plan for the region that addresses regional growth, air quality, and other issues based on analysis of past and future regional trends. The Department of City Planning refined and adjusted the SCAG population and housing unit projections (employment projections were not adjusted) to be consistent with the Framework Element and other City policies, reflecting most of the projected growth in the City's regional and commercial centers.

In addition, SCAG has developed its Compass Blueprint 2 Percent Strategy that calls for modest changes to current land use and transportation trends on only 2 percent of the land area of the region. SCAG has identified 2 Percent Opportunity Areas, which are key parts of the region for targeting growth, where projects, plans and policies consistent with the Compass Blueprint principles will best serve the mobility, livability, prosperity and sustainability goals of the Growth Vision.²⁰² These opportunity areas include metro centers, city centers, rail transit stops, bus rapid transit corridors, airports, ports, and industrial centers, priority residential infill areas, and Compass Blueprint priority communities. The result of less growth in San Pedro and proportionally more growth on the fringes of the greater Los Angeles urban area, or any locations further from the regional core than San Pedro CPA, would be increased

²⁰² SCAG Compass Blueprint <http://www.compassblueprint.org/opportunityareas>. Accessed 10/12/2011.

consumption of undeveloped land (i.e., traditional green-field development), greater reliance on the automobile, greater commute distances, and greater demand for infrastructure and other services in areas, as the growth would occur in less dense, more auto-oriented land-intensive manner. On a regional basis, per capita vehicle trips would be increased, along with VMT, air emissions, and GHG emissions. The accommodation of population and employment at lower densities throughout the region could also result in the loss of increased amounts of raw land, including, potentially, habitats for sensitive and protected species, and/or the loss of valuable farmland. In addition, growth at more traditional suburban densities would comparatively increase demand for water, an increasingly scarce resources, potentially increasing pressure on the sensitive habitats of the Sacramento/San Joaquin Delta and the Colorado River. Conversely, accommodation of future population at higher densities and under the programs and standards of the proposed plan would tend to minimize both per capita and regional consumption of resources and generation of pollutants.

Thus, while an alternative with less new land use development and a lower population than contemplated under the proposed plan and the regional projections would have marginally lower environmental impacts within the CPA limits, it would not reduce environmental effects from a citywide or regional perspective. Under this scenario, the Southern California region would likely have greater environmental degradation.

For reasons explained above, an alternative that arbitrarily reduces the amount of growth contemplated by the proposed plan would not fall into the CEQA definition of a reasonable range of alternatives in light of the planning context in which the San Pedro CPA finds itself, as such an alternative would tend to be contrary to the basic objectives of the project and would not substantially lessen any of significant effects of the project to a less-than-significant level.

6.2.3 Alternatives Considered and Eliminated from Further Evaluation

No Development Alternative—As the San Pedro CPA is subject to an existing Community Plan that allows development, the No Development Alternative does not represent a scenario that would likely occur.

Limited Development Alternative—The Limited Development Alternative would limit and deter the vast majority of new development activities in the CPA over the next 20 years. New construction would be limited to development of vacant lots, reuse of existing buildings, or replacement or reconstruction of existing buildings that may be damaged or need improvements to meet safety codes. Vacant lots could be developed to a level compatible with the land uses on adjacent properties. Substantially limiting the construction of any structures associated with new land uses would be a means of reducing, as much as possible, the significant unavoidable effects of the proposed plan related to construction activities, and even very small contributions to intersections congested by existing and future pass-through traffic. While this alternative, for the most part, would involve carrying the existing conditions in the CPA forward into the future, unlike the No Development Alternative, this is an “action alternative” that would require the adoption of new policies and development regulations to limit most existing development to improvements within the envelope of existing buildings rather than permit continued land use activity under the existing Community Plan.

With this alternative, some population growth could occur within the CPA, to the extent that existing residential units, or units that have already been approved, could accommodate additional residents, or due to the change of use of existing structures which could occur under this alternative (e.g., an older commercial structure could be renovated and changed to residential uses). Similarly, there could be increased intensity of nonresidential uses by changing the use in a building from an existing use with low levels of employment (e.g., warehouse) to a use with higher-levels of employment (e.g., office or retail).

This alternative was rejected as infeasible because it would not accommodate the future growth forecasted by SCAG and would, therefore, be inconsistent with population, housing, and employment projections.

Reduced Height and Development—With this alternative, new building heights and FAR would be lower than under the proposed plan, but all other land use and transportation policies of the plan would remain as proposed. New land uses would be limited to 35 feet in height. A maximum FAR of 1.5 is assumed for all commercial and industrial development. In recognition of the projected amount of growth and economic development pressures over the coming 20 years, it is anticipated that under this alternative new land uses would be geographically spread out to more parcels across the CPA and that there would be inadequate land available to accommodate the projected growth exclusively on the existing industrial and commercial corridors and in the Downtown. Under this alternative, it is expected that less mixed-use development would occur in these focus areas than the proposed plan. This alternative was rejected as infeasible because it would not accommodate the future growth forecasted by SCAG and would, therefore, be inconsistent with population, housing, and employment projections. In addition, spreading out development throughout the CPA would not necessarily protect existing residential neighborhoods.

Distributed Growth—The proposed plan already concentrates future growth in the Downtown, including the North Gaffey Street and Pacific Avenue commercial corridors. Little development is considered elsewhere in the CPA. Distributing growth in other areas of the CPA would not reduce the significant and unavoidable impacts of the proposed plan, which are related to construction air quality and noise, and traffic. In addition, as most of the San Pedro CPA is residential, distributing growth in other areas would not achieve the City's goals of preserving existing residential neighborhoods. In fact, more spread-out growth, or growth in other areas of the CPA, would likely result in greater impacts to visual quality, scenic views, and historic resources. Increased building height impacts would also be greater in sensitive residential areas, an impact that would not occur under the proposed plan. Also, there would likely be increased VMT, as future growth would not be concentrated along existing transportation corridors where employees, residents, and visitors can take advantage of existing transit opportunities. The City carefully considered those areas in the CPA with the highest potential to accommodate future growth while limiting environmental impacts. Other areas of the CPA do not have the same potential to accommodate the same level of growth that is required to be consistent with SCAG growth forecasts. Therefore, this alternative was rejected from further consideration.

6.2.4 Alternatives Considered in This Draft EIR

In accordance with CEQA Guidelines Section 15126.6, the only feasible alternative to the proposed plan would be continuation of the 1999 San Pedro Community Plan. As explained previously, the Los

Angeles City Council will make the final determination of the feasibility of the alternatives and the extent to which the alternatives meet the project objectives.

The alternatives include the following:

- **Alternative 1: No Project (1999 Plan)**—This legally mandated alternative, which is not subject to the requirements to meet most of the project objectives of the proposed plan or to substantially lessen any of the significant effects of the project, reflects conditions likely to occur in the future without the adoption of the proposed plan. Rather, future land uses in the San Pedro CPA would be guided by continued implementation of the 1999 Plan. The anticipated land use in 2030 under this alternative are shown in Table 6-1 (Land Uses Anticipated under Alternative 1), below.
- **Alternative 2: SCAG 2030 Forecast**—Under this alternative, employment, housing, and population levels are analyzed at levels based on those projected by SCAG for the year 2030 (as adjusted). These projections are provided to the City of Los Angeles by SCAG, which forecasts population, housing, and employment growth for cities and counties in the Southern California region.

The following subsection describes the above alternative, comparatively analyzes the potential environmental effects of the alternatives, and evaluates the extent that the alternatives meet the proposed plan objectives. The focus of the analysis is the difference between the environmental effects of the alternatives compared to those of the proposed plan, with an emphasis on how the alternatives affect the identified significant impacts of the proposed plan, and the identification of any new effects created by the alternative. For each issue area, the analysis indicates which mitigation measures would be required for the alternatives and which significant and unavoidable impacts would be avoided or substantially reduced. Where appropriate, the analysis indicates whether any mitigation measures would no longer be required, or whether additional mitigation measures would be required for the alternatives. Unless otherwise indicated, the level of significance and relative magnitude of environmental impacts, and any required mitigation measures, would be the same for the alternatives as for the proposed plan. Table 2-2 (Summary of Impacts Compared to Existing Conditions and Mitigation Measures) in Chapter 2 (Summary) provides a comparison of the impacts of the proposed plan to the impacts of each of the alternatives.

6.3 ALTERNATIVE 1: NO PROJECT (1999 PLAN)

6.3.1 Description

Alternative 1, the No Project (1999 plan) Alternative, reflects “no project” conditions (i.e., without the adoption of a new plan). The No Project Alternative would continue the land use and transportation goals, policies, and programs contained in the adopted 1999 San Pedro Community Plan. Future land use change would occur as allowed in the 1999 Plan. Under the Alternative 1 No Project Alternative, projections from SCAG of future population and employment were assumed within the San Pedro CPA and in the surrounding region; these projections were assumed to reflect growth likely to occur without the adoption of the proposed plan. Under Alternative 2, projected growth through 2030 reflects a population of 81,413, housing units totaling 33,922, and 17,101 jobs (compared to the SCAG projected jobs of 19,917). The proposed plan would result in an increase in the reasonable anticipated capacity of the San Pedro CPA, with the potential to accommodate an anticipated level of 83,354 persons compared

to the existing (2005) population of 82,112, which represents an increase of 1,242 persons. With regard to housing units, the proposed plan would result in maximum development of 34,731 dwelling units, compared to the 33,922 units under Alternative 1, or 809 fewer units than would be accommodated under the proposed plan. There would be 1,973 fewer jobs provided by Alternative 1 compared to the proposed plan.

Table 6-1 (Summary Comparison of Proposed Plan and Alternative 1) summarizes the total population, dwelling units, and employment for both plans.

Table 6-1 Summary Comparison of Proposed Plan and Alternative 1		
	<i>Reasonable Capacity Proposed Plan</i>	<i>Alternative 1: 1999 Community Plan</i>
Population	83,354	81,413
Housing	34,731	33,922
Employment	19,074	17,101

SOURCE: Los Angeles Department of City Planning (2011).

Under this alternative, it is assumed there would be no revisions in land use designation or zoning. Current land use densities and intensities would remain and typical urban infill development would continue to occur throughout the CPA, not necessarily concentrated along existing industrial and commercial corridors and in the Downtown. Entitlement requests for zone changes and General Plan Amendments would likely continue as existing regulations do not reflect focused development in commercial and industrial areas.

6.3.2 Comparative Environmental Effects

As shown in Table 6-1, continuation of the 1999 Plan would result in fewer residents, less housing, and fewer jobs than the proposed plan. With lower levels of development, significant impacts related to construction, such as construction noise, air pollution, and greenhouse gas emissions, would be less under the 1999 plan than under the proposed plan. Because future growth in the CPA would not be concentrated around major transit corridors and the Downtown, this alternative could also result in greater potential for historic and cultural resource impacts, such as the loss of noteworthy residences and/or courtyard homes, than under the proposed plan. It could also have greater impacts on existing residential neighborhoods, as the policies providing for transitions in height and massing, concentration of denser uses in existing commercial and industrial corridors and the Downtown, and specifically protecting existing residential neighborhoods would not be implemented.

All of the less-than-significant impacts of the proposed plan that are associated with population growth (e.g., public services, water demand, wastewater generation, etc.) would be slightly less under the 1999 plan than under the proposed plan because of the reduced overall growth, and these effects would continue to be considered less than significant under Alternative 1. The existing land use inconsistencies would not be addressed as under the proposed plan.

With continued implementation of the 1999 plan, slightly less development allowed than under the proposed plan would generate reduced amounts of primary ozone precursors, reactive organic gases

(ROG) and oxides of nitrogen (NO_x), than under the proposed plan. Land use changes under the proposed plan were found to result in a significant and unavoidable impact during construction with regard to air emissions. Given that the South Coast Air Basin is in nonattainment for criteria pollutants such as NO_x and PM, any substantial construction would result in exceedance of significance thresholds and air quality violations. Therefore, air pollutant emissions from development under Alternative 1, while slightly less than under the proposed plan, would remain significant and unavoidable.

In part because the CPA is largely urbanized, is already served by bus transit, and has a mix of residential and employment-generating uses, it is projected that improved technologies in the future combined with relatively modest levels of new development would allow future conditions under both the 1999 plan and the proposed plan to comply with the GHG reduction requirements of AB 32. The 1999 plan is a less transit-oriented land use plan and contains less aggressive transportation management requirements than are included in the proposed plan, but traffic impacts would be substantially similar. However, because the proposed plan contains GHG-reduction measures that the 1999 plan does not, the generation of GHG emissions would be greater in Alternative 1 than those of the proposed plan.

Although land use changes under the 1999 plan are projected to affect an amount of land area similar to that which would be affected by the proposed plan, it is likely that the potential for significant impacts to historic resources would be greater due to the fact that it is projected that more sites in the City's existing residential neighborhoods would be affected and because the 1999 plan lacks the new, more specific policies for historic preservation and neighborhood conservation that would be established under the proposed plan.

The establishment of lively and walkable commercial districts is a key goal of the new Community Plan to retain elements of San Pedro's small town environment. Community input received during the outreach process reflected a strong need for shopping and other community services within walking distance of neighborhoods. Additionally, input indicated a desire to preserve the unique and varied neighborhoods of San Pedro. Examples of the policies and programs that would be established by the proposed plan but which do not exist under the 1999 plan include substantial support for the creation and maintenance of distinctive neighborhoods, districts, and centers that provide visual diversity, varying intensities of residential and commercial activity that are appropriate to their location, and plentiful opportunities for social interaction. Further, the proposed plan identifies districts and centers that reflect a defined local character, scale, and relationship to adjacent neighborhoods and provide a full complement of uses with easy access to parks, stores, and other amenities of everyday living. Development intensities are designed to retain low-scale residential neighborhoods, concentrate more intense development in specific locations, and maximize accessibility to amenities, while providing transition in scale and height to lower-density neighborhoods. These goals are not fully realized in the existing 1999 Plan.

Impacts associated with construction noise and vibration under Alternative 1 would be similar in terms of findings of significance to those discussed for the proposed plan, although slightly less due to the potential for more Low II residential compared to the proposed plan, which would result in greater development and construction activity within the CPA's residential neighborhoods. The proposed plan provides for more mixed-use development in the urban core than the existing plan, which redirects construction activity away from the residential neighborhoods. The construction noise anticipated under

the 1999 plan would not be anticipated to be any noisier than construction noise under the proposed plan, but it would likely affect greater numbers of homes and people within existing residential neighborhoods than under the proposed plan.

Compared to the proposed plan, the 1999 plan does not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, does not include requirements for aggressive TDM, and would not concentrate future development along major transit corridors and in the Downtown (all of which reduce VMT). However, this is somewhat balanced by the slightly lower level of development, population, and jobs that would be created by Alternative 1. Table 6-2 (Year 2030 Proposed Land Use Plan and Committed Roadway Network Statistics Comparison) shows that the Proposed Land Use Plan and the Current Land Use Plan have higher VMT and VHT than 2005 Traffic Conditions, but would result in essentially the same VMT and VHT. The Proposed Land Use Plan and Current Land Use Plan have very similar arterial statistics.

Table 6-2 Year 2030 Proposed Land Use Plan and Committed Roadway Network Statistics Comparison			
<i>PM Peak Hour Data</i>	<i>Existing Traffic Conditions</i>	<i>Current Land Use Plan</i>	<i>Proposed Land Use Plan</i>
VMT	56,792	67,475	67,475
VHT	1,895	2,385	2,385
Avg. Speed	30	28	28
Weighted V/C	0.605	0.662	0.662
# E/F Links	32	37	39

SOURCE: Iteris, (2011).

As shown, continuation of the 1999 Plan would result in two fewer roadway links adversely affected, although all other characteristics would be essentially the same. Therefore, significant and unavoidable adverse impacts on roadway links would be slightly less under the 1999 plan than under the proposed plan.

6.3.3 Significant and Unavoidable Impacts That Would No Longer Occur

The 1999 plan would involve new land uses of similar types as the proposed plan, at slightly less intensity. The 1999 plan would not reduce any of the significant and unavoidable impacts of the proposed plan to less than significant, and could result in increased GHG emissions compared to the proposed plan, as it does not contain the specific GHG-reduction measures as the proposed plan. Rather, the 1999 plan could create worse environmental conditions in the CPA than would occur under the proposed plan. For example, the potential conflict between the 1999 plan and AB 32 would be considered significant unless feasible mitigation that was not required for the proposed plan is implemented.

6.3.4 Relationship of Alternative 1: No Project Alternative (1999 Plan) to the Project Objectives

The No Project Alternative represents the continuation of the City's 1999 plan to guide future growth and development in the San Pedro CPA. Continued implementation of the 1999 plan would result in development within the CPA that would not meet the project objectives of the proposed plan. Alternative 1 would not include new policies to foster greater sustainability and integration of land use and transportation in the City, to protect the scale and character of existing residential neighborhoods, encourage historic preservation, retain land for employment uses, to create a more sustainable land use pattern by focusing change along existing transit corridors and in the Downtown to create a complete, multimodal transportation system, or to further the goals of AB 32.

Continued implementation of the 1999 plan would not protect and conserve the CPA's residential neighborhoods to the extent accomplished under the proposed plan. For most of the CPA, the proposed plan preserves the existing pattern of uses and establishes policies for protection and long-term conservation of established neighborhoods. In addition to concentrating growth along transportation corridors and in the Downtown, the proposed plan would provide revenue to allow the City to provide the alternative transportation infrastructure required to achieve the City's goals for reduced per-capita vehicle miles traveled, improved traffic flow, and reduced greenhouse gas emissions.

Alternative 1 would not achieve the proposed plan objectives to promote sustainability and adverse impacts could be increased. This alternative would not be as effective at meeting the targets of AB 32 with respect to reduction in greenhouse gas emissions. Continuation of the 1999 plan would not result in creation of as many jobs to accommodate forecasted employment growth, falling well short of SCAG's 2030 employment forecast.

For the reasons listed above, this alternative would be generally inconsistent with, and would fail to achieve many of, the objectives of the proposed plan.

6.4 ALTERNATIVE 2: SCAG 2030 FORECAST

6.4.1 Description

Under this alternative, population, housing, and employment growth forecasts are analyzed for the year 2030. The Department of City Planning refined and adjusted the SCAG population and housing unit projections (employment projections were not adjusted) to be consistent with the Framework Element and other City policies, reflecting most of the projected growth in the City's regional and commercial centers. The City must then accommodate, or ensure the "capacity," for these projected levels of population, housing, and employment by providing development potential in its Community Plans.

Table 6-3 (Comparison of Proposed Plan and Alternative 2) illustrates the build-out of the proposed plan compared to the adjusted SCAG 2030 forecasts.

Table 6-3 Comparison of Proposed Plan Capacity and Alternative 2		
	<i>Reasonable Capacity 2030 Proposed Plan</i>	<i>2030 SCAG Forecasts</i>
Population	83,354	83,152
Housing	34,731	34,647
Employment	19,074	19,917

SOURCE: City of Los Angeles (2011).

The build-out of Alternative 2 would result in slightly lower population and fewer housing units, and somewhat greater employment. Under Alternative 2, projected growth through 2030 reflects a population of 83,152, housing units totaling 34,647, and 19,917 jobs. The proposed plan would result in an increase in the reasonable anticipated level of development in the San Pedro CPA, with the potential to accommodate an anticipated level of 83,354 persons compared to the existing (2005) population of 82,112, which represents an increase of 1,242 persons. Continuation of the 1999 plan would result in a decrease in population of 700 persons compared to 2005 conditions. With regard to housing units, the proposed plan would result in maximum development of 34,731 dwelling units, compared to the 33,922 units under the 1999 plan, or 809 fewer units than would be accommodated under the proposed plan. There would be 1,973 fewer jobs provided by Alternative 1 compared to the proposed plan.

As Alternative 2 would result in substantially similar levels of development as under the proposed plan, most of the environmental impacts from implementation of this alternative would be substantially the same as identified for the project. However, this alternative would result in more dispersed growth patterns through the plan area. Because future growth in the CPA would not be concentrated around major transit corridors and the Downtown, this alternative could result in greater potential for historic and cultural resource impacts, such as the loss of noteworthy residences and/or courtyard homes, than under the proposed plan. It could also have greater impacts on existing residential neighborhoods, as the policies providing for transitions in height and massing, concentration of denser uses in existing commercial and industrial corridors and the Downtown, and specifically protecting existing residential neighborhoods would not be implemented. The existing land use inconsistencies would not be addressed as under the proposed plan.

All of the less-than-significant impacts of the proposed plan that are associated with population growth (e.g., public services, water demand, wastewater generation, etc.) would not be significantly different under Alternative 2 than under the proposed plan because of the reduced overall growth, and these effects would continue to be considered less than significant under Alternative 2. Additional design guidelines aimed at improving the aesthetic quality of new development would not be implemented as under the proposed plan. The significant and unavoidable impacts during construction to air quality and noise would continue to be significant and unavoidable for Alternative 2. Because there would be more jobs provided, the potential for increased VMT exists, which would increase air emissions and traffic noise. Under Alternative 2, the integration of land use and transportation of the proposed plan, such as development of a multi-modal transportation center and mixed-use development in the Downtown and established industrial and commercial corridors, would not be as likely to occur, and GHG emissions and air quality emissions could be greater than under the proposed plan. Compared to the proposed plan,

Alternative 2 does not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, does not include requirements for aggressive TDM, and would not concentrate future development along major transit corridors and in the Downtown (all of which reduce VMT).

6.4.2 Mitigation That Would No Longer Be Required

All future development projects that are proposed under the Community Plan and subject to discretionary approval would be subject to conditions of approval and/or project-specific mitigation measures that would be identified at that time.

6.4.3 Significant and Unavoidable Impacts That Would No Longer Occur

Alternative 2 would involve new land uses of similar types as the proposed plan, at similar intensity for population and housing and some increase in the number of jobs provided. Alternative 2 would not reduce any of the significant and unavoidable impacts of the proposed plan to less than significant, as the levels of development would be substantially the same.

6.4.4 Relationship of Alternative 2 to the Project Objectives

Alternative 2 represents build-out in the San Pedro CPA according to adjusted 2030 SCAG forecasts. Implementation of this Alternative would result in development within the CPA that would not meet the project objectives of the proposed plan. Alternative 2 would not include new policies to create a sustainable and truly integrated system of land use and transportation in the City, to protect the scale and character of existing residential neighborhoods, to create a more sustainable land use pattern by focusing change along existing transit corridors and in the Downtown, to create a complete, multimodal transportation system, or to further the goals of AB 32.

Under Alternative 2, the integration of land use and transportation of the proposed plan, such as development of a multi-modal transportation center and mixed-use development in the Downtown and established industrial and commercial corridors, would not occur. Without the new GHG-reduction policies contained in the proposed plan, GHG emissions, and air quality in general, could be greater than under the proposed plan.

Alternative 2 would not protect and conserve the CPA's residential neighborhoods to the extent accomplished under the proposed plan. For most of the CPA, the proposed plan preserves the existing pattern of uses and establishes policies for protection and long-term conservation of established neighborhoods. In addition to concentrating growth along transit corridors and in the Downtown, the proposed plan would provide revenue to allow the City to provide the alternative transportation infrastructure required to achieve the City's goals for reduced per-capita vehicle miles traveled, improved traffic flow, and reduced greenhouse gas emissions.

This alternative would not achieve the proposed plan objectives to promote sustainability and adverse impacts could be increased. This alternative would not be as effective at meeting the targets of AB 32

with respect to reduction in greenhouse gas emissions. Alternative 2 would accommodate a greater number of jobs; this increased employment could have resultant increased air quality and noise impacts due to increase in VMT.

For the reasons listed above, this alternative would be generally inconsistent with, and would fail to achieve many of, the objectives of the proposed plan.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the reasonable range of potentially feasible alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. As noted, above, there is no feasible development alternative that would reduce the significant impacts of the proposed plan, which are related to construction activities associated with future development. As the South Coast Air Basin is in nonattainment for criteria pollutants, construction of any reasonable size would result in exceedance of significance thresholds and result in air quality violations. Both Alternative 1 and Alternative 2 would allow substantially similar development, more widely dispersed throughout through the CPA and potentially intruding into existing neighborhoods compared to the proposed plan. Thus, the environmentally superior alternative is the proposed plan. Table 6-4 (Comparison of Impacts—Proposed Plan and Alternatives [2030] to Existing [2005] Conditions) compares the environmental effects of the proposed plan and the alternatives against existing conditions.

Table 6-4 Comparison of Impacts—Proposed Plan and Alternatives (2030) to Existing (2005) Conditions

<i>Environmental Impacts</i>	<i>Proposed Plan</i>	<i>Alternative 1—Continuation of 1999 Plan</i>	<i>Alternative 2—SCAG 2030 Forecast</i>
Aesthetics	S	S >	S >
Air Quality	S	S >	S >
Biological Resources	L	L ≈	L ≈
Cultural Resources	L	L >	L >
Geology/Soils and Mineral Resources	L	L ≈	L ≈
Greenhouse Gas Emissions	S	S >	S >
Safety/Risk of Upset	L	L ≈	L ≈
Hydrology/Water Quality	L/S	L/S >	L/S >
Land Use/Planning	L	L ≈	L ≈
Noise	S	S >	S >
Population, Housing, and Employment	L	L ≈	L ≈
Public Services and Recreation	L	L ≈	L ≈
Transportation/Traffic	S	S >	S >
Utilities/Service Systems	L/S	L/S >	L/S >

S = Significant and Potentially Significant

L = Less than Significant

L ≈ Less than Significant and substantially similar to the proposed plan

L > Less than Significant but potentially greater than the proposed plan

S > Significant and Potentially Significant, and potentially greater than the proposed plan