Chapter 4
Cumulative

Chapter Summary

This chapter evaluates the potential for the Proposed Project, together with other past, present, and reasonably foreseeable future projects in the geographic scope of each resource area, to make a cumulatively considerable contribution to a new or substantially more severe significant cumulative impact than those cumulative impacts considered in the *2009 San Pedro Waterfront* (SPW) *Project Environmental Impact Statement* (EIS)/*Environmental Impact Report* (EIR) (2009 SPW EIS/EIR) (Port 2009). Chapter 4, Cumulative Analysis, provides the following:

- A description of existing environmental setting in the Port area;
- A description of applicable local, state, and federal regulations and policies that apply to the cumulative impact analysis;
- A description of the past, present, and foreseeable future projects in the surrounding area;
- A discussion of the methodology used to determine whether the Proposed Project would make a cumulatively considerable contribution to a significant cumulative impact;
- An impact analysis of the cumulative impacts related to the Proposed Project; and
- A description of any mitigation measures proposed to reduce any potential impacts and residual cumulative impacts, as applicable.

Key Points

The Proposed Project would have cumulatively considerable contributions to cumulative impacts which would remain significant and unavoidable even after implementation of mitigation in the following resource areas:

- Air Quality; and
- GHG.

4.1 Introduction

This Chapter presents the California Environmental Quality Act (CEQA) requirements for a cumulative impact analysis and analyzes the potential for the Proposed Project to make a considerable contribution to a new or substantially more severe significant cumulative impact when combined with other past, present, and reasonably foreseeable future projects, compared to the cumulative impacts disclosed in the (2009 SPW EIS/EIR. Following the presentation of the requirements related to the cumulative impact analyses and a description of the related projects (Sections 4.1.1 and 4.1.2,

respectively), the analysis in Section 4.2 addresses each of the resource areas analyzed in this Draft Subsequent Environmental Impact Report (SEIR).

4.1.1 Requirements for Cumulative Impact Analysis

The CEQA Guidelines (14 California Code of Regulations [CCR] 15130) require a reasonable analysis of the cumulatively considerable impacts of a project. *Cumulative impacts* are defined by CEQA as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (State CEQA Guidelines § 15355).

Cumulative impacts are further described as follows (40 CFR § 1508.7 and State CEQA Guidelines § 15355(b)).

> (a) The individual effects may be changes resulting from a single project or a number of separate projects.
>
> (b) The cumulative impacts from several projects are the changes in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Furthermore, according to State CEQA Guidelines Section 15130(a)(1):

> As defined in Section 15355, a "cumulative impact" consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in the State CEQA Guidelines, Section 15064(i)(5):

> The mere existence of significant cumulative impacts caused by other projects alone will not constitute substantial evidence that the Proposed Project's incremental effects are cumulatively considerable.

Therefore, the following cumulative impact analysis focuses on whether the impacts of the Proposed Project would have a cumulatively considerable contribution to a significant cumulative impact within the context of impacts caused by other past, present, or future projects. The cumulative impact scenario considers other projects proposed within the area defined for each resource that would have the potential to contribute to cumulatively considerable impacts.

The CEQA Guidelines set forth two methods, which may be used singly or in combination, for identifying related area projects with a potential to contribute, along with the Proposed Project, to cumulative impacts: (1) the *list of projects* methodology (based on a list of past, present, and probable future projects producing related impacts); or (2) the *summary of projections* methodology (based on a summary of projections in adopted state, regional, or local plans, a related planning document, or an environmental document that has been adopted or certified) (State CEQA Guidelines § 15130[b]). For this Draft SEIR, resource areas were analyzed using a projection or a combined list and projection approach, as described below.

4.1.2 Projects Considered in the Cumulative Analysis

4.1.2.1 Past, Current, and Reasonably Foreseeable Future Projects

A total of 42 recent, current, or reasonably foreseeable future projects (approved or proposed) were identified within the general vicinity of the Proposed Project that could contribute to cumulative impacts. The projects are listed in Table 4-1, which has been compiled from sources that include the Los Angeles Harbor Department (LAHD), the Port of Los Angeles (Port), the Port of Long Beach, Los Angeles Department of Transportation (LADOT), the City of Los Angeles (City), and other local jurisdictions. For the purposes of this Draft SEIR, the timeframe of current or reasonably anticipated projects extends from 2009–2032, and the *vicinity* is defined as the area over which effects of the Proposed Project could contribute to cumulative effects, which differs for each resource area. The physical location of each of the 42 cumulative projects is shown on Figure 4-1.

Table 4-1. Cumulative Project List

Number in Figure	Project Title and Location	Project Description	Project Status
Port of Los Angeles Projects			
1	Berth 163–164 (Nustar-Valero) Marine Oil Terminal Wharf Improvements Project	The proposed project involves demolishing the existing 19,000-square-foot timber wharf and constructing a new, steel-and-concrete loading platform, access trestles, mooring and berthing structures, and necessary utilities to comply with the Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS). The project also consists of a 30-year lease for the facility.	Initial Study (IS)/Mitigated Negative Declaration (MND) approved September 2021, construction pending.
2	Navy Way Seaside Interchange Project	Construction of roadway improvements at State Route (SR-) 47/Navy Way to eliminate traffic signal and movement conflicts. The project would augment an existing partial interchange at SR 47/Seaside Avenue/Navy Way by removing the last traffic signal and at-grade intersection between Interstate (I-) 710 and I-110, adding a new auxiliary lane and a new collector-distributor road, and implementing traffic channelization improvements.	Environmental review in process.
3	Cabrillo Way Marina Project	The proposed project includes developing, operating, and maintaining a marina, hotels, boater and visitor-serving club and meeting facilities, restaurants, retail buildings, and commercial areas at 2293 Miner Street. This project was evaluated in the *West Channel/Cabrillo Marina Phase II Development Project (Cabrillo Way Marina) Final Supplemental Environmental Impact Report* certified in December 2003.	Environmental review in process.
4	Berths 191–194 (Ecocem) Low-Carbon Cement Processing Facility	Construction and operation of a dry bulk terminal for vessel unloading, raw material milling, and storage and loading onto trucks of low-carbon construction binder.	Notice of Preparation (NOP) released in March 2022. Draft Environmental Impact Report (DEIR) released in October 2023. Final Environmental Impact Report (FEIR) in preparation.
5	SA Recycling Amendment to Permit No. 750 Project	The proposed project is located at 901 New Dock Street on Terminal Island, 90731. The proposed project seeks an amendment to Permit No. 750 to allow for an up to 10-year extension of existing operations, with up to 5 additional years for use of the site	Final Subsequent Environmental Impact Report (FSEIR) approved by the Board of Harbor Commissioners in April 2024.

Number in Figure	Project Title and Location	Project Description	Project Status
		as a non-operational restoration period for any necessary closure and remediation activities to restore the property.	
6	Westway Decommissioning	Decommissioning of the Westway Terminal along the Main Channel (Berths 70–71). Work includes decommissioning and removing 136 storage tanks with total capacity of 593,000 barrels and remediation of the site.	Decommissioning completed in 2013. Remediation planning underway.
7	Berths 97–109, China Shipping Development Project	Development of the China Shipping Terminal Phase I, II, and III including wharf construction, landfill and terminal construction, and back-land development, including operation under a revised project to modify certain mitigation measures.	Final Supplemental EIR completed in 2019. Impact levels assumed in this Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) are those disclosed in the Final Supplemental EIR.
8	Wilmington Waterfront Master Plan (Avalon Boulevard Corridor Project)	Planned development intended to provide waterfront access and promote development specifically along Avalon Boulevard. Project elements include a promenade, waterfront park, pedestrian bridge, location for the Wilmington Youth Sailing and Aquatic Center, public pier, and other visitor serving uses.	Construction underway in phases.
9	Berth 44 Boatyard Project	The proposed project includes redevelopment of the former San Pedro Boatworks site at 2945 Miner Street. Project components include demolition of existing structures and buildings on site, grading, paving, and constructing concrete pads, docks, gangways, slips, underground utilities, water treatment systems, storm drain, fencing, lighting, and buildings to support boatyard operations.	IS/NOP released in January 2024. DEIR in preparation.
10	Berths 206–209 Chassis Depot and Repair Facilities	Use of existing warehouses at 849 E. New Dock St and 921 E. New Dock St for chassis depot, storage, maintenance, and repair.	Final Negative Declaration (ND) approved July 2019. Addendum considered in 2023.
11	Berths 121–131 Container Terminal Improvements Project	Demolish existing wharf at Berths 126–129, construct a new wharf, install up to 10 new wharf cranes, reconstruct the shoreline, dredge and dispose of up to 310,000 cubic yards of sediments to deepen the berth, expand the existing on-dock railyard and install electric-powered rail-mounted gantry (RMG) cranes for railcar loading/unloading.	Notice of Intent (NOI)/NOP released in 2014. EIR/EIS in preparation.

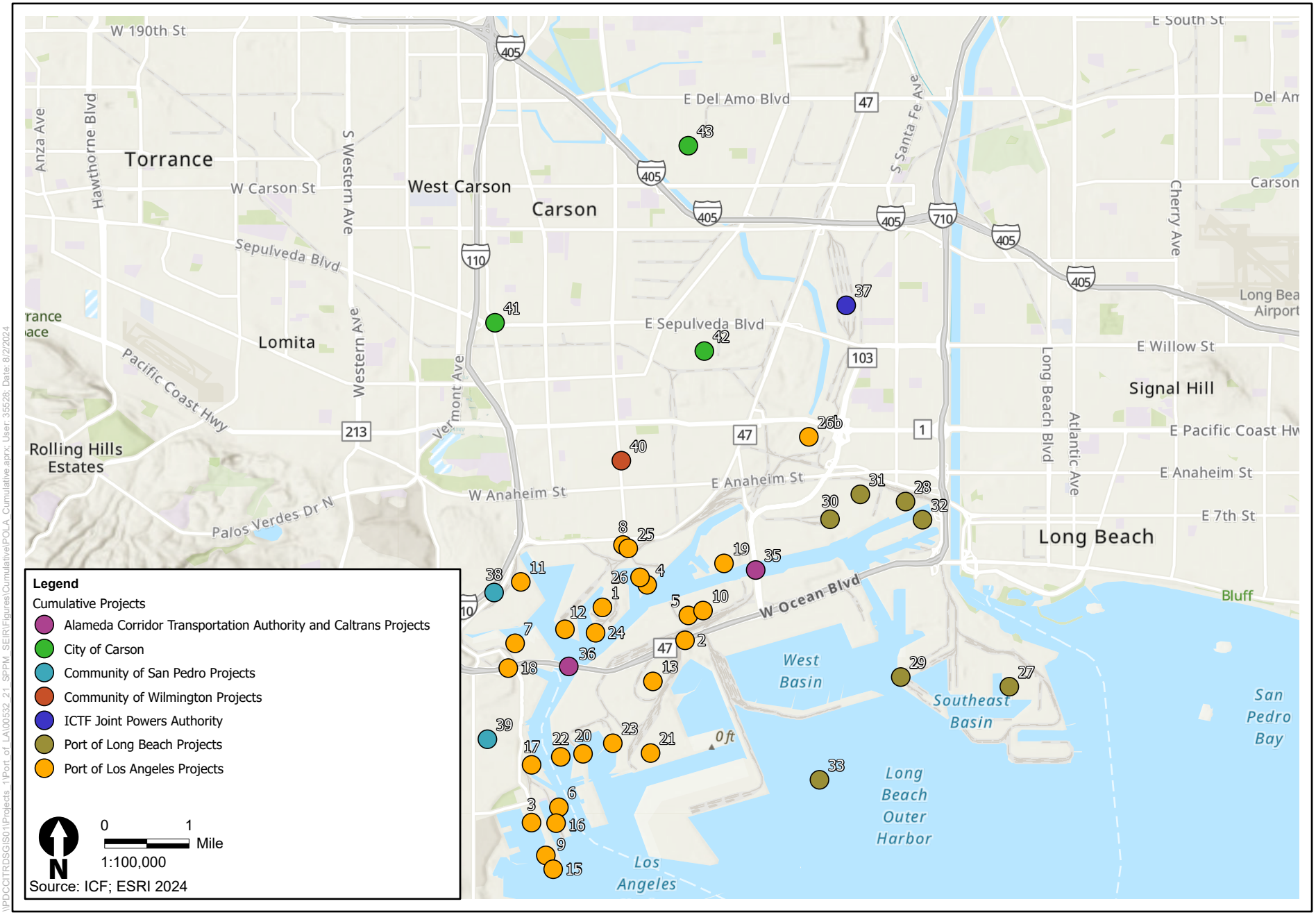
Number in Figure	Project Title and Location	Project Description	Project Status
12	Berths 148–151 (Phillips 66) Marine Oil Terminal Improvement Project	Various wharf and seismic ground improvements required to comply with MOTEMS and a new 20-year entitlement.	IS/NOP released in March 2022. DEIR in preparation.
13	Terminal Island Maritime Support Facility	Development and operation of a maritime support facility on an approximately 80-acre LAXT loop site on Terminal Island.	IS/NOP released in December 2023. DEIR in preparation.
14	Maintenance Dredging	Maintenance dredging is the routine removal of accumulated sediment from channel beds to maintain the design depths of navigation channels, harbors, marinas, boat launches, and port facilities. This is conducted regularly for navigational purposes (at least once every 5 years).	Continuous, but intermittent on average every 3–5 years.
15	Outer Harbor Cruise Terminal and Outer Harbor Park	Construction of two new, cruise terminals that would total up to 200,000 square feet (approximately 100,000 square feet each) and parking at Berths 45–47 and 49–50 in the Outer Harbor. The terminals would be designed to accommodate the berthing of a Freedom Class or equivalent cruise vessel (1,150 feet in length). A proposed Outer Harbor Park would encompass approximately 6 acres at the Outer Harbor. This project was evaluated in the 2009 San Pedro Waterfront (SPW) EIS/EIR.	Draft Request for Proposal for future development released January 2023.
16	City Dock No. 1 Marine Research Project (AltaSea)	This project includes development of a marine research center within a 28-acre area located between Berths 57–72. This project would change the break bulk areas east of East Channel (Berths 57–72) to institutional uses.	Phase I development in progress since 2017.
17	West Harbor Modification Project (formerly San Pedro Public Market (SPPM))	This project includes redevelopment of 42 acres, formerly known as the Ports O' Call Village, with up to 300,000 square feet of visitor-serving commercial uses and up to a 75,000-square-foot conference center. This project would involve changing the industrial uses along Harbor Boulevard to commercial. This project also includes a waterfront promenade and 3 acres of open space. This project was evaluated in the 2009 SPW EIS/EIR and subsequent 2016 SPPM Addendum. The revised project's environmental analysis involves development of a 108,000-square-foot outdoor Amphitheater, an entertainment venue 2.1 acres in	BHC certified the Final EIS/EIR and approved the project in 2009. Addendum 1 in May 2016 and Addendum 2 in November 2019. Construction of the 2016 Project is ongoing. NOP released in April 2022. Draft Subsequent Environmental Impact Report in preparation. Conceptual planning by private developer ongoing.

Number in Figure	Project Title and Location	Project Description	Project Status
		size, a 175-foot-diameter Ferris wheel, with additional amusement attractions, and other visitor-serving commercial uses. This project was evaluated in the 2009 SPW EIS/EIR.	
18	SR-47/Vincent Thomas Bridge and Front Street/Harbor Boulevard Interchange Reconfiguration	Reconfigure the existing interchange at SR-47/Vincent Thomas Bridge and Harbor Boulevard/Front Street to improve safety and operation for vehicles exiting the highway. Improvements also include modifications of the eastbound entrance ramps and modification of Harbor Boulevard and Front Street approaching and between the ramp termini.	Construction underway.
19	Port of Los Angeles and Port of Long Beach Workforce Training Facility	The proposed project includes development of an approximately 20-acre site at 1440 Anchorage Road for a goods movement workforce training facility.	IS/NOP released in February 2024. EIR in preparation.
20	Al Larson Boat Shop Improvement Project	Modernization of existing boat yard and 30-year lease extension. This project was evaluated in a Final EIR approved in 2009.	Project on hold.
21	Berths 302–306 (APL now known as Fenix Marine) Container Terminal Project	Improvements and expansion of the existing terminal, including the addition of cranes, modifications to the main gate, converting an existing dry container storage unit to a refrigerated unit, and the expansion of the terminal onto 41 acres adjacent to the existing terminal. Revised project includes continued operations with minor modifications to the terminal and a 15-year lease extension through 2043. This project was evaluated in a Final EIR in 2012 and Addendum in 2016.	Expansion project on hold, revised project ongoing.
22	Berths 238–239 (PBF Energy) Marine Oil Terminal Improvement Project	Demolition of the existing Berth 238 loading platform and construction of a new platform and associated mooring structures at Berth 238, and installation of landside improvements.	Construction pending.
23	Star-Kist Cannery Facility	Demolition of 14-acre site for future use as cargo support or container chassis storage.	BHC adopted MND February 2023; construction pending.
24	Berths 167–169 (Shell) Marine Oil Terminal Wharf Improvements Project	Various wharf and seismic ground improvements that are required to comply with MOTEMS, as well as other landside elements and a new 30-year lease. This project was evaluated in a Final EIR approved in 2018.	Construction is ongoing.

Number in Figure	Project Title and Location	Project Description	Project Status
25	Avalon and Fries Street Segments Closure Project	Physical closure of segments of Avalon Boulevard and Fries Avenue by installing street modifications that include cul-de-sacs, curbs and gutters, and fencing and signage.	Construction is pending.
26	Berths 187–191 (Vopak) Liquid Bulk Terminal Wharf Improvements and Cement Terminal Project	Various wharf and improvements that are required to comply with MOTEMS, improvements to an adjacent wharf to facilitate resumption of cement terminal operations on the site, and a new 30-year entitlement.	IS/NOP issued July 2022. DEIR in preparation.
Port of Long Beach Projects			
27	Piers G & J Terminal Redevelopment Project, Port of Long Beach	Redevelopment of two existing marine-container terminals into one terminal. The Piers G and J redevelopment project is in the Southeast Harbor Planning District area of the Port of Long Beach. The project will develop a marine terminal of up to 315 acres by consolidating two existing terminals on Piers G and J and several surrounding parcels. Construction will occur in four phases and will include approximately 53 acres of landfills, dredging, concrete wharves, rock dikes, and road and railway improvements.	Approved project. Construction ongoing.
28	Pier B Rail Yard Expansion (On-Dock Rail Support Facility)	Expansion of the existing Pier B Rail Yard in two phases, including realignment of the adjacent Pier B Street and utility relocation.	FEIR certified February 2018. Construction pending.
29	Mitsubishi Cement Corporation Facility Modifications	Facility modification, including the addition of a catalytic control system, construction of four additional cement storage silos, and upgrading existing cement unloading equipment on Pier F.	Project approved in April 2015. Construction commenced June 2021.
30	Southern California Edison Transmission Tower Replacement Project	Replace a series of transmission towers across the Cerritos Channel.	FEIR certified in 2017. Construction completed in August 2021. Demolition of old towers underway.
31	Toyota Facility Improvements Project	Construction of a new consolidated Vehicle Processing and Distribution Center, Hydrogen Call and Generator Facility, and Fueling Station. Demolition of some existing facilities.	MND adopted in 2018. Construction ongoing.
32	World Oil Tank Installation Project	Installation and operation of two 25,000-barrel petroleum storage tanks.	Environmental review underway.

Number in Figure	Project Title and Location	Project Description	Project Status
33	Pier Wind	Development of a 400-acre terminal to construct and assemble large offshore floating wind turbines and a 30-acre transport corridor to transport turbines for offshore wind projects in Northern and Central California coastal waters. The project will construct new land at the port and dredge approximately 50 million cubic yards for wharf construction, sinking basin, wet storage areas, and concrete piers adjacent to the transportation corridor.	IS/NOP issued January 2024. DEIR in preparation
Army Corps of Engineers			
34	Deep Draft Navigation and Main Channel Deepening Project	Dredge up to 10 million cubic yards of material to deepen channels, basins, and standby areas to improve waterborne transportation efficiencies and navigational safety for vessel operations. A new dredge substation may be constructed to provide electricity to dredge equipment.	FEIR/EIS underway.
Alameda Corridor Transportation Authority and Caltrans Projects			
35	Schuyler Heim Bridge Replacement and SR-47 Terminal Island Expressway	Alameda Corridor Transportation Authority (ACTA)/California Department of Transportation (Caltrans) project to replace the Schuyler Heim Bridge with a fixed structure and improve the SR-47/Henry Ford Avenue/Alameda Street transportation corridor by constructing an elevated expressway from the Heim Bridge to SR-1 (Pacific Coast Highway [PCH]).	Construction completed. Elevated expressway deferred indefinitely.
36	SR-47 Vincent Thomas Bridge Deck Replacement Project	Bridge repairs including replacement of bridge deck, median concrete barrier, and guardrails and upgrading of seismic sensors.	Draft EIR released February 2024
ICTF Joint Powers Authority			
37	Union Pacific Railroad ICTF Modernization and Expansion Project	Union Pacific proposal to modernize existing intermodal yard 4 miles from the Port.	Draft EIR on hold.
Community of San Pedro Projects			
38	John S. Gibson Truck and Chassis Parking Lot Project	Develop the 1599 John S. Gibson Boulevard 18.63-acre site with a short-term truck and chassis parking facility and related site improvements. The site is anticipated to be utilized for short-term parking, as chassis with or without containers are not anticipated to be parked on site over 24 hours. It includes paving of the site and	IS/NOP was released in October 2023. DEIR in preparation.

Number in Figure	Project Title and Location	Project Description	Project Status
		striping of approximately 393 truck and chassis stalls. The project would be implemented in one development phase and would require a *Port Master Plan* Amendment.	
39	Pacific Corridors Redevelopment Project, San Pedro	Development of commercial/retail, manufacturing, and residential components. Construction underway of four housing developments and Welcome Park.	Project underway. Estimated 2032 completion year according to City of Los Angeles Planning Department.
Community of Wilmington Projects			
40	Wilmington Redevelopment Plan Amendment/Expansion Project, Wilmington	The existing Wilmington Industrial Park would be expanded by an additional 2,487 acres, for a total of approximately 2,719 acres. Under the probable maximum level of development, the overall project area could support up approximately 7,326 residential units (primarily multifamily; zone changes under the Plan would permit multi-use and higher density residential development). In addition to the residential development, the project could accommodate up to approximately 207 acres (9 million square feet) of commercial development and up to 333 acres (14.5 million square feet) of industrial development.	NOP for Program EIR released for public review in August 2010. Currently on hold.
City of Carson			
41	Carson Stormwater and Runoff Capture Project	Excavation of 1.5-acre parcel at Sepulveda Boulevard and Figueroa Street and installation of an underground stormwater storage facility and associated infrastructure to store up to 17 acre-feet of water.	ND adopted 2017.
42	Shell Carson Facility Ethanol (E10) Project	Conversion of existing 69,000 barrels of gasoline storage tanks to ethanol service. The EIR for this project included the following project objectives: (1) increase the Carson Facility's ethanol storage capacity by approximately 75%; (2) increase ethanol tanker-truck loading capacity by at least 75%; (3) include modifications that would minimize impacts on its existing capacity to receive, store and deliver other petroleum products at current levels; and (4) maintain operational efficiency, safety and flexibility.	FEIR published December 2012.



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West Harbor Project - Cumulative List

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4.2 Cumulative Impact Analysis

The following sections analyze the cumulative impacts identified for each resource area relative to the Proposed Project and the list of related projects identified in Table 4-1. The discussion of the impacts of past, present, and reasonably foreseeable future projects refers to the list of projects and reference numbers as shown in Table 4-1. The alternatives listed below are analyzed under CEQA relative to the related projects:

- **Alternative 1 – No Project Alternative**. Conditions would remain based on the previously approved projects in both the 2009 SPW EIS/EIR and *2016 Addendum to the San Pedro Waterfront Project Environmental Impact Statement/Environmental Impact Report for the San Pedro Public Market (SPPM) Project* (2016 SPPM Addendum) (ICF 2016)); and
- **Alternative 2 – Half-Capacity Amphitheater Alternative.** This alternative would include all improvements of the Proposed Project, except that the Amphitheater would have half the seating capacity (3,100 seats).

The cumulative impact analysis considers the resources analyzed in Chapter 3, *Environmental Analysis*, of this SEIR. The Initial Study (IS) determined that construction and operation of the Proposed Project could make substantial contributions to cumulatively considerable impacts related to air quality. The Proposed Project, Alternative 1, or Alternative 2 would not change the determination of significance for air quality made in the 2009 SPW EIS/EIR and 2016 SPPM Addendum, as discussed in Section 3.2. Residual impacts would remain significant and unavoidable. The Proposed Project would add to impacts, but would not create new impacts nor substantially increase the severity of impacts deemed significant and unavoidable in the 2009 SPW EIS/EIR and 2016 SPPM Addendum. The Proposed Project would therefore make a cumulatively considerable contribution to existing cumulatively significant impacts on air quality. Impacts deemed significant in the 2009 SPW EIS/EIR and 2016 SPPM Addendum would remain significant and unavoidable.

The No Project Alternative (Alternative 1) would not add to nor change impacts identified in the 2009 SPW EIS/EIR or the 2016 SPPM Addendum, and impacts deemed significant in the 2009 SPW EIS/ EIR and 2016 SPPM Addendum would remain significant and unavoidable.

Similar to the Proposed Project, the Half-Capacity Amphitheater Alternative (Alternative 2) would add to impacts, but would not create new impacts nor substantially increase the severity of impacts deemed significant in the 2009 SPW EIS/EIR and 2016 SPPM Addendum. Alternative 2 impacts would be less than those of the Proposed Project. Alternative 2 would therefore make a cumulatively considerable contribution to existing cumulatively significant impacts on air quality. Impacts deemed significant in the 2009 SPW EIS/EIR and 2016 SPPM Addendum would remain significant and unavoidable.

4.2.1 Aesthetics

4.2.1.1 Scope of Analysis

A cumulative analysis for aesthetic resources evaluates whether impacts of the Proposed Project and related projects, when taken as a whole, would have a significant environmental impact on aesthetic resources. The geographic area for cumulative analysis of aesthetic resources is the Port, which is located in San Pedro Bay within the County of Los Angeles. The Port is located in an urban setting, built out and featuring Berths and Port buildings. The Proposed Project would adhere to all applicable scenic quality regulations and impacts on scenic resources would be less than significant. As previously mentioned, City plans that contain applicable scenic quality regulations include the *L.A. Waterfront Design Guidelines* (Port 2011), the City's *General Plan 2035* (City of Los Angeles 2015), and the Los Angeles Planning and Zoning Code (Section 3.1.8.3).

4.2.1.2 Significance Criteria

In terms of light and glare, the Proposed Project was determined to have the potential to create a new source of substantial light or glare that could adversely affect daytime or nighttime views. The analytical framework for assessing impacts and their significance is the *Visual Modification Class Approach to Preparing National Environmental Policy Act (NEPA)- and CEQA-Compliant Visual Impact Assessments* (Headley 2008).

Steep bluffs to the northwest provide a natural physical edge between portions of the San Pedro community and the Project Site. As described in Section 3.1.9.2, light-sensitive residents would be located more than 40 feet above and approximately 500 feet or more away from the Project Site (formerly Ports O'Call Village) and would not be exposed to spill light. Furthermore, because this area is adjacent to downtown commercial and office buildings, night lighting would not affect light-sensitive areas. Additionally, the Proposed Project would follow applicable light and glare guidelines.

After further study, it was determined that the Proposed Project would have less-than-significant impacts for light and glare (Section 3.1.8.3).

Baseline for Cumulative Aesthetic Impacts

The CEQA baseline is discussed in detail in Chapter 2, *Project Description.* In summary, the CEQA baseline for the Proposed Project is conditions that existed at the time the 2009 SPW EIS/EIR was certified and that are identified in Section 3.8.1, *Environmental Setting*, of that document.

4.2.1.3 Impact Analysis

Cumulative Impact AES-1: Would the Proposed Project contribute to a substantial adverse effect on a scenic vista from a designated scenic resource due to obstruction of views?

The Project Site is not within or near any protected or designated scenic vistas. Because there would be no Proposed Project-specific impact, there would be no cumulatively considerable impacts under CEQA.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The surrounding area of the Proposed Project is not within or near any protected or designated scenic vistas. Any past, present, or any reasonably foreseeable future projects would not have any impacts that would be considered cumulatively considerable under CEQA.

Mitigation Measures and Residual Cumulative Impacts

The Proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact regarding scenic vistas. Therefore, no mitigation measures would be required.

Cumulative Impact AES-2: Would the Proposed Project contribute to a new source of cumulatively substantial light or glare that would adversely affect day or nighttime views of the area?

Components of the Proposed Project, including the Amphitheater, would not create significant light and glare impacts on the surrounding developments. Therefore, the Proposed Project would not increase the severity of impacts compared to those identified in the 2009 EIS/EIR.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Construction of projects identified in Table 4-1 would be cumulatively significant if they were to create a new source of light or glare that would adversely affect day or nighttime views of the area. All projects in the area would be required to follow City plans that contain applicable scenic quality regulations, including the *L.A. Waterfront Design Guidelines*, the City's *General Plan 2035*, and the Los Angeles Planning and Zoning Code (Section 3.1.8.3). Therefore, impacts would not be cumulatively considerable.

Contribution of the Proposed Project

The Proposed Project, including the 208 E. 22nd Street Parking Lot, would not lead to a new significant environmental effect or a substantial increase in the severity of previously identified significant effects. Proposed Project impacts would be less than significant, and no mitigation would be required; therefore, no residual impacts would occur.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor its alternatives would make a cumulatively considerable contribution to a significant cumulative impact regarding light and glare. Therefore, no mitigation measures would be required.

4.2.2 Air Quality

4.2.2.1 Scope of Analysis

The region of analysis for cumulative effects on regional air quality (**Impacts AQ-1** and **AQ-3**) is the South Coast Air Basin (SCAB). For localized effects (**Impacts AQ-2** and **AQ-4**), the South Coast Air Quality Management District (SCAQMD) typically assesses cumulative projects within 1 mile of a

project site. For health effects (**Impact AQ-7**), the area of influence includes the cumulative projects within the Port complex and their effects on the surrounding communities of San Pedro, Wilmington, and Long Beach. **Impact AQ-5** (CO Hot Spots) and **AQ-6** (Odors) are not included in this section because the Proposed Project is not likely to make a significant contribution to a CO hotspot nor result in odors that would adversely affect a substantial number of people. **Impact AQ-8** (Consistency with Applicable Plans and Policies) is not included in this section because the Proposed Project would comply with rules and regulations developed as part of the SCAQMD Air Quality Management Plan (AQMP) and would not result in new significant impacts.

4.2.2.2 Significance Criteria

Criteria Pollutants

As described in Section 3.2, *Air Quality*, air quality within the SCAB has generally improved since the inception of air-pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more-stringent regulation of industrial sources, and the implementation of emission-reduction strategies by the SCAQMD. This trend toward cleaner air has occurred despite continued population growth. Even so, stationary industrial and mobile emission sources and topographical/meteorological conditions that inhibit atmospheric dispersion combine to create adverse pollution effects in the SCAB.

The U.S. Environmental Protection Agency (EPA) currently classifies the SCAB as in "extreme" nonattainment of the National Ambient Air Quality Standard (NAAQS) for ozone (8-hour standard) and in "serious" nonattainment for particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) (24-hour standard) (CARB 2022). The SCAB is in attainment of the NAAQS for particulate matter less than 10 microns in diameter (PM_{10}), carbon monoxide (CO), sulfur dioxide (SO_2), and nitrogen dioxide (NO_2) (CARB 2022).

The California Air Resources Board (CARB) currently classifies the SCAB as in nonattainment of the California Ambient Air Quality Standards (CAAQS) for ozone, PM_{10}, and $PM_{2.5}$ (CARB 2022). The SCAB is in attainment of the CAAQS for NO_2, SO_2, CO, lead, and sulfates and is unclassified for hydrogen sulfide and visibility-reducing particles (CARB 2022). SCAQMD predicts that the SCAB will reach attainment of the 2015 ozone 8-hour standard by 2037, but only if substantial reductions in nitrogen-oxide (NO_X) emissions, especially from federally regulated sources such as heavy-duty trucks, trains, and oceangoing vessels, can be achieved (SCAQMD 2022).

Criteria-pollutant emissions were calculated using the methodology and significance thresholds presented in Section 3.2. The Proposed Project's contributions to cumulative impacts for criteria pollutants were assessed using SCAQMD's guidance, which states that projects that exceed SCAQMD's project-level significance thresholds are considered by the SCAQMD to be cumulatively considerable. Conversely, projects that do not exceed the project-level thresholds are not considered to be cumulatively considerable (SCAQMD 2003). Because SCAQMD guidance does not distinguish between attainment and nonattainment pollutants, this analysis assumes that for **Cumulative Impacts AQ-1**, **AQ-2**, **AQ-3**, **AQ-4**, and **AQ-7**, exceedance of any project-level threshold would also constitute a cumulatively considerable contribution.

Toxic Air Contaminants

According to SCAQMD's Multiple Air Toxics Exposure Study (MATES) V study, the cancer risk in 2018 from inhalation of toxic air contaminants (TAC) in the communities in the vicinity of the San Pedro Bay ports was estimated at 504 in one million (SCAQMD 2021). Although the MATES V results showed a 40-percent decrease in cancer risk from the MATES IV study in 2013 (SCAQMD 2015), and a basin-wide 84-percent decrease since the MATES II study in 1998 (SCAQMD 2000), health risk from air toxics in the Port area remains elevated above the risks in communities elsewhere in the basin.

To reduce Port-related cancer risks in adjacent communities, the Ports of Los Angeles and Long Beach approved Port-wide air pollution–control measures through implementation of the *San Pedro Bay Ports Clean Air Action Plan* (CAAP), designed to reduce diesel particulate-matter (DPM) emissions by 77 percent, compared to 2005 emissions, by 2023 (Ports of Los Angeles and Long Beach 2010, 2017). In developing the CAAP, the Port recognized the importance of ensuring that new projects are designed to be consistent with the CAAP and other applicable regulations, allowing the Port to meet long-term health risk and emissions-reduction goals. According to the latest report (Port 2023), the Port has met the CAAP's emission reduction goals for DPM.

Notwithstanding, given the existing elevated cancer risk in communities surrounding the Port, this analysis assumes that any increase in health impacts (e.g., individual cancer risk, chronic hazard index, acute hazard index, population cancer burden) above the CEQA baseline, resulting from the Proposed Project, would be cumulatively considerable. TAC emissions were calculated using the methodology and significance thresholds presented in Section 3.2.

Baseline for Cumulative Air Quality Impacts

The CEQA baseline is discussed in detail in Chapter 2, *Project Description.* In summary, the CEQA baseline for the Proposed Project is conditions that existed at the time the 2009 SPW EIS/EIR was certified and that are identified in Section 3.8.1, *Environmental Setting*, of that document.

4.2.2.3 Impact Analysis

Cumulative Impact AQ-1: Would construction of the Proposed Project result in regional construction emissions?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Construction of projects identified in Table 4-1 would be cumulatively significant if their combined emissions would exceed the SCAQMD daily emission thresholds for construction. Because this would almost certainly be the case for the majority of criteria pollutants and ozone precursors, these projects would result in a significant cumulative air quality impact for PM_{10}, $PM_{2.5}$, NO_X, SO_X, CO, and volatile organic compounds (VOCs).

Contribution of the Proposed Project (Prior to Mitigation)

Criteria-pollutant emissions associated with construction of the Proposed Project are presented in Table 3.2-9, which shows that emissions of all criteria pollutants would not exceed SCAQMD significance thresholds in any of the analyzed years.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.2, mitigation measures (**MM-**) **AQ-3** through **MM-AQ-8**, although not quantified for the Proposed Project, would be implemented, and may reduce emissions. Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-1**, and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under **Cumulative Impact AQ-1**.

Cumulative Impact AQ-2: Would construction of the Proposed Project result in ambient air pollutant concentrations that would make a cumulatively considerable contribution to localized air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Construction of projects identified in Table 4-1 would be cumulatively significant if their combined emissions would result in ambient pollutant concentrations that would exceed the NAAQS and CAAQS. Although there is no way to be certain if a cumulative exceedance of the thresholds would occur for any pollutant without performing dispersion modeling for each related project, cumulative air-quality impacts are likely to exceed thresholds for PM_{10}, $PM_{2.5}$, and NO_2. Cumulative impacts are unlikely to exceed the thresholds for CO and SO_2 because the SCAB is in attainment for CO and SO_2, and project-level modeling evaluations for other large Port projects have calculated levels well below CO and SO_2 thresholds. Consequently, construction of projects identified in Table 4-1 are assumed to result in a significant cumulative air quality impact for PM_{10}, $PM_{2.5}$, and NO_2.

Contribution of the Proposed Project (Prior to Mitigation)

The SCAQMD developed the Localized Significance Thresholds (LST) methodology to aid CEQA lead agencies in assessing localized air-quality impacts from proposed projects. This screening methodology, based on onsite emissions, emission area, ambient air quality, and distance to the nearest exposed individual, enables a determination of whether a project would cause or contribute to exceeding air-quality standards without the need for a dispersion-modeling analysis. The LST is presented in look-up tables for various pollutants, and, if onsite emissions were to fall below the specified levels, then the proposed activity would be considered compliant with ambient air quality standards.

Criteria-pollutant emissions from onsite construction activities of the Proposed Project are presented in Table 3.2-10, which shows that emissions would not exceed SCAQMD LST significance thresholds and would therefore not exceed ambient air-quality standards for construction of the Proposed Project.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.2, **MM-AQ-3** through **MM-AQ-8**, although not quantified for the Proposed Project, would be implemented and may reduce emissions. Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-2**, and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under **Cumulative Impact AQ-2**.

Cumulative Impact AQ-3: Would operation of the Proposed Project result in emissions that would make a cumulatively considerable contribution to regional air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Operation of projects identified in Table 4-1 would be cumulatively significant if their combined emissions were to exceed the SCAQMD daily-emission thresholds for operations. Because this would almost certainly be the case for the majority of criteria pollutants and ozone precursors, these projects would result in a significant cumulative air quality impact for PM_{10}, $PM_{2.5}$, NO_X, SOx, CO, and VOC.

Contribution of the Proposed Project (Prior to Mitigation)

Criteria-pollutant emissions associated with operation of the Proposed Project are presented in Table 3.2-11, which shows that emissions would not exceed SCAQMD significance thresholds.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.2 and presented in Table 3.2-12, **MM-AQ-31** would be implemented and reduce emissions. Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-3** and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under **Cumulative Impact AQ-3**.

Cumulative Impact AQ-4: Would operation of the Proposed Project result in ambient air pollutant concentrations that would make a cumulatively considerable contribution to localized air quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Operation of projects identified in Table 4-1 would be cumulatively significant if their combined emissions were to result in ambient pollutant concentrations that would exceed the NAAQS and CAAQS. Although there is no way to be certain if a cumulative exceedance of the thresholds would occur for any pollutant without performing dispersion modeling for each related project, cumulative air-quality impacts are likely to exceed thresholds for PM_{10}, $PM_{2.5}$, and NO_2. Cumulative impacts are unlikely to exceed the thresholds for CO and SO_2 because the SCAB is in attainment for CO and SO_2, and project-level modeling evaluations for other large Port projects have calculated levels well below

CO and SO_2 thresholds. Consequently, operation of projects identified in Table 4-1 are assumed to result in a significant cumulative air-quality impact for PM_{10}, $PM_{2.5}$, and NO_2.

Contribution of the Proposed Project (Prior to Mitigation)

Criteria-pollutant emissions, from onsite operational activities of the Proposed Project are presented in Table 3.2-13. The table shows that emissions would not exceed SCAQMD LST significance thresholds and would therefore not exceed ambient air quality standards.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.2 and presented in Table 3.2-14, **MM-AQ-31** would be implemented and reduce emissions. Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-4**, and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under **Cumulative Impact AQ-4**.

Cumulative Impact AQ-6: Would the Proposed Project result in exposure to odors that would make a cumulatively considerable contribution to adversely affecting a substantial number of people?

The *Cumulative* section of the 2009 SPW EIS/EIR found that this impact would be cumulatively significant. Although the Proposed Project would not result in exposure to odors, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum, and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under this cumulative impact.

Cumulative Impact AQ-7: Would the Proposed Project result in exposure to TACs that would make a cumulatively considerable contribution to human health?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Although the SCAQMD MATES studies have documented substantial decreases in cancer risk to Port-area populations over the past 20 years, health risk from air toxics in the port area remains elevated compared to many other communities in the SCAB. Consequently, projects identified in Table 4-1 are assumed to result in a significant cumulative impact on cancer risk from TAC exposure. In addition, non-cancer chronic and acute impacts associated with these projects are also assumed to result in significant cumulative impacts from TAC exposure.

As described in Section 3.2, the Port has approved Port-wide air pollution control measures through its CAAP (Ports of Los Angeles and Long Beach 2010, 2017). Implementation of those measures would reduce the health-risk impacts from the Proposed Project and future projects at the Port. Existing regulations and future rules proposed by CARB and EPA (see Section 3.2) would also further reduce air emissions and associated cumulative health impacts from Port operations. However,

because future proposed measures (other than CAAP measures) and rules have not been adopted, they have not been accounted for in the emissions calculations or health-risk evaluation for the Proposed Project. Therefore, it is unknown at this time how those future measures would reduce cumulative health risk impacts within the Proposed Project area. Accordingly, airborne cancer and non-cancer impacts within the Proposed Project region are cumulatively significant.

Contribution of the Proposed Project (Prior to Mitigation)

As discussed in detail in Section 3.2, Proposed Project construction activities would result in emissions from engine exhaust in the form of DPM. Operation of the Proposed Project would be primarily recreational and would not involve heavy industrial processes associated with TACs or land uses associated with heavy-diesel transportation. Patron and worker vehicles would be mostly gasoline-fueled autos, and the use of electric vehicles is expected to increase in future years as California regulations drive the penetration of electric vehicles in the fleet mix.

Impacts associated with proposed firework displays and tugboats used to position firework barges are unique to the Proposed Project and presented in Table 3.2-15. The table shows that emissions associated with firework activities would not exceed SCAQMD thresholds of significance.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.2, **MM-AQ-3** through **MM-AQ-8** and **MM-AQ-31** would be implemented and reduce emissions. Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-7**, and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under **Cumulative Impact AQ-7**.

4.2.3 Biological Resources

4.2.3.1 Scope of Analysis

Cumulative impacts on biological resources are primarily the result of urbanization, habitat fragmentation, water pollution, and conversion of natural land to other uses. The scope for considering cumulative impacts on biological resources for the Proposed Project includes cumulative projects that could have an adverse effect on special-status plant and wildlife species or Sensitive Natural Communities, as discussed in Section 3.3, *Biological Resources*. When considering the cumulative biological effects of a proposed project, the setting is based on a geographic area and not necessarily on a project-specific site because biological resources are not limited to one specific area, and changes in other areas may affect resources on the project site. The geographic extent for considering project-related cumulative impacts on biological resources for the Proposed Project includes the Ports of Los Angeles and Long Beach (including the Inner and Outer Harbor areas) because this distance encompasses a reasonable representative range for populations of the sensitive species, such as special-status species, identified in the individual impact analysis for the Proposed Project.

Baseline for Cumulative Biological Impacts

The CEQA baseline for biological resources includes the environmental conditions (e.g., vegetation communities/land cover types, plant and wildlife species present, aquatic resources) that existed in the plan area at the time that the 2009 SPW EIS/EIR was certified and that are identified in Section 3.3.2, *Environmental Setting*, of that document. The 2016 SPPM Addendum determined that the SPPM Project would not result in new significant impacts, substantially increase the severity of a previously analyzed impact, nor require new mitigation measures that were not already addressed in the 2009 SPW EIS/EIR. The 2016 SPPM Addendum concluded that impacts on biological resources resulting from the SPPM Project would be less than significant, and there would be no substantial change from the findings in the 2009 SPW EIS/EIR.

4.2.3.2 Impact Analysis

Cumulative Impact BIO-1: Would the Proposed Project contribute to a cumulative substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The Ports of Los Angeles and Long Beach are heavily developed urban areas. Extensive dredging of lagoons, marshes, and the ocean floor took place along most of the California coast during the early 1900s, including at San Pedro Bay within the Proposed Project region. Coastal areas were dredged and filled to construct land masses along the California coast for urban development, including ports, highways, industrial areas, and residential areas. Current land uses in the region include parking lots, wharves, paved roads, commercial (e.g., fish markets, cruises, whale watching, restaurants), and industrial (e.g., container storage yards, commercial fishing). Very little native habitat or open areas still exist. However, the Harbor still supports a variety of marine life, including fish, mammals, and water birds.

A total of 42 projects were reviewed for this cumulative analysis, as described in Section 4.1.2, above. The majority of the cumulative projects listed in Table 4-1 are planned to be constructed in heavily developed areas (see Figure 4-1) within the Ports of Los Angeles and Long Beach. Project work includes traffic and roadway improvements, construction of new facilities (e.g., terminal, cargo container storage), commercial and residential development, facility modifications and improvements, and construction of urban parks and a pedestrian bridge. Because these projects are located in developed, industrial areas with little to no native habitat or open areas, they are unlikely to result in cumulatively considerable impacts on any sensitive species or their suitable habitat. However, some of the projects are located along or within the Los Angeles and Long Beach Harbors, and could potentially affect sensitive species, particularly marine species and water birds. Some of the projects along the Harbor would involve construction of marine infrastructure that could require in-water construction, including in-water piling and/or disturbance of the ocean floor (e.g., wharfs, marinas, docks, rock dikes). Several projects also include dredging. All projects in the area would be required to assess the potential of each individual project site to support sensitive species, and to

implement avoidance and minimization measures to avoid or reduce both direct and indirect impacts, including avoidance of any sensitive species that may be present where feasible. Significant impacts on or take of any listed species would require mitigation and consultation with the wildlife agencies (i.e., U.S. Fish and Wildlife Department [USFWS], California Department of Fish and Wildlife [CDFW], and/or National Marine Fisheries Service [NMFS]). Cumulative impacts on sensitive species from construction of projects identified in Table 4-1 could range from not cumulatively considerable to cumulatively significant, depending on the extent of the impacts.

Contribution of the Proposed Project (Prior to Mitigation)

No candidate, sensitive, or special-status terrestrial species are known to occur within the Project Site, and no federally critical habitat exists within the Proposed Project area. All new Proposed Project features covered under this SEIR are located within upland areas in developed or disturbed areas that do not contain any suitable habitat to support special-status species, including listed species. Neither construction nor operation of the Amphitheater, 208 E. 22nd Street Parking Lot, or Ferris wheel and Amusement Attractions would involve any in-water or over-water work. Therefore, no direct impacts on special-status species or their suitable habitat or critical habitat is expected. However, special-status species do occur within the surrounding Harbor and could be indirectly affected by the Proposed Project, particularly marine mammals and water birds, as a result of noise and trash from concerts at the Amphitheater and firework shows during special events, as described in Section 3.3.8, *Impact BIO-1*. In addition, the 2009 SPW EIS/EIR concluded that tree-removal activities could have a significant impact if birds were roosting or nesting in the area. Therefore, the contribution of the Proposed Project, together with cumulative projects, could result in significant impacts on sensitive species, including disturbance and degradation of suitable habitat, and be cumulatively considerable.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.3, for other issues that were not assessed in the 2009 SPW EIS/EIR, including impacts from Amphitheater events, fireworks shows, and the Amusement Attractions, implementation of the 2009 SPW EIS/EIR's **MM-BIO-2**, *Conduct Nesting Bird Surveys*, along with new **MM-BIO-7**, *Trash Management and Post-Event Cleanup*, **MM-BIO-10**, *Biodegradable Venue Products*, and **MM-BIO-11**, *Nest Clearance Must Avoid Breeding-Bird Season*, would reduce impacts on sensitive terrestrial and marine species as a result of debris and trash from Amphitheater events, fireworks shows, and the Amusement Attractions to less-than-significant levels. Lighting from Proposed Project features would not represent a substantial change from current ambient Port conditions; therefore, any impacts from night lighting would be less than significant. Noise impacts on marine mammals and nesting California least term would be reduced to less-than-significant levels with the implementation of **MM-BIO-8**, *Marine Mammal Monitoring during Fireworks Events*, and **MM-BIO-9**, *California Least Tern Nesting Colony Monitoring during Fireworks Events.* Therefore, the Proposed Project would not contribute considerably to cumulative impacts on sensitive species in the region.

Cumulative Impact BIO-2: Would the Proposed Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The Ports of Los Angeles and Long Beach are heavily developed urban areas, as described under *Cumulative Impact BIO-2*, above. Very little native habitat or open areas still exist, although there are small patches of sensitive natural communities scattered throughout, including in upland areas along the Harbor's edge (e.g., mudflats, coastal salt marsh, freshwater marsh) and within the inner and outer harbors (e.g., eelgrass beds, kelp beds).

Construction of projects identified in Table 4-1 would be cumulatively significant if they were to result in a significant loss of the remaining sensitive natural communities in the region. The majority of the cumulative projects listed in Table 4-1 are planned to be constructed in heavily developed areas (see Figure 4-1) within the Ports of Los Angeles and Long Beach and are therefore unlikely to result in cumulatively considerable impacts on sensitive natural communities. However, some of the projects are located along or within the Los Angeles and Long Beach Harbors, and could potentially affect sensitive natural communities, particularly sensitive marine habitats. All projects in the area would be required to document sensitive natural communities within their respective project sites and implement avoidance and minimization measures to avoid or reduce both direct and indirect impacts, including avoidance of the natural community, where feasible. Removal of any protected communities (e.g., eelgrass beds) would require mitigation. Cumulative impacts on sensitive natural communities from construction of projects identified in Table 4-1 could range from not cumulatively considerable to cumulatively significant, depending on the extent of the impacts.

Contribution of the Proposed Project (Prior to Mitigation)

All new Proposed Project features covered under this SEIR are located within upland areas in developed or disturbed areas that do not contain any sensitive natural communities, including riparian habitats or sensitive marine habitats. Therefore, no direct impacts would occur. However, the Proposed Project has the potential to significantly affect sensitive natural communities and marine environments as a result of human-produced trash and debris from events at the Amphitheater and fireworks shows, as described in Section 3.3.9, *Impact BIO-2*. The contribution of the Proposed Project, together with cumulative projects, could degrade sensitive natural communities and be cumulatively considerable.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.3, for other issues that were not assessed in the 2009 SPW EIS/EIR, including impacts from Amphitheater events, fireworks shows, and the Amusement Attractions, implementation of **MM-BIO-7**, *Trash Management and Post-Event Cleanup*, and **MM-BIO-10**, *Biodegradable Venue Products*, as well as compliance with the requirements specified in General NPDES Permit No. CAG994007 (Construction General Permit), would ensure that impacts on sensitive natural communities are reduced to less-than-significant levels. Therefore, the Proposed

Project would not contribute to cumulative impacts on sensitive natural communities in the region, including riparian habitats and sensitive marine habitats.

4.2.4 Cultural Resources

4.2.4.1 Scope of Analysis

This section discusses the potential of the Proposed Project, along with related cumulative projects (Table 4-1), to have a substantial adverse change in the significance of a historical or archaeological resource or a significant impact on a historical or archaeological resource by altering, directly or indirectly, any of the characteristics of an historic property that qualify the property for inclusion in the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP).

Past projects within the cumulative settings including the Proposed Project area have involved demolition of architectural and built-environment resources—some that could be now considered historic had they not been demolished—most often without the benefit of their recordation (i.e., photographs and professional drawings) beforehand. Although each structure more than 50 years old is not necessarily unique, historic buildings and some buildings that were demolished before meeting the definition of *historic* could have contributed to understanding events that have made a significant contribution to the broad patterns of history, may have been associated with the lives of persons significant in the past, and/or may have been architecturally distinctive. Their demolition without previous recordation may have reduced the ability to fully describe the region's heritage. Cumulative impacts associated with past, present, and reasonably foreseeable future projects regarding historical resources could be cumulatively significant if they were to include the removal of significant or potentially significant historical architectural resources.

Similarly, for archaeological resources, past development prior to the enactment of federal, state, and local laws and regulations, has resulted in the loss of potentially significant scientific and cultural data. More-recent development has been carried out under federal, state, and local regulations, with mitigation of significant impacts on such resources. However, because archaeological resources are nonrenewable resources, the direct and indirect impacts of past, present, and future projects would be cumulatively significant.

As discussed in Section 3.4, the SEIR evaluated the addition of the 208 E. 22nd Street Parking Lot for historical resources and found that impacts would be less than significant, with no mitigation necessary. Impacts related to the inadvertent discovery of archaeological resources or human remains during grading activities were found to be less than significant with implementation of **MM CR-3**, *Stop Work if Cultural Resources Are Discovered During Ground-Disturbing Activities*. This is a commonly accepted method of avoiding significant impacts under CEQA, and it is assumed that cumulative projects would implement a similar approach should grading be proposed that could affect as-yet-undiscovered archaeological resources or human remains. Therefore, the Proposed Project would not make a significant contribution to a cumulative impact regarding archaeological resources.

Cumulative Impact CUL-1: Would the Proposed Project contribute to a substantial adverse effect in the significance of a historical resource pursuant to Section 15064.5?

Cumulative Impact CUL-1 represents the potential of the Proposed Project, along with other cumulative projects, to alter, damage, or destroy a historical resource's ability to convey its significance, thus resulting in a substantial adverse effect.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past projects within urban areas, including the Proposed Project vicinity, have involved the demolition of significant historical resources. Although each resource more than 45 years of age is not necessarily unique, historical resources, such as buildings, structures, districts, and objects, are capable of contributing to understanding events that have made significant contributions to events or patterns of events, may have been associated with significant contributions by persons important in our history, may have been important for their architecture or as the work of a master practitioner, or may have been important for their potential to yield information about our history. The loss of these resources affects the ability to identify and interpret the region's history.

Construction and operation of the projects identified in Table 4-1 would result in cumulatively significant impacts if they were to alter a historical resource such that it no longer retained character-defining features necessary to convey its significance or demolished a historical resource.

Contribution of the Proposed Project (Prior to Mitigation)

The 208 E. 22nd Street Parking Lot does not have historical resources present within the study area that qualify as CEQA historical resources. Therefore, the Proposed Project would have no new cumulative impacts on historical resources. The Proposed Project would not result in a cumulatively considerable contribution to a change in the significance of a historical resource, as defined in CEQA Guidelines 15064.5.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are required because no historical resources are present within the 208 E. 22nd Street Parking Lot.

Cumulative Impact CUL-2: Would the Proposed Project contribute to a substantial adverse effect in the significance of an archaeological resource pursuant to Section 15064.5?

Cumulative Impact CUL-2 represents the potential of the Proposed Project, along with other cumulative projects, to alter, damage, or destroy a significant archaeological resource or a unique archaeological resource to a degree that reduces its ability to convey its significance, resulting in a substantial adverse effect.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

For archaeological resources, previous historical urban development without proper professional assessment and systematic collection of data, prior to the enactment of federal, state, and local laws and regulations, has resulted in the loss of potentially significant scientific and cultural data. More-recent development has been carried out under federal, state, and local regulations, with mitigation of significant impacts on such resources. However, because archaeological resources, including archaeological historical resources and unique archaeological resources, are nonrenewable resources, the direct and indirect impacts of past, present, and future projects would be cumulatively significant.

Construction and operation of the projects identified in Table 4-1 would result in cumulatively significant impacts if they were to alter a significant archaeological resource or a unique archaeological resource through damage or destruction such that it no longer retained character-defining features to convey its significance.

Contribution of the Proposed Project (Prior to Mitigation)

The 208 E. 22nd Street Parking Lot does not have any known archaeological resources or unique archaeological resources present within the study area that qualify as CEQA historical resources. Therefore, the Proposed Project would have no new cumulative impacts on archaeological resources. The Proposed Project would not result in a cumulatively considerable contribution to a change in the significance of an archaeological resource or unique archaeological resource, as defined in CEQA Guidelines 15064.5.

Mitigation Measures and Residual Cumulative Impacts

Impacts related to the inadvertent discovery of archaeological resources or human remains during grading activities were found to be less than significant with implementation of **MM CR-3,** *Stop Work if Cultural Resources Are Discovered During Ground-Disturbing Activities*. Implementation of **MM CR-3** would help to avoid contributing to the loss or alteration of archaeological historical resources and unique archaeological resources. **MM-CR-3** would avoid or reduce cumulative impacts to less than significant.

Cumulative Impact CUL-3: Would the Proposed Project contribute to a substantial adverse effect on human remains, including those interred outside of dedicated cemeteries?

Cumulative Impact CUL-3 represents the potential of the Proposed Project, along with other cumulative projects, to disturb, damage, or destroy prehistoric or historic-period human remains.

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Development of the Proposed Project, in conjunction with buildout of the City and the region, has the potential to adversely affect human remains through their destruction or disturbance during ground-disturbing activities. Impacts on human remains tend to be site-specific and are assessed on a site-by-site basis. The significance of the impacts would depend largely on what, if any, human remains occur on or near the sites of related projects that are developed in the cumulative setting. Similar to

the Proposed Project, such determinations would be made on a case-by-case basis, and, if necessary, the applicants of the related projects would be required to comply with applicable state and local regulations and implement appropriate mitigation measures.

Contribution of the Proposed Project (Prior to Mitigation)

The 208 E. 22nd Street Parking Lot does not have any known human remains present within the study area. Development of the Proposed Project would comply with state laws protecting human remains. Implementation of **MM-CR-3**, identified above, would ensure that human remains, if discovered on the Project Site, would be handled appropriately. Thus, given that the Proposed Project's cultural resources impacts are less than significant with mitigation, the Proposed Project's impacts on human remains would not be cumulatively considerable. Therefore, cumulative impacts on human remains would be less than significant.

Mitigation Measures and Residual Cumulative Impacts

Impacts related to the inadvertent discovery of human remains during grading activities was found to be less than significant with implementation of **MM CR-3**, *Stop Work if Cultural Resources Are Discovered During Ground-Disturbing Activities*. Implementation of **MM CR-3** would help to avoid contributing to the damage or destruction of human remains. Implementation of **MM-CR-3** would ensure that residual impacts on human remains are not cumulatively considerable and would reduce cumulative impacts to less than significant.

4.2.5 Greenhouse Gas Emissions

4.2.5.1 Scope of Analysis

Scientific evidence indicates a trend of warming global surface temperatures over the past century, due largely to the generation of greenhouse-gas (GHG) emissions from anthropogenic sources, as further discussed in Section 3.5, *Greenhouse Gas Emissions*. GHG emissions contribute to global climate change and are in part attributed to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors.

The region of analysis for cumulative GHG effects (**Cumulative Impact GHG-1**) is the California state boundary.

The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate-change impacts is to determine whether a project's GHG emissions, which are at a micro-scale relative to global emissions, make a cumulatively considerable incremental contribution to a macro-scale impact. The SCAQMD Governing Board developed a threshold of 3,000 metric tons per year for nonindustrial projects. However, because the SCAQMD did not formally adopt this threshold, this analysis does not rely on it for determination of significance. Therefore, GHG emissions were calculated based on the methodology presented in Section 3.5 for informational purposes, and the determination of significance was based on an analysis of the Proposed Project's consistency with applicable plans and policies established for the purpose of reducing GHG emissions.

Baseline for Cumulative Greenhouse Gas Impacts of Greenhouse-Gas Emissions

The CEQA baseline is discussed in detail in Chapter 2, *Project Description*. In summary, the CEQA baseline for the Proposed Project is the existing operation in Fiscal Year 2021/2022.

Cumulative Impact GHG-1: Would the Proposed Project result in GHG emissions that would make a cumulatively considerable contribution?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects in the area (Table 4-1) have generated and will continue to generate GHGs from the combustion of fossil fuels and the use of coatings, solvents, refrigerants, and other products. Current and future projects will incorporate a variety of GHG-reduction measures in response to federal, state, and local mandates and initiatives, and these measures are expected to reduce GHG emissions from future projects. However, because of the long-lived nature of GHGs in the atmosphere and the global nature of GHG-emissions impacts, no specific quantitative thresholds of significance under CEQA for GHG emissions from related projects in the state or region have been identified. It is therefore conservatively assumed that GHG emissions related to past, present, and reasonably foreseeable future projects would represent a significant cumulative impact.

Contribution of the Proposed Project (Prior to Mitigation)

GHG emissions associated with the Proposed Project are presented in Table 3.5-1 for informational purposes. Table 3.5-2 compares the Proposed Project's actions to applicable plans, policies, and regulations developed to reduce GHG emissions. The table identifies plans, policies, and regulations, discusses their relevance to elements and actions of the Proposed Project, and assesses the Proposed Project's consistency with the specified plans, policies, and regulations. Table 3.5-1 shows that Proposed Project activities would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum, and residual impacts would remain significant and unavoidable.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.5, **MM-AQ-3**, **MM-AQ-4**, **MM-AQ-6**, **MM-AQ-7**, and **MM-AQ-27**, although not quantified for the Proposed Project, would be implemented and may reduce emissions. In addition, **MM-AQ-31** was quantified and would reduce GHG emissions slightly, as shown in Table 3.5-3.

Nevertheless, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum, and residual impacts would remain significant and unavoidable. The Proposed Project would therefore make a cumulatively considerable contribution to an existing cumulatively significant impact under **Cumulative Impact GHG-1**.

4.2.6 Hazards and Hazardous Materials

4.2.6.1 Scope of Analysis

The cumulative geographic context for hazards and hazardous materials consists of sites within the Proposed Project area and nearby properties in the immediate vicinity. In general, only projects occurring in the immediate vicinity to the Proposed Project are considered due to the limited potential impact area associated with the release of hazardous materials into the environment. Similarly to the Proposed Project, reasonably foreseeable projects in the Proposed Project's surroundings could result in construction impacts related to the routine transport, disposal, or handling of hazardous materials, intermittent use and transport of petroleum-based lubricants, solvents, and fuels, and transport of affected soil to and from sites. However, hazardous waste generated during construction of any project would be collected, properly characterized for disposal, and transported in compliance with regulations, such as the ones described under Section 3.6.4, *Regulatory Setting*. In addition, affected sites under development would undergo remediation under oversight of applicable state and local agencies, effectively reducing the amount of contaminants found in the cumulative project area.

Hazardous materials are strictly regulated by federal, state, and local laws. Specifically, these laws are designed to ensure that hazardous materials do not result in a gradual increase in toxins in the environment. For each of the reasonably foreseeable projects under consideration, various project-specific measures (i.e., as identified for the Proposed Project) would be implemented as a condition of development approval to mitigate risks associated with exposure to hazardous materials. For these reasons, the Proposed Project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative hazards or hazardous-materials impacts. The Proposed Project's contribution to cumulative impacts would therefore not be significant.

Baseline for Cumulative Hazards and Hazardous Materials Impacts

The geographic scope for cumulative impacts associated with accidental spills or hazardous materials encompasses the overall Port Complex and Precautionary Area. Past, present, and reasonably foreseeable future projects that could contribute to these cumulative impacts include those projects that transport hazardous materials in the vicinity of the Port Complex.

The significance criteria for the cumulative analysis are the same as those used for the Proposed Project in Section 3.6, *Hazards*.

4.2.6.2 Impact Analysis

Cumulative Impact HAZ-1: Would the Proposed Project contribute to a cumulative substantial adverse effect by creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Some of the cumulative projects identified in Table 4-1 may also be included on government cleanup databases (e.g., Cortese List), and, as such, would be under regulatory oversight for cleanup of released hazardous materials to the environment. As with the Project Site, the cumulative projects' presence on this list does not necessarily result in a significant impact because ongoing remediation, as required by these regulatory agencies, would ultimately reduce impacts on the environment (i.e., remove hazardous materials from soil, soil vapor, and groundwater during remediation activities). Construction and operation of cumulative projects that are identified on Cortese List databases would not likely result in a cumulative significant impact.

Contribution of the Proposed Project (Prior to Mitigation)

The 2009 SPW EIS/EIR determined that affected soil and groundwater exist in limited areas of the Project Site due to releases associated with historic onsite industrial land uses. As such, the 2009 SPW EIS/EIR concluded that onsite disturbance, including grading and excavation activities, could expose construction personnel, existing personnel, and future site occupants to affected soil. In addition, grading conducted in the proposed park and open space areas as part of the Proposed Project could also expose construction personnel and future recreational users to affected soil. It was concluded that human-health and safety impacts would be significant, pursuant to exposure levels established by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment. The Proposed Project, including the 208 E. 22nd Street Parking Lot, would not lead to a new significant environmental effect or a substantial increase in the severity of previously identified effects.

Mitigation Measures and Residual Cumulative Impacts

No mitigation measures are required because cleanup and remediation are inherently required for contaminated sites that are under regulatory oversight. There would be no cumulatively considerable impacts.

Cumulative Impact HAZ-2: Would the Proposed Project contribute to a cumulative substantial adverse effect by being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

As discussed above, concurrent cumulative projects within the Port Complex are not likely to have similar impacts because proposed operations are not similar. Cumulative projects do have the potential to release hazardous materials to the environment from accidental or upset conditions. Regulations in place that manage the handling of these hazardous materials require written and practicable release-prevention and -response procedures if reportable quantities of hazardous materials are used on site. Should contaminated media be present, similar to the Proposed Project Site, where construction would disturb and potentially release hazardous materials, then implementation of contaminated-media best management practices (BMPs)/protocols would mitigate such releases. These mitigation measures, similar to those proposed for the Proposed Project (see **MM-HAZ-1** in Section 3.6.9.5), would reduce potentially cumulative impacts to less-than-significant levels.

Contribution of the Proposed Project (Prior to Mitigation)

As discussed in Section 3.6.9.5, with the implementation of **MM-HAZ-1**, the Proposed Project would not result in a new foreseeable upset condition associated with the release of hazardous materials and would not result in a cumulatively considerable impact.

Mitigation Measures and Residual Cumulative Impacts

MM-HAZ-1 would be implemented to develop a soil management plan (SMP) for the 208 E. 22nd Street Parking Lot. The SMP would be designed to protect human health and the environment and would include protocols, measures, and techniques for the proper handling, management, and disposition of affected soils found on site and in any areas of offsite work during site-preparation and -grading activities. The SMP would also be designed to protect workers and offsite receptors during site activities and ensure the proper characterization, management, and/or disposal of contaminated environmental media that is above applicable environmental-screening levels. A commercial environmental-engineering firm with demonstrated expertise and experience in the preparation of SMPs would prepare the SMP, which would be stamped by an appropriately licensed professional. The SMP would be implemented throughout all ground-disturbing work. Implementation of **MM-HAZ-1** would ensure that residual impacts would be reduced to a less-than-significant level.

4.2.7 Hydrology and Water Quality

4.2.7.1 Scope of Analysis

The geographic scope of analysis for cumulative impacts on water and sediment quality is the Los Angeles and Long Beach Harbors (Inner and Outer Harbor areas) because these areas represent the

receiving waters for all cumulative projects considered. Water and sediment quality within the geographic scope are affected by activities within the Harbor (i.e., shipping, wastewater discharges from the Terminal Island Water Reclamation Plant, inputs from the watershed including aerial deposition of particulate pollutants, and effects from historical [i.e., legacy] inputs to the Harbor). As discussed in Section 3.11, portions of the Los Angeles and Long Beach Harbors are identified on the current Section 303(d) list as impaired for a variety of chemical and bacteriological stressors and effects on biological communities. Water quality in San Pedro Bay has improved greatly over the last 40 years, through compliance with federal and state regulations, better pollution-source control, and dredging that has removed accumulated contaminants in Harbor sediment.

Baseline for Hydrology and Water Quality Impacts

The CEQA baseline is discussed in detail in Chapter 2, *Project Description*. In summary, the CEQA hydrology and water quality baseline for the Proposed Project is conditions that existed at the time the 2009 SPW EIS/EIR was certified and that are identified in Section 3.6.2 and Section 3.14.2, *Environmental Setting*, of that document.

Cumulative Impact HYD-1: Would the Proposed Project contribute to a cumulative substantial adverse effect by violating any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Assuming concurrent implementation of other present and reasonably foreseeable future projects, adverse cumulative effects on hydrology and water quality could include construction impacts related to increases in stormwater runoff and pollutant loading to receiving water bodies. The cumulative geographic areas, inclusive of the Project Site, are fully developed. Buildout of cumulative projects would be anticipated primarily to involve redevelopment of existing developed sites that contain substantial impervious surfaces.

Impacts of past, present, and reasonably foreseeable future projects could degrade stormwater quality through an increase in impervious surface area and an increase in contaminated runoff. During operation, runoff may contain oil, grease, and metals that accumulated in streets and parking lots, as well as pesticides, nutrients, animal waste, and trash from landscaped areas. Other potential water-quality impacts, especially for in-water work, could include chemical spills if proper minimization measures were not implemented. Such potential impacts could ultimately violate water-quality standards, affect beneficial uses, and/or further impair 303(d)-listed waters within the watershed. The quality of stormwater runoff varies with surrounding land uses, topography, and the amount of impervious cover, as well as with the intensity (i.e., energy) and frequency of irrigation or rainfall. When the effects of the Proposed Project on water quality are considered in combination with the overall Proposed Project and potential effects of other cumulative projects, the potential for cumulative impacts on surface and groundwater quality would exist.

Cumulative projects would be required to comply with the Construction General Permit, regional, and local requirements regarding protection of water quality to control runoff and regulate water quality at

each development site. Additionally, development projects would be subject to an environmental-review process, which would identify potential site and/or project-specific water-quality impacts and mitigate for any potential significant impacts. Therefore, impacts of past, present, and reasonably foreseeable future projects would not contribute to a cumulative substantial adverse effect on water quality, and impacts would be less than significant.

Contribution of the Proposed Project (Prior to Mitigation)

The contribution of the Proposed Project, together with cumulative projects, could degrade stormwater quality during construction through land disturbance and during operation through an increase in impervious surface area and contaminated runoff.

During construction, dewatering in areas of shallow groundwater may be required during excavation activities, which could result in the exposure of pollutants from spills or contaminated soils, thereby contaminating groundwater. Additionally, existing concerns are associated with contaminated onsite soil that may be disturbed during construction and adversely affect water quality. However, the Storm Water Pollution Prevention Plan would include a dewatering plan, which would establish measures to prevent/minimize sediment and contaminant releases into groundwater during excavation. Compliance with dewatering requirements would prevents potential water-quality impacts on surface waters and ensure that proper treatment measures are implemented prior to discharge. Implementation of the 2009 SPW EIS/EIR's **MM-GW-1** and **MM-GW-2** would reduce potential impacts to less than significant.

During operations, the Proposed Project would result in an increase of impervious surface on the Project Site. Increased impervious areas result in increased runoff rates and volumes and associated pollutants. Impervious areas also reduce infiltration of stormwater and prevent pollutant filtration of stormwater that would otherwise occur in pervious areas. The Proposed Project would be required to comply with the City's Low-Impact Development (LID) ordinance, including site design, pollutant source control, stormwater treatment, and flow-control measures. Operations would also comply with the latest Municipal Separate Storm Sewer System (MS4) permit. In addition, standard Port permit conditions would require the provision of adequate onsite waste collection, contained trash enclosures, and minimization of waste from concessions through compliance with City ordinances for single-use items and food recycling. Standard BMPs would also be part of the permit conditions to ensure that trash is picked up, and the entire site would be cleaned after each event to minimize mobilization of pollutants from concert events. Furthermore, implementation of **MM-BIO-7**, *Trash Management and Post-Event Cleanup* and **MM-BIO-10**, *Biodegradable Venue Products*, would ensure that trash and other debris resulting from Amphitheater events and fireworks shows would be removed from the Harbor and that biodegradable products would be used to reduce impacts that could affect water quality on nearby marine environments.

In summary, the Proposed Project would result in similar hydrology and water-quality impacts as those already deemed significant (but mitigated) in the 2009 SPW EIS/EIR, but would not substantially increase the severity of those impacts. Implementation of the 2009 SPW EIS/EIR's **MM-GW-1** and **MM-GW-2**, **MM-HAZ-1**, along with new mitigation measure **MM-BIO-7** would ensure that impacts were reduced to less-than-significant levels. For each of the reasonably foreseeable projects under consideration, various project-specific measures (e.g., as identified for the Proposed Project) would be implemented as a condition of development approval to minimize or

mitigate issues related to hydrologic or water-quality conditions. For these reasons, the Proposed Project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative hydrology or water-quality impact. The Proposed Project's contribution to cumulative impacts would therefore not be significant.

The Proposed Project would be required to comply with the Construction General Permit to control runoff and regulate water quality, in addition to regional and local requirements regarding protection of water quality. Additionally, the Proposed Project would be subject to an environmental-review process, which would identify potential Project Site and/or Proposed Project-specific water-quality impacts and mitigate for any potential significant impacts. Therefore, the Proposed Project's contribution to cumulative impacts on hydrology and water quality would be less than cumulatively considerable**.**

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor either of its alternatives would have a cumulatively considerable contribution to a significant cumulative impact. Therefore, no additional mitigation measures would be required.

Cumulative Impact HYD-2: Would the Proposed Project contribute to a cumulative substantial adverse effect by substantially altering the existing drainage pattern of the site or area in a manner that would (1) result in substantial erosion or siltation; (2) substantially increase the rate or amount of surface runoff in a manner that would result in flooding; (3) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems; and (4) impede or redirect flood flows?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Past, present, and reasonably foreseeable future projects within the vicinity of the Proposed Project could increase the volume and rate of stormwater runoff. Such increases could cause localized flooding if the storm drainage capacity were exceeded or conveyed excess flows to overbank areas, where flood storage may not be available. Generally, cumulative projects would occur in developed areas with existing impervious surfaces and would not be expected to substantially increase the amount of new impervious surfaces.

All new development would be required to address stormwater in a manner that ensures that flooding would not increase and flood flows would not be redirected to other areas that are not currently prone to flooding. All cumulative projects would be required to include stormwater-management features, such as LID measures into project designs that reduce flows to pre-project conditions. If improvements to storm drainage capacity were needed, then the City would ensure that the appropriate storm drainage improvements were identified. Therefore, impacts of past, present, and reasonably foreseeable future projects would not contribute to the cumulative exceedance of storm-drainage capacity, and there would be a less-than-significant cumulative impact.

Contribution of the Proposed Project (Prior to Mitigation)

The Proposed Project would result in an increase in impervious surfaces. However, LID compliance through infiltration would reduce runoff rates and volumes. Stormwater runoff at the Project Site would comply with applicable LID requirements, including the City's LID ordinance and MS4 permit. All drainage facilities would be designed to meet City standards and Port guidelines. To meet federal, state, and local requirements for water-quality treatment and flood control, stormwater-management facilities would be maintained. Implementation of postconstruction stormwater-management BMPs, including LID features, would allow stormwater infiltration and reduce impacts associated with impervious areas. The Proposed Project is required to address stormwater in a manner that ensures that flooding does not increase, and flood flows do not need to be redirected to other areas that are not currently prone to flooding. The Proposed Project includes stormwater-management features, such as LID measures, that must be implemented into Proposed Project designs to reduce flows to pre-project conditions. If improvements to storm drainage capacity were needed, then the City would ensure that the appropriate storm-drainage improvements were identified. Therefore, the Proposed Project would not contribute to the cumulative exceedance of storm-drainage capacity, and there would be a less-than-significant cumulative impact.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor its alternatives would have a cumulatively considerable contribution to a significant cumulative impact. Therefore, no mitigation measures would be required.

4.2.8 Noise and Vibration

4.2.8.1 Scope of Analysis

Cumulative noise or vibration impacts can occur when two or more projects are under construction simultaneously or generate operational noise or vibration simultaneously. Because noise and vibration are localized effects that decrease with distance from the source, significant cumulative impacts typically do not occur unless two or more projects are located close to a single receiver. The presence of any natural or human-made barriers (e.g., hills, topography, walls, buildings) between a project site and a receiver increase the rate of noise reduction over distance and further reduce any cumulative noise levels. Related projects in the vicinity of the noise- and vibration-sensitive receivers considered in this analysis would include construction and/or operational activities that could occur simultaneously with the construction and/or operation of the Proposed Project, depending on project timing.

Baseline for Cumulative Noise Impacts

The baseline for the noise analysis is generally intended to match the 2007 baseline considered in the 2009 SPW EIS/EIR. Existing (2007) traffic noise levels were calculated as part of the 2009 SPW EIS/EIR. However, to facilitate a thorough analysis, it was necessary to develop additional baseline data using ambient noise measurements conducted after the 2009 SPW EIS/EIR was complete. Most of the ambient noise data gathered as part of the 2009 SPW EIS/EIR was taken from short-term (i.e., 20-minute) daytime-noise measurements. Therefore, new ambient noise data was gathered as part of this

SEIR that included long-term (i.e., 24 hours or more) measurements to characterize daytime-, evening-, and nighttime-noise levels separately. The new ambient noise data also represented receivers farther away from the Project Site, where no measurements were obtained for the 2009 SPW EIS/EIR.

Cumulative Impact NOI-1: Would the Proposed Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project that would result in a cumulatively considerable exceedance of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Development of most of the projects identified in Table 4-1 would include construction activities with heavy-construction equipment and, in some cases, pile driving. Many of the projects are located in industrial areas, away from noise-sensitive receptors, and, as such, would not generate any significant construction-noise impacts, either individually or when combined with other projects. Where projects are proposed near homes and other noise-sensitive uses, noise-abatement measures would be required to reduce construction-noise impacts to the extent feasible. Nonetheless, some individual, related projects may cause significant construction-noise impacts on nearby sensitive receptors, even with abatement measures implemented.

Table 4-1 identifies a range of project types that would introduce a variety of operational noise sources. Many of the projects are located in industrial areas, away from noise-sensitive receptors, and, as such, would not generate any significant operational-noise impacts, either individually or when combined with other projects. Many projects would replace existing infrastructure and operations with similar and upgraded infrastructure and operations. Consequently, these projects would produce noise levels similar to those already produced at the existing sites and would not substantially increase existing ambient noise levels. All projects would be subject to environmental review, including applicable noise standards and guidelines (federal, state, and/or local, depending on the project type and jurisdiction), and where any new or expanded noise sources are anticipated to exceed applicable thresholds, projects would be required to implement noise-mitigation or -abatement to reduce impacts. As a result of all these factors, it is anticipated that most projects would not generate significant noise impacts. Nonetheless, given the number of projects identified in Table 4-1 and the size and scope of those projects, it cannot be ruled out that one or more related projects may cause significant operational-noise impacts at nearby sensitive receptors, even with abatement measures implemented.

Contribution of the Proposed Project (Prior to Mitigation)

The direct noise impacts of the Proposed Project are detailed in Section 3.8.8.4. Because noise is a localized impact, Proposed Project construction and operation would not contribute to a cumulative noise impact unless another project were to be constructed or operated simultaneously nearby. Any projects listed in Table 4-1 that are not within 0.25 mile of noise-sensitive receivers affected by the Proposed Project were excluded from further consideration because only projects within 0.25 mile would be sufficiently close to have the potential to cause a significant change in total noise level.

Construction Noise

Significant construction-noise impacts from the Proposed Project are predicted at nearby residences to the west of the Project Site due heavy construction at the 208 E. 22nd Street Parking Lot. With three exceptions, all the projects listed in Table 4-1 are more than 0.25 mile from the affected residences. The three nearby projects are the Cabrillo Way Marina Project, Deep Draft Navigation and Main Channel Deepening Project, and Pacific Corridors Redevelopment Project.

The closest construction activity typically dominates noise levels at any single receiver. Incremental noise increases of up to 3 A-weighted decibels (dBA), relative to noise from a single construction site, could occur if two nearby construction sites were active simultaneously. This worst-case cumulative increase would be barely perceptible and would only occur at receivers that are exposed to identical noise levels from two construction sites simultaneously. At any location where noise levels from a single construction site were dominant, the incremental increase from noise from a second site would be less than 3 dB, due to the logarithmic nature of decibels (refer to Section 2.1.1, *Decibel Calculations*, for an explanation of decibels and how they are added). Therefore, most (and possibly all) significant construction-noise impacts would be due to the direct impact of a single project, and the incremental increase due to the cumulative effect of additional projects would be negligible. As a result, noise from the construction of the Proposed Project or either of its alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

Operational Noise

Significant operational-noise impacts from the Proposed Project are predicted at numerous nearby noise-sensitive receptors due to proposed Amphitheater operations and fireworks displays. After the implementation of Proposed Project mitigation measures, affected receptors would include Project Site liveaboard vessels in Al Larson Marina and Cabrillo Marina, employee housing at Reservation Point, and military housing at Fort MacArthur. Most of the projects listed in Table 4-1 are more than 0.25 mile from the affected residences. The exceptions are the Cabrillo Way Marina Project, Westway Decommissioning Project, Berth 44 Boatyard Project, Outer Harbor Cruise Terminal and Outer Harbor Park Project, City Dock No. 1 Marine Research (Alta Sea) Project, Al Larson Boat Shop Improvement Project, Berths 238–239 (PBF Energy) Marine Oil Terminal Improvement Project, Star-Kist Cannery Facility Project, Deep Draft Navigation and Main Channel Deepening Project, and Pacific Corridors Redevelopment Project. As discussed previously, all projects would be subject to environmental review and would be required to implement noise-mitigation or -abatement features to reduce any predicted noise impacts. The type of noise generated by these projects would be different from the short-term, event-specific music and fireworks noise from the Proposed Project and would not be expected to be concentrated around the same weekend and evening periods when worst-case noise from the Proposed Project would occur. As a result, worst-case noise levels from the Proposed Project would be rarely expected to overlap with worst-case noise levels from cumulative projects. The largest noise increases from the Proposed Project would occur at receivers closest to the Amphitheater or the fireworks-launch location. At these most-affected receivers, noise from the Proposed Project would dominate, and the cumulative effect of other projects would be minimal. At receivers farther from the Proposed Project and closer to other project(s), noise levels could be influenced by both, if they were to operate simultaneously. The largest cumulative increase in noise levels would be 3 dBA, which would occur at locations where the noise contribution from the

Proposed Project were equal to that of the simultaneous cumulative project(s) (refer to Section 2.1.1, *Decibel Calculations*, for an explanation of decibels and how they are added). At other locations, receivers would experience greater direct noise levels from either the Proposed Project or cumulative project(s), and the increase from combining the two would be smaller. The maximum cumulative increase of 3 dBA is generally considered to be a barely noticeable increase. As a result, noise from operation of the Proposed Project or either of its alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor either of its alternatives would make a cumulatively considerable contribution to a significant cumulative noise impact. Therefore, no new or additional mitigation measures would be required, and there would be no residual cumulative noise impacts from the Proposed Project.

The project feature (PF) and mitigation measures recommended in Section 3.8 to reduce direct impacts from Proposed Project construction noise (**MM NOI-1** and **MM NOI-2**), Amphitheater noise (**PF-1** and **MM NOI-3** through **MM NOI-10**), and fireworks noise (**MM NOI-11** through **MM NOI-14**) would reduce Proposed Project impacts to the extent feasible and, as such, would minimize any incremental contributions that the Proposed Project might have on cumulative noise levels.

Cumulative Impact NOI-2: Would the Proposed Project result in a considerable contribution to a cumulatively significant generation of excessive groundborne vibration or groundborne noise levels?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Development of most of the projects identified in Table 4-1 would include construction activities with heavy-construction equipment and, in some cases, pile driving that could generate perceptible levels of groundborne vibration. Many of the projects are located in industrial areas, away from sensitive receptors, and, as such, would not generate any significant construction-vibration impacts, either individually or when combined with other projects. Where projects are proposed near homes and other sensitive uses, groundborne vibration may be perceptible, but would typically be less than significant because of the rapid reduction of vibration levels over distance. Any significant impacts would typically be limited to locations within approximately 100 feet of heavy construction.

Table 4-1 identifies a range of project types. Once operational, most projects would not include any substantial sources of groundborne vibration. Project activities that might generate perceptible groundborne vibration beyond their respective project boundaries generally would be limited to railroad operations and very heavy industrial activities. No projects with these activities are located near the Proposed Project.

Contribution of the Proposed Project (Prior to Mitigation)

Groundborne vibration is a highly localized phenomenon. Therefore, the worst-case vibration levels experienced at any single receiver location would typically be dominated by the closest vibration source, and the incremental increase caused by any secondary source(s) would be minimal. As

described in Section 3.8.9.4, the direct vibration impacts of the Proposed Project would be less than significant. Groundborne vibration from the construction of the Proposed Project would not be perceptible at offsite sensitive receptors and would pose no risk of building damage. The Proposed Project would not utilize any notable sources of groundborne vibration during project operation. None of the projects identified in Table 4-1 would be close enough to the Proposed Project to generate substantial combined groundborne-vibration levels. As a result, groundborne vibration from the operation of the Proposed Project and either of its alternatives would not make a cumulatively considerable contribution to a significant cumulative impact.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor either of its alternatives would make a cumulatively considerable contribution to a significant cumulative impact. Therefore, no mitigation measures would be required.

Cumulative Impact NOI-3: Would the Proposed Project result in a considerable contribution to a cumulatively significant impact by being located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

None of the projects identified in Table 4-1 propose changes to the operations of any public airport or public-use airport. Because the nearest airport to the Project Site (i.e., Torrance Municipal Airport) is more than 4 miles away, new noise-sensitive receptors, if any, developed by cumulative projects in the vicinity of an airport would be far from the Project Site and would not contribute to any cumulative impacts.

Contribution of the Proposed Project (Prior to Mitigation)

The Proposed Project would not cause any changes to the operation of any public airport or public-use airport. As described in Section 3.8.10.4, the Proposed Project would not result in any significant airport-noise impacts and would be more than 4 miles from the nearest airport (i.e., Torrance Municipal Airport). As a result, the operation of the Proposed Project or either of its alternatives would not make a cumulatively considerable contribution to a significant cumulative impact related to airport noise.

Mitigation Measures and Residual Cumulative Impacts

Neither the Proposed Project nor either of its alternatives would make a cumulatively considerable contribution to a significant cumulative impact. Therefore, no mitigation measures would be required.

4.2.9 Transportation/Traffic

4.2.9.1 Scope of Analysis

As a regional-serving use, other development or nonregional transportation projects would have an unsubstantial effect on vehicle miles traveled (VMT) associated with the Proposed Project. Some cumulative transportation project types could support a substantial decrease in VMT to a regional-serving use, such as the construction of a light-rail line with direct, walkable access to the land use; however, no such transportation projects are anticipated near the Proposed Project.

Table 4-1 includes a list of related and cumulative projects near the Proposed Project, provided by the Port. None of the projects listed in Table 4-1 are anticipated to result in a substantial increase or decrease in the Proposed Project's VMT or a change in the Proposed Project's significant and unavoidable transportation impact determinations.

Baseline for Cumulative Transportation Impacts

The baseline condition for transportation impacts is defined as the date of the IS/Notice of Preparation (NOP) (Appendix A). As of April 2022, there were no active, trip-generating uses at the proposed site of the Amphitheater, as defined on the Overall Site Plan included in the IS/NOP. Although there were trip-generating uses adjacent to the Amusement Attractions and Ferris Wheel, including the San Pedro Fish Market & Restaurant and Crusty Crab Restaurant in April 2022, neither the Amphitheater nor the Amusement Attractions and Ferris Wheel are proposed to directly replace these uses.

Cumulative Impact TRANS-1: Would the Proposed Project make a cumulatively considerable contribution to a significant cumulative conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Table 4-1 presents a list of related and cumulative projects near the Proposed Project, provided by the Port. The projects listed in Table 4-1 are included for informational purposes only and are not expected to substantially affect the Proposed Project's less-than-significant impact on circulation-system policies, including transit, roadways, and bicycle and pedestrian facilities, as discussed in Section 3.9.7.3. This determination is further described below.

Contribution of the Proposed Project (Prior to Mitigation)

Per the LADOT Transportation Assessment Guidelines (TAG), cumulative analyses for conflicts with plans, programs, ordinances, or policies should consider whether there would be a significant impact to which both the Proposed Project and other projects contribute (LADOT TAG 2022).

A cumulative impact could occur if the Proposed Project, as well as related projects located within the vicinity, were to preclude the City's ability to implement relevant plans, programs, ordinances, and policies. The Proposed Project's mobility access points are buffered from adjacent development by North Park to the north and Fisherman's Slip to the south, even though the development does not

occupy its own block. As such, the Proposed Project's access is relatively isolated and would not contribute to the impediment of transportation access along with nearby projects, thus resulting in a less-than-significant impact for **Cumulative Impact TRAN-1**.

Detailed documentation of the Proposed Project's consistency with programs, plans, ordinances, and polices included in LADOT TAG Attachment D.1 and the 2024 SCAG Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) is included in Appendix G to this report.

Mitigation Measures and Residual Cumulative Impacts

No significant impact related to **Cumulative Impact TRAN-1** was identified; thus, no mitigation measures would be required.

Cumulative Impact TRANS-2: Would the Proposed Project make a cumulatively considerable contribution to a significant cumulative conflict or inconsistency with CEQA Guidelines Section 15064.3, subdivision (b)?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Given the emphasis on VMT, rather than Level of Service, as analyzed for significant impacts under CEQA prior to 2020, the inclusion of cumulatively relevant projects is less applicable. As a regionally serving use, other development or nonregional transportation projects would have an unsubstantial effect on the VMT associated with the Proposed Project. Some cumulative transportation project types could support a substantial decrease in VMT to a regionally serving use, such as the construction of a light-rail line with direct, walkable access to the land use; however, no such transportation projects are anticipated near the Proposed Project.

Table 4-1 includes a list of related and cumulative projects near the Proposed Project, provided by the Port. The projects listed in Table 4-1 are included for informational purposes, and none are anticipated to result in a substantial increase or decrease in the Proposed Project's VMT or a change in the Proposed Project's transportation-impact determinations.

Contribution of the Proposed Project (Prior to Mitigation)

In addition to the project-level VMT analysis, which addresses the short-term VMT impacts of the Proposed Project, the LADOT also defines cumulative impacts to VMT, which are based on a project's consistency with development location and intensity described in the 2024 SCAG RTP/SCS.

The 2024 SCAG RTP/SCS defines four types of Priority Development Areas (PDAs), which are areas within the region where growth can be strategically located to support 2024 SCAG RTP/SCS goals related to sustainability. The four types of PDAs defined in the 2024 SCAG RTP/SCS are Neighborhood Mobility Areas (NMAs), Livable Corridors, Transit Priority Areas (TPAs), and Spheres of Influence (SOIs). The 2024 SCAG RTP/SCS includes a regional map, with all NMAs, Livable Corridors, TPAs, and SOIs shown. Although the central portion of San Pedro is defined as an NMA, the Proposed Project itself is not located within a PDA. However, whether a project is located within a PDA does not necessarily constitute a significant cumulative impact per the LADOT TAG. The Port incorporated the expected employment of the Proposed Project into its employment

forecasts provided to SCAG for inclusion in the 2024 SCAG RTP model. Therefore, the VMT forecasts for the 2024 SCAG RTP/SCS included employment that would be generated by the Proposed Project. The LADOT TAG indicates that entertainment venues should provide an analysis of cumulative VMT with the project compared with a cumulative no-project scenario using the SCAG model. This analysis is not needed because the Proposed Project is already incorporated. Thus, although the Proposed Project would result in a significant impact related to **TRAN-2** by causing a net increase in regional VMT, it would not result in a cumulative VMT impact.

Mitigation Measures and Residual Cumulative Impacts

As discussed in Section 3.9.7.4, the Proposed Project would have a less-than-significant cumulative impact related to **TRAN-2**. Therefore, no mitigation measures would be required.

4.2.10 Tribal Cultural Resources

4.2.10.1 Scope of Analysis

Similar to what was discussed in Section 4.2.4, above, for cultural resources, impacts related to the inadvertent discovery of tribal cultural resources during grading activities were found to be less than significant with implementation of **MM CR-3**, *Stop Work if Cultural Resources Are Discovered During Ground-Disturbing Activities*. This is a commonly accepted method of avoiding significant impacts under CEQA, and it is assumed that cumulative projects would implement a similar approach should grading be proposed that could affect as-yet-undiscovered tribal cultural resources. Therefore, the Proposed Project would not make a significant contribution to a cumulative impact under CEQA.

Cumulative Impact TCR-1: Would the Proposed Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 4020.1(k)?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Impacts on tribal cultural resources were not analyzed in the 2009 SWP EIS/EIR because tribal cultural resources were not defined as a CEQA resource category until Assembly Bill (AB) 52 became law on July 1, 2015. Ongoing development and growth in the broader Proposed Project area may result in a cumulatively significant impact on tribal cultural resources from the continuing disturbance of undeveloped areas, which could potentially contain significant buried archaeological or tribal cultural resources, or transform an area related to tribal cultural history.

Contribution of the Proposed Project (Prior to Mitigation)

The 208 E. 22nd Street Parking Lot does not have any known tribal cultural resources present within the study area. Therefore, the Proposed Project would have no new cumulative impacts on archaeological resources. The Proposed Project would not result in a cumulatively considerable contribution to a change in the significance of a tribal cultural resource as defined in CEQA.

Mitigation Measures and Residual Cumulative Impacts

Impacts related to the inadvertent discovery of tribal cultural resources during grading activities were found to be less than significant with implementation of **MM CR-3**, *Stop Work if Cultural Resources Are Discovered During Ground-Disturbing Activities*. Implementation of **MM CR-3** would help to avoid contributing to the loss or alteration of tribal cultural resources. **MM-CR-3** would avoid or reduce cumulative impacts to less than significant.

Cumulative Impact TCR-2: Would the Proposed Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency will consider the significance of the resource to a California Native American Tribe?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

Impacts on tribal cultural resources were not analyzed in the 2009 SWP EIS/EIR because tribal cultural resources were not defined as a CEQA resource category until AB 52 became law on July 1, 2015. Ongoing development and growth in the broader Proposed Project area may result in the identification of future tribal cultural resources through AB 52 tribal consultation, resulting in a cumulatively significant impact on tribal cultural resources from the continuing disturbance of undeveloped areas, which could potentially contain significant buried archaeological or tribal cultural resources, or transform an area related to tribal cultural history.

Contribution of the Proposed Project (Prior to Mitigation)

No tribal cultural resources were identified by the Port through outreach to the Native American Heritage Council or AB 52 consultation with local Native American Tribes. Construction and operation of the 208 E. 22nd Street Parking Lot would not result in a substantial adverse change in a resource determined by the Port, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 4024.1(c). As such, the Proposed Project would not result in a cumulative contribution to a change in the significance of a tribal cultural resource, as defined in CEQA.

Mitigation Measures and Residual Cumulative Impacts

Impacts related to the inadvertent discovery of tribal cultural resources during grading activities was found to be less than significant with implementation of **MM CR-3**, *Stop Work if Cultural Resources Are Discovered During Ground-Disturbing Activities*. Implementation of **MM CR-3** would help to avoid contributing to the loss or alteration of tribal cultural resources. **MM-CR-3** would avoid or reduce cumulative impacts to less than significant. Therefore, no additional mitigation measures would be required.

4.2.11 Public Services

4.2.11.1 Scope of Analysis

This section analyzes whether implementation of the Proposed Project would result in cumulative impacts on public services in the Proposed Project area, including fire and police access, available equipment, and station locations.

The 2009 SPW EIS/ EIR determined that there could be temporary impacts on public services associated with emergency access to portions of the Proposed Project area during construction. The 2009 SPW EIS/EIR also found that construction would not affect response times to the area. However, the LAHD, in compliance with the *Los Angeles Port Police Policy Manual* (Port 2023) (formerly known as the *Watch Manual*), would establish emergency-vehicle access routes.

Consequently, the 2009 SPW EIS/EIR identified **MM-PS-1** requiring coordination with law enforcement agencies.

> As discussed, the Proposed Project would implement **MM-PS-1** in order to reduce response-time impacts in the area to less than significant during construction. During the operations phase, the Proposed Project would be required to implement measures required by Port Police that are specific to the Project Site and the uses and activities proposed as part of the Proposed Project. It is assumed that cumulative projects would similarly be required to implement safety measures, as applicable. For these reasons, the Proposed Project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative public-safety impact. The Proposed Project's contribution to cumulative impacts would therefore not be significant.

Baseline for Cumulative Impacts to Public Services

The CEQA baseline is discussed in detail in Chapter 2, *Project Description.* In summary, the CEQA baseline for the Proposed Project is conditions that existed at the time the 2009 SPW EIS/EIR was certified and that are identified in Section 3.8.1, *Environmental Setting*, of that document.

Cumulative Impact PS-1: Would the Proposed Project substantially reduce public services such as law enforcement, emergency services, and park services during construction?

Impacts of Past, Present, and Reasonably Foreseeable Future Projects

LAPD is not the primary police service provider in the Port area, but primarily provides support to the Port Police under special circumstances. LAPD would have a presence on the Project Site because a portion of the area is within City limits. However, Port Police would be the first responders. Specifically, Port Police officers are responsible for patrol operations and surveillance within the Port's boundaries, including Port-owned properties in the communities of Wilmington, San Pedro, and Harbor City. Port Police officers maintain 24-hour land and water patrols and enforce federal, state, and local public-safety statutes, Port tariff regulations, and environmental and maritime-safety regulations. Many of the present and reasonably foreseeable projects described in Table 4-1 involve the relocation of existing facilities within the Port and its vicinity and do not otherwise involve expansion of facilities; therefore, these projects would not result in an increase in demand for public resources. However, several of the related projects would utilize or increase the demand for local police services by increasing the amount of Port land used for operations. Those projects would be required to implement Maritime Transportation Security Act-mandated security features, including terminal security personnel, gated entrances, perimeter fencing, terminal and backlands lighting, and camera systems that would reduce the demand for law-enforcement personnel. Additionally, the Port Police would continue to assess the needs of the Port, including the Proposed Project area, and would make adjustments to its operations as appropriate, and increase staffing, as needed, in conjunction with future development in order to ensure that adequate services would be provided to all future project sites.

Construction and operation of past projects has created an existing demand for fire protection that would be accommodated by Los Angeles Fire Department (LAFD) before emergency-response times to the Port area were considered affected. Many of the present and reasonably foreseeable projects described in Table 4-1 involve the relocation of existing facilities within the Port and vicinity and do not otherwise involve expansion of facilities; therefore, these projects would not result in an increased need for fire-protection services.

LAFD emergency-response times would only be affected by land-use changes and removal of site access routes; intensification of existing uses would not affect response time. Several of the related projects would increase the demand for local fire-protection services by increasing the amount of Port land used for operations. However, these related projects would be designed and constructed to meet all applicable state and local codes and ordinances to ensure adequate fire prevention, which would be subject to LAFD review and approval. As a standard practice, LAFD would be notified in advance of any construction activities and would review plans to ensure that adequate fire-prevention measures were incorporated into the projects, including emergency-access provisions. Codes and ordinances to be complied with would include measures such as requiring fire-protection infrastructure and ensuring that LAFD is given the opportunity to review and approve any changes to Project Site access. Furthermore, fire stations in the area are generally distributed to facilitate quick emergency response throughout the Proposed Project area. As a consequence, past, present, and reasonable

foreseeable future related projects would not be expected to result in significant cumulative impacts on fire-protection services.

Contribution of the Proposed Project (Prior to Mitigation)

The Proposed Project would result in impacts on public services similar to those already deemed significant in the 2009 SPW EIS/EIR, but would not substantially increase the severity of those impacts.

Mitigation Measures and Residual Cumulative Impacts

For the Proposed Project, **MM-PS-1** would be implemented, which would require proper coordination with law enforcement agencies to ensure adequate access to and around the Project Site during construction. Operation of the Proposed Project would implement **MM-PS-2**, which would ensure the presence of adequate public services on site. Implementation of these mitigation measures would ensure that the Proposed Project would not result in a cumulative contribution to a change in the significance of the ability for the Port to provide public services, as defined in CEQA. Therefore, no additional mitigation measures would be required.

4.3 Summary of Cumulatively Considerable Impacts

The following is a summary of the resource areas in which the Proposed Project and its alternatives would have a cumulatively considerable and unavoidable contribution to a significant cumulative impact after mitigation, as based on the discussions in Section 4.2, above.

4.3.1 Proposed Project

The Proposed Project would have cumulatively considerable and unavoidable contributions to significant cumulative impacts after mitigation (when applicable) in the following resource areas.

- Air Quality
    - Emissions from the construction and operation of combined projects and the Proposed Project would make a cumulatively considerable contribution to an existing cumulatively significant impact on regional air quality for PM_{10}, $PM_{2.5}$, NO_X, SOx, CO, and VOC emissions.
    - Emissions from construction and operations of combined projects and the Proposed Project would have a cumulatively considerable and unavoidable contribution to a significant cumulative impact for offsite ambient pollutant concentrations of PM_{10}, $PM_{2.5}$, and NO_2
    - The Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-6**, and residual impacts would remain significant and unavoidable. The Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR or 2016 SPPM Addendum under **Impact AQ-7**, and residual impacts would remain significant and unavoidable.

- GHG
    - For **Impact GHG-1**, the Proposed Project would not change the determination of significance made in the 2009 SPW EIS/EIR and 2016 SPPM Addendum, and residual impacts would remain significant and unavoidable.