Executive Summary

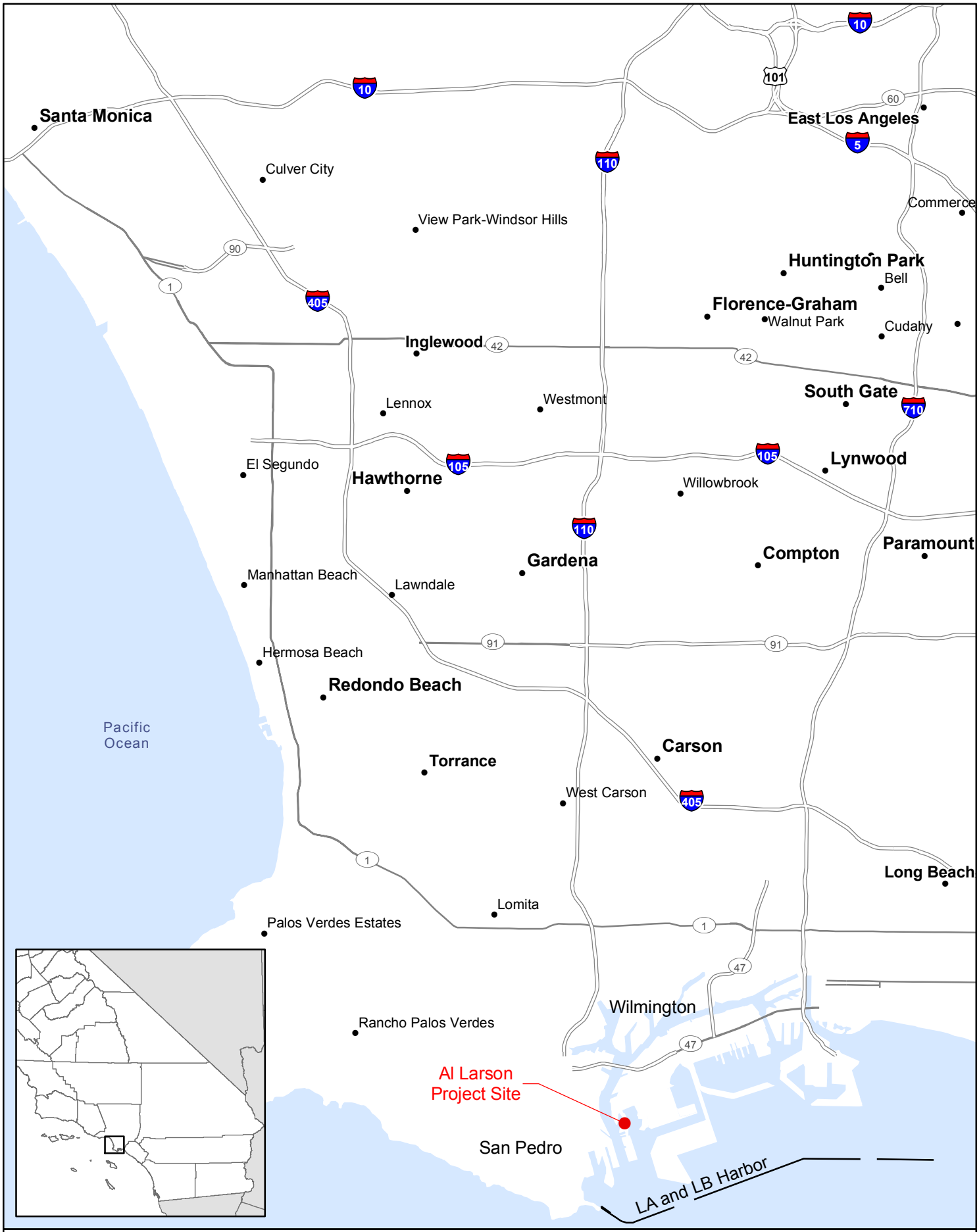
ES.1 Introduction

This Draft Environmental Impact Report (EIR) has been prepared to evaluate environmental impacts related to the construction and operation of the Al Larson Boat Shop Improvements Project (hereafter referred to as the "proposed Project") and alternatives, as proposed by the Los Angeles Harbor Department (LAHD). The LAHD administers development within the Port of Los Angeles (Port) and overall Port operations. The proposed Project is located 1046 Seaside Avenue on Terminal Island, within the Port of Los Angeles Community in the City of Los Angeles. The Al Larson Boat Shop (ALBS) occupies Berth 258 at the entrance to Fish Harbor (Figure ES-1 and Figure ES-2).

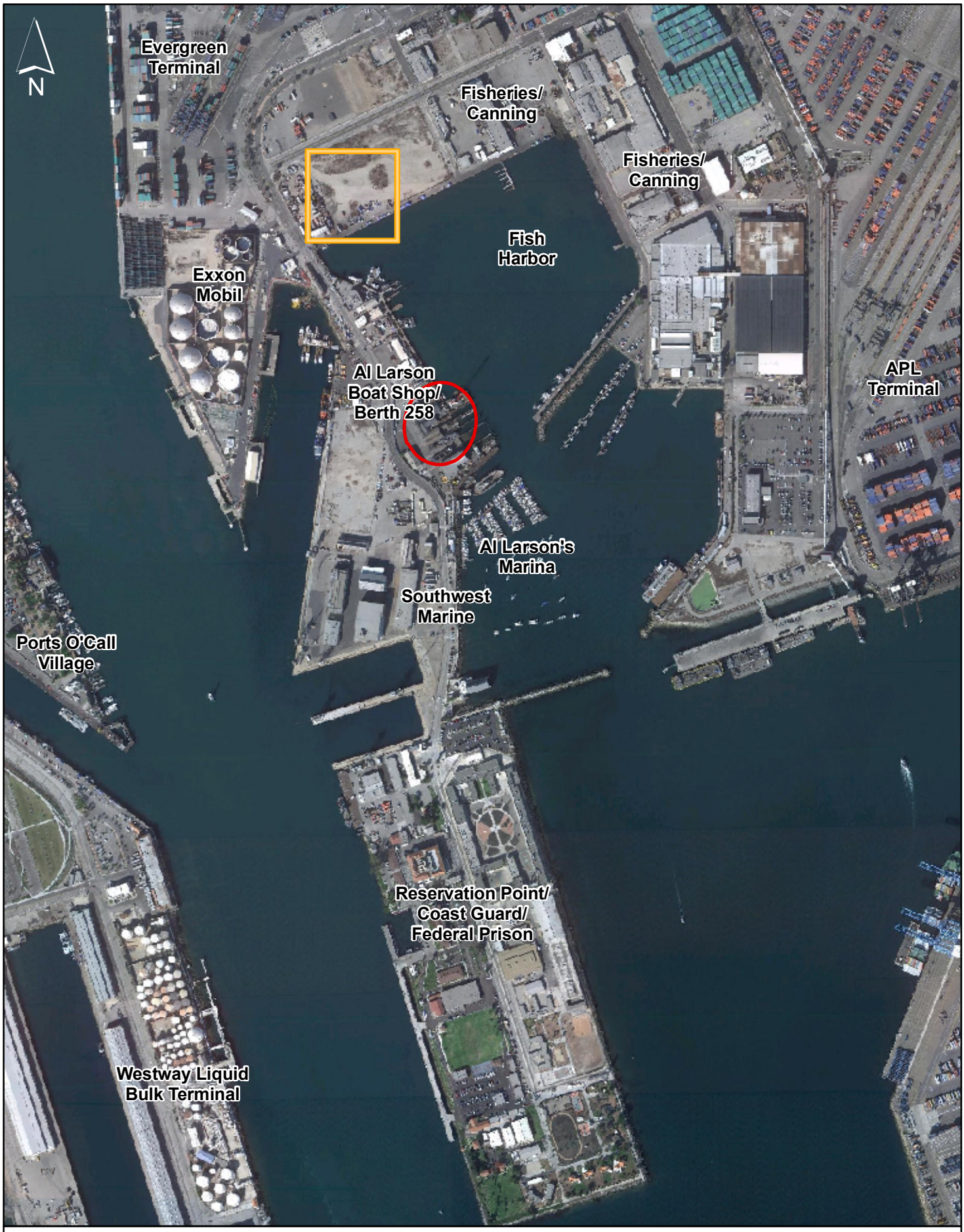
This Draft EIR has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Sections 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act of 1970 (CEQA Guidelines) (14 California Code of Regulations [CCR] Sections 15000 et seq.). Specifically, this Executive Summary has been prepared in accordance with Section 15123 (b) of the CEQA Guidelines which states that the EIR should contain a brief summary of the proposed actions and its consequences and should identify: 1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; 2) areas of controversy known to the lead agency; and 3) issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects. Throughout the Executive Summary are references to various chapters and sections in the Draft EIR where detailed information and analyzes can be reviewed.

The LAHD is the lead agency responsible for preparation of the Draft EIR.

This Draft EIR describes the affected resources and evaluates the potential impacts to those resources as a result of building and operating the proposed Project and alternatives.



Port of Los Angeles
Al Larson Boat Shop Improvement Project
Regional Location Map
Figure ES-1



Project Site

Proposed Site for Dredged Material/Concrete Mixing

500 0 500

Feet

CDM Smith

Port of Los Angeles

Al Larson Boat Shop Improvement Project

Project Site and Vicinity Map

Figure ES-2

ES.2 Purpose of the Draft EIR

This Draft EIR will be used to inform decision-makers and the public about the potential significant environmental effects of the proposed Project and alternatives. Within Chapter 1, Introduction, of this Draft EIR, Section 1.4 describes the agencies that are expected to use this document, including the lead, responsible, and trustee agencies under CEQA. Section 1.5 describes the scope and content required of the document, and Section 1.6 describes the key principles guiding the preparation of the document.

This Draft EIR is being provided to the public for review, comment, and participation in the planning process. After public review and comment, a Final EIR will be prepared that would include responses to comments on the Draft EIR received from agencies, organizations, and individuals. The Final EIR would then provide the basis for decision-making by the LAHD, as described below, and other concerned agencies.

ES.2.1 Introduction

The LAHD operates the Port of Los Angeles (Port) under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601; California Tidelands Trust Act of 1911) and the California Coastal Act (PRC Division 20 Sections 30700 *et seq*.), which identify the Port and its facilities as a primary economic and coastal resource of the State of California and an essential element of the national maritime industry for promotion of commerce, navigation, fisheries, and Harbor operations. Activities should be water dependent and the LAHD must give highest priority to navigation, shipping, and necessary support and access facilities to accommodate the demands of foreign and domestic waterborne commerce. The LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a landlord by leasing Port properties to more than 300 tenants.

According to Section 15121(a) of the CEQA Guidelines (CCR, Title 14, Division 6, Chapter 3), the purpose of an EIR is to serve as an informational document that:

> *…will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

The actions under consideration by the LAHD involve physical changes to the environment that would have a potentially significant impact, as determined in the Initial Study of the Project (see Appendix A). In addition, comments provided by public agencies, including responsible and trustee agencies, and the public in response to the Notice of Preparation (NOP) have also indicated that the proposed Project could have significant impacts. Accordingly, an EIR pursuant to CEQA (PRC 21000 *et seq*.) is required. This Draft EIR evaluates the direct, indirect, and cumulative impacts of the proposed Project in accordance with the provisions set forth in the CEQA Guidelines. It will be used to address potentially significant environmental issues.

The primary intended use of this Draft EIR by LAHD is to inform agencies considering permit applications and other actions required to construct, lease, and operate the selected alternative and to inform the public of the potential environmental consequences of the proposed Project and alternatives. The certification by LAHD of the EIR, Notice of Completion, and Statement of Overriding Considerations (if necessary) will document the

decision of the LAHD as to the adequacy of the Draft EIR and will inform subsequent decisions by the LAHD whether to approve and implement the Proposed Project, implement a revised lease for the ALBS, and grant the necessary operating permits. The LAHD would use this Draft EIR to support permit applications, construction contracts, the lease, and other actions required to implement the selected alternative and to adopt mitigation measures that, where possible, could reduce or eliminate significant environmental impacts.

Other agencies (federal, state, regional, and local) that have jurisdiction over an element of the proposed Project or a resource area affected by the proposed Project are expected to use this Draft EIR as part of their approval or permitting process.

ES.2.2 Project Objectives

The overall goal of the LAHD for the proposed Project is to renew a new long-term lease (30 years) to modernize and upgrade the existing ALBS, which would force compliance with the National Pollution Discharge Elimination System (NPDES) permit and Water Discharge Requirement (WDR).

To meet the overall Project purposes, the following objectives need to be accomplished:

- Place ALBS in compliance with its WDR and NPDES requirements by re-contouring the site, removing three existing marine railways and constructing a stormwater collection and treatment system.
- Demolish existing wharfs, piers and buildings/structures to allow for the subsequent creation and use of two CDF cells, which will sequester contaminated sediment and expand use of the boat shop.
- Dredge sediment to accommodate deeper draft vessels, remove contaminated sediment to improve water quality, and promote regional sediment management objectives by beneficially reusing dredged material to create two CDFs.
- Remove buildings/structures in order to modernize and reconfigure the facility, to optimize and expand the existing boat shop operation at the present location and continue to meet a regional need for marine vessel repair.
- Replace aging infrastructure and construct new office space to support operations.
- Clean-up site legacy contaminants from the historical use of the site as a boat shop, including contaminants located beneath existing pavement and buildings.
- Enter a 30-year lease renewal between ALBS and LAHD changing the facility's leasehold from 7.7 acres (2.35 acres of land and 5.35 acres of water) to 7.3 acres (4.1 acres of land and 3.2 acres of water).

ES.2.3 CEQA Baseline

Section 15125 of the CEQA Guidelines requires EIRs to include a description of the physical environmental conditions in the vicinity of a Project that exist at the time of the NOP. These environmental conditions would normally constitute the baseline physical conditions by which the CEQA lead agency determines if an impact is significant. For purposes of this Draft EIR, the CEQA baseline for determining the significance of potential Project impacts the current ALBS configuration and operational activity for the

12-month period preceding the NOP date (September 2009 to August 2010). The CEQA baseline conditions are described in further detail in Section 2.6 of Chapter 2, Project Description.

ES.3 Proposed Project

ES.3.1 Background

ALBS was established in the Port in 1903, although it was originally located on Mormon Island in Wilmington, California. The original lease was with the Banning family. The operation was moved to its current location in 1924, and now occupies approximately 7.7 acres (2.35 acres of land and 5.35 acres of water) at Berth 258, under Revocable Permit No. 07-15. It is the last remaining large-capacity dry dock boat repair facility within the Port. ALBS is considered a mid-sized shipyard and can dry dock vessels up to 260 feet long. It is a full-service shipyard that provides maintenance and repair of tugboats, government vessels, fireboats, ferries, barges, offshore oil equipment, research vessels, and yachts. It has the capacity to accommodate five vessels with four marine railways, one floating dry dock for hull repairs, and dock space for dockside repairs. The marine railways' capacities range from 100 to 1,250 tons with the ability to haul-out vessels up to 1,000 tons. Wood, welding, and machine shops; storage areas; and crew quarters support the shipyard. Existing equipment includes portable and fixed cranes, portable forklifts, welders and sand blasting equipment. Operations include normal maintenance and repair activities found at a boat yard such as water or sand blasting, and painting of vessels.

ES.3.2 Overview

In June 2008, ALBS submitted an application to the LAHD (through LAHD's Application for Discretionary Project [ADP] process) for a new long-term (30-year) lease and to modernize and upgrade the existing boat shop. The proposed Project represents the first major upgrade to the facility since 1924. The proposed Project would redevelop the existing boat shop to modernize the facility, comply with ALBS' NPDES permit and WDR, and to improve its ability to repair ships and vessels. Improvements would include replacing obsolete facilities with new facilities, improving site hydrology to address NPDES stormwater requirements, maintenance dredging to ensure adequate vessel access to the site (including larger ships), and construction of two CDFs over two phases of the Project to contain contaminated sediments and create additional land space. A CDF is an engineered landfill designed to safely sequester sediment not suitable for open water disposal such that the contaminated material is not in contact with the surrounding water. The proposed Project's CDFs would beneficially reuse contaminated dredge materials and result in approximately 0.9 acres of new land for increased vessel maintenance and repair, constructing new finger piers and wharves, and installing new 600- and 100-ton boat hoists. Construction would include demolishing and reconstructing a number of existing buildings, maintenance dredging to a depth of -22 feet mean lower low water (MLLW) plus an additional -2 feet overdredge (for a total of approximately 19,000 cubic yards of sediment), creation of the CDFs containing cement-stabilized dredge materials, and installing new equipment. In addition, the proposed Project would remove historical sediment and soil contamination.

ES.3.3 Project Description

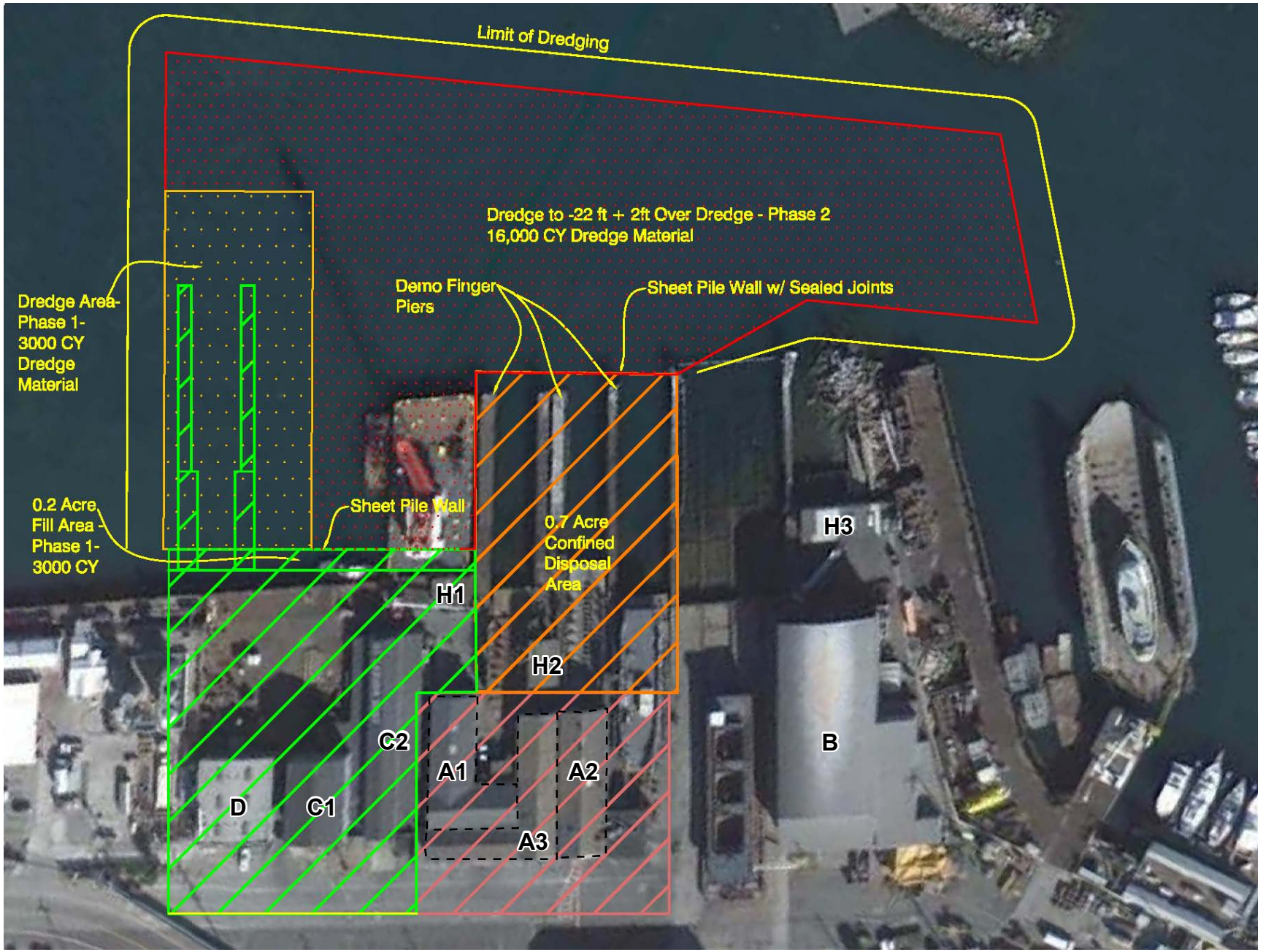
To minimize operational impacts to the facility during construction, the proposed Project would be constructed in three phases (Figure ES-3). The basic elements of the three phases are as follows:

Phase 1

- Demolish the existing 200-foot creosote-treated timber wharf and piles within the Phase 1 footprint.
- Demolish Buildings D, C1, and H1 in the Phase 1 footprint.
- Construct a sealed steel sheet pile bulkhead to form the perimeter of the CDF cell.
- Dredge approximately 3,000 cubic yards within the Phase 1 footprint to a depth of -22 feet MLLW, plus an additional 2-foot overdredge allowance. The dredged material would be placed in the CDF cell.
- Install two concrete finger piers supported by 24-inch octagonal concrete piles for each pier (126 total) to support new 600- and 100-ton boat hoists.
- Install new 600- and 100-ton boat hoists on the new piers along the north end of the Project site.
- Install facilities consistent with the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, including new storm drain system within the Phase 1 footprint and the installation of an oil/water separator.
- Construct a raised curb/step around Buildings C2 and A1.
- Remove pavement, excavate (from open area and building footprints) and export for disposal approximately 2,000 cubic yards (cy) of contaminated landside contaminated soil from Phase 1 area followed by import of approximately 2,000 cy of clean soil to approximately the same elevation of the Phase 1 CDF (12 feet MLLW).
- Grading, high-strength paving, and lighting improvements within the Phase 1 footprint.

Phase 2

- Removal of the finger piers associated with the existing marine railways for the existing boat hoist (the rails associated with the existing lift system would remain because this area would be contained within the second CDF).
- Demolish structure H2.
- Construction of a second sealed sheet pile bulkhead for the second CDF.
- Dredge approximately 16,000 cy of material to -22 feet MLLW (plus an additional 2-foot overdredge allowance) to provide navigation for the upgraded facilities. The dredged material would be treated and placed in the CDF cell.



A - Office and Workshop Complex
B - Paint and Shed
C - Machine Shop Complex
D - Building No. 4
H - Ancillary Buildings and Structures

LEGEND:
PHASE 1
PHASE 2
PHASE 3

CDM Smith

Port of Los Angeles
Al Larson Boat Shop
Improvement Project
Project Site Plan
Figure ES-3

- Excavate approximately 2,800 cy of contaminated landside soil from under the buildings and export for disposal followed by import of approximately 2,800 cy of clean material to bring the upland area to approximately the same elevation as the Phase 2 CDF (approximately 12 feet MLLW).
- Install facilities consistent with the SUSMP provisions, including new storm drain system within the Phase 2 footprint that directs stormwater to the oil/water separator installed Phase 1.
- Grading, high strength pavement and lighting improvements within the Phase 2 footprint.

Phase 3

- Demolish Buildings A2 and A3, landside of the Phase 2 CDF.
- Remove asphalt, excavate approximately 2,800 cy of contaminated landside soil form the Phase 3 footprint area , including from the footprints of the demolished buildings, export the contaminated soil for disposal and import of approximately 2,800 cy of clean fill.
- Implement landside improvements including grading, paving, existing utility protection, electrical relocations, yard lighting, shop air and installation of new storm drain system.
- Construct a new 2,400 square foot, two-story office building on the reconfigured site to replace Buildings A2, A3, C1, and D that were demolished in Phases 1 and 2.

The proposed Project would also require a permit from the U.S. Army Corps of Engineers (USACE) to perform maintenance dredging and to construct the CDFs. The National Environmental Policy Act (NEPA) analysis is being completed separately from the CEQA analysis; a preliminary determination has been made by the USACE that an Environmental Impact Statement is not required for the proposed work. A Public Notice was circulated by the USACE from October 9, 2009 to November 9, 2009. An Environmental Assessment is currently being prepared by the USACE to comply with Section 404(b)(1) guidelines (40 C.F.R. Part 230 *et seq*.) for the proposed Project.

ES.3.3.1 Project Elements

Following is a more detailed discussion of several of the Project elements listed above:

ES.3.3.1.1 Stormwater Management & Best Management Practices (BMP)

One of the major components of the Project is the installation of facilities to change the direction of the flow of stormwater on the site. Currently, stormwater flows untreated through the existing stormwater system or over the wharf and into the harbor in a storm event.

As part of the proposed Project, a new storm drain system would be installed in conjunction with the installation of an oil/water separator. The current pavement would be replaced with high strength pavement (including over the newly-constructed CDF cells) designed to drain stormwater away from harbor waters to be collected by the storm drain system for treatment in the proposed oil/water separator facility.

Under the proposed Project, dikes would be used to redirect the flow of stormwater around the remaining buildings. A raised curb/step would be constructed around

Buildings C2 and A1, a combination of either trench drains and/or catch basins to capture the flow would be introduced, and the flow would be directed to the new oil/grease separator unit(s) to comply with the BMP requirements for NPDES and WDR permitted discharge into harbor waters. Along the north side of the remaining buildings, a small retaining structure would be required to allow the grades for Phase 1 to be raised. On the south side of the wall, a concrete curb and trench drain to capture any drainage from the Phase 1 area would be required.

ES.3.3.1.2 Maintenance Dredging

Maintenance dredging would be performed as part of the proposed Project to remove the accumulated sediment and to allow for the safe transit of vessels to the facility. The approach channel would be dredged to -22 feet below MLLW (-22 feet below MLLW with an allowable overdredge of an additional -2 feet, per the Master Dredge Permit). The maintenance dredging, along with the installation of the 600- and 100-ton capacity boat hoists would enable ALBS to accommodate the building and repair of deeper draft vessels. Approximately 19,000 cy of sediments would be dredged over two phases (Phases 1 and 2) and beneficially reused through creation of two CDFs.

ES.3.3.1.3 CDF Creation

Two CDFs would be created (one each in Phases 1 and 2) to beneficially reuse contaminated dredged sediments to create additional land area for ALBS.

Phase 1 CDF

A sealed steel sheet pile bulkhead consisting of interlocking sheets of steel placed in the ground to contain the contaminated soil material would be constructed to form the perimeter of the CDF cell. The CDF created in Phase 1 would be approximately 200 feet wide and up to 32 feet in length. Approximately 3,000 cy of marine sediments would be dredged working from a barge using a clamshell bucket that would ultimately be used to fill the CDF.

Cement stabilization would be used to solidify the dredged materials. Cement stabilization, or immobilization technology, stabilizes and solidifies contaminated dredged material with cement-based additive mixed to convert contaminants in the material into the least soluble, mobile, or toxic form and enhances the physical properties of the material. Cement stabilization is very successful in immobilizing contaminants (such as PCBs) generally not mobile through air, soil, and water. Cement stabilization binds soluble constituents, reduced chloride mobility, and significantly reduces compaction times.

After being dredged, the dredged material would be placed on a scow, and the binder would be added to the sediment and mechanically mixed. There is no access for a cement truck at the ALBS wharf; therefore, scows would be tugged to an accessible area north of the dredge location. Using two scows, the material would be first allowed to stabilize (approximately one to two days), and then returned to ALBS and placed behind the sheet pile bulkhead and into the CDF.

Phase 2 CDF

The same process would be used to stabilize the dredged materials for the second CDF, which would be created during Phase 2 of the proposed Project. However, the Phase 2 CDF would be approximately 145 feet wide and up to 140 feet in length and would hold 16,000 cy of dredged material.

ES.3.3.1.4 Removal of Marine Railways and Installation of Boat Hoists

Currently the dry docking capacity at the ALBS is comprised of four marine railways, one floating dry dock for repair and maintenance, and dock space for dockside repairs. ALBS can simultaneously remove five vessels from the water via the four existing marine railways and floating dry dock. The current size and configuration of the facility limits the capacity of the operation. The proposed project would create the Phase 1 CDF in conjunction with constructing new piers to support the installation of two new boat hoists - 600- and 100-ton. Once installed, the boat hoists would provide flexibility to ALBS' operation, as operations would no longer be limited by the number of railways and dry docks. Now redundant, the three marine railways (Nos. 1 to 3) would be removed to provide space for construction of the Phase 2 CDF. The large railway (No. 4) and the floating dry dock would remain.

With the introduction of the boat hoists there would no longer be the need to solely depend upon the use of the existing railways, which require the tides to be high enough to launch the vessel safely. Instead, ALBS would be able to launch vessels without these tidal delays and optimize the operation. Also the boat hoists would allow for better utilization of available space at the facility by opening (through building demolition described below), more of the backland for use for dry docking of vessels. This would allow ALBS to dry dock more vessels at a time, thus maximizing the efficiency of the operation.

Elimination of the marine railways together with site re-contouring, installation of a new storm water drainage system and water treatment system (oil/water separator) would reduce discharge of stormwater pollutants into harbor waters.

ES.3.3.1.5 Demolition of Potentially Historic Structures

As indicated in the section above, the proposed Project would require the demolition of six structures/buildings on the site (two are small sheds – H1 and H2). Of these buildings, it has been determined that three are potentially historic. These structures include Buildings A2 and A3 (part of the Office and Workshop Complex) and Building C1 (part of the Machine Shop Complex). The removal of these structures is necessary to accommodate the placement of the new boat hoists on the site, as well as to provide the appropriate access to use the new boat hoists. The necessary turn radius required by the boat hoists requires the removal of Buildings A2, A3, C1 and D).

ES.3.3.1.6 Landside Contaminated Soils

Once the structures and pavement have been demolished, contaminated soil would be excavated during Phases 1, 2 and 3 to remediate the site. It is estimated that approximately 7,600 cubic yards of soil and approximately 2,470 cubic yards of concrete/asphalt would be removed to an off-site location. The contaminated material would be tested on-site and disposed of off-site at an approved disposal facility. In addition, approximately 7,600 cubic yards of clean fill would be imported.

ES.3.3.1.7 Replacement of Infrastructure

Electrical utilities, water lines, utility protection, yard lighting, and security lighting would be installed. In addition, a new 2,400 square foot building would be constructed to the east of the existing Building A1 to support the new facility the proposed operation.

ES.3.3.1.8 Renewal of ALBS' Lease

ALBS has applied for a 30-year renewal of their existing leasehold with expansion of the premises by 9,304 square feet of land and 43,368 square feet of water. Additionally, from the existing leasehold, 0.9 acres (39,204 square feet) would be converted from water to land by the creation of the two CDFs (Figure ES-4). This would require an amendment to the Port's Master Plan.

ES.3.3.1.9 Port Master Plan (PMP) Amendment

The PMP provides for the development, expansion, and alteration of the Port (both short-term and long-term) for commerce, navigation, fisheries, Port-dependent activities, and general public recreation. Those objectives are consistent with the provisions of the California Coastal Act (1976), the Charter of the City of Los Angeles, and applicable federal, state, and municipal laws and regulations. Creation of the CDFs would require an amendment to change the land use of this acreage from water to Maritime Support. The proposed Project's proposed uses are consistent with the Plan but will necessitate an amendment of the PMP.

ES.3.3.2 Construction

Construction of the proposed Project is anticipated to commence in 2012 and last for approximately three years. Phase 1 would last approximately one year, employing approximately 30 people. Phase 2 would last approximately six to ten months and would employ 30 people. Phase 3 would last approximately six months and would employ 20 people. Construction would take place on the site Monday through Friday (with some Saturdays) from 7:00 a.m. until 3:30 p.m.

ES.3.3.3 Project Operation

Operation of the proposed Project would occur under a new 30-year lease. The new lease term would begin in 2012. The 30-year lease renewal between ALBS and LAHD would change the facility's leasehold from 7.7 acres (2.35 acres of land and 5.35 acres of water) to 7.3 acres (4.1 acres of land and 3.2 acres of water).

The proposed Project would replace three of the marine railways systems with the 600- and 100-ton boat hoists. The removal of the three marine railway systems in Phase 2 would lead to more flexible scheduling of vessel repairs, allowing ALBS to remove more vessels from the water and accommodate the repair and maintenance of those vessels at any one time, thus maximizing the efficiency of the operation. In addition, with the introduction of the boat hoists, there would no longer be the need to solely depend upon the use of the existing railways, which require the tides to be high enough to launch the vessel safely, and are limited to four simultaneous vessel removals for maintenance and repair. With the new hoist operations, ALBS would be able to launch vessels without these tidal delays and increase ALBS's capacity for simultaneous servicing to as many as 12; thereby optimizing the operation. Also, after building demolition, the boat hoists would allow for better utilization of available space at the facility by allowing the backlands to be accessed for use for dry docking (placement on land) of vessels for maintenance and repair. Elimination of the marine railways together with site re-contouring, installation of a new storm water drainage system and water treatment system (oil/water separator) would reduce discharge of stormwater pollutants into harbor waters.

Existing Lease
Area to be added to lease
Excluded
Buildings to be demolished
Buildings to remain
Redevelopment Area

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Port of Los Angeles
Al Larson Boat Shop
Improvement Project
Current and Future Lease Conditions
Figure ES-4

Upon completion of the proposed Project, hours of operation would remain the same and work would continue to occur in two shifts (7:45 a.m. to 4:15 p.m. and 3:30 p.m. to 11:00 p.m.). The number of employees on-site would increase from between 70 and 100 to between 90 and 130, depending on work load. More employees would be onsite during the morning shift, with approximately 80 employees, while approximately 15 employees would be onsite during the evening shift. In addition, the number of vessels served by ALBS during a year would increase from between 120 and 130 to between 240 and 304.

ES.4 Alternatives to the Project

ES.4.1 Basis of Alternatives

As described more fully in Section 2.7 of Chapter 2, Project Description, the CEQA Guidelines require that an EIR, respectively, describe a range of reasonable alternatives to a project that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant environmental impacts. The Draft EIR should briefly describe the rationale for selection and rejection of alternatives, compare the merits of the alternatives, and determine an environmentally superior alternative.

The lead agency may make an initial determination as to which alternatives are feasible and, therefore, merit in-depth consideration, and which alternatives are infeasible. The range of alternatives need not be beyond a reasonable range necessary to permit a reasoned choice between the alternatives and the proposed Project.

ES.4.2 Alternatives Considered

This Draft EIR evaluates a reasonable range of alternatives to the proposed Project. The identification by the LAHD of a reasonable range of alternatives is informed by the legal mandates of the lead agency. These mandates identify the LAHD and its facilities as a primary economic/coastal resource of the State and an essential element of the national maritime industry for promotion of commerce, navigation, fisheries, and operations of a harbor. Activities should be water dependent and the LAHD is required to give highest priority to navigation, shipping and necessary support, and access facilities to accommodate the demands of foreign and domestic waterborne commerce. See Section 1.7 of Chapter 1, Introduction, for additional information regarding the Ports mandates/policies and Section 2.8 of Chapter 2, Project Description, for additional information regarding statutes, plans, policies and other regulatory requirements applicable to the proposed Project and alternatives.

A total of seven alternatives were considered during preparation of this Draft EIR, which included reduced impacts on potentially historic structures, alternative uses, and alternative locations for the ALBS. All of these alternatives (in addition to the proposed Project) have been carried forward for detailed analysis, as presented in Chapter 3, Environmental Analysis.

This section includes description of the seven alternatives carried forward for further detail analysis. Chapter 6, Analysis of Alternatives, contains a more detailed discussion of the Project alternatives.

Alternatives Analyzed in this Draft EIR

The seven alternatives to the proposed Project that are considered in this Draft EIR are:

- Alternative 1 – Reduced Project: Water Quality Improvements
- Alternative 2 – Reduced Project: Limited Demolition
- Alternative 3 – Retention of Historic Buildings
- Alternative 4 – Relocation of Historic Buildings
- Alternative 5 – Alternate Site
- Alternative 6 – No Project
- Alternative 7 – No Federal Action

ES.4.2.1 Alternative 1 – Reduced Project: Water Quality Improvements

Under this alternative, ALBS would not implement any of the proposed improvements on the site. However, in order to comply with the Los Angeles Regional Water Quality Control Board (RWQCB) requirements and remain in operation, they would implement measures on the site to redirect water away from Fish Harbor. Under this alternative, ALBS would place dikes around buildings, berms around the wharf edges, or change the slope of the site so that stormwater runoff would drain away from Fish Harbor into an oil/water separator before discharge. Under this alternative, minor changes to the existing operations would occur due to impediments from the dikes and berms. ALBS would continue to operate on the site under a new 30-year lease. The new lease term would begin in 2012; however, the lease would involve the existing site and no new land would be created or added to the lease.

ES.4.2.2 Alternative 2 – Reduced Project: Limited Demolition

This alternative would be very similar to the proposed Project; however, not all of the three potentially historic buildings (A2, A3, or C1) would be demolished. Most of the other Project components would be constructed/implemented (i.e., drainage improvements, soil clean-up, dredging, 100-ton boat hoist, and CDFs). However, due to the retention of some of the potentially historic buildings, some of these components would not be implemented to their fullest extent, or, as is the case with the 600-ton boat hoist, not implemented at all (due to reduced clearance as a result of the retention of buildings slated for demolition as part of the proposed Project). In particular, the clean-up of landside legacy contaminants would not fully occur, as some of the potentially historic buildings would remain (i.e., contaminated soils beneath the buildings and asbestos from the buildings themselves would remain). Further, the maneuverability and versatility of the boat hoists would be limited due to site constraints. No new structures would be constructed on the site, since some of the potentially historic buildings would remain available for reuse. Under this alternative, ALBS would continue to operate on the site under a new 30-year lease for the new area. The new lease term would begin in 2012.

ES.4.2.3 Alternative 3 – Retention of Historic Buildings

This alternative would contain most of the elements of the proposed Project; however, none of the potentially historic buildings (A2, A3, and C1) would be demolished. No new structure would be constructed on the site, since the historic buildings would remain. As compared to the proposed Project, this alternative would reduce the development of the site by not demolishing/relocating any of the potentially historic buildings, which would preclude the use of the 600-ton hoist accessing the ALBS backland and land area created by the construction of the Phase 2 CDF. Under this alternative, ALBS would continue to operate on the site under a new 30-year lease for the new area. The new lease term would begin in 2012.

ES.4.2.4 Alternative 4 –Relocation of Historic Buildings

This alternative would be the same as the proposed Project; however, all of the potentially historic buildings would be moved to another location within the Port. The relocation site would be one of two redevelopment project sites within the Port: the San Pedro Waterfront project, or the Wilmington Waterfront project (see Figure ES-5). Relocation to either of the redevelopment project sites would be consistent with the LAHD's "Procedures to Implement the Real Estate Leasing Policy," which incorporates long-range facility planning and objectives in the two redevelopment project areas. All of the components of the proposed Project would be constructed under this alternative, as all of the potentially historic buildings slated for demolition would be removed from the site. Under this alternative, ALBS would continue to operate on the site under a new 30-year lease for the new area. The new lease term would begin in 2012.

ES.4.2.5 Alternative 5 – Alternate Site

This alternative would involve construction and operation of ALBS at a different location elsewhere within the Port under a new 30-year lease for the alternate site. LAHD has identified four possible alternate sites, which are shown on Figure ES-6. Each alternate site is similar in size as the existing ALBS site. ALBS would operate on one of the alternate sites at the same level and capacity as the proposed Project. Under this alternative, ALBS would not renew its existing lease at the Project site and would be required to return the site to its pre-lease conditions, meaning all remaining structures would be demolished and legacy contaminants within the landside soils would have to be cleaned. No CDFs would be created and instead the dredge material would be hauled off-site to a licensed landfill. It is assumed that no dredging would occur at the new site. Returning the existing ALBS site to pre-lease conditions would also include the elimination of the flow of runoff from Seaside Avenue through the site into Fish Harbor. For more details on the alternate sites see Figure 6.3 in Chapter 6, Analysis of Alternatives.

N

CDM Smith

Port of Los Angeles
Al Larson Boat Shop
Improvement Project
San Pedro and Wilmington Waterfronts
Figure ES-5

CDM Smith

Legend

Potential Relocation Site

0 0.125 0.25 0.5 Miles

Port of Los Angeles
Al Larson Boat Shop Improvement Project
Alternate Locations
Figure ES-6

ES.4.2.6 Alternative 6 – No Project

This alternative considers what would reasonably be expected to occur on the Project site if no future discretionary actions were to occur. Under this alternative, no development would occur on the site and no other action would be taken by the tenant to bring the site into compliance with the applicable surface water quality standards.

Currently, ALBS has a revocable permit and month to month lease with the LAHD to operate on the site. ALBS is required to implement improvements to bring the site into compliance with the current NPDES permit, including the establishment of site-specific management processes for minimizing storm water runoff containing pollutants from being discharged into surface water and ensuring that the stormwater discharges from the facility would neither cause, nor contribute to, the exceedance of water quality standards and objectives, nor create conditions of nuisance in the receiving water. Without implementation of measures to ensure compliance with the NPDES permit, ALBS would be forced to cease operation.

Upon cessation of the existing operation on the site, ALBS would be required to clear the site, including contaminated soil and sediment, and return it to its original condition. This site would then be available for use consistent with its zoning: shipbuilding/ship repair facilities, light manufacturing and industrial activities, or ocean resource-oriented industries.

Dredging and removal of legacy contaminants within the sediments under the water surface would occur, however, no CDFs would be created. The dredge material would be hauled offsite to a licensed landfill.

ES.4.2.7 Alternative 7 – No Federal Action

This alternative represents what would reasonably be expected to occur in the foreseeable future if the USACE Permit was not approved. Under the No Federal Action Alternative, there would be no dredging, no CDF construction (no removal of historical sediment and soil contamination), and no construction of the concrete piers for the 600- and 100-ton boat hoists. However, the landside construction could occur and a new lease would be issued to ALBS for the existing lease area. Operation would occur at the alternate site under a new 30-year lease for the existing site. The new lease term would begin in 2012.

ES.5 Scope of Analysis and Environmental Impacts

The scope of this Draft EIR was established based on the Initial Study and NOP prepared pursuant to CEQA (see Appendix A) and comments received during the NOP review process. The breadth of the analysis and technical work plans developed during the preparation of this Draft EIR were designed to ensure that comments received from regulatory agencies and public during this review process would be addressed. The NOP scoping period lasted from September 19, 2010 until October 18, 2010, and included one scoping meeting on September 29, 2010. Public and agency comments received during this period were considered in the scope of the analysis for this EIR.

This Draft EIR focuses on the significant environmental effects of the proposed Project and their relevance to the decision-making process. The CEQA Guidelines (Section 15360) define the Environment as follows:

The physical conditions which exist within the areas which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise and objects of historic or aesthetic significance.

Based on the Initial Study, the following issues have been determined to be potentially significant and are therefore evaluated in this draft EIR:

- Aesthetics and Visual Resources
- Air Quality, Meteorology, and Greenhouse Gases
- Biological Resources
- Cultural Resources
- Geology
- Groundwater and Soils
- Hazards and Hazardous Materials
- Land Use
- Noise
- Population and Housing
- Public Services and Utilities
- Traffic and Transportation
- Water Quality, Sediments, and Oceanography

Chapter 3, Environmental Analysis, discusses the issues that would be significantly affected by the proposed Project. The criteria for determining the significance of environmental impacts in this Draft EIR analysis are described in the "Thresholds of Significance" sections for each resource topic in Chapter 3, Environmental Analysis. Mitigation measures to reduce impacts to less than significant levels are proposed whenever feasible.

Chapter 4, Environmental Justice, evaluates the potential for the proposed Project and the alternatives to result in high and adverse impacts that disproportionately affect low income and/or minority populations. Chapter 5, Cumulative Analysis, discusses the cumulative impacts of the proposed Project. Chapter 6, Analysis of Alternatives, discusses the anticipated potential environmental effects of the alternatives. Summary descriptions of the impacts, mitigation measures, and residual impacts for the proposed Project are provided in Table ES-1. This table also presents significant cumulative impact results and environmental justice impact determinations.

ES.5.1 Impacts Not Considered in this Draft EIR

The scope of this Draft EIR was established based on the NOP issued by LAHD on September 19, 2010. The NOP, and Public Scoping Meeting held on September 29, 2010, identified potential impact areas of the proposed Project. The NOP also determined that several resource areas would not be affected. In accordance with CEQA, issues found in the Initial Study/NOP that have no impact do not require further evaluation and are not addressed in this Draft EIR. The resource areas found not have any impacts which are

therefore not addressed in this Draft EIR are agricultural resources, mineral resources, and recreation.

ES.5.2 Impacts of the Proposed Project

The following sections describe the significant and less than significant impacts.

ES.5.2.1 Unavoidable Significant Impacts

Table ES-1 identifies unavoidable significant impacts associated with the proposed Project. This Draft EIR has determined that implementation of the proposed Project would result in significant impacts on:

- Air Quality, Meteorology, and Greenhouse Gases
- Cultural Resources
- Noise

No feasible mitigation measures are available that would avoid all of the potential impacts or reduce all impacts to less than significant levels. Therefore, potential impacts to these resource areas are considered significant and unavoidable.

ES.5.2.2 Summary of Significant Impacts that Can Be Mitigated, Avoided, or Substantially Lessened

Table ES-1 identifies the significant impacts that can be mitigated, avoided or substantially lessened. This Draft EIR has determined that implementation of the proposed Project would result in significant impacts that can be mitigated to less than significant on:

- Biological Resources

ES.5.2.3 Summary of Less than Significant Impacts

Table ES-1 identifies the resource areas where less than significant impacts were determined. This Draft EIR has determined that implementation of the proposed Project would result in a less than significant impact on:

- Aesthetics and Visual Resources
- Geology
- Groundwater and Soils
- Hazards and Hazardous Materials
- Land Use
- Population and Housing
- Public Services and Unities
- Traffic and Transportation

Water Quality, Sediments, and Oceanography

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
3.1 Aesthetics and Visual Resources			
AES-1: The proposed Project would not result in an adverse effect on a scenic vista from a designated scenic resource due to obstruction of views.	Less than significant	No mitigation is required	Less than significant
AES-2: The proposed Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway.	Less than significant	No mitigation is required	Less than significant
AES-3: The proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings.	Less than significant	No mitigation is required	Less than significant
AES-4: Construction and operation of the proposed Project would not result in an adverse effect due to shading on the existing visual character or quality of the site or its surroundings.	No Impact	No mitigation is required	No Impact
AES-5: The proposed Project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
3.2 Air Quality, Meteorology, and Greenhouse Gases			
AQ-1: The proposed Project would result in construction-related emissions that exceed an SCAQMD threshold of significance in Table 3.2-7.	Significant for NO_X	**MM AQ-1. Harbor Craft Used during Construction** 1. As of January 1, 2011: All harbor craft with USEPA designated Category 1 (C1) or Category 2 (C2) marine engines must utilize a USEPA Tier-3 engine, or cleaner. 2. Three exception conditions from this measure may apply a. A piece of specialized equipment is unavailable in a controlled form, or within the required Tier level, within the state of California, including through a leasing agreement. b. A contractor has applied for necessary incentive funds to put controls on a piece of uncontrolled equipment planned for use on the project, but the application process is not yet approved, or the application has been approved, but funds are not yet available. c. A contractor has ordered a control device for a piece of equipment planned for use on the project, or the contractor has ordered a new piece of controlled equipment to replace the uncontrolled equipment, but that order has not been completed by the manufacturer or dealer. In addition, for this exemption to apply, the contractor must attempt to lease controlled equipment to avoid using uncontrolled equipment, but no dealer within 200 miles of the project has the controlled equipment available for lease. **MM AQ-2. On-Road Trucks** 1. Trucks hauling material such as debris or any fill material will be fully covered while operating off Port property. 2. USEPA Standards: a. For On-road trucks except for Import Haulers and Earth Movers: Comply with the most recent (i.e., 2007) on-road emission standards for PM_{10} and NOx.	**Significant and unavoidable for NO_x**

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
		b. For Import Haulers: Comply with most recent (i.e., 2004) on-road emission standards for PM_{10} and NO. c. For Earth Movers: Comply with most recent (i.e., 2004) on-road emission standards for PM_{10} and NOx. **MM AQ-3. Construction Equipment** 1. All dredging equipment shall at a minimum meet Tier 3 standards. Construction equipment will incorporate, where feasible, emissions-savings technology such as hybrid drives and specific fuel economy standards. 2. Idling will be restricted to a maximum of 5 minutes when not in use. 3. Equipment Engine Specifications: a. Meet Tier 2, 3, or 4 standards depending on timing. b. Two categories of exceptions exist i. Requirements do not apply to equipment less than 50hp. ii. Requirements do not apply to marine vessels and harbor craft. **MM AQ-4. Best Management Practices** BMPs shall be implemented to reduce air emissions from construction activities, including: 1. Use of diesel oxidation catalysts and catalyzed diesel particulate traps. 2. Maintain equipment according to manufacturers' specifications. 3. Install high-pressure fuel injectors on construction equipment vehicles. 4. Re-route construction trucks away from congested streets or sensitive receptor areas.	

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
		MM AQ-5. Additional Fugitive Dust Controls The project construction contractor shall reduce fugitive dust emissions by 90 percent from uncontrolled levels. The project construction contractor shall specify the dust-control methods that will achieve this control level in the Dust Control Plan submitted to the South Coast Air Quality Management District (SCAQMD) for review and approval in compliance with SCAQMD Rule 403. These measures shall also apply, as appropriate, during holiday and weekend periods when work may not be in progress. The following measures to reduce dust shall be included in this plan, at a minimum: • SCAQMD's Best Available Control Technology (BACT) measures must be followed on all projects. They are outlined on Table 1 in Rule 403. Large construction projects (on a property which contains 50 or more disturbed acres) shall also follow Rule 403 Tables 2 and 3. • Active grading sites shall be watered three times per day. • Contractors shall apply approved non-toxic chemical soil stabilizers to all inactive construction areas or replace groundcover in disturbed areas. • Contractors shall provide temporary wind fencing around sites being graded or cleared. • Trucks hauling dirt, sand, or gravel shall be covered or shall maintain at least 2 feet of freeboard in accordance with Section 23114 of the California Vehicle Code. ("Spilling Loads on Highways"). • Construction contractors shall install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving the construction site.	

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
		• The grading contractor shall suspend all soil disturbance activities when winds exceed 25 mph or when visible dust plumes emanate from a site; disturbed areas shall be stabilized if construction is delayed. • Open storage piles (greater than 3 feet tall and a total surface area of 150 square feet) shall be covered with a plastic tarp or chemical dust suppressant. • Stabilize the materials while loading, unloading and transporting to reduce fugitive dust emissions. • Belly-dump truck seals should be checked regularly to remove trapped rocks to prevent possible spillage. • Comply with track-out regulations and provide water while loading and unloading to reduce visible dust plumes. • Waste materials should be hauled off-site immediately. **MM AQ-6. General Mitigation Measure** For any of the above mitigation measures (MM AQ-1 through MM AQ-5), if a CARB-certified technology becomes available and is shown to be as good as or better in terms of emissions performance than the existing measure, the technology shall replace the existing measure pending approval by the LAHD.	
AQ-2: Proposed Project construction would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-8.	Significant for PM_{10} (24-hour average), $PM_{2.5}$ (24-hour average), and NO_2 (1-hour average)	**MM AQ-1 through MM AQ-6**	**Significant and unavoidable for PM_{10} (24-hour average), $PM_{2.5}$ (24-hour average), and NO_2 (1-hour average)**
AQ-3: The proposed Project would not result in operational emissions that exceed 10 tons per year of VOCs or an SCAQMD threshold of significance in Table 3.2-9.	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
AQ-4: Proposed Project operations would result in off-site ambient air pollutant concentrations that exceed a SCAQMD threshold of significance in Table 3.2-10.	Significant for NO_2, PM_{10}, and $PM_{2.5}$.	Feasible mitigation measure not identified.	**Significant and unavoidable for NO_2, PM_{10}, and $PM_{2.5}$**
AQ-5: The proposed Project would not create an objectionable odor at the nearest sensitive receptor.	Less than significant	No mitigation is required	Less than significant
AQ-6: The proposed Project would expose receptors to significant levels of TACs.	During construction, cancer risk would be significant for residential receptors. During construction, the acute hazard index would be significant for residential and occupational receptors. The chronic hazard index would be less than significant for all receptors	**MM AQ-1 through MM AQ-6**	**The cancer risk and acute hazard index would be significant and unavoidable during construction at residential receptors (livaboards in Al Larson Marina). The acute hazard index would be significant and unavoidable at occupational receptors during construction**
AQ-7: The proposed Project would not conflict with or obstruct implementation of an applicable air quality plan.	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
AQ-8: The proposed Project would produce GHG emissions that would exceed baseline levels.	Exceedance of baseline emissions for construction and operations	**MM AQ-1 through MM AQ-6** **MM AQ-7. Compact Fluorescent Light Bulbs** All interior buildings on the premises shall exclusively use compact fluorescent light bulbs, fluorescent light bulbs, or a technology with similar energy-saving capabilities for ambient lighting within all on-site buildings. Instructions on proper disposal of used bulbs and clean-up of broken bulbs in compliance with USEPA recommendations shall be posted in a readily visible location within each building to reduce potential exposure to mercury vapor. Fluorescent light bulbs produce less waste heat and use substantially less electricity than incandescent light bulbs. Although not quantified in this analysis, implementation of this measure is expected to reduce the Project's GHG emissions by less than 0.1 percent. **MM AQ-8. Energy Audit** The tenant shall conduct a third party energy audit every 5 years and install innovative power saving technology where feasible, such as power factor correction systems and lighting power regulators. Such systems help to maximize usable electric current and eliminate wasted electricity, thereby lowering overall electricity use. This mitigation measure primarily targets large on-site electricity consumers such as lighting and electric machine shop equipment. These sources and other building energy uses consume the majority of on-site electricity, and account for about 30 percent of overall Project GHG emissions. Therefore, implementation of power saving technology on-site could minimally reduce overall Project GHG emissions. The effectiveness of this mitigation measure was not quantified.	**Significant and unavoidable**

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
		MM AQ-9. Recycling. The tenant shall ensure a minimum of 40 percent of all waste generated in all on-site buildings is recycled by 2014 and 60 percent of all waste generated in all on-site buildings is recycled by 2016. Recycled materials shall include: (a) white and colored paper; (b) post-it notes; (c) magazines; (d) newspaper; (e) file folders; (f) all envelopes including those with plastic windows; (g) all cardboard boxes and cartons; (h) all metal and aluminum cans; (i) glass bottles and jars; and; (j) all plastic bottles. In general, products made with recycled materials require less energy and raw materials to produce than products made with un-recycled materials. This savings in energy and raw material use translates into GHG emission reductions. The effectiveness of this mitigation measure was not quantified due to the lack of a standard emission estimation approach. **MM AQ-10. Tree Planting.** The applicant shall plant shade trees where appropriate/feasible around on-site buildings, and the tenant shall maintain all trees through the life of the lease. Trees act as insulators from weather, thereby decreasing energy requirements. On-site trees also provide carbon storage. Although not quantified, implementation of this measure is expected to reduce Project GHG emissions by less than 0.1 percent.	
3.3 Biological Resources			
BIO-1: Construction and operation of the proposed Project would not cause a loss of individuals or habitat of a state- or federally-listed endangered, threatened, rare,	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
protected, or candidate species, or a Species of Special Concern or the loss of federally listed critical habitat.			
BIO-2: Construction and operation of the proposed Project would result in a substantial reduction or alteration of a state, federally, or locally designated natural habitat, special aquatic site, or plant community, including wetlands.	Significant	**MM BIO-1: Apply Habitat Mitigation Credits.** The LAHD shall apply 0.45 credits available in the Bolsa Chica or Outer Harbor mitigation banks to compensate for loss of 0.9 acres of marine habitat in the Inner Harbor due to construction of fill in Fish Harbor. This mitigation measure would also offset the impacts to Essential Fish Habitat.	Less than significant
BIO-3: Construction and operation of the proposed Project would not interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a species.	Less than significant	No mitigation is required	Less than significant
BIO-4: Construction and operation of the proposed Project would not substantially disrupt local biological communities.	Less than significant	No mitigation is required	Less than significant
BIO-5: Construction and operation of the proposed Project would result in a permanent loss of marine habitat.	Significant	**MM BIO-1**	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
3.4 Cultural Resources			
CUL-1: Construction of the proposed Project has an extremely low potential to disturb, damage, or degrade unknown archaeological and ethnographic cultural resources.	Less than significant	Although the impact on unknown resources is remote, mitigation is recommended: **MM CUL-1: Archaeological and Ethnographic Resources.** An archaeological monitor shall be present during all initial grading and excavation activities at the proposed Project site. In the event any cultural resources are encountered during earthmoving activities, the construction contractor shall cease activity in the affected area until the discovery can be evaluated by a qualified archaeologist in accordance with the provisions of CEQA Section 15064.5. The archaeologist shall complete any requirements for the mitigation of adverse effects on any resources determined to be significant and implement appropriate treatment measures. The treatment plan may include methods for: (1) subsurface testing after demolition of existing buildings, (2) data recovery of archaeological or ethnographic deposits, and (3) post-construction documentation. A detailed historic context that clearly demonstrates the themes under which any identified subsurface deposits would be determined significant would be included in the treatment plan, as well as anticipated artifact types, artifact analysis, report writing, repatriation of human remains and associated grave goods, and curation. A preconstruction information and safety meeting shall be held to make construction personnel aware of archaeological monitoring procedures and the types of archaeological resources that might be encountered. All construction equipment operators shall attend a pre-construction meeting presented by a professional archaeologist retained by LAHD that shall review types of cultural resources and artifacts that would be considered potentially significant, to ensure operator recognition of these materials during construction.	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
CUL-2: Construction of the proposed Project would impact significant historic architectural resources	Significant	**MM CUL-2: Historic Resource Recordation.** Impacts resulting from the demolition of Buildings A2, A3, and C1 shall be minimized through archival documentation of both building complexes in as-built and as-found condition. Prior to issuance of demolition permits, the Los Angeles Harbor Department (LAHD) shall ensure that documentation of the buildings proposed for demolition is completed in the form of a Historic American Building Survey (HABS) Level II documentation that shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be offered as donated material to Port of Los Angeles archives. Archival copies of the documentation shall also be submitted to the Los Angeles Maritime Museum, the Central Branch of the Los Angeles Public Library and the Port of Los Angeles archives where it would be available to local researchers. **MM CUL-3: Recordation Posting.** Impacts related to the loss of Buildings A2, A3, and C1 shall be reduced through the development of a retrospective website detailing the history of the Project site and its historical significance. The information may be incorporated into the existing Los Angeles Harbor District (LAHD) website (Port of Los Angeles Historic Virtual Tour website at http://www.laporthistory.org/level2/archive/archive_frameset.html. The website shall include images and details from the Historic American Building Survey documentation and any collected research pertaining historic resources. The content shall be prepared by a qualified architectural historian or historian who meets the Secretary of Interior's Professional	**Significant and unavoidable**

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
		Qualification Standards for the History and/or Architectural History. The information shall be posted within two years of the date of completion of the proposed Project.	
CUL-3: The proposed Project would have a low potential to disturb paleontological resources.	Less than significant	No mitigation is required	Less than significant
3.5 Geology			
GEO-1: During the construction period (through 2014) and operations period (through 2042), the proposed Project would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury from seismic activity along the Palos Verdes fault zone or other regional faults that could produce fault rupture, seismic ground shaking, liquefaction or other seismically induced ground failure.	Less than significant	No mitigation is required	Less than significant
GEO-2: Construction and operation of the proposed Project in the Port area would not expose people and structures to substantial risk involving tsunamis or seiches.	Less than significant	No mitigation is required	Less than significant
GEO-3 Construction and operation of the proposed Project would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury from substantial/soil settlement.	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
GEO-4: Construction and operation of the proposed Project would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury from soil expansion.	Less than significant	No mitigation is required	Less than significant
GEO-5: Construction and operation of the proposed Project would not result in or expose people or property to a substantial risk of landslides or mudflows.	No impact	No mitigation is required	No impact
GEO-6: Shallow groundwater, which would cause unstable collapsible soils, may be encountered during excavation, but it would not expose people or structures to substantial risk.	Less than significant	No mitigation is required	Less than significant
GEO-7: Construction and operation of the proposed Project would not result in the destruction, permanent covering of the material and adverse modification of one or more distinct and prominent geologic or topographic features.	No impact	No mitigation is required	No impact
GEO-8: Construction and operation of the proposed Project would not result in the permanent loss of availability of a known mineral resource of regional, statewide or local significance.	No impact	No mitigation is required	No impact

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
GEO-9: Construction and operation of the proposed Project in the Port area would not expose people and structures to substantial risk involving sea level rise.	Less than significant	No mitigation is required	Less than significant
3.6 Groundwater and Soils			
GW-1: Proposed Project construction activities may encounter toxic substances or other contaminants associated with historical uses of the Port, resulting in short-term exposure (duration of construction) to construction/operations personnel and/or long-term exposure to future site contaminants.	Less than significant	With implementation of lease requirements (**LM GW-1** and **LM-GW-2**) and adherence to regulations, no mitigation is required	Less than significant
GW-2: Proposed Project construction and operation would not result in expansion of the area affected by contaminants.	Less than significant	No mitigation is required	Less than significant
GW-3: Proposed Project construction and operation would not result in a change to potable water levels.	No impact.	No mitigation is required	No impact
GW-4: Proposed Project construction and operation would not result in a demonstrable and sustained reduction in groundwater recharge capacity (for potable water storage).	No impact	No mitigation is required	No impact

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
GW-5: Proposed Project construction and operation would not result in violation of regulatory water quality standards at an existing production well.	No impact	No mitigation is required	No impact
3.7 Hazards and Hazardous Materials			
RISK-1: Construction and operation of the proposed Project would comply with applicable safety and security regulations and policies guiding development within the Port.	Less than significant	No mitigation is required	Less than significant
RISK-2: Construction and operation of the proposed Project would not substantially increase the frequency and severity of consequences to people or property from accidental exposure to health hazards.	Less than significant	No mitigation is required	Less than significant
RISK-3: Construction and operation of the proposed Project would not substantially interfere with an existing emergency response or evacuation plan, thereby increasing the risk of injury or death.	Less than significant impact	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
RISK-4: Construction and operation of the proposed Project would not result in a substantial increase in public health and safety concerns as a result of the accidental release, spill, or explosion of hazardous materials due to a tsunami.	Less than significant	No mitigation is required	Less than significant
RISK-5: Construction and operation of the proposed Project would not substantially increase the likelihood of a spill, release, or explosion of hazardous materials due to a terrorist attack.	Less than significant	No mitigation is required	Less than significant
3.8 Land Use			
LU-1: The proposed Project would be consistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site.	Less than significant	No mitigation is required	Less than significant
LU-2: The proposed Project would be consistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.	Less than significant	No mitigation is required	Less than significant
LU-3: The proposed Project would not substantially affect the types and/or extent of existing land uses in the Project area.	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
LU-4: The proposed Project would not cause secondary impacts to surrounding land uses.	Less than significant	No mitigation is required	Less than significant
3.9 Noise			
NOI-1: Construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use (Al Larson Marina).	Significant	**MM NOI-1: Noise reduction during pile driving.** Where feasible, the contractor shall be required to use a pile driving system, such as a Bruce hammer (with silencing kit), an IHC Hydrohammer SC series (with sound insulation system), or equivalent silenced hammer, which is capable of limiting maximum noise levels at 50 feet from the pile driver to 104 dBA, or less, for wharf construction. **MM NOI-2: Erect temporary noise reduction barriers adjacent to pile driving equipment, where necessary and feasible.** Erect temporary noise attenuation barriers suitable for pile driving equipment as needed. The barriers should be installed directly between the equipment and the nearest noise sensitive use to the construction site. The need for and feasibility of noise attenuation barriers should be evaluated on a case-by-case basis considering the distance to noise sensitive receptors, the available space at the construction location, and taking account of safety and operational considerations. **MM NOI-3: Temporary noise attenuation barriers.** When construction is occurring within 500 feet of a residence or park, temporary noise barriers (solid fences or curtains) will be located between noise-generating construction activities and sensitive receivers. The following will reduce the impact of noise from construction activities: a) Idling Prohibitions. Unnecessary idling of internal combustion engines near noise-sensitive areas will be prohibited.	**Significant and unavoidable**

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
		b) Equipment Location. All stationary noise-generating construction equipment, such as air compressors and portable power generators, will be located as far as practical from existing noise-sensitive land uses. c) Quiet Equipment Selection. The quietest construction equipment available will be utilized, and all internal combustion powered equipment shall be equipped with properly operating mufflers and kept in tune to avoid backfires. In addition, if exposed, engines are to be fitted with protective shrouds to reduce motor noise. Comply where feasible with noise limits established in the City of Los Angeles Noise Ordinance. d) d) Notification. Sensitive receptors including residences within 500 feet of the proposed project site will be notified of the construction schedule in writing prior to the beginning of construction.	
NOI-2: Noise levels from construction activities would not exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 pm and 7:00 am Monday through Friday, before 8:00 am or after 6:00 pm on Saturday, or at any time on Sunday.	No impact	No mitigation is required	No impact
NOI-3: Operations would not generate noise levels that exceed existing ambient noise levels at sensitive receivers by 3 dBA in CNEL to or within the 'normally unacceptable' or 'clearly unacceptable category,' or otherwise by 5 dBA or greater.	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
3.10 Population and Housing			
POP-1: The proposed Project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	Less than significant	No mitigation is required	Less than significant
3.11 Public Services and Utilities			
PS-1: The proposed Project would not increase the demand for additional law enforcement officers and/or facilities such that the USCG, LAPD, or Port Police would not be able to maintain an adequate level of service without additional facilities, the construction of which could cause significant environmental effects.	Less than significant	No mitigation is required	Less than significant
PS-2: Development of the proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.	Less than significant	No mitigation is required	Less than significant
PS-3: The proposed Project would not result in a substantial increase in utility demands; however, construction and/or expansion of on-site water,	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
wastewater, or storm drain lines would be required to support new boat shop development.			
PS-4: The proposed Project would not generate substantial solid waste, water, and/or wastewater demands that would exceed the capacity of existing facilities in the proposed Project area.	Less than significant	No mitigation is required	Less than significant
PS-5: Implementation of the proposed Project would generate minor increases in energy demands; however, construction of new offsite energy supply facilities and distribution infrastructure would not be required to support proposed Project activities.	Less than significant	No mitigation is required	Less than significant
3.12 Traffic and Transportation			
TRANS-1: The proposed Project would not result in a short-term, temporary increase in construction-related truck and auto traffic that could result in decreases in roadway capacity, potential safety hazards, and disruption of travel for vehicular and nonmotorized travelers.	Less that significant	No mitigation is required	Less than significant
TRANS-2: Operation of the proposed Project would not result in a long-term increase in truck and auto traffic that would	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
result in a significant impact on transportation/circulation.			
TRANS-3: Operation of the proposed Project would not result in a significant increase in related public transit use beyond the supply of such services anticipated at Project build-out.	No impact	No mitigation is required	No impact
TRANS-4: The proposed Project would not result in increases considered significant related to freeway congestion.	No impact	No mitigation is required	No impact
3.13 Water Quality, Sediments, and Oceanography			
WQ-1: Proposed Project construction and operation would not create pollution, contamination, or a nuisance as defined in Section 13050 of the CWC or cause regulatory standards to be violated in Harbor waters.	Less than significant	No mitigation is required	Less than significant
WQ-2: Proposed Project construction and operation would not result in increased flooding that would have the potential to harm people or damage property or sensitive biological resources.	Less than significant	No mitigation is required	Less than significant
WQ-3: Construction and operation of the proposed Project would not result in a permanent adverse change in	Less than significant	No mitigation is required	Less than significant

Table ES-1: Summary of Potential Significant Impacts and Mitigation for the Proposed Project and Alternatives

Environmental Impacts	Impact Determination	Mitigation Measures	Impacts after Mitigation
movement of surface water in the Harbor.			
WQ-4: Construction and operation of the proposed Project would not accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled onsite.	Less than significant	No mitigation is required	Less than significant

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ES.5.2.4 Cumulative Impacts

The proposed Project was analyzed in conjunction with other related projects in the area for potential to contribute to significant cumulative impacts. The proposed Project would not result in cumulatively considerable contributions to significant cumulative impacts (after applicable mitigation) for the following resource areas:

- Aesthetics and Visual Resources
- Biological Resources
- Geology
- Groundwater and Soils
- Hazards and Hazardous Materials
- Land Use
- Population and Housing
- Public Services and Utilities
- Traffic and Transportation
- Water Quality, Sediments, and Oceanography

The proposed Project could result in cumulatively considerable impacts for the following resource areas:

- Air Quality, Meteorology and Greenhouse Gases
- Cultural Resources
- Noise

Cumulative impact evaluations for each resource are included in Chapter 5 of this Draft EIR.

ES.5.2.5 Environmental Justice

CEQA is only concerned with the disclosure and mitigation of significant physical environmental effects related to the construction and operation of a proposed project. However, LAHD is committed to disclosing any disproportionate impacts a proposed Project may have on minority and low-income residents.

The potential for the proposed Project to cause disproportionately serious and adverse human health and environmental effects on low-income and minority populations is discussed in the Environmental Justice analysis (Chapter 4).

The proposed Project would have a disproportionate effect on minority and low-income populations as a result of the cumulative contribution of operational activities to the existing significant health risk from air toxics. The proposed Project would have a disproportionate effect on minority and low-income populations as a result of its cumulative in regards to noise in the construction phase. Other potentially significant impacts of the proposed Project would be reduced to less than significant or less than cumulatively considerable through implementation of mitigation measures, would not affect human populations, or the proposed Project or alternatives would not have disproportionate effects on minority and low-income populations.

ES.5.2.6 Socioeconomic and Growth-Inducing Impacts

As mentioned above, CEQA is only concerned with the disclosure and mitigation of significant physical environmental effects related to the construction and operation of a proposed project. For the purposes of informational disclosure, however, socioeconomics and environmental quality issues are analyzed in Chapter 7 of this EIR. Socioeconomics encompasses a number of topical areas, including employment and income, population, and housing.

The proposed Project would not involve acquisitions or relocations of housing. The proposed Project would not result in significant impacts related to business displacement. No new land is being acquired as part of the proposed Project, as all of the proposed improvements would take place within the existing ALBS property.

The proposed Project would lead to an increase in temporary construction jobs and some additional permanent employment upon completion of the Project. It is not anticipated that the proposed Project would change residential property trends in the areas immediately adjacent to the Port, as a substantial demand for housing would not occur as a result of the proposed Project.

Over the long-term, an additional 20 to 50 jobs could be added as a result of the proposed Project. When compared to regional employment levels expected to occur at the corresponding times, the Project would account for less than 0.1 percent of regional employment.

The proposed Project would indirectly increase earnings to firms and households throughout the region as Project expenditures are spent throughout the region. The short-term indirect effects from construction would incrementally increase activity in nearby retail establishments as a result of construction workers patronizing local establishments. However, the long-term effects in the immediate area from the proposed Project would be extremely small relative to the size of the regional economy. Overall, the proposed Project would not generate significant indirect growth-inducing impacts.

ES.5.2.7 Significant Irreversible Changes to the Environment

Pursuant to Section 15126.2(c) of the CEQA Guidelines, and EIR must consider any significant irreversible environmental changes that would be caused by the proposed Project should it be implemented.

Implementation of the proposed Project would require the use of nonrenewable resources, such as fossil fuels, and nonrenewable construction materials.

The proposed Project would redevelop the site with the same use, modernizing the facilities on the site, allowing for larger vessels, and allowing for an increased numbers of vessels to be serviced at the boat shop. Resources that are committed irreversibly and irretrievably are those that would be used by a project on a long-term or permanent basis. Resources committed to this proposed Project include the use of fossil fuels, and nonrenewable construction materials such as rock, concrete, gravel, and soils.

Fossil fuels and energy would be consumed during construction and operation activities. Fossil fuels in the form of diesel oil and gasoline would be used for construction equipment and vehicles. During operations, diesel oil and gasoline would be used by vessels coming in to the boat shop to be serviced, by on-site equipment used to service the vessels, and by on-road vehicles. Electrical energy and natural gas would be

consumed during construction and operation. Use of these energy resources would be irretrievable and irreversible.

Nonrecoverable materials and energy would be used during construction and operation activities, but the amounts needed would be accommodated by existing supplies. Although the increase in the amount of materials and energy used would be limited, they would nevertheless be unavailable for other uses.

The proposed Project would result in a permanent loss of approximately 0.9 acres of marine habitat. This represents aquatic habitat (i.e., seafloor and water column) that would be filled with the creation of the CDFs and used as part of the proposed Project. Results from sediment testing in the proposed Project area demonstrated that most of the seafloor sediments would not be suitable for unconfined aquatic disposal; therefore, sediments are being beneficially reused, and would be sequestered from the marine environment. Although, while there is an irreversible loss of approximately 0.9 acres of seafloor and water column habitat, the water quality benefits of the proposed Project would improve habitat conditions within Fish Harbor.

Therefore, the minimal irreversible commitments of resources would be justified by the improvements to water quality and clean up of legacy contaminants on the land and in Fish Harbor, as well as economic growth resulting from the increased efficiency of the boat repair operation.

Other than that discussed above, the only other permanent, adverse change would be from the demolition of potentially significant cultural resources.

ES.5.3 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative. Under CEQA, if the No Project Alternative is determined to be environmentally superior, the EIR must identify an environmentally superior alternative from among the other alternatives.

The environmentally superior alternative was determined based on a ranking system that assigned numerical scores comparing the impacts under each resource area for each alternative relative to the CEQA baselines. The scoring system ranged from -2 if impacts are considered to be substantially reduced when compared to the CEQA baseline, to +1 if impacts are considered to be substantially increased when compared with the CEQA baselines. Table 6-4 in Chapter 6, Analysis of Alternatives, present the scoring system and rankings for each alternative.

Under the alternatives analysis, Alternative 1 – Reduced Project: Water Quality Improvements is the environmentally superior alternative because it would result in the least amount of impacts on the site while meeting the NPDES requirements, thus allowing ALBS to remain in operation. Impacts on Air Quality, Meteorology, and Greenhouse Gases, Biological Resources, Cultural Resources, and Noise, would all be reduced. Impacts on Air Quality, Meteorology, and Greenhouse Gases would remain significant and unavoidable. The benefits to water quality that would occur by removing and sequestering legacy contaminants would not occur under Alternative 1.

ES.6 Public Comment

ES.6.1 Issues Raised

During the scoping process, various individuals or organization representatives provided comments on the scope and content of the Draft EIR.

The LAHD determined that an EIR should be prepared for the proposed Project. The LAHD issued an NOP for the AL Larson Boat Shop Improvement Project EIR on September 10, 2010. Agencies and the public submitted written responses to the NOP. Table ES-2 presents a summary of the relevant comments on the NOP and where a particular comment would be addressed in this Draft EIR.

The scope of this Draft EIR was established based on the NOP issued by LAHD on September 10, 2010. Written and oral comments have been grouped into common topics and are summarized below by the topic raised.

Table ES-2: Summary of Comments Received for the NOP

Commenter	Key Issues Raised	Sections Addressed
City of Los Angeles	▪ Include more detail regarding the site improvements that would allow a more precise calculation of a wastewater capacity analysis and a determination of whether a sewer assessment is required.	Section 3.11 – Public Services and Utilities
Los Angeles Dept. of Transportation	▪ Construction phase may significantly impact the local circulation system. ▪ Recommend construction related truck trips on State Highways occur during off-peak commute periods. ▪ Transport of oversize or overweight vehicles on State Highways will require a Transportation Permit ▪ The contractor should agree to avoid platooning of trucks on mainline freeways. ▪ Conduct a traffic analysis to determine the impacts to the transportation system, including State Highways. ▪ If a traffic analysis is required, major intersections, mainline freeways, freeway on/off ramps and freeway ramp intersections will need to be analyzed. ▪ Conduct a level of service analysis for all major intersections.	Section 3.12 – Traffic and Transportation
DTSC	▪ Evaluate whether conditions within the Project area may pose a threat to human health or the environment. ▪ Site should be investigated for asbestos containing materials and lead based paints, and proper precautions should be taken to remediate if these substances are found. ▪ In the event of excavation, soils should be sampled and tested for contamination. Contaminated soils should be property disposed of and replaced with clean imported fill.	Section 3.7 – Hazards and Hazardous Materials

Table ES-2: Summary of Comments Received for the NOP

Commenter	Key Issues Raised	Sections Addressed
	▪ Human health and sensitive receptors should be protected during any construction or demolition activities. A Health Risk Assessment should be conducted. ▪ If hazardous wastes are or will be generated, wastes must be managed in accordance with applicable laws and regulations. ▪ DTSC can provide cleanup oversight through an Environmental Oversight Agreement.	
Exxon Mobil	▪ There is an idle 4-inch pipeline and an abandoned 3-inch pipeline within the vicinity of the Project. ▪ Exxon Mobile requires a representative to be onsite during any construction activities within the vicinity of their facilities. ▪ All facilities identified as “Active,” “Idle,” or “Abandoned” are the property of Exxon Mobil. Any project that interferes with any facilities requires that Exxon Mobile is contacted directly.	Section 3.7 – Hazards and Hazardous Materials
SCAQMD	▪ The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Project and all air pollutant sources related to the Project. ▪ Perform air quality analyses for both construction and operation consistent with SCAQMD recommendations. ▪ Calculate localized air quality impacts and compare the results to localized significance thresholds. ▪ A Health Risk Assessment should be performed if the Project generates or attracts vehicle trips, especially heavy-duty diesel-fueled vehicles. ▪ All feasible mitigation measures that go beyond what is required by the law should be utilized during Project construction and operation to minimize or eliminate significant adverse air quality impacts.	Section 3.2 – Air Quality, Meteorology and Greenhouse Gases
Los Angeles Conservatory	▪ Substantial demolition of portions of the historic structures jeopardizes the historic integrity of the buildings. ▪ Clearly identify the need to demolish the structures proposed for demolition. ▪ Prioritize development of alternatives that retain the historic structures. ▪ Include a detailed description of the character-defining features of each historic structure. ▪ The Port should clarify the feasibility of rehabilitating the historic structures, the ability to meet stormwater runoff requirements while retaining all of the historic structures, and the nature and extent of contamination under the historic buildings as well as methods and regulatory standards that must be met.	Section 3.4 – Cultural Resources Chapter 6 – Analysis of Alternatives

Table ES-2: Summary of Comments Received for the NOP

Commenter	Key Issues Raised	Sections Addressed
	▪ Alternative 2 should consider the age, uniqueness, and significance of the buildings as well as the potential for maintaining California Register eligibility when evaluating which of the two buildings to retain. ▪ Alternative 4 should evaluate the feasibility of returning the historic buildings to their original locations once the site work is completed.	

ES.6.2 Issues to be Resolved

Section 15123(b)(3) of the state CEQA Guidelines requires that an EIR contain issues to be resolved; this includes whether or how to mitigate significant impacts. This section discusses the major issues to be resolved regarding the proposed Project. The major issues to be resolved include decisions by the lead agency as to whether:

- This EIR adequately describes the environmental impacts of the proposed Project and alternatives,
- The proposed Project is preferable over one or more of the alternatives,
- The recommended mitigation measures should be adopted or modified,
- Additional mitigation measures need to be applied to the Project, or
- The proposed Project should or should not be approved for implementation.

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