

# 4.0

## CUMULATIVE ANALYSIS

### 4.1 Introduction

This chapter presents CEQA requirements for cumulative impact analysis and analyzes the potential for the proposed project to have significant cumulative effects when combined with other past, present, and reasonably foreseeable future projects in each resource area's cumulative geographic scope. This section provides the requirements for cumulative impact analysis. Cumulative impacts for the proposed project when combined with other reasonable and foreseeable future projects in the area are organized by resource topic and analyzed below.

#### 4.1.1 Requirements for Cumulative Impact Analysis

The State CEQA Guidelines (14 CCR 15130) require a reasonable analysis of the significant cumulative impacts of a proposed project. *Cumulative impacts* are defined by CEQA as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (State CEQA Guidelines, Section 15355).

Cumulative impacts are further described as follows:

- (a) The individual effects may be changes resulting from a single project or number of separate projects (40 CFR 1508.7 and State CEQA Guidelines, Section 15355[a]).
- (b) The cumulative impacts from several projects are the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (40 CFR 1508.7 and State CEQA Guidelines, Section 15355[b]).

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

As defined in Section 15355, a “cumulative impact” consists of an impact that is created as a result of the combination of projects evaluated

in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in the State CEQA Guidelines, Section 15064(h)(4):

The mere existence of significant cumulative impacts cause by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Therefore the following cumulative impacts analysis focuses on whether the impacts of the proposed project are cumulatively considerable within the context of impacts caused by other past, present, or reasonable foreseeable future projects. The cumulative impact scenario considers other projects proposed within the area defined for each resource that have the potential to contribute to cumulatively considerable impacts.

For this EIR, related area projects with a potential to contribute to cumulative impacts were identified using one of two approaches: the *list* methodology or the *projection* methodology. Most of the resource areas were analyzed using a list of closely related projects that would be constructed in the cumulative geographic scope (which differs by resource and sometimes for impacts within a resource; cumulative regions of influence are documented in Section 4.2 below). The list of related projects is provided in Section 4.1.2.

Aesthetics, Air Quality, and Traffic and Circulation analyses use a projection or a combined list and projection approach as described below. Cumulative analysis of air quality impacts uses projections from the South Coast Air Basin (SCAB) 2007 AQMP. The traffic/circulation cumulative analysis uses annual regional growth, which is described in Section 3.3, "Transportation and Circulation."

For purposes of thresholds, the concept of *cumulatively considerable* effects, as derived from the CEQA guidelines, is used.

## 4.1.2 Projects Considered in the Cumulative Analysis

This section describes past, present, and reasonably foreseeable projects in the area that affect cumulative conditions at the Port of Los Angeles (Port or POLA).

### Past Projects

#### History of the Port of Los Angeles

The Port is located at San Pedro Bay at the southernmost point of Los Angeles County, approximately 20 miles from downtown Los Angeles. San Pedro Bay has a long history of maritime activity due to its proximity to the Pacific Ocean.

History of the Port of Los Angeles is further discussed in detail in Section 4.1.2.1 of the *San Pedro Waterfront EIS/EIR*.

### History of the Proposed Project Area

The proposed project area has been intensively used for various Port activities since the mid 1800s. Prior to the industrialization of the Port, the area was low-lying coastal marsh. History of the proposed project area is a part of the discussion in Section 4.1.2.2 of the *San Pedro Waterfront EIS/EIR*.

### Current and Future Projects

A total of seventeen (17) present or reasonably foreseeable future projects (approved or proposed) were identified within the general vicinity of the proposed project that could contribute to cumulative impacts. As discussed in Section 4.1.1 and further in the resource-specific sections below, some resource analyses use a projection approach encompassing a larger cumulative geographic scope, and for these resources a larger set of past, present, and reasonably foreseeable future projects was included for analysis of cumulative impacts.

For the purposes of this EIR, the timeframe of current or reasonably anticipated projects extends from 2011 to 2042, and the vicinity is defined as the area over which effects of the proposed project could contribute to cumulative effects. The cumulative regions of influence for individual resources are documented further in each of the resource-specific subsections in Section 4.2 below.

Projects with approved environmental documentation proposed to occur within or near the Port of Los Angeles include:

- San Pedro Waterfront Project
- Wilmington Waterfront Project
- Port of Los Angeles Channel Deepening Project
- Berths 97-109 (China Shipping) Container Terminal Project
- Pacific L.A. Marine Terminal LLC Crude Oil Terminal Project
- Berths 136-147 (TraPac) Container Terminal Project
- San Pedro Waterfront Enhancements
- Supplemental Environmental Impact Report for the West Channel/Cabrillo Marina Phase II Development Project (Cabrillo Way Marina)

Projects under environmental review by the Port include:

- I-110/C Street Interchange Project
- Southern California International Gateway (SCIG) Project
- John S. Gibson Blvd/I-110 Access Ramps and SR 47/I-110 Connector Improvements Project

- ILWU Local 13 Dispatch Hall
- City Dock No. 1 Marine Research Center Project
- Al Larson Boat Shop Improvement Project
- Berths 302-306 (APL) Container Terminal Project
- Intermodal Container Transfer Facility (ICTF) Project
- Wallenius Wilhelmson Logistics (WWL) Vehicle Cargo Terminal

The following sixty-six (66) projects are a part of the adopted San Pedro Waterfront Plan:

***Port of Los Angeles Projects***

- Pier 400 Container Terminal and Transportation Corridor Project
- Berths 136-147 Marine Terminal, West Basin (Proposed Project)
- Channel Deepening Project
- Cabrillo Way Marina, Phase II
- Artificial Reef, San Pedro Breakwater
- Berth 226-236 (Evergreen) Container Terminal Improvements Project and Cannery Steam Demolition
- Port of Los Angeles Charter School and Port Police Headquarters
- SSA Outer Harbor Fruit Facility Relocation
- Crescent Warehouse Company Relocation
- Plains All American Oil Marine Terminal, Pier 400
- Ultramar Lease Renewal Project
- Westway Decommissioning
- Consolidated Slip Restoration Project
- Berths 97-109, China Shipping Development Project
- Berths 171-181 Pasha Marine Terminal Improvements
- Berths 206-209 Interim Container Terminal Reuse Project
- LAXT Dome and Site Demolition
- Southern California International Gateway Project
- Pan-Pacific Fisheries Cannery Buildings Demolition Project
- San Pedro Waterfront Enhancements Project
- Joint Container Inspection Facility
- Berth 302-305 (APL) Container Terminal Improvements Project
- South Wilmington Grade Separation
- Wilmington Waterfront Master Plan/Avalon Blvd. Corridor Project
- "C" Street/Figueroa Street Interchange
- Port Transportation Master Plan
- Berths 212-224 YTI Wharf Upgrades
- Berths 121-131 Yang Ming Container Terminal
- Southwest Marine Demolition Project
- I-110/SR47 Connector Improvement Program
- Inner Cabrillo Beach Water Quality Improvement Program

***Potential Port-Wide Operational Projects***

- Terminal Free Time
- Extended Terminal Gates
- Shuttle Train/Inland Container Yard
- Origin/Destination and Toll Study
- Virtual Container Yard
- Increased On-Dock Rail Usage
- Union Pacific Railroad ICTF Modernization Project
- Optical Character Recognition
- Truck Driver Appointment System

***Community of San Pedro Projects***

- 15th Street Elementary School
- Pacific Corridors Redevelopment Project
- Cabrillo Marine Aquarium Expansion
- Gas Station and Mini-Mart
- Fast Food Restaurant w/drive thru
- Mixed-Use Development, 407 Seventh Street
- Condos, 28000 Western Ave.
- Pacific Trade Center
- 50 Single Family Homes (Gaffey St.)
- Mixed-Use Development, 281 West 8th Street
- Target (Gaffey Street)
- Palos Verdes Urban Village
- Temporary Little League Park

***Community of Wilmington Projects***

- Banning Elementary School #1
- East Wilmington Greenbelt Community Center
- Distribution Center and Warehouse
- Dana Strand Public Housing Redevelopment Project

***Projects in Harbor City, Lomita, and Torrance***

- 1437 Lomita Blvd. Condos
- Harbor City Child Development Center
- Kaiser Permanente South Bay Master Plan
- Drive-thru Restaurant, Harbor City
- Ponte Vista
- Warehouses, 1351 West Sepulveda Blvd.
- Sepulveda Industrial Park

**ACTA and CalTrans Projects**

- Schuyler Heim Bridge Replacement/SR47 Expressway
- I-710 Major Corridor Study

## 4.2 Cumulative Impact Analysis

The following sections analyze the cumulative impacts identified for each resource area.

### 4.2.1 Aesthetics

#### **Cumulative Impacts AES-1: Would the proposed project result in cumulative impacts related to aesthetics?**

A cumulative impact on an aesthetic resource would occur if the development activities necessary to implement the proposed project, in combination with one or more of the related cumulative projects, would result in significant impacts to aesthetic resources.

The proposed project would result in the year-round presence of the USS *Iowa* at Berth 87 in the Main Channel. The geographic scope for the analysis of cumulative visual impacts extends to both the areas bordering the Port that have views of Port development projects as well as the geographical limits from which cumulative projects can be viewed.

As previously stated, the proposed project would create an attractive physical presence, and would contribute to a distinctive, recognizable, and well-maintained physical presence at the Port / community interface. In addition, it would enhance the coastal zone environment by providing a unique and historic tourist attraction, while complying with applicable design and lighting guidelines

Although many of the future projects would be visible within the same viewshed as the proposed project, they would not substantially obstruct views of the waterfront and would not have significant adverse impacts on the Port's distinct character type within the region, that of a highly engineered, working port. Therefore, implementation of the proposed project in compliance with current applicable standards and design guidelines contained in the Port of Los Angeles Master Plan, City of Los Angeles General Plan and Zoning Code, and San Pedro Community Plan would result in less than significant cumulative impacts related to scenic vistas and visual character.

#### **Impact Determination**

The proposed project would have a less than significant cumulative impact on aesthetic resources. As a result, impacts on scenic vistas are considered to be less than significant.

**Mitigation Measures**

No mitigation is required.

**Cumulative Impacts AES-2: Would the proposed project result in cumulative impacts related to light and glare?**

Given the size of the proposed project relative to anticipated future development in the Port, the project's impact on cumulative light and glare would be perceived as a minimal part of the overall, cumulative changes that would occur at Master Plan build out of the Port.

As discussed in Section 3.1, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views resulting in significant impacts. Proposed project features that would contribute to ambient nighttime illumination would be negligible within the context of the functional lighting of the Port which includes the Inner Harbor Parking Structure, lighting of the Town Square area and associated harbors, lighting of the waterfront promenade and Ports O'Call area, and lighting of the Outer Harbor Cruise Terminals. New lighting would be both functional and decorative to enhance visual quality.

Lighting related to proposed project components would comply with the San Pedro Waterfront and Promenade Design Guidelines, which include lighting recommendations to minimize nighttime light pollution, light spillover, and glare while furthering the goal of an attractive and safe daytime and nighttime waterfront. Design consistency with these guidelines and regulations would minimize lighting effects and keep the lighting impacts of the proposed project below significance.

**Impact Determination**

The proposed project would have a less than significant cumulative impact on light and glare. As a result, impacts related to light and glare are considered to be less than significant.

**Mitigation Measures**

No mitigation is required.

## 4.2.2 Air Quality and Greenhouse Gas Emissions

**Cumulative Impacts AQ-1:** Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

### **Cumulative Short-Term Emissions (Construction-Related)**

With respect to the proposed project's construction-period air quality emissions and cumulative SCAB-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2007 AQMP pursuant to FCAA mandates. As such, the proposed project would comply with SCAQMD Rule 403 requirements, as well as adhere to all BMPs within the LAHD Construction Guidelines and programs within the CAAP (refer to Mitigation Measures AQ-1 and AQ-2). Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the proposed project. In addition, the proposed project would comply with adopted 2007 AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the SCAB, which would include related projects.

Compliance with SCAQMD rules and regulations, as well as implementation of LAHD Construction Guidelines and programs within the CAAP (as required by Mitigation Measures AQ-1 and AQ-2), would reduce the project's construction-related impacts to a less than significant level. Thus, it can be reasonably inferred that the project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. Thus, a less than significant impact would occur in this regard.

### **Cumulative Long-Term Emissions**

The SCAQMD has set forth both a methodological framework as well as significance thresholds for the assessment of a project's cumulative operational air quality impacts. The SCAQMD's approach for assessing cumulative impacts is based on the SCAQMD's AQMP forecasts of attainment of AAQS in accordance with the requirements of the federal and state CAAs. This forecast also takes into account SCAG's AQMP forecasted future regional growth. As such, the analysis of cumulative impacts focuses on determining whether the



proposed project is consistent with the growth assumptions upon which the SCAQMD's AQMP is based. If the project is consistent with the growth assumptions, then future development would not impede the attainment of AAQS and a significant cumulative air quality impact would not occur.

Based on the SCAQMD's methodology, a project would have a significant cumulative air quality impact if the project's contribution to VMT growth exceeds its contribution to employment growth in the region. This is determined by comparing the following two ratios:

- The ratio of daily project-related VMT to daily countywide VMT; and
- The ratio of project-related employment growth to countywide employment growth.

As shown in Table 4.0-1, *Project Cumulative Air Quality Impacts*, the project's VMT ratio does not exceed the employment ratio. Based on these criteria, development of the proposed project would have a less than significant impact in this regard. In addition, as stated above, no local CO violations would occur in the project area as a result of project implementation. As such, the mass regional emissions that would occur as a result of the proposed project would not be cumulatively considerable.

**Table 4.0-1.** Project Cumulative Air Quality Impacts

<i>Cumulative Air Quality Criteria</i>	<i>VMT, Employment, and Cumulative Ratios</i>
Daily Vehicle Miles Traveled for Project <sup>1</sup>	6,036
Daily Vehicle Miles Traveled Countywide <sup>2</sup>	240,260,000
<i>Daily Vehicle Miles Traveled Ratio</i>	<i>0.00003</i>
Project Related Employment Increase <sup>3</sup>	80
Countywide Employment Increase <sup>4</sup>	394,022
<i>Employment Ratio</i>	<i>0.0002</i>
Significance Test (Daily Vehicle Miles Traveled Ratio Greater Than Employment Ratio?)	<b>No</b>
VMT = Vehicle Miles Traveled	
Notes:	
1 – Increase of VMT based on the CalEEMod outputs (refer to Appendix D, <i>Air Quality/Greenhouse Gas Emissions Data</i> ).	
2 – Data obtained from EMFAC 2007.	
3 – Project employment estimation obtained from the <i>Traffic Study for the USS Iowa Project Environmental Impact Report</i> , prepared by Fehr and Peers, dated December 2011.	
4 – Countywide employment increase from 2010 to 2030; obtained from <i>Southern California Association of Governments, 2008 Regional Transportation Plan, Growth Forecasting, May 8, 2008</i> , <a href="http://www.scag.ca.gov/forecast/downloads/excel/RTP07_CityLevel.xls">http://www.scag.ca.gov/forecast/downloads/excel/RTP07_CityLevel.xls</a> , accessed November 15, 2011	

### Impact Determination

Impacts would be less than significant with implementation of Mitigation Measures AQ-1 and AQ-2.

### **Mitigation Measures**

Refer to Mitigation Measures AQ-1 and AQ-2 in Section 3.2, *Air Quality and Greenhouse Gas Emissions*.

### **Cumulative Impacts GHG-1: Would the proposed project result in cumulative impacts related to GHG emissions?**

As stated in Section 3.2, *Air Quality and Greenhouse Gas Emissions*, GHG emissions impacts resulting from the proposed project would be less than significant with implementation of mitigation. Direct project-related GHG emissions for “business as usual” conditions including emissions from construction activities, area sources, and mobile sources, were analyzed in Section 3.2, and provided in Table 3.2-13, *Business As Usual Greenhouse Gas Emissions*.

The project would result in a total of 1,466.74 MTCO<sub>2</sub>eq/yr. Project construction and transport of the ship represent a substantial portion of the total emissions, resulting in 996.52 MTCO<sub>2</sub>eq. Short-term (transport of the USS *Iowa*) and construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions. Once the USS *Iowa* arrives to the Port, the tugboats used to place the ship at Berth 87 would be required to comply with Mitigation Measure AQ-1, which would reduce tugboat-related emissions, and also reducing cumulative GHG emissions in the project area.

On December 30, 2009, the Natural Resources Agency adopted the CEQA Guideline Amendments prepared by Office of Planning and Research (OPR), as directed by SB 97. On February 16, 2010, the Office of Administration Law approved the CEQA Guidelines Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The CEQA Guidelines Amendments became effective on March 18, 2010. The Natural Resources Agency originally proposed to add subdivision (f) to section 15130 to clarify that sections 21083 and 21083.05 of the Public Resources Code do not require a detailed analysis of GHG emissions solely due to the emissions of other projects (i.e., State CEQA Guidelines, Section 15130(a)(1); *Santa Monica Chamber of Commerce v. City of Santa Monica* (2002) 101 Cal.App.4th 786, 799). Rather, the proposed subdivision (f) would have provided that a detailed analysis is required when evidence shows that the incremental contribution of the project’s GHG emissions is cumulatively considerable when added to other cumulative projects (i.e., *Communities for a Better Environment v. California Resources Agency* (2002), supra, 103 Cal.App.4th at 119-120). In essence, the proposed addition would be a restatement of law as applied to GHG emissions. Analysis of GHG emissions as a cumulative impact is consistent with case law arising under the National Environmental Policy Act (e.g., *Center for Biological Diversity v. National Highway Traffic Safety Administration*, 538 F.3d 1172,

1215-1217 [9th Cir. 2008]). Other portions of the CEQA Guideline Amendments address how lead agencies may determine whether a project's emissions are cumulatively considerable (e.g., Proposed Sections 1506(h)(3) and 15064.4). However, public comments noted that the new subdivision merely restated the law, and was capable of misinterpretation. The Natural Resources Agency, therefore, determined that because other provisions of the CEQA Guideline Amendments address the analysis of GHG emissions as a cumulative impact, and because the reasoning of those is fully explained in the Initial Statement of Reasons, subdivision (f) should not be added to the CEQA Guidelines. The deletion was reflected in the revisions that were made available for further public review and comment on October 23, 2009.

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory.<sup>1</sup> GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.<sup>2</sup> The additive effect of the project's GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed project as well as other cumulative related projects would also be subject to all applicable regulatory requirements, which would also reduce the GHG emissions of the project. Therefore, the project's cumulative GHG emissions would have a less than significant impact on the environment.

### **Impact Determination**

The proposed project would have a less than significant impact related to GHG emissions with implementation of mitigation.

### **Mitigation Measures**

Refer to Mitigation Measures AQ-1 and AQ-2 in Section 3.2, *Air Quality and Greenhouse Gas Emissions*.

## **4.2.3**

### **Traffic**

**Cumulative Impacts TRA-1:** Would the proposed project result in cumulative impacts relative to traffic?

Increased traffic is expected to result in the short-term, as the proposed project is constructed, and in the long-term, as visitors to the USS *Iowa* utilize the roadways, bikeways and walkways to get to the Port area. Short-term

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<sup>1</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, 2008.

<sup>2</sup> Ibid.

construction traffic impacts may result in traffic congestion and delays; however, this would be temporary in nature, would be mitigated with implementation of a Traffic Management Plan, and would cease upon project completion. Long-term operational traffic impacts would result in increased vehicular traffic and degraded levels of service on adjacent roadways; however, these would be mitigated through intersection improvements at the Gaffey Street/1<sup>st</sup> Street intersection, and review and approval of project plans by the local transportation authorities including LADOT, in coordination with the Port.

As discussed in Section 3.3, *Traffic and Circulation*, the future base traffic forecasts include the effects of specific cumulative development projects, also called related projects, expected to be built in the vicinity of the proposed project site prior to the proposed project's future years of 2024 and 2042. Regional background (ambient) traffic growth was estimated using data from a computerized traffic analysis tool known as the Port Area Travel Demand Model, which includes traffic growth for the port and the local area. Background traffic growth occurs as a result of regional growth in employment, population, schools, and other activities. Related projects are covered by the growth forecasts of the Port Travel Demand Model. Local projects not included in the SCAG Regional Travel Demand Forecasting Model were separately accounted for in the Port Travel Demand Model, such as detailed Ports of Long Beach and Los Angeles projected container and non-container terminal growth and the Wilmington Waterfront.

The following projects were included in the related project traffic generation and assignment:

- CRAFTED in San Pedro (Warehouses #9 and #10) – CRAFTED would be located in Warehouses #9 and #10 in San Pedro, near Miner Street & 22nd Street, approximately 1.5 miles from the project site. This project would consist of adaptive reuse of the existing warehouses to create a permanent craft marketplace. The building programming would be composed of juried vendor stalls selling handmade wares. The building would also feature concession areas and a demonstration area. CRAFTED would be open throughout the week, with peak activity occurring on weekends.
- City Dock #1 – City Dock #1 would be located at Berths 56-60 and 70-71, near the intersection of Miner Street & Signal Street, approximately 1.5 miles from the project site. This project consists of marine research laboratory, educational, and conference facilities in addition to a research and development business incubator park. There would also be a concession area and small passive uses on the project site.
- San Pedro Waterfront – The San Pedro waterfront transformation is a long-range specific plan for the San Pedro side of the Los Angeles waterfront. It includes redevelopment of Ports O'Call, the primary retail outlet along the

waterfront, additional promenades and boat harbors, and several recreational elements. The project is expected to increase utilization of the Waterfront area with adaptive reuse of underutilized buildings and new development opportunities along the waterfront.

Given the size of the proposed project relative to anticipated future development in the Port, the project's impact on cumulative traffic would be perceived as a minimal part of the overall, cumulative changes that would occur at Master Plan build out of the Port. Each project proposed within the harbor area, and particularly along the San Pedro Waterfront, would need to be individually evaluated to ensure that the existing and proposed roadways, bikeways and walkways within the area would be sufficient to accommodate the proposed developments and projected traffic increases. Based on the above considerations, this project would not have substantial cumulative impacts.

### **Impact Determination**

The proposed project would have a less than significant impact related to traffic with incorporation of mitigation measures discussed in Section 3.3, *Traffic and Circulation*. As a result, impacts are considered to be less than significant.

### **Mitigation Measures**

Refer to Mitigation Measure TRA-2 in Section 3.3, *Traffic and Circulation*. Implementation of intersection improvements at the Gaffey Street/1<sup>st</sup> Street intersection including reconfiguration of the westbound approach of 1st Street with provision of an exclusive right-turn lane along the westbound approach, would reduce long-term operational impacts to V/C ratios and levels of service for this intersection. No additional mitigation is required.

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