

**ADDENDUM TO THE SAN PEDRO WATERFRONT PROJECT ENVIRONMENTAL
IMPACT REPORT FOR THE LOS ANGELES MARITIME INSTITUTE RELOCATION
PROJECT**

[SCH No. 2005061041, APP No. 151221-142]



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August 2016

TRANSMITTAL 2

1.1 INTRODUCTION AND OVERVIEW

Pursuant to the California Environmental Quality Act (CEQA) Public Resources Code section 21000 et. seq., this Addendum to the San Pedro Waterfront (SPW) Project Final Environmental Impact Report (EIR) has been prepared to address proposed changes to the relocation site for the Los Angeles Maritime Institute (LAMI) as originally identified and analyzed in the SPW Project EIR that was certified by the Los Angeles Board of Harbor Commissioners on September 29, 2009 (State Clearinghouse No. 2005061041). Since certification, three previous addenda were prepared for the SWP EIR, the first was for Warehouse Nos. 9 and 10, Crafted at the Port of Los Angeles, the second for the Harbor Boulevard/7th Street/Sampson Way Intersection Improvements and the third for the San Pedro Public Market Project.

The City of Los Angeles Harbor Department (LAHD) has prepared this fourth Addendum to address the potential environmental effects of the proposed changes to the relocation site of the LAMI from the Crowley Building at Berth 87 that was originally identified and analyzed in the SPW Project EIR to another location identified as Building G within the San Pedro Waterfront boundaries at Berth 73W (referred to as the proposed Project or LAMI Relocation Project). Another change is the transport of the schooner *Swift of Ipswich* currently undergoing renovation in Chula Vista to the proposed relocation site to completion its renovation.

The LAHD has prepared this Addendum to the Final EIR in accordance with CEQA (Public Resources Code [PRC] 21000 et seq.), and the State CEQA Guidelines Section 15164 to adequately assess the proposed modifications to the Final EIR.

1.2 PURPOSE AND USE OF AN ADDENDUM TO A PREVIOUSLY CERTIFIED EIR

According to Section 15164(a) of the State CEQA Guidelines, the lead agency or the responsible agency shall prepare an Addendum to a previously certified EIR or adopted negative declaration if changes or additions are necessary, but none of the conditions described in Section 15162 calling for the preparation of a subsequent or supplemental to the certified EIR or adopted negative declaration have occurred. An Addendum need not be circulated for public review but can be included in or attached to the adopted negative declaration or certified EIR. The decision-making body considers the Addendum with the adopted EIR or negative declaration prior to making a decision on the project.

Section 15162 of the State CEQA Guidelines states that, for a project covered by a certified EIR or adopted negative declaration, no subsequent EIR or negative declaration shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- 1) Substantial changes are proposed in the project that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

1.3 PREVIOUS ENVIRONMENTAL DOCUMENTS INCORPORATED BY REFERENCE

- Los Angeles Harbor Department. 2008, September. San Pedro Waterfront Project Draft EIS/EIR (SCH No. 2005061041).
- Los Angeles Harbor Department. 2009, September. San Pedro Waterfront Project Findings of Fact and Statement of Overriding Considerations.
- Los Angeles Harbor Department. 2009, September. San Pedro Waterfront Project Mitigation Monitoring Report and Program.
- Los Angeles Harbor Department. 2009, September. San Pedro Waterfront Project Final EIS/EIR (SCH No. 2005061041).
- Los Angeles Harbor Department. 2011, November. Addendum to the San Pedro Waterfront Project Final EIR/EIS Warehouse Nos. 9 and 10, Crafted at the Port of Los Angeles.

- Los Angeles Harbor Department. 2015, June. EIR Addendum San Pedro Waterfront Project, Harbor Boulevard/7th Street/Sampson Way Intersection Improvements.
- Los Angeles Harbor Department. 2016, May. EIR Addendum to the San Pedro Waterfront Project, San Pedro Public Market Project.

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

This document, prepared pursuant to CEQA, constitutes an Addendum to the SPW Project EIR. These documents, together with the other documents incorporated by reference herein, serve as the environmental review of the LAMI Relocation Project, as required pursuant to the provisions of CEQA, the State CEQA Guidelines, and the City of Los Angeles procedures for CEQA implementation.

The SPW Project Environmental Impact Statement/Environmental Impact Report (EIS/EIR) described the affected resources and evaluated the potential impacts on those resources as a result of building and operating the SPW Project, including the relocation of LAMI. Impacts on Cultural Resources, Groundwater and Soils, Hazards and Hazardous Materials, Land Use and Planning, Transportation and Navigation (Marine), and Utilities and Public Services were determined to be less than significant or were reduced to a level that is considered less than significant through the adoption of mitigation measures. Impacts on Aesthetics, Air Quality, Biological Resources, Geology, Noise, Recreation, Ground Transportation, and Water Quality, Sediments, and Oceanography, however, were identified as significant and unavoidable. For those impact areas, the Board adopted a Statement of Overriding Considerations.

The First EIR Addendum for Crafted at the Port of Los Angeles Project involving Warehouses 9 and 10, analyzed the development of a marketplace for handmade goods with a higher number of visitors and workers than for the originally proposed low-intensity uses. This document concluded that there were no new significant impacts nor was there an increase in severity of previously identified impacts.

A second EIR Addendum was prepared that analyzed design changes to the Harbor Boulevard/7th Street/Sampson Way Intersection. This document did not find any new significant impacts or increases in severity of previously identified impacts as previously disclosed in the SPW Project EIS/EIR.

Finally, a third EIR Addendum analyzed the San Pedro Public Marketplace (SPPM). This document found it is consistent with the development scenario for Ports O'Call analyzed in the Final EIS/EIR. The SPPM Project would introduce a similar mix of land uses and would include most of the other SPW Project components, such as extension of the promenade, recreational elements, a trolley, parking areas, and waterside improvements. Under the SPPM Project, overall development intensity would be similar; however, the development of a 75,000-square foot conference center, which was a possibility discussed in the Final EIR, is not currently anticipated to be developed. Also, the SPPM Project would reconfigure the promenade to avoid the coverage and shading of the mudflat at Berth 78 that would have occurred under the development scenario

for Ports O'Call analyzed in the Final EIR. This eliminates a significant impact and the need for compensatory mitigate at the Salinas de San Pedro Salt Marsh. Additionally, the proposed lease would be for 50 years, which extends beyond the planning horizon of 2037, which was assumed in the Final EIS/EIR. Lastly, adjustments to the SPPM Project from that which was analyzed in the Final EIS/EIR will require review by the U.S. Army Corps of Engineers for all in-water development. All modifications are being developed and designed in coordination with the respective resource agencies (U.S. Army Corps of Engineers and California Department of Fish and Wildlife).

This Addendum addresses whether the conditions set forth in Section 15162 of the State CEQA Guidelines that would require a subsequent or supplemental EIR are met, and whether there are new significant impacts or a substantial increase in the severity of previously identified impacts resulting from the proposed Project. For purposes of determining whether new or substantially more severe "significant effects" would occur under State CEQA Guidelines Section 15162, the criteria for determining whether environmental effects would be significant in this Addendum analysis are the same as the significance thresholds contained within the certified SPW Project EIS/EIR.

The scope of analysis contained within this Addendum addresses the environmental resource areas that were previously analyzed in the certified EIS/ EIR as follows:

- Aesthetics
- Air Quality and Greenhouse Gases
- Biological Resources
- Cultural Resources
- Geology and Soils
- Groundwater and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Transportation and Circulation – Ground and Marine
- Utilities and Public Services
- Water Quality, Sediments, and Oceanography
- Environmental Justice
- Socioeconomics and Environmental Quality
- Growth Inducement
- Cumulative Impacts

1.5 SUMMARY OF FINDINGS

Based on the findings of this Addendum, the LAMI Relocation Project would not result in any new significant impacts or a substantial increase in the severity of previously identified impacts that were analyzed in the SPW Project EIS/EIR, and none of the conditions set forth in Section 15162 of the State CEQA Guidelines that would otherwise require preparation of a subsequent EIR are met in this instance.

2.1 PROJECT LOCATION AND SETTING

The Port of Los Angeles is located at the southernmost portion of the city and comprises 43 miles of waterfront and 7,500 acres of land and water, with approximately 300 commercial berths. The Port is approximately 23 miles south of downtown Los Angeles and is surrounded by the community of San Pedro to the west, the Wilmington community to the north, the Port of Long Beach to the east and the Pacific Ocean to the south. The project site is located on the north side of the Southern Pacific Slip of the Main Channel of the Port of Los Angeles at Berth 73W (Figure 1).

2.2 PROJECT OBJECTIVES

The CEQA project objectives identified in the SPW Project EIS/EIR, which includes relocation of the LAMI facility from Berth 86 to allow for the construction of the North Harbor Cut, is relevant to the LAMI Relocation Project. The only difference is the change in the LAMI relocation site from the Crowley Marine Service Building at Berth 87 to Building G at Berth 73W.

2.3 FINAL SAN PEDRO WATERFRONT EIR PROJECT COMPONENTS

As described in the SPW Project EIS/EIR, the LAMI is a cultural educational facility located in trailers at Berth 86 that would be temporarily relocated to Berth 87 for construction of the Downtown Harbor water cut and a new building for Crowley Marine Service at Berth 86. LAMI would then be moved to the original Crowley Building (a 2-story building totaling 3,530 square feet with an outdoor carport totaling 500 square feet) north of the Downtown Harbor area at Berth 87. The LAMI element of the SPW Project would include a new lease that consolidates permits for several parcels and the including reuse of the original Crowley Building. At the time of the SPW Project EIR, LAMI operated four ships: the 70-foot-long topsail schooner *Swift of Ipswich*, the 136-foot-long gaff-topsail schooner *Bill of Rights*, and the 90-foot-long Twin Brigantines *Irving Johnson* and *Exy Johnson* and requires two 120-foot-long berths, one 95-foot-long berth, space for visiting tall ships, and temporary berthing for their fourth vessel.

LAMI is an educational facility that operates the TopSail Youth Program. The program consists of a series of one-day sailings in and around the Los Angeles/Long Beach Harbors, as well as multi-day trips beyond the harbor waters. LAMI provides classroom sessions prior to hands-on

Figure 1: LAMI Project Locations

Date Printed: 30 August 2016



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THIS MAP IS NOT TO BE USED FOR NAVIGATION



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experience on a working sailing ship. The facility provides space for a maintenance shop and work area, small boat construction and repair, laboratory and classroom space, meeting areas, and administrative offices. The TopSail Youth Program has provided as many as 5,000 youth-sailing days per year to schools and youth organizations crewed by LAMI mariners/educations/mentors. Students arrived at LAMI location by foot, private vehicle or bus for the educational and on-board ship programs. LAMI has a full-time staff of four and as many as ten volunteers on any given day.

2.4 CURRENT LAMI OPERATION

LAMI currently employs six full time persons (two administrative personnel, two captains, one operations person and a Director of Development) and occupies 2,565 square feet of second floor office space and 589 square feet of ground floor classroom space in the former Fisherman’s Cooperative Association Building (commonly known as the Utro’s Building) at the head of the SP Slip (Berth 73) (Figure 2). LAMI also utilizes approximately 451 square feet in Ports O’ Call Village for retail, display and training exhibits and an 8,000 square foot paved lot (Lot 1) next to the proposed LAMI Relocation Project site. A boat building training course for the Port of Los Angeles High School (POLAHS) is conducted at LAMI Lot 1. As many as ten volunteers are on site weekends and holidays. Currently, the *Swift of Ipswich* is being restored at a municipal lot in Chula Vista and LAMI no longer owns or operates the *Bill of Rights*.

2.4 PROPOSED MODIFICATIONS

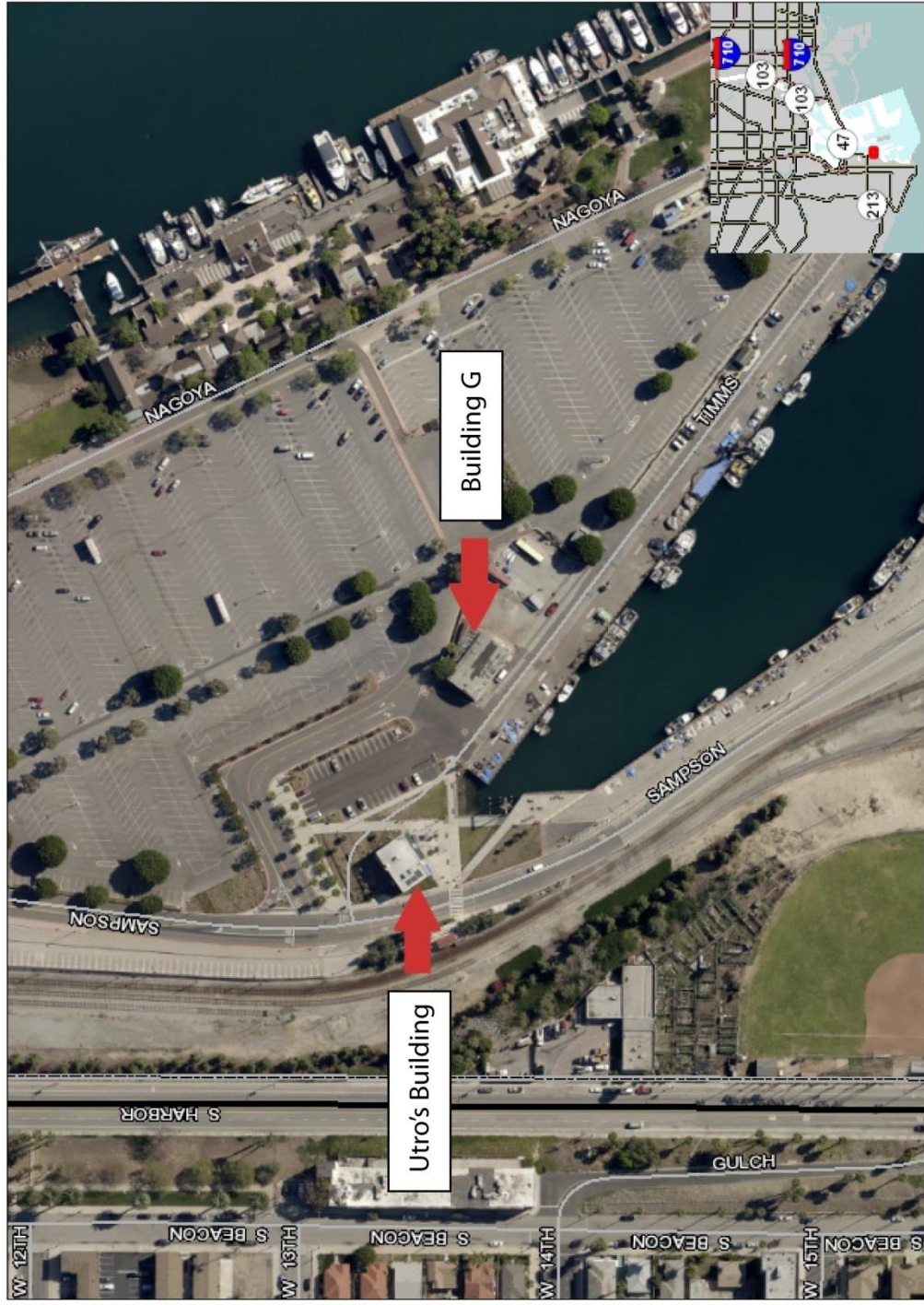
The proposed modifications to the LAMI Relocation Project consist of the renovation and use of the 4,516 square foot Building G and adjacent 5,789 square foot paved lot (Lot 2) at Berth 73W within the boundary of the SPW Project. (Figure 3) The renovation of Building G involves replacement of the roof, reconnection of utilities, and minor interior modification and cleaning.

The proposed LAMI properties as well as the current leased space in the Utro’s building, Ports O’ Call Village and the 8,000 square foot lot (Lot 1) will be combined into a 60-day revocable permit to LAMI. Classes in maritime training will continue to be held in the Utro’s building. The current boat building training will continue at Lots 1 and 2. The number of LAMI employees will not change. This facility will be used to complete the restoration of the *Swift of Ipswich* and for on-going boat maintenance for all three vessels. It is not anticipated that more than six parking spaces will typically be needed by the facility. There are spaces immediately adjacent to the proposed Project site (Figure 3) and in the nearby Utro’s and Ports of Call parking lots. Approximately thirty students will be on site when classes are held and they will walk, be dropped off or transported by bus to the site.

Hazardous materials to be used on the site are the same as those previously used by LAMI:

1. Oil and water based paints
2. Synthetic “red lead” paint (nontoxic)

Figure 2: Building G and Utro's Building



Date Printed: 16 June 2016

This map is a user generated static output from an internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate - current or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

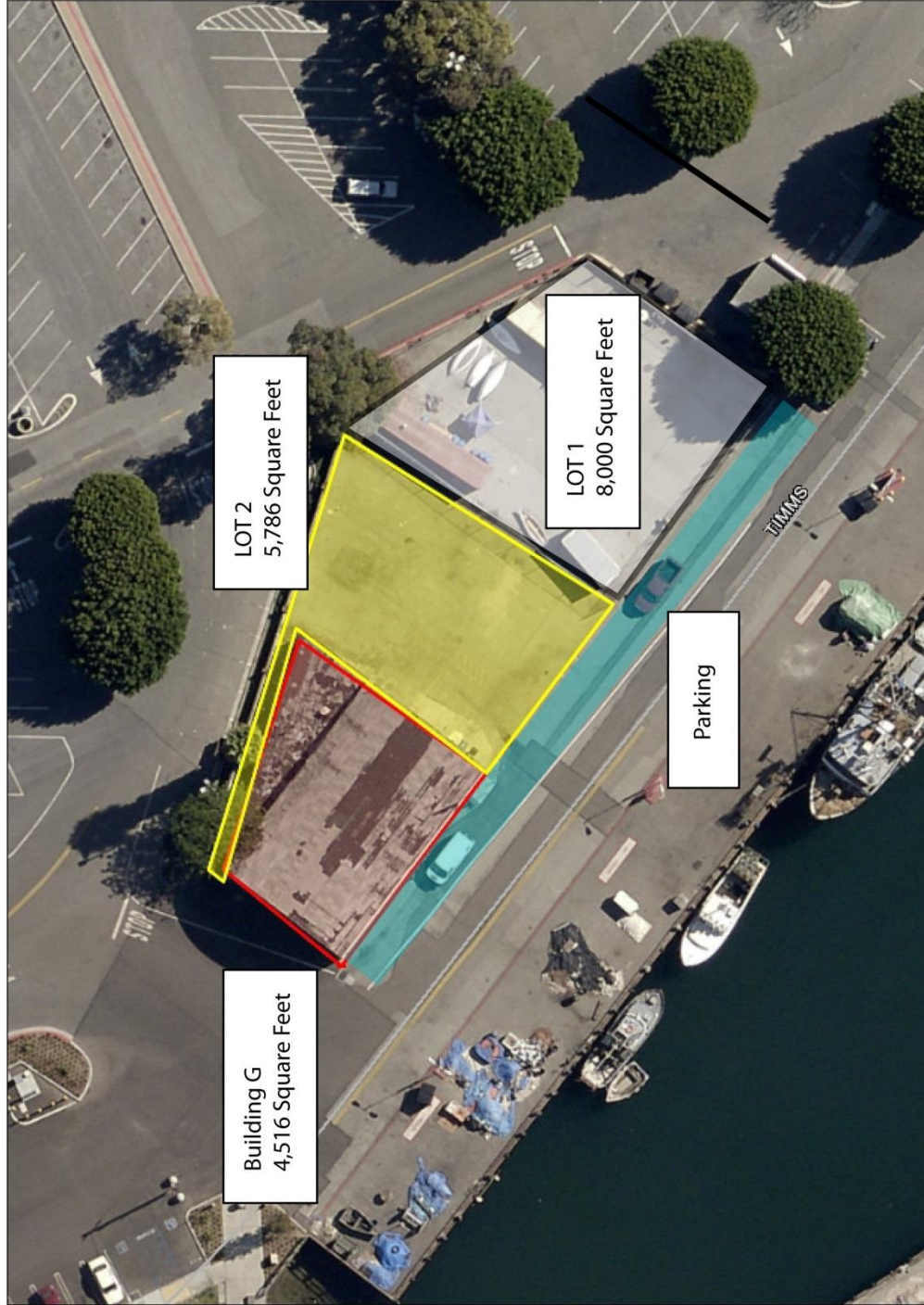


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437.0
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Figure 3: LAMI Site

Date Printed: 16 June 2016



3. Bottom paint
4. Epoxy paints
5. Epoxy adhesives
6. Wood glue (tight bond 1, 2 & 3)
7. Polysulfide sealants
8. Lubricants including WD40
9. Solvents: mineral spirits, turpentine, kerosene, acetone, MEK
10. Varnishes, shellac, raw and boiled linseed oil

The quantities will remain relatively low being in quart, gallon or five-gallon containers. There will be no significant hazardous materials stored within building G. The hazardous materials will be stored in a locked fire safe container outside under an open air lean-to structure and protected by spill containment structures. The lean-to structure will be in a corner of the yard away from Building G and the *Swift of Ipswich*.

The facility will serve as a living exhibit of the Port's maritime heritage and provide the public with opportunities to observe boat construction and repair. Currently, the *Irving Johnson* and *Exy Johnson* are berthed at Berths 77 and 78 in the Port of Los Angeles and the *Swift of Ipswich* is stored on land at a municipal lot in Chula Vista, California.

Renovation of the Swift of Ipswich

As part of the proposed Project, the *Swift of Ipswich* will be trucked 120-miles from Chula Vista to the proposed project site for completion of its renovation. Alternatively, the *Swift of Ipswich* will be placed in the water at Chula Vista and sailed the 130 miles under its own power (a 165 hp diesel Tier 3 engine) to San Pedro and lifted onto the proposed Project site by crane. The proposed Project will consist of renovating/reconstructing *Swift of Ipswich's* rigging, spars (masts, bow sprit, gaff's booms and yards), bow detail, galley, aft cabin, main cabin, head/shower, engine compartment, binnacle and associated equipment, generator, transmission, prop shaft, stuffing box, cutlass bearing and propeller. Top treatment for finished decks and stanchions will require painting, varnishing and oiling. These renovation activities are consistent with the ongoing maintenance of LAMI ships.

The restoration work will be done largely by volunteers. It is anticipated that there will rarely be more than a gallon or two of paint used in anyone day. Varnish is usually used by the quart and would not anticipate any more than one per day. Right before the vessel is returned to the water, four or five gallons of low VOC water based bottom paint will be applied. On weekdays there will be one or two individuals working on the boat with as many as ten during weekends and holidays. These activities are consistent with the ongoing routine maintenance of LAMI vessels and will be conducted in accordance with all applicable laws.

Renovation of Building G

Renovation of Building G will include: installation of a new roof, new outdoor lighting (exterior lighting on both ends of the building and two poles in the yard), new security fencing, and

reconnection of utilities. Installation of the new roof will involve four persons over 10 days. The utility reconnection will require no excavation. No modifications over, under, or in the harbor or waters of the United States are required and no federal permits are needed.

3. ENVIRONMENTAL IMPACT ANALYSIS

This section provides an impact assessment of the proposed modifications to the LAMI Relocation Project. The sections below compare the modified project against the findings made in the 2009 SPW Final EIR/EIS (Final EIR) to determine whether any new impacts would be created by the modifications and/or if previously identified impacts would be exacerbated by the proposed changes.

As described below, no new impact areas have been identified nor do any impacts cause an increase in severity of previously identified impacts.

3.1 Aesthetics

AES-1: A project would have a significant impact if it would result in an adverse effect on a scenic vista from a designated scenic resource due to obstruction of view.

The Final EIR found the construction of parking structures at the existing Inner Harbor cruise ship terminal would block views to the Vincent Thomas Bridge (a scenic vista) for approximately 1,440 feet from a locally designated scenic highway (Harbor Boulevard). A reduction in the height of the proposed structures, partial subterranean construction, or a reduced footprint could offer opportunities to maintain views; however, these options would not meet the parking requirements for the SPW Project. Consequently, no mitigation is available and impacts would be significant and unavoidable from a short segment of Harbor Boulevard.

The proposed LAMI Relocation Project will use an existing facility with the only change that could impact a scenic vista is the *Swift of Ipswich* during the completion of her renovation. The vessel is a relatively small mass and not a permanent fixture of the site. Designate scenic resources are at a similar elevation or above the proposed Project site with intervening building blocking the view of the vessel or elevated above the facility with clear line of sight of the harbor with the vessel present. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

AES-2: A project would have a significant impact if it would substantially damage scenic resources (including, but not limited to, trees, rock outcroppings, and historic buildings) within a state scenic highway.

The Final EIR found no designated state scenic highways within the proposed project area and no impact would occur.

The proposed LAMI Relocation Project is within the boundaries of the SWP Project. The proposed Project would not introduce a new significant impact or substantially increase previously identified impacts.

AES-3: A project would have a significant impact if it would substantially degrade the existing visual character or quality of the site or its surroundings.

The Final EIR found project features would not degrade the existing visual character or quality of the site or its surroundings. Impacts will be less than significant.

The proposed LAMI Relocation Project will use an existing facility for the completion of the *Swift of Ipswich*'s renovation, routine maintenance of LAMI's three ships and for conducting training including construction of small boats as part of a POLAHS maritime program. The operations at the facility will be of a maritime nature and in keeping with the visual characteristics of SP Slip as an area for fishing vessel berthing and maintenance. The proposed Project would not introduce a new significant impact or substantially increase previously identified impacts.

AES-4: A project would have a significant impact if it would result in an adverse effect due to shading on the existing visual character or quality of the site or its surroundings.

The Final EIR found little effect on shade sensitive viewers because sensitive viewers would not be present in the specific settings where shadows cast by limited multiple-story development would occur. Impacts would be less than significant.

The proposed LAMI Relocation Project will use an existing building and include renovation of the *Swift of Ipswich*. The shading effects of the *Swift of Ipswich* on land would be minimal and temporary. The proposed Project will not introduce a new significant impact or substantially increase previous identified impacts.

AES-5: A project would have a significant impact if it would create a new source of substantial light or glare that would adversely affect day or nighttime views of the area.

The Final EIR found lighting associated with the project components would comply with the San Pedro Waterfront and Promenade Design Guidelines, which include lighting recommendations to minimize light pollution, spill light, and glare while promoting goals to create an attractive and safe daytime and nighttime waterfront that supports local economic growth. Additionally, lighting would comply with the Port Master Plan (PMP), which requires an analysis of design and operational effects on existing community areas. Design consistency with these guidelines and regulations would ensure that views of the area would not be adversely affected. New lighting would be both functional and decorative to enhance visual quality. Impacts would be less than significant.

The proposed LAMI Relocation Project would install new outdoor lights at each end of Building G and two in the adjacent lots. The SP Slip area is well lit and the outdoor lights will follow the San Pedro Waterfront and Promenade Design Guidelines and the LAHD Engineering Design

Guidelines. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.2 Air Quality

Impact AQ-1: The proposed Project would result in construction-related emissions that exceed an SCAQMD daily emission threshold.

The Final EIR found peak daily construction emissions (Table 1) of VOC, CO, NO_x, PM₁₀, and PM_{2.5} after mitigation would be significant and unavoidable. SO_x emissions were less than significant

Table 1: Daily Peak Construction Emission for SPW Project after Mitigation

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Emissions (lb/day)	1,404	3,538	256	4	194	119
Daily Construction Threshold (lb/day)	550	100	75	150	150	55
Significant	Yes	Yes	Yes	No	Yes	Yes

The construction phase of the proposed LAMI Relocation Project would involve renovating Building G, primarily installation of a new roof and reconnection of utilities. The renovation is scheduled for 10-days and will occur in late 2016 involving construction equipment similar to the construction described in the Final EIR forklift, hoist, on-road heavy duty truck to remove waste bin, delivery trucks and passenger vehicles. The emissions from this construction are given in Table 2.

Table 2: LAMI Relocation Project Daily Peak Construction Emissions

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Emissions (lb/day)	5.84	6.51	1.28	0.02	0.36	0.10
Increase over SPW Project	0.4%	0.1%	0.2%	0.4%	0.2%	0.1%
New Significant Impact or Substantial Increase to Existing Significant Impact	No	No	No	No	No	No

The project emissions will be less than 1% compared to the existing daily peak for construction and will not increase SO_x emission over the significance threshold. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact AQ-2: Proposed project construction would result in offsite ambient air pollutant concentrations that exceed a SCAQMD Ambient Concentration Threshold.

The Final EIR found that with mitigation the maximum offsite ambient pollutant concentrations associated with construction for CO would be less than significant but impacts of NO₂, PM₁₀, and PM_{2.5} would be significant and unavoidable.

The construction phase of the proposed LAMI Relocation Project would involve renovating Building G, primarily installation of a new roof and reconnection of utilities. These emissions were not included in the Final EIR. The renovation of Building G will be completed by early 2017 at the latest while construction of the SPW project will not begin until 2018. Given the very small emissions associated with the renovation of Building G, less than 0.5% of the total construction emissions for any SPW Project pollutants (Table 2). The proposed LAMI Relocation Project will not introduce a new significant impact or substantially increase previous identified impacts.

Impact AQ-3: The proposed Project would result in operational emissions that exceed 10 tons per year of VOCs or an SCAQMD Daily Emission Threshold.

The Final EIR found project daily operational emissions to be significant for all pollutants in all project analysis years, with the exception of CO in years 2011 and 2037.

Table 3: Daily Peak Operational Emission for SPW Project after Mitigation

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Project Emissions (lb/day)	3,485	26,429	1,108	36,089	3,826	2,969
Baseline Emissions (lb/day)	4,503	23,935	1,105	32,088	3,562	2,682
Project minus Baseline (lb/day)	-1,018	2,492	3	4,001	264	287
Daily Construction Threshold (lb/day)	550	55	55	150	150	55
Significant	No	Yes	No	Yes	Yes	Yes

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 86 to Berth 73W, the transport and renovation of the *Swift of Ipswich* and the addition of two full-time employees bringing the total to six. The renovation work is similar to the on-going maintenance of LAMI vessels analyzed in the Final EIR. Therefore, the transport of the *Swift of Ipswich* is the only new operational activity. The implementation of the SPW Project would have begun with construction of Phase I between June 2009 and June 2010 with project operations beginning in 2011. In the third addendum, San Pedro Public Market Project, most of the Phase I construction was delayed to between late 2018 and late 2020. The new operational activity, transport of the *Swift of Ipswich* would occur before the end of 2016.

The *Swift of Ipswich* may come to the proposed LAMI Relocation Project site in one of two scenarios. The first is to be transported by tractor-trailer the 120 miles from Chula Vista accompanied by a scout car. A crane will be used at Chula Vista and the proposed LAMI

Relocation Project site to place the ship on and off the trailer. Emissions for this scenario are given in Table 4.

Table 4: LAMI Relocation Project Operational - *Swift of Ipswich* Trucking Emissions

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Emissions (lb/day)	3.24	6.70	0.71	0.01	0.28	0.1013
Increase over SPW Project	0.3%	0.3%	23.6%	0.0003%	0.1%	0.04%
New Significant Impact or Substantial Increase to Existing Significant Impact	No	No	No	No	No	No

The second option is to place the *Swift of Ipswich* in the water at Chula Vista and sail her approximately 113 nautical miles to the proposed LAMI Relocation Project site. A crane would again be employed to move the *Swift of Ipswich* into and out of the water. A conservative analysis was completed which calculated emissions over the entire transit in the water (not just approximately 40 nautical miles from the southern boundary of the South Coast Air Quality District). The emissions for this scenario are given in Table 5.

In neither scenario do the CO or ROG emissions from the propose Project when added to the SPW Project emission rise above the significance thresholds found in Table 3. For the other pollutants where the SPW Project emissions are significant the proposed Project increases emission by less than 1.1%. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Table 5: LAMI Relocation Project Operational - *Swift of Ipswich* Sailing Emissions

	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Emissions (lb/day)	34.0	28.6	1.8	0.006	0.15	1.92
Increase over SPW Project	3.3%	1.1%	58.8%	0.0001%	0.1%	0.7%
New Significant Impact or Substantial Increase to Existing Significant Impact	No	No	No	No	No	No

The transport of the *Swift of Ipswich* would occur in 2016. The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact AQ-4: Proposed project operations would result in offsite ambient air pollutant concentrations that exceed a SCAQMD Ambient Concentration Threshold.

The Final EIR found maximum offsite ambient pollutant concentrations associated with the proposed project operations would be less than significant before mitigation for CO, but after mitigation the impacts from for NO₂ (1-hour average and annual average), PM₁₀ and PM_{2.5} (24-hour average), and annual PM₁₀ would be significant and unavoidable.

The proposed LAMI construction in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. The renovation will involve activities similar to the on-going maintenance of the LAMI ships. The emissions involved in the transport of the *Swift of Ipswich* to the proposed LAMI Relocation Project site occur primarily outside of the SPW Project boundaries and are of a limited duration and would not exceed the SCAQMD thresholds. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact AQ-5: The proposed Project would not generate on-road traffic that would contribute to an exceedance of the 1-hour or 8-hour CO standards.

The Final EIR found that the impact of on-road traffic to CO standards would be less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating Building G, primarily installation of a new roof and reconnection of utilities. This will involve the transport of construction equipment to and from the site and four passenger vehicles per day over ten days. The Final EIR found the CO emissions generated by traffic associated with by the SPW Project construction to be well under the significance threshold.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. Except for the scenario of transporting the *Swift of Ipswich* by truck, there will be no addition traffic generated by the operation over that analyzed in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact AQ-6: The proposed Project would not create an objectionable odor at the nearest sensitive receptor.

The Final EIR found the potential is low for the proposed Project to produce objectionable odors that would affect a sensitive receptor is less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The number of ships operated by LAMI has been reduced from four to three. The paint, varnishes and other materials used in the restoration of the *Swift of Ipswich* are the same that have and will be used in the maintenance of LAMI's vessels. The Berth 73W location is twice as far from the nearest residential neighborhood as the Berth 86 location. The

proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact AQ-7: The proposed Project would expose receptors to significant levels of TACs.

The Final EIR found the main source of Toxic Air Contaminants (TACs) from SPW Project operations would be Diesel Particulate Matter (DPM) emissions from cruise vessels, terminal equipment, and motor vehicles. The Maximum Exposed Individuals (MEIs) for residential, occupation, sensitive and student receptor locations for cancer risk, chronic risk index and acute risk index from the SPW Project are given in Figure 1 (Figure D3.7-3 of the Final EIR). The MEIs for residential, sensitive, and student receptors were less than significant while impacts to occupational and recreational (both in the vicinity of Berths 44-51) MEIs were significant and unavoidable. The MEIs for chronic hazard index for residential (near Harbor Blvd. and 9th St.), occupational (Berths 44-51), recreational (Berths 44-51), sensitive and student (both near 22nd St. and Leland St.) receptors are all less than significant. The acute hazard index for MEIs sensitive (vicinity of S. Palos Verdes St. and 6th St.) and student (Lomita Blvd. and Broadwell Ave.) receptors are less than significant while the acute hazard index is significant for MEIs residential (vicinity of Harbor Blvd. and 1st St.), occupational, and recreational receptors (both in the vicinity of Harbor Blvd and 6th St.).

The construction phase of the proposed LAMI Relocation Project would involve renovating Building G, primarily installation of a new roof and reconnection of utilities. Construction equipment, delivery and passenger vehicles and on-road heavy trucks will be employed over the ten day construction period. The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transportation and renovation of the *Swift of Ipswich*. The transportation of the *Swift of Ipswich* to the proposed LAMI Relocation Project site is expected to take place over a 24-hour period.

Given that the only emission sources for the proposed LAMI Relocation Project not included in the Final EIR Health Risk Assessment are the renovation of Building G and the transport and renovation of the *Swift of Ipswich*. Exposure of sensitive receptors to TACs is largely associated with operation of the cruise terminals and, therefore, the LAMI Relocation Project would not result in a substantial contribution to impacts related to TACs.

Impact AQ-8: The proposed Project would not conflict with or obstruct implementation of an applicable AQMP.

The Final EIR found the LAHD regularly provides SCAG with its Port-wide commercial forecasts for development of the AQMP. Therefore, attainment demonstrations included in the 2007 AQMP accounted for the emissions generated by projected future growth at the Port. In addition the rules and regulations pertaining to air quality would be designed to bring the air basin into compliance with the AQMP. The SPW Project would not conflict with or obstruct implementation of the AQMP; therefore, impacts will be less than significant.

The LAMI Relocation Project is consistent with the project objectives of the SPW Project and would not introduce a new significant impact or substantially increase previous identified impacts.

Impact AQ-9: The proposed Project would produce GHG emissions that would exceed CEQA and NEPA baseline levels.

The Final EIR found during project the total mitigated CO₂e emissions from construction (48,617 MT CO₂e) and for each future operational years (50,766 – 65,633 MT CO₂e) would be significant and unavoidable.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building generating 0.68 MT CO₂e (0.001% of total construction GHG). SCAQMD allows for construction-related GHGs to be amortized over a 30-year period; thus annual increases in emissions would be 0.02 MT of CO₂e.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The change in location will entail no change in GHG emissions nor will the renovation of the *Swift of Ipswich* as the renovation involves activities similar to the on-going maintenance of LAMI ships.

The transport of the *Swift of Ipswich* to the project site from Chula Vista would generate between 0.27-0.58 MT CO₂e (<0.1% of total operational GHG). The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.3 Biological Resources

Impact BIO-1a: Construction of the proposed Project would not result in the loss of individuals or the reduction of existing habitat, of a state- or federally listed endangered, threatened, rare, protected, candidate, or sensitive species or a species of special concern, or the loss of federally listed critical habitat.

The Final EIR found construction of the SPW Project would result in significant and a substantial reduction or alteration of a state-, federally, or locally designated natural habitat, special aquatic site, or plant community, including wetlands. Construction activities would affect several special aquatic sites in the project area, including a small mudflat at Berth 78–Ports O’Call; mudflat and eelgrass habitat within the Salinas de San Pedro Salt Marsh and at the proposed location for the rock groin; salt marsh habitat, cord grass, and mudflat habitat in the Salinas de San Pedro Salt Marsh; and kelp outcroppings at Berths 68–69 and Berths 47–50 at the proposed Outer Harbor Cruise Terminals. Mitigation would reduce the affects to less-than-significant with the exception of construction activities associated with expansion and enhancement of the mudflat and salt marsh. While this would benefit the marsh over for the long-term it would result in significant short-term impacts on the salt marsh, and eelgrass and mudflat habitat within the marsh.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building, surround paved parcels. There will be no in or over water construction nor change in any habitat. No species of special concern or listed as endangered, threatened, rare, protected, or as a candidate for listing are known to occur at the site. The proposed Project

would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-2a: Construction 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.

The Final EIR found project construction activities would affect several special aquatic sites in the project area, including a small mudflat at Berth 78–Ports O’Call; mudflat and eelgrass habitat within the Salinas de San Pedro Salt Marsh and at the proposed location for the rock groin; salt marsh habitat, cord grass, and mudflat habitat in the Salinas de San Pedro Salt Marsh; and kelp outcroppings at Berths 68–69 and Berths 47–50 at the proposed Outer Harbor Cruise Terminals. Avoidance measures and mitigation would reduce these impacts to less-than-significant levels. However, construction activities associated with expansion and enhancement of the mudflat and salt marsh for the long-term benefit of the marsh would result in significant short-term and unavoidable impacts on the salt marsh, and eelgrass and mudflat habitat within the marsh at Salinas de San Pedro Salt Marsh.

The third addendum changed the location of the promenade to avoid the mudflats at Berth 78, removing the need for the expansion and enhancement of the mudflat and salt marsh, thus removing the short-term and unavoidable impact.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. No dredging or filling would occur with the proposed Project and the facility would be subject to SWPP and construction BMPs. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-3a: Construction of the proposed Project would not interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a species.

The Final EIR found no known terrestrial wildlife migration corridors are present in the SPW project area. The only defined migratory species in the harbor are birds. California least tern is a migratory bird species that nests on Pier 400; construction of the Project would not interfere with the aerial migration of this species. California brown pelican move to breeding sites in Mexico and on offshore islands for part of the year. A number of other water-related birds that are present at least seasonally in the harbor are migratory as well. Construction activities within the project area would not block or interfere with migration or movement of any of these species covered under the MBTA because the work would be in a small portion of the harbor area where the birds occur and the birds could easily fly around or over the work. Fish species would avoidance constructions areas but would otherwise there movement would not be constrained. Project-related construction vessel traffic to and from the harbor (i.e., tugboats carrying disposal materials to LA-2 or LA-3) would not interfere with marine mammal migrations along the coast because these vessels would represent a small proportion (3%) of the total Port-related commercial traffic in the area. The Project would not create any physical barriers to movement. Impacts would be less than significant.

Contaminated sediments released during dredging could adversely affect aquatic organisms if toxic substances are present in sediments and if those sediments are suspended in the water column during dredge activities or when disposed of at a marine disposal site. Impacts would be significant. Project construction activities that have the potential to introduce or redistribute invasive species or spreading the invasive green alga *Caulerpa*. However, the potential for introduction during construction activity would be essentially the same as under normal Port operations. *Caulerpa* has yet to be found with the Port of Los Angeles. If *Caulerpa* is found during the required preconstruction survey an eradication program per the U.S. and California Fish and Wildlife agencies will be implemented. Applying mitigation measures would result in impacts less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. There will be no construction in or over the water and the existing building will not present a barrier to migration. The only potential ship traffic associated with the project is if the decision is made to sailing the *Swift of Ipswich* from Chula Vista. The impact of ship traffic on marine mammals was discussed in the Final EIR. The addition of one ship trip would not substantially increase previous identified impact. The proposed Project will not introduce a new significant impact.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. This will not involve dredging, filling, and wharf construction. During construction LAMI would comply with SWPP and construction BMPs as call for the in Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts to biological communities.

Impact BIO-4a: Dredging, filling, and wharf construction activities for the proposed Project would not substantially disrupt local biological communities.

The Final EIR found short-term and locally significant impacts on individuals (e.g. birds, marine mammals, and fish including those with designated Essential Fish Habitat). Permanent impacts to mudflat habitat at Berth 78–Ports O’Call and at the inlet to the Salinas de San Pedro Salt Marsh, as well as eelgrass impacts associated with groin placement and lowering the elevation of the salt marsh, would be significant and unavoidable. The redesign of the promenade discussed in the San Pedro Public Market Addendum reduces the impact to less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. There is no dredging or filling associate with the proposed Project. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-5a: Construction of the proposed Project would not result in a permanent loss of marine habitat.

The Final EIR found project construction would result in an increase in water area, which could add 3.4 mitigation credits to LAHD’s Inner Harbor Mitigation Bank. This creation of Inner

Harbor new water area would result in increased biological production until the time that banked mitigation credits might be used for some future Port fill. There would be no permanent loss of marine habitat as a result of proposed project construction. Although there would be changes in habitat character/type from discharge of materials and physical structures, the total quantity of open-water habitat would be increased. Impacts would be less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. There is no dredging or filling associated with the proposed Project. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-1b: Operation of the proposed Project would not result in the loss of individuals or the reduction of existing habitat, of a state- or federally listed endangered, threatened, rare, protected, candidate, or sensitive species or a species of special concern, or the loss of federally listed critical habitat.

The Final EIR found increased vessel traffic would incrementally increase the potential for accidental fuel spills and illegal discharges. Impacts would be significant; however, implementation of spill control mitigation measures would reduce the potential for spills to a level that is less than significant.

Cruise ships transiting the coastal waters of southern California could potentially cause harm to endangered, threatened, or species of concern such as marine mammals and sea turtles from vessel collisions. Impacts of project-related vessel traffic on marine mammals would be considered less than significant because of the low probability of vessel strikes. Given the small increase in number of vessels compared to the small number of reported strikes per year (less than three), the likelihood of such a collision from the proposed Project is very low and only a small incremental increase in the likelihood of a vessel strike would occur as a result of the proposed Project. Therefore, this impact would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 86 to Berth 73. This change in location does not change the nature of their marine operation. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-2b: Operation of the proposed Project would not result in a substantial reduction or alteration of a state-, federally, or locally designated natural habitat, special aquatic site, or plant community, including wetlands.

The Final EIR found the Project would not result in a substantial reduction or alteration of a state-, federally, or locally designated natural habitat, special aquatic site, or plant community, including wetlands. The salt marsh promenade would shade portions of the unvegetated entrance to the Salinas de San Pedro Salt Marsh and potentially small portions of the vegetated salt marsh habitat. Because the promenade would be elevated 18 feet and would be 30 feet wide, shading occurrences in any one area would be brief and are not anticipated to alter the vegetation. Impacts associated with operation of the waterfront promenade over the 0.175-acre mudflat

located at Berth 78–Ports O’Call and the 2 0.04-acre mudflat area at the entrance to the salt marsh, with mitigation, would be less than significant.

The proposed LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. This change in location does not change the nature of their operation. The renovation of the *Swift of Ipswich*, as would the operation of the facility for the term of the permit, would be subject to SWPPP and BMPs to prevent runoff into harbor waters. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-3b: 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.

The Final EIR found no barriers to wildlife passage would result from operation of the proposed Project. The type of activity that would occur within the harbor (vessel traffic) would slightly increase by 24 calls per year and would have no effect on wildlife movement or migration within the harbor. There would be less than significant due to operation of the project.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. This change in location does not change the nature of their operation. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact BIO-4b: Operation of the proposed Project would cause a substantial disruption of local biological communities.

The Final EIR found pilings and floating docks constructed as part of the proposed Project would provide shaded horizontal (i.e. boat 14 floats) and vertical (i.e. bulkheads) submerged attachment surfaces that would support invertebrate communities, and some fish species would likely be attracted to the new over-water and in-water structures. Additionally, newly placed piles would support a different community of invertebrates compared to rock or soft-bottom habitats. Habitat complexity and cover would increase as well, as rock provides attachment for sessile invertebrates, macro-algae, and cover for motile organisms. Where it replaces vertical bulkheads, there would also be an increase in physical habitat complexity and cover. In addition, this area of disruption, specifically between Berths 83–88, is a relatively small part of the harbor, and this small-scale disruption would not be considered a substantial disruption of a local biological community. Although there would be a short-term disruption to biological communities in part of the proposed project area as a result of removal of existing over-water and in-water structures, and recolonization of these areas would take 1 to 3 years, there would be no net loss of open-water marine habitat or long-term biological community disruption overall. There will be no impact from the operation of the structures.

While unlikely, operation of the proposed Project has the potential to introduce invasive marine species into the harbor through minor ballast water exchanges that could occur, or through attachment to ship hulls or equipment. Invasive species would substantially disrupt biological communities, which would be a significant impact. No feasible mitigation is currently available to totally prevent introductions of invasive species via vessel hulls, equipment, or ballast water, due to the lack of a proven technology, therefore this impact is significant and unavoidable.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The number of ships operated by LAMI has been reduced from four to three. This change in location does not change the nature of their operation. The transit of the *Swift of Ipswich* is a one-time event. During the transit the ship will remain in the coastal waters of Southern California so no marine species not already present in Southern California will be introduced into the marine environment. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.4 Cultural Resources

Impact CR-1: Construction of the proposed Project would not disturb, damage, or degrade known prehistoric and historic archaeological resources.

The Final EIR found no known prehistoric or historic archaeological sites within the project area. However, construction of the Project would potentially result in impacts adjacent sites and Mexican Hollywood, a non-listed historic archaeological site. Buried cultural resources that were not identified during field surveys could be inadvertently unearthed during ground-disturbing activities associated with construction. Mitigation measures reduce these impacts to less than significant.

The proposed Project site is located on fill material and away from known prehistoric archaeological or historical archaeological sites. The proposed Project is for the relocation of LAMI from Berth 86 to Berth 73W, renovation of an existing building and the transport and renovation of the *Swift of Ipswich*. There will be minimal ground disturbance during renovation. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact CR-2: Construction of the proposed Project would not disturb, damage, or degrade unknown archaeological and ethnographic cultural resources.

The Final EIR found that while buried cultural resources were not identified during field surveys, potentially including human remains could be inadvertently unearthed during ground-disturbing activities, which would potentially result in the demolition or substantial damage to significant cultural resources. In addition, submerged sites could also be located during dredging activities. However, the potential for underwater resources is considered to be low due to the disturbed nature of the harbor from previous dredging. With mitigation the impacts were less than significant.

The proposed Project site is located on fill material and there will be minimal ground disturbance. . The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact CR-3: The proposed Project would not result in a substantial adverse change in the significance of a historical resource, involving demolition, relocation, conversion, rehabilitation, alteration, or other construction that reduces the integrity or significance of important resources on the site or in the vicinity.

The Final EIR found several historic resources within the project boundary including SP Slip which is eligible for listing for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) as the first large mooring facility for Pacific Coast lumber schooners in the early history of the Port of Los Angeles. SP Slip currently supports commercial fishing activities a change from the historic lumber industry but keeping the maritime nature of lumber shipping by existence of the wooden wharfs and general layout of the slip. The Project does not materially alter in an adverse manner those physical characteristics of a historical resource that convey its historic significance and justifies its eligibility for inclusion on a historic register and the impacts are less than significant.

The proposed LAMI Relocation Project will renovate Building G. Building G was evaluated for eligibility for inclusion on the NRHP and the CRHR in 2004 and the NRHP, CRHR and as a City of Los Angeles Historic/Cultural Monument in 2015 (Jones & Stokes, 2004; ICF International, 2015). The evaluation concluded Building G was not eligible for listing at the federal, state or local level as a historic resource. The building is an existing structure within the SP Slip area and the facilities operation is in keeping with the maritime nature of the slip. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact CR-4: The proposed Project would not result in the permanent loss of or loss of access to a paleontological resource of regional or statewide significance.

The Final EIR found grading, trenching, and the North Harbor cut, as well as other ground-disturbing actions, have the potential to damage or destroy significant paleontological resources within the project area. Mitigation would reduce impacts to less than significant.

The proposed LAMI Relocation Project site is located on fill material. There will be minimal ground disturbance for reconnecting utility lines to Building G. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

3.5 Geology

Impact GEO-1a: Construction of the proposed Project would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury from fault rupture, seismic ground shaking, liquefaction, or other seismically induced ground failure.

The Final EIR found seismic activity along the Palos Verdes Fault zone, or other regional faults, would potentially produce fault rupture, seismic ground shaking, liquefaction, or other seismically induced ground failure. Seismic hazards are common to the Los Angeles region and are not increased by the proposed Project. However, because the project area is potentially underlain by strands of the active Palos Verdes Fault and liquefaction-prone hydraulic fill, there is a substantial risk of seismic impacts. Design and construction in accordance with applicable laws and regulations pertaining to seismically induced ground movement would minimize structural damage in the event of an earthquake. However, increased exposure of people and property during construction to seismic hazards from a major or great earthquake cannot be precluded even with incorporation of modern construction engineering and safety standards. Therefore, impacts due to seismically induced ground failure would be significant and unavoidable under CEQA.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. The hazards during this renovation would be the same as identified in the Final EIR. The proposed LAMI Relocation Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-2a: Construction of the proposed Project would result in substantial damage to structures or infrastructure, or expose people to substantial risk involving tsunamis or seiches.

The Final EIR found designing new facilities based on existing building codes during construction may not prevent substantial damage to structures from coastal flooding. In addition, projects in construction phases are especially susceptible to damage due to temporary conditions, such as unfinished structures, which are typically not in a condition to withstand coastal flooding. Mitigating the tsunami risk would not be feasible. As a result, impacts during the construction phase would be significant and unavoidable.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. The risk from tsunamis to the proposed Project site is the same as that identified in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-3a: Construction of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury from land subsidence/settlement.

The Final EIR found subsidence in the vicinity of the proposed Project, due to previous oil extraction in the Port area, has been mitigated through water injection and is not anticipated to adversely impact the Project. However, in the absence of proper engineering, proposed structures could be cracked and warped as a result of saturated, unconsolidated/compressible sediments. During proposed project design, a geotechnical engineer would evaluate the settlement potential in areas where structures are proposed. Design and construct in compliance with the recommendations of the geotechnical engineer, consistent with Sections 91.000 through 91.7016 of the Los Angeles Municipal Code, and in conjunction with criteria established by LAHD, and would not result in substantial damage to structures or infrastructure, or expose people to

substantial risk of injury. Therefore, settlement impacts in upland areas would be less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building and reconnecting utility lines. There will be no buildings constructed as part of the proposed Project. Historically, subsidence has occurred on Terminal Island, primarily Long Beach portion of Terminal Island. There has been no subsidence from oil extraction or other activities at the proposed LAMI Relocation Project site. The Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-4a: Construction of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury from expansive soils.

The Final EIR found the project would be designed and constructed in compliance with the recommendations of the geotechnical engineer, consistent with implementation of Sections 91.000 through 91.7016 of the Los Angeles Municipal Code, and in conjunction with criteria established by LAHD, and would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Therefore, expansive soil impacts in upland areas would be less than significant under CEQA.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building and reconnecting utility lines. There will be no buildings constructed as part of the proposed Project. Expansive soils generally result from specific clay minerals that expand when saturated and shrink in volume when dry. Building G was constructed on artificial fill of mostly poorly graded sand with a shallow (6 foot) water table. The Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-5a: Construction of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to a substantial risk of landslides or mudslides.

The Final EIR found the topography in the vicinity of the project site is flat and not subject to landslides or mudflows, no impacts would occur under CEQA.

The proposed LAMI Relocation Project site is within the SPW Project boundaries. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-6a: Construction of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people or property to a substantial risk of unstable soil conditions from excavation, grading, or fill.

The Final EIR found that implementation of standard engineering practices regarding unstable soils, people and structures would not be exposed to substantial adverse effects from the

proposed Project, and impacts associated with unstable soil would be less than significant under CEQA.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building including reconnection to existing utility lines. Grading, excavating or filling is not required for the renovation or reconnecting utility lines. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-7a: Construction of the proposed Project would not result in one or more distinct and prominent geologic or topographic features being destroyed, permanently covered, or materially and adversely modified.

The Final EIR found no construction impact from the project as the topography in the vicinity of the proposed project site is flat and does not contain prominent geologic or topographic features that would be destroyed, permanently covered, or materially and adversely modified.

The proposed LAMI Relocation Project site is within the SPW Project boundaries. The LAMI site is developed, flat and does not contain prominent geologic or topographic features that would be destroyed, permanently covered, or materially and adversely modified. The proposed LAMI Relocation Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-8a: Construction of the proposed Project would not result in the permanent loss of availability of any mineral resource of regional, statewide, or local significance.

The Final EIR found no permanent loss of availability of a known mineral resource that would be of future value to the region and the residents of the state due to construction. Mineral resource impacts would be less than significant.

The LAMI Relocation Project site is within the SPW Project boundaries and does not contain mineral resources of regional, statewide, or local significance. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-1b: Operation of the proposed Project would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury from fault rupture, seismic ground shaking, liquefaction, or other seismically induced ground failure.

The Final EIR found seismic activity along the Palos Verdes Fault zone, or other regional faults, would potentially produce fault rupture, seismic ground shaking, liquefaction, or other seismically induced ground failure. Seismic hazards are common to the Los Angeles region and are not increased by the proposed Project. However, because the project area is potentially underlain by strands of the active Palos Verdes Fault and liquefaction-prone hydraulic fill, there is a substantial risk of seismic impacts. Design and construction in accordance with applicable laws and regulations pertaining to seismically induced ground movement would minimize structural damage in the event of an earthquake. However, increased exposure of people and property during construction to seismic hazards from a major or great earthquake cannot be

precluded even with incorporation of modern construction engineering and safety standards. Therefore, impacts due to seismically induced ground failure would be significant and unavoidable under CEQA.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-2b: Operation of the proposed Project would result in substantial damage to structures or infrastructure, or expose people to substantial risk involving tsunamis or seiches.

The Final EIR found designing new facilities based on existing building codes may not prevent substantial damage to structures from coastal flooding. Impacts due to seismically induced tsunamis and seiches are typical for the entire California coastline and would not be increased by construction of the proposed Project. Emergency planning and coordination between the Terminal operator and LAHD, as outlined in Mitigation Measure MM GEO-1, would contribute to reducing onsite injuries during a tsunami. However, even with incorporation of emergency planning and construction in accordance with current City and State regulations, substantial damage and/or injury could occur in the event of a tsunami or seiche. Because portions of the proposed project site are at elevations lower than the predicted tsunami wave heights, there is a substantial risk of coastal flooding due to tsunamis and seiches. Raising the elevation of the site or constructing a wall along the perimeter of the site of sufficient height to mitigate the potentially damaging effects of tsunami would be the only way to mitigate potential impacts. However, elevating the approximately 400 acres within the site or building a wall around the entire perimeter of the proposed project area would be cost-prohibitive and would significantly impact existing infrastructure requiring extensive modification of existing improvements. Mitigation of the tsunami risk would not be feasible. Impacts from the worst-case wave action would be significant and unavoidable.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73, which is within the SPW Project boundaries, and the transport and renovation of the *Swift of Ipswich*. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-3b: Operation of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury from land subsidence/settlement.

The Final EIR found subsidence in the vicinity of the proposed Project, due to previous oil extraction in the Port area, has been mitigated through water injection and is not anticipated to adversely impact the Project. However, in the absence of proper engineering, proposed structures could be cracked and warped as a result of saturated, unconsolidated/compressible sediments. During proposed project design, a geotechnical engineer would evaluate the settlement potential in areas where structures are proposed. Design and construct in compliance with the

recommendations of the geotechnical engineer, consistent with Sections 91.000 through 91.7016 of the Los Angeles Municipal Code, and in conjunction with criteria established by LAHD, and would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Therefore, settlement impacts in upland areas would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from an existing building at Berth 87 to an existing building at Berth 73W and the transport and renovation of the *Swift of Ipswich*. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-4b: Operation of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury from expansive soils.

The Final EIR found the project would be designed and constructed in compliance with the recommendations of the geotechnical engineer, consistent with implementation of Sections 91.000 through 91.7016 of the Los Angeles Municipal Code, and in conjunction with criteria established by LAHD, and would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Therefore, expansive soil impacts in upland areas would be less than significant under CEQA.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. Expansive soils generally result from specific clay minerals that expand when saturated and shrink in volume when dry. Building G was constructed in 1949 on artificial fill of mostly poorly graded sand with a shallow (6 foot) water table. The Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-5b: Operation of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to a substantial risk of landslides or mudslides.

The Final EIR identified the topography in the vicinity of the project site as flat and not subject to landslides or mudflows, no impacts would occur.

The LAMI Relocation Project site is flat and not subject to landslides or mudflows. The Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact GEO-6b: Operation of the proposed Project would not result in substantial damage to structures or infrastructure, or expose people or structures to substantial risk of unstable soil conditions from excavation, grading, or fill.

The Final EIR found no excavations performed as a part of proposed project operations; therefore, impacts associated with unstable soils would not occur.

The operation of the proposed LAMI Relocation Project will be the completion the restoration of the *Swift of Ipswich*, on-going maintenance of the three LAMI ships and conducting boat building and other maritime training. As in the Final EIR there is no excavation, grading or filling occurring in the operation of the LAMI facility. The Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact GEO-7b: Operation of the proposed Project would not result in one or more distinct and prominent geologic or topographic features being destroyed, permanently covered, or materially and adversely modified.

The Final EIR found no impact from the project as the topography in the vicinity of the proposed project site is flat and does not contain prominent geologic or topographic features that would be destroyed, permanently covered, or materially and adversely modified.

The proposed LAMI Relocation Project operations entails the transport and restoration of the *Swift of Ipswich*, on-going maintenance of the three LAMI ships and conducting boat building training. The proposed Project area within the SPW Project boundaries and contains no distinct and prominent geologic or topographic features. The Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact GEO-8b: Operation of the proposed Project would not result in the permanent loss of availability of any mineral resource of regional, statewide, or local significance.

The Final EIR found no permanent loss of availability of a known mineral resource that would be of future value to the region and the residents of the state. Mineral resource impacts would be less than significant.

The proposed LAMI Relocation Project operations entails transport and restoration of the *Swift of Ipswich*, on-going maintenance of the three LAMI ships, conducting boat building training and other educational programs. The proposed LAMI Relocation Project site is within the SPW Project boundaries. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

3.6 Groundwater and Soils

GW-1a: Construction activities for the proposed Project would not 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 occupants.

The Final EIR found grading and construction could expose construction personnel, existing operations personnel, and future occupants of the site to contaminated soil. Similarly, grading in the proposed park and open space areas could expose construction personnel and future recreational users to contaminated soil. Human health and safety impacts would be significant

pursuant to exposure levels established by Cal/EPA's Office of Environmental Health Hazard Assessment (OEHHA). With mitigation these impacts would be less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. No grading would occur at the site and only minor excavation to re-establish utility connections. No contamination is known to be present at the site. The mitigation measure of a contingency plan for the encounter of unexpected contamination during construction in the Final EIR is applicable to the proposed LAMI Relocation Project. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

GW-2a: Proposed project construction would not alter contaminant transport pathways and result in expansion of the area affected by contaminants.

The Final EIR found grading and construction in upland areas could inadvertently spread contaminated soil to non-contaminated areas, thus potentially exposing construction personnel, existing operations personnel, and future occupants of the site to contaminants. Human health and safety impacts would be significant pursuant to exposure levels established by OEHHA. With mitigation these impacts would be less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing building. No grading would occur at the site and only minor excavation to re-establish utility connections. No contamination is known to be present at the site. The mitigation measure of a contingency plan for the encounter of unexpected contamination during construction in the Final EIR is applicable to the proposed LAMI. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

GW-3a: Proposed project construction would not result in a change to potable water levels.

The Final EIR found the project site is underlain by saline, non-potable groundwater. Drinking water is provided to the proposed project area by LADWP from other sources. There will be no impact with respect to changes in potable water levels beneath the site.

The proposed LMAI Relocation Project involves renovation of an existing building located within the boundaries of the SPW Project. As such the site underlain by saline, non-potable groundwater; the proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

GW-4a: Proposed project construction would not result in a demonstrable and sustained reduction in potable groundwater recharge capacity.

The Final EIR found the project construction would result in a temporary increase in groundwater recharge of the saline, non-potable groundwater at the site. Because the water is non-potable, the amount of recharge is irrelevant with respect to potential utilization of the perched aquifer as a drinking water source. Therefore, any temporary increase in recharge would be inconsequential, and no impacts to potable groundwater recharge.

The proposed LMAI Project location is within the boundaries of the SPW Project. Minimal ground disturbance will occur during the reconnection of utilities. As such the site underlain by saline, non-potable groundwater; the proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact GW-5a: Proposed project construction would not result in violation of regulatory water quality standards at an existing production well.

The Final EIR found that no existing production wells are located in the vicinity of the proposed project site and no impact will occur.

The proposed LMAI Relocation Project site is within the boundaries of the SPW Project. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact GW-1b: Proposed project operations would not result in uncovering of toxic substances or other contaminants associated with historical uses of the Port that might result in exposure to operations personnel.

The Final EIR found soil and groundwater in limited portions of the proposed project site have been impacted by hazardous substances and petroleum products as a result of spills during historic industrial land uses. While no excavations that might encounter contaminated soil would be completed as part of Project operations, operations related to the proposed project on these sites would be significantly impacted. With mitigation the impact would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The LAMI Relocation Project location was not identified in the Final EIR as an area of concern. There will be no excavation during operations that may encounter contamination. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts

Impact GW-2b: Proposed project operations would not result in expansion of the area affected by contaminants.

The Final EIR found soil and groundwater in limited portions of the proposed project site have been impacted by hazardous substances and petroleum products as a result of spills during historic industrial land uses. While no excavations that might encounter contaminated soil and/or groundwater, and that could spread contamination, would be completed as part of proposed project operations, operations related to the proposed project on these sites would be significantly impacted. With mitigation the impact would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The LAMI Relocation Project location was not identified in the Final EIR as an area of concern regarding contamination. There will be no excavation associated with operations that may encounter contamination. The proposed Project would not withdraw or

inject groundwater altering the hydraulic gradient to expanding the extent of any unknown contamination. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts

GW-3b: Proposed project operations would not result in a change to potable water levels.

The Final EIR found the project site is underlain by saline, non-potable groundwater. Drinking water is provided to the project area by LADWP from other sources. There will be no impact with respect to changes in potable water levels beneath the site.

The proposed LAMI Project location is within the boundaries of the SPW Project. As such the site underlain by saline, non-potable groundwater and drinking water is provided to the proposed Project area by LADWP from other sources. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

GW-4b: Proposed project operations would not result in a demonstrable and sustained reduction in potable groundwater recharge capacity.

The Final EIR found although paving across most of the site would substantially reduce any groundwater recharge of underlying groundwater, the project site is underlain by saline, non-potable groundwater. Therefore, impact to respect to loss of potable groundwater recharge is less than significant.

The proposed LAMI Relocation Project facility is currently paved. The proposed Project will not increase the amount of paved land and not alter the current groundwater recharge for the area. The LAMI Relocation Project would not introduce a new significant impact or substantially increase previous identified impacts.

GW-5b: Proposed project operations would not result in violation of regulatory water quality standards at an existing production well.

The Final EIR found no existing production wells located in the vicinity of the project site, therefore no impact would occur.

The proposed LAMI Relocation Project location is within the boundaries of the SPW Project and would not introduce a new significant impact or substantially increase previous identified impacts.

3.7 Hazards and Hazardous Materials

Impact RISK-1a: Construction of the proposed Project would comply with applicable safety and security regulations and policies guiding development within the Port.

The Final EIR found construction and demolition activities for the proposed Project would involve the handling and use of certain amounts of hazardous materials. This handling would comply with all applicable regulations. The potential consequences of construction-related spills

are generally reduced when compared to other accidental spills and releases. This is generally because the amount of hazardous material released during a construction-related spill is small, as the volume in any single piece of construction equipment is generally less than 50 gallons, and fuel trucks are limited to 10,000 gallons or less. Construction-related spills of hazardous materials are not uncommon, but the enforcement of construction and demolition standards, including BMPs by appropriate local and state agencies (i.e., Port Police, LAFD, and LAHD) would minimize the potential for an accidental release of petroleum products and/or hazardous materials or explosions during construction. Therefore, the construction of the proposed Project would comply with applicable security and safety regulations and/or LAHD policies guiding Port development, and impacts would be less than significant.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building. The equipment to be used for the renovation is similar to that to be employed in the SPW Project. The contractor will be required to adhere to the security and safety regulations and LAHD polices guiding Port development as described in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact RISK-2a: Construction of the proposed Project would not substantially interfere with an existing emergency response or evacuation plan, thereby increasing the risk of injury or death.

The Final EIR found the project contractors would be required to adhere to all Homeland Security, Port Police, and LAFD emergency response and evacuation regulations, ensuring compliance with existing emergency response plans. The construction/demolition activities would not substantially interfere with an existing emergency response or evacuation plan or increase the risk of injury or death. Impacts would be less than significant.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building, including reconnection to existing utility lines. As described in the Final EIR the project contractors would be required to adhere to all Homeland Security, Port Police, and LAFD emergency response and evacuation regulations, ensuring compliance with existing emergency response plans. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact RISK-3a: Construction 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.

The Final EIR found although impacts due to seismically induced tsunamis and seiches are typical for the entire California coastline, these impacts would not be increased by the construction of the Project. The potential is very low for a major tsunami to occur. Additionally, the potential consequences of such accidents would be small due to the localized, short-term nature of the releases. The volume of spilled fuel is also expected to be relatively low. Therefore, construction and/or demolition activities would not result in a substantial increased public health and safety concern as a result of the accidental release, spill, or explosion of hazardous materials due to a tsunami. Impact would be less than significant.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building, including reconnection to existing utility lines. The proposed Project site is located within the boundaries of and will use the same type of equipment with the same types and amount of hazardous material as in the SPW Project. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-4a: Construction of the proposed Project would not result in a substantial increase in the likelihood of a spill, release, or explosion of hazardous materials due to a terrorist action.

Construction and demolition activities for the Project would involve the handling and use of certain amounts of hazardous materials. The potential consequences of a spill, release, or explosion of the hazardous materials due to a terrorist action are generally reduced when compared to other accidents, due to the fact that generally the amount of hazardous material released during construction or demolition activities is small. Generally the volume in any single piece of construction equipment is generally less than 50 gallons and fuel trucks are limited to 10,000 gallons or less. The enforcement of construction and demolition standards, including BMPs by appropriate local and state agencies (i.e., Port Police, LAFD, and LAHD) would minimize the potential for a release or explosion of hazardous materials during construction due to a terrorist action. Furthermore, the enforcement of construction and demolition standards, including BMPs by appropriate local and state agencies (i.e., Port Police, LAFD, LAHD), would minimize the potential for a spill, release, or explosion of hazardous materials or during construction due to a terrorist action. Therefore, construction and/or demolition activities would not result in a substantial increase in the likelihood of a spill, release, or explosion of hazardous material(s) due to a terrorist action. Impacts would be less than significant.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building, including reconnection to existing utility lines. The project contractors would be required to adhere to all Homeland Security, Port Police, and LAFD emergency response and evacuation regulations, ensuring compliance with existing emergency response plans. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-5a: Construction of the proposed Project would not substantially increase the likelihood of an accidental spill, release, or explosion of hazardous materials as a result of modifications related to the proposed Project.

The Final EIR found construction and demolition activities for the Project would not involve the handling of significant amounts of hazardous materials beyond those needed for said activities. Furthermore, implementation of construction and demolition standards, including BMPs, and compliance with the state and federal requirements for the transport, handling, and storage of any hazardous materials during construction and demolition phases would minimize the potential for an accidental release of petroleum products and/or hazardous materials and/or explosion during the construction/demolition activities. The impact will be less than significant.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building, including reconnection to existing utility lines, and adjacent paved property. The proposed Project will adhere to the same requirements as described in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-1b: Operation of the proposed Project would comply with applicable safety and security regulations and policies guiding development within the Port.

The Final EIR found the operation of the Project would comply with applicable federal and Port security and other regulations regarding operational security and safety. The proximity of the visiting public and recreators (defined as vulnerable populations under the Port's RMP) to Mike's fueling station via the waterfront promenade would not comply with the RMP with respect to locating vulnerable resources near existing or approved facilities handling hazardous liquid bulk cargos. Therefore, the operation of the proposed Project would not comply with applicable safety regulations (e.g. RMP) and impacts would be significant. With mitigation the impacts would be reduced to less-than-significant levels.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The hazardous materials will be stored in a locked fire safe container outside under an open air lean-to structure and protected by spill containment structures. It will comply with the same mitigation measures and operational security and safety regulations as described in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-2b: 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.

The Final EIR found that although the proposed Project is designed to and would likely bring a large number of visitors to the waterfront area, the current emergency preparedness plans would accommodate the Project. Furthermore, LAHD is in the process of updating the evacuation plan and establishing an Emergency Notification System, which would include the project area and assist with the notification and evacuation of the increase in visitors to the waterfront. The operation of the proposed Project would not substantially interfere with an existing emergency response or evacuation plan or require a new emergency response or evacuation plan. Impacts would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. It will comply with the same preparedness plans as described in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-3b: 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.

The Final EIR found that designing new facilities based on existing building codes may not prevent substantial damage to structures from coastal flooding as a result of tsunamis or seiches. Impacts due to seismically induced tsunamis and seiches would be the same for the entire California coastline and would not increase through operation of the proposed Project. However because Project would be located between 1.5 meters above MSL and 3.41 meters above MSL, there is a risk of coastal flooding during a tsunami, which, in turn, could lead to an accidental release, spill, or explosion of hazardous material(s). Since the Project would remove a number of industrial uses that could potentially cause a release, spill, or explosion of a hazardous material in the event of a tsunami, operation of the proposed Project would generally reduce the potential for a release, spill, or explosion of hazardous materials. Additionally, the risk associated with Mike's fueling station would remain as the existing baseline, since the facility would remain in its existing location at its existing capacity. Therefore, the risk of an accidental spill, release, or explosion at Mike's fueling station due to a tsunami would not increase over the baseline and would remain the same. Therefore, the Project would not result in a substantial increased public health and safety concern as a result of the accidental release, spill, or explosion of hazardous materials due to a tsunami. Impacts would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the Swift of Ipswich. The hazardous materials will be stored in a locked fire safe container outside under an open air lean-to structure and protected by spill containment structures. Currently, LAMI has six employees working out of the Utro's Building at Berth 73Z. With the renovation of Building G boat building classes will be held twice a week for students of POLAHS. The site is within the SPW Project boundaries and subject to the same risk from hazardous materials as that described in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-4b: Operation of the proposed Project would not result in a substantial increase in the likelihood of a spill, release, or explosion of hazardous materials due to a terrorist action.

The Final EIR found that although the proposed Project would increase the number of cruise terminals, cruise berths, and visiting cruise vessels to the Port, it would ultimately not substantially increase the vulnerability of these facilities or the seriousness of the consequences over the existing conditions. The environmental consequences of a terrorist action, including casualties arising from the action and from the release, explosion, or spill of hazardous materials, would remain relatively the same due to a relative small increase in the number of vessels and the existing safeguards and security that would be in place. Therefore, operation of the proposed Project would not result in a substantial increase in the likelihood of a spill, release, or explosion of hazardous material(s) due to a terrorist action. Impacts would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. It will comply with the same operational security and safety regulations as described in the Final EIR. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact RISK-5b: Operation of the proposed Project would not substantially increase the likelihood of an accidental spill, release, or explosion of hazardous materials as a result of modifications related to the proposed Project.

Although the proposed Project would increase the number of cruise terminals, cruise berths, and visiting cruise vessels to the Port, it would not substantially increase the likelihood of an accidental spill, release, or explosion of hazardous materials resulting in a significant impact. Additionally, the proposed expansion of the square footage in the Ports O'Call area would not substantially increase the likelihood of an accidental hazardous material spill, release, or explosion involving people or property as a result of modifications related to the proposed Project. Regulations are in place to minimize spills, releases, and explosions of hazardous materials and would serve to reduce the risk associated with any slight increase in use of these materials within the existing cruise facility, the two new Outer Harbor Cruise Terminals, and the expanded Ports O'Call area.

Mike's fueling station currently handles hazardous materials with a flashpoint below 140 degrees, which would result in significant explosion hazards to users of the promenade. Therefore, the potential for a hazardous materials spill, release, or explosion at Mike's fueling station is significant. With mitigation the impact is less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. It will comply with the same safety regulations as described in the Final EIR. The Berth 73W location 0.4 miles from Mike's fueling station. The mitigations in the Final EIR will apply to the proposed Project. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.8 Land Use and Planning

Impact 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.

The Final EIR found the project would generally be consistent with the Port of Los Angeles Plan, the Port Master Plan (PMP), and City zoning [Q]M2 or [Q]M3 for the Port. The proposed Project would require amendments to the PMP for the proposed water cuts to bring the proposed Project into consistency with the PMP. Because the proposed project would be consistent with all applicable land use/zoning designations (after the approval of the General Plan Amendment) and includes a physical separation of terminal facilities from residential areas, impacts on land use would be less than significant under CEQA.

The Final EIR also found the project would locate the proposed waterfront promenade adjacent to Mike's fueling station, which stores and handles hazardous liquid bulk materials. This would be inconsistent with the objective of the Risk Management Plan of the PMP to locate vulnerable populations away from hazardous facilities. This land use inconsistency could result in adverse physical environmental impacts to vulnerable populations (i.e., public recreators) should Mike's fueling station ever have an accidental release, spill, or explosion of the hazardous liquid bulk materials. Therefore, this land use inconsistency is a significant impact under CEQA. Implementation of mitigation would reduce impacts to less-than-significant levels.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. The proposed LAMI location is zoned for visitor-serving commercial use including cultural uses, museums and exhibit space. Use for a living exhibit of the Port's maritime heritage is consistent with the Port of Los Angeles Plan, the Port of Los Angeles Plan, the PMP and existing zoning. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact LU-2: The proposed Project would be consistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

The Final EIR found the project would be consistent with the, the California Coastal Act, Southern California Association of Governments policies including the Regional Comprehensive Plan and Guide, and the adjacent San Pedro Community Plan and San Pedro Coastal Specific Plan. The proposed Project would be consistent with the General Plan and adopted environmental goals, objectives, policies, and purposes contained in other applicable plans. The Final EIR found policy inconsistency between the proposed Project and the RMP of the PMP could result in a physical environmental impact (i.e., accidental explosion or release of hazardous materials from Mike's fueling station) that would affect vulnerable populations (e.g., visiting public, recreators). Therefore, this policy inconsistency is considered a significant impact under CEQA. Implementation of mitigation would reduce impacts to less-than-significant levels.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The proposed LAMI location is zoned for visitor-serving commercial use including cultural uses, museums and exhibit space. Use for a living exhibit of the Port's maritime heritage is consistent with the PMP, the California Coastal Act, SCAG policies including the RCPG, and the adjacent San Pedro Community Plan and San Pedro Coastal Specific Plan. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact LU-3: The proposed Project would not physically disrupt, divide, or isolate existing neighborhoods, communities, or land uses.

The Final EIR found the Project would not physically disrupt, divide, or isolate the existing neighborhoods, communities, or land uses within the existing proposed project area. The proposed Project would serve to further provide access to the coast and Port recreational areas

and would reroute Port traffic away from existing residential and commercial neighborhoods. Impacts would be less than significant.

The LAMI Relocation Project site is within the SPW Project boundaries and consists of a vacant building and adjacent paved areas. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

3.9 Noise

Impact NOI-1: The proposed Project would exceed construction noise standards.

The Final EIR analyzed the noise from the various projects elements and found construction of many of the elements resulted in significant impact to sensitive receptors. The implementation of mitigation, considering the distances between the construction noise sources and receivers, the standard controls and temporary noise barriers would not be sufficient to reduce the projected increase in the ambient noise level to the point where noise increase from construction would be less than significant. Therefore, noise impacts during the construction phase would be significant and unavoidable.

The proposed LAMI Relocation Project would employ construction equipment for the renovation of Building G and for handling the *Swift of Ipswich*. The nearest sensitive receptors to the proposed Project location are the residences near the corner of Beacon Street and 12th Street. Pile driving associated with the construction of the Waterfront Promenade at Ports O' Call Village and general noise from construction of the Waterfront Red Car Maintenance Facility had a significant impact on the nearest sensitive receptors at Beacon Street and 12th Street. However, noise from the general construction activities at S.P. Slip was less than significant.

Renovation of Building G will employ a forklift and aerial boom for installation of a new roof, and heavy duty trucks for debris removal. After renovation a crane will return the *Swift of Ipswich* to the water. The proposed Project site is 900 feet from Beacon Street and 12th Street. With distance attenuation, the calculated Leq noise levels of each piece of equipment at the corner of Beacon Street and 12th Street when compared with the ambient noise (62.6 dBA) are well below the significance threshold of a 5dB increase (Table 4).

Table 4: Noise

	Crane	Truck	Forklift	Man Lift
Leq (dBA) at 900 feet from source	47.5	54.9	47.9	42.6

a. Federal Highway Administration, Roadway Construction Noise Model Version 1.0

The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact NOI-2: Construction activities for the proposed Project would not exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and

7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

The Final EIR found no construction activities would occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday. Impacts would be less than significant.

The construction phase of the proposed LAMI Relocation Project would involve renovating an existing facility including the existing Building G. There will be no construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact NOI-3a: The proposed Project would cause noise from motor vehicle traffic measured at the property line of affected uses to increase by 3 dBA in CNEL, to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase.

The Final EIR found Miner Street south of 22nd Street is significant and unavoidable. For all other street segments, no significant noise impacts are anticipated, and impacts would be less than significant.

The motor vehicle traffic noise associated with the proposed LAMI Relocation Project is the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. The transport of the *Swift of Ipswich* by truck is a one-time event and will not adversely affect the CNEL in the area. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact NOI-3b: The proposed Project would not cause noise from railroad operations measured at the property line of affected uses to increase by 3 dBA in CNEL, to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase.

Using 3 dB and 5 dB as a noise increase threshold, the Final EIR found any location that is greater than 124 feet from the Red Car tracks would experience less than a 5 dB daytime increase in Leq above ambient levels due to the noise generated by the Red Car, and any location that is greater than 269 feet from the tracks would experience less than a 3 dB daytime increase in Leq during daytime operations. It further found under the worst-case scenario the increase in CNEL due to the Red Car Line operations be a less than significant impact.

The proposed LAMI Relocation Project does not affect railroad operations. Further, the proposed Project is situated 282 feet from the Red Car tracks. The proposed Project will not be impacted by the operation of the Red Car Line and does not introduce a new significant impact or substantially increase previous identified impacts.

Impact NOI-3c: The proposed Project would not cause noise from cruise ship operations measured at the property line of affected uses to increase by 3 dBA in CNEL, to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase.

The Final EIR found that cruise ship operations would have a less than significant impact on community noise.

The proposed LAMI Relocation Project does not affect cruise ship operations and will not introduce a new significant impact or substantially increase previous identified impacts.

3.10 Recreation

Impact REC-1a: Construction of the proposed Project would result in a substantial loss or diminished quality of recreational, educational, or visitor-oriented opportunities, facilities, or resources.

The Final EIR evaluated all aspects of the project for impacts to recreational, educational, and visitor-oriented opportunities, facilities, or resources. The Final EIR found construction would impede parking for recreational users and patrons of harbor cruises, vessel access to launch ramps, access to bike lanes and the California Coastal Trail, access to recreational fishing and boating and access to dock space and slips as a result of the placement of construction staging areas and the movement of construction equipment around and within harbor waters. Additionally, the recreational enjoyment of recreational users of the harbor would be significantly diminished as a result of construction noise, particularly from construction of the promenades along the waterfront. Even with mitigation this constitutes a significant and unavoidable impact.

The proposed LAMI Relocation Project construction is the renovation and use of a Building G and adjacent property. The proposed construction would not realign any street or block access to recreational opportunities. The proposed Project would not introduce a new significant impact or substantially increase previously identified impacts.

Impact REC-1b: Operation of the proposed Project would not result in a substantial loss or diminished quality of recreational, educational, or visitor-oriented opportunities, facilities, or resources.

The proposed LAMI facility will be use to complete the restoration of the *Swift of Ipswich*, for on-going maintenance of LAMI’s sailing ships, boat building and other maritime classes in association with POLAHS. As part of the project the *Swift of Ipswich* will be trucked or barged from Chula Vista for completion of its renovation at project site. The *Swift of Ipswich*, routine maintenance and boat building training would not preclude access to any recreational facilities or opportunities but would represent an education and visitor oriented opportunity. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.11 Socioeconomics

SE-1 Would the Proposed Project Displace People or Existing Housing or Construction of New Housing due to Project Acquisitions and Displacements

The Final EIR found no population growth, acquisitions, or displacements, physical changes anticipated as a result of the proposed Project. The impacts would be less than significant.

The proposed Project site consists of an existing vacant building and adjacent paved areas. The site is not zoned for residences and there are no existing or planned homes at the site. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

SE-2 Local Business and Tax Revenue

The Final EIR found the Project would lead to increased tax revenues by expanding the tax base of the area with introduction of new marine commercial developments and new restaurants, expanding the cruise ship industry, and by the provision of a new conference center. It also found that some, but not all, of the businesses displaced in the Ports O' Call redevelopment would return. However, the beneficial economic effects of the proposed Project would not result in physical changes to the area. The impact will be less the significant.

The building at Berth 73W is vacant and its use by LAMI will not displace any local business or decrease tax revenues as a result. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

SE-3 Local Employment and Labor Force

The Final EIR found the project would not result in substantial change in local labor force and employment. As a result, the proposed Project is not anticipated to result in indirect physical changes like construction of new housing to accommodate new labor force of the proposed Project. The impact is less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. While LAMI's employment numbers increase from two from the time of the Final EIR, the proposed Project will increase the number of LAMI employees. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

SE-4 Property Value Trends

The Final EIR found the Project would not likely contribute substantially to effects on property values due to its direct or indirect economic impacts. The impact is less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73E and the renovation of the *Swift of Ipswich*. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.11 Transportation– Ground Transportation

Impact TC-1: Construction of the proposed Project would not result in a short-term, temporary increase in construction-related truck and auto traffic, decreases in roadway capacity, and disruption of vehicular and non-motorized travel.

The Final EIR found project construction would result in a temporary increase in traffic volumes and a decrease in roadway capacity due to temporary lane closures. By implementing mitigation, a Traffic Control Plan, decreases in roadway capacity and disruption of vehicular and non-motorized travel would be minimized. Impacts would be less than significant.

The construction in the proposed LAMI Relocation Project consists of the renovation of an existing building, including reconnection to existing utility lines. Vehicular traffic during construction will be personal vehicles of the four construction workers, trucks to remove debris from installation of the new roof, and trucks to transport construction equipment and material to the site. The amount of construction related traffic will be minimal. Proposed LAMI Relocation Project construction would begin immediately does not coincide with other SPW construction so the projected increase traffic volumes and decrease roadway capacity will not occur during the proposed Project. If the construction coincides the mitigation described in the Final EIR will reduce the any LAMI traffic impact to less than significant. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact TC-2a: Proposed Project operations would increase traffic volumes and degrade LOS at intersections within the proposed project vicinity.

The Final EIR found increase traffic volumes and degrade LOS at intersections from operations along neighborhood streets within the project vicinity and after mitigation the impact would be significant and unavoidable.

The level of the proposed LAMI operational traffic will increase by two from that described in the Final EIR, six vehicles on weekdays and as many as ten volunteers on weekends and holidays. This traffic is currently occurring near the site at the Utro's building and at Ports O' Call Village. The only change is the inclusion of the Berth 73W site and the possible transportation of the *Swift of Ipswich* to the proposed LAMI facility. This traffic from this relocation will be over roadways within the boundaries of the SPW Project area and was included in the Final EIR analysis. If the *Swift of Ipswich* is transported by truck to the proposed Project site it will be a onetime event occurring during the night when traffic is light. The proposed LAMI Relocation Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact TC-2b: Proposed Project operations would increase traffic volumes and degrade LOS along neighborhood streets within the proposed project vicinity.

The Final EIR found with 2037 operational conditions, projected increases in traffic on the neighborhood streets for the 17th Street segment would be significant and unavoidable.

The level of the proposed LAMI operational traffic will increase by two from that described in the Final EIR, six vehicles on weekdays and as many as ten volunteers on weekends and

holidays. This traffic is currently occurring near the site at the Utro's building and at Ports O' Call Village. The only change is the inclusion of the Berth 73W site and the possible transportation of the *Swift of Ipswich* to the proposed LAMI facility. This traffic from this relocation will be over roadways within the boundaries of the SPW Project area and was included in the Final EIR analysis. If the *Swift of Ipswich* is transported by truck to the proposed Project site it will be a onetime event occurring during the night when traffic is light. The proposed LAMI Relocation Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact TC-2c: Proposed Project operations would not increase traffic volumes and degrade operations on CMP facilities within the proposed Project vicinity.

The Final EIR found the impact to Congestion Management Program freeway facilities from operational traffic to be less than significant.

The level of the proposed LAMI operational traffic will not change from that described in the Final EIR, four vehicles on weekdays and as many as ten volunteers on weekends and holidays. This traffic is currently occurring near the site at the Utro's building and at Ports O' Call Village. The only change is the inclusion of the Berth 73W site and the possible transportation of the *Swift of Ipswich* to the proposed LAMI facility. This traffic from this relocation will be over roadways within the boundaries of the SPW Project area and was included in the Final EIR analysis. This change in location will not affect the Congestion Management Program freeway facilities will not be affected as the roadways involved in this change of location are all internal to the SPW Project. If the *Swift of Ipswich* is transported by truck to the proposed Project site it will be over southern California freeways but is a onetime event occurring during the night when traffic is minimal. The proposed LAMI Relocation Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact TC-3: Proposed Project operations would not cause increases in demand for transit service beyond the supply of such services.

The Final EIR found the project could add, on average, approximately three person trips per bus in the AM peak hour and five person trips per bus in the PM peak hour in 2015 and 2037. Five people per bus represent the equivalent of slightly more than 12% of the capacity of a typical 40-passenger bus. At this level of activity, proposed project-related impacts to the regional transit system would be considered less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the additional of two employees, the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The renovation of the *Swift of Ipswich* will involve 2 persons on weekdays with additional persons on weekends and holidays. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts

Impact TC-4: Proposed Project operations would not result in a violation of the City's adopted parking policies and parking demand would not exceed supply.

The Final EIR found the project's parking supply would exceed code requirements as well as projected parking demand through 2015 and 2037. The SPPM Addendum found that with project modification the parking supply still would exceed code requirements.

The alignment of the Waterfront Red Car expansion could result in loss of available parking. The affected areas of the Cabrillo Marine Aquarium and Cabrillo Beach parking lot would need to be reconfigured to accommodate the dynamic envelope of the streetcar, avoiding the potential for parked cars to overhang onto the rail line and to ensure that it has adequate clearance to operate safely. The existing parking lots in this area currently provide approximately 285 spaces, including approximately 110 spaces reserved for vehicles with attached boat trailers. Thus, operational impacts of the Waterfront Red Car Expansion Project on parking at the Cabrillo Marine Aquarium and Cabrillo Beach would be significant. Mitigation measures would reduce the impact to less than significant.

The proposed LAMI Relocation Project will increase by two the number of persons parking at the site during weekdays from that described in the Final EIR and as many as ten volunteers may be present on any given weekend or holiday. The parking demand was assumed in both the SPW Project and SPPM environmental documents. Currently the four LAMI employees at the Utro's Building find parking in the surrounding parking lots. The difference between what was previously assessed and the proposed LAMI Relocation Project is the change in proposed Project location and the addition of two employee vehicles. Parking is available adjacent to the proposed Project site and in the nearby Ports O' Call parking lot. The proposed LAMI Relocation Project will have no impact on parking in the Cabrillo Marine Aquarium and Cabrillo Beach area. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact TC-5a: The alignment of the Waterfront Red Car expansion for the proposed Project would not increase potential conflict with vehicles at cross streets.

The proposed expansion of the Waterfront Red Car would realign portions of the existing line and extend it in the southern proposed project area along three new branch lines to City Dock No. 1, Outer Harbor, and Cabrillo Beach creating numerous new grade crossings. The alignment would also be crossed by both existing and proposed driveways serving adjacent uses. Vehicular and pedestrian safety hazards associated with the Waterfront Red Car expansion at cross street locations are significant. Implementation of mitigation measures would minimize or avoid potential conflicts between the Waterfront Red Car and vehicles at cross streets by providing additional traffic controls and/or operating restrictions on the Waterfront Red Car. Impacts would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact TC-5b: The alignment of the Waterfront Red Car expansion for the proposed Project would not increase potential conflict at track crossovers where the rail would transition between center-running and side-running.

The Waterfront Red Car alignment includes several locations where the tracks would cross over the adjoining streets. The potential conflict of the Waterfront Red Car expansion with vehicles at track crossovers would potentially increase collisions with vehicular traffic or indirectly cause vehicular accidents. Impacts are considered significant. Mitigation includes installation of a half-signal at the track crossover located near Sampson Way near the southern entrance to Ports O' Call. Implementation of mitigations would minimize or avoid potential conflicts between the Waterfront Red Car and vehicles at crossovers by providing additional traffic controls. Impacts would be less than significant.

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The Berth 73W site is located near the southern entrance to Ports O' Call which would be the most convenient route for traffic to the LAMI facility. The mitigation of a half-signal at the track crossovers near this location will mitigation would mitigate any increase potential conflict from the proposed LAMI Relocation Project. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

Impact TC-5c: The Waterfront Red Car expansion for the proposed Project would not result in increased pedestrian conflicts at stations.

An increased number of stations and level of pedestrian activity associated with the stations and the new pedestrian bridge also increases the number of places where pedestrians and vehicles may mix, and thus increases potential safety conflict points for pedestrians. Additionally, increased pedestrian activity throughout the proposed project area could potentially conflict with the Waterfront Red Car at other locations throughout the route where there are no planned designated crossings. Increased pedestrian conflict points resulting from the Waterfront Red Car expansion would be significant. With mitigation impacts would be less than significant.

In the proposed LAMI Relocation Project the relocation site is changed from Berth 87 to Berth 73W. Both locations are east of the Waterfront Red Car tracks with no increase in the potential of pedestrian traffic to cross the tracts. The proposed Project will not increase pedestrian traffic or conflicts with the Waterfront Red Car. The proposed Project would not introduce a new significant impact or substantially increase pervious identified impacts.

3.12 Transportation– Navigation Marine

Impact VT-1a: Construction of the proposed Project would not interfere with operation of designated vessel traffic lanes and/or impair the level of safety for vessels navigating the Main Channel, West Basin area, or precautionary areas.

The Final EIR found dredging and in-water construction activities could create in-water hazards and increase the potential for accidents for vessel traffic within the harbor, Main Channel, and precautionary areas. However, these activities are routinely conducted in the harbor, and contractors performing in-water construction activities are subject to all applicable rules and

regulations stipulated in all LAHD contracts. Because standard safety precautions would be utilized in piloting these vessels, the short-term presence of barges or boats would not reduce the existing level of safety for vessel navigation in the harbor. Therefore, construction impacts on vessel traffic would be less than significant.

The proposed LAMI Relocation Project construction phase involves renovation of a building. There will be no construction in or over the water. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

Impact VT-1b: Operation of the proposed Project would not interfere with the operation of designated vessel traffic lanes and/or impair the level of safety for vessels navigating the Main Channel, West Basin area, or precautionary areas.

The Final EIR found project operations would result in an increase of vessel calls. Adherence to HSP speed-limit regulations, traffic separation schemes, limited visibility guidelines, Vessel Tracking System monitoring requirements, and Port tariffs requiring vessels of foreign registry and U.S. vessels that do not have a federally licensed pilot on board to use a Port pilot for transit in and out of the harbor and adjacent waterways would continue to be used as standard practice. Operation impacts will be less than significant

The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The relocation will require the ships to move from their berths to the nearby SP Slip for maintenance. Also, there could be one transit from Chula Vista to San Pedro. These changes are in keeping with the ships normal overall operations; move within the Port and to and from the ocean. The proposed Project would not introduce a new significant impact or substantially increase previous identified impacts.

3.13 Utilities and Public Services

Impact PS-1: The proposed Project would not burden existing USCG, LAPD, or Port Police staff levels and facilities such that USCG, LAPD, or Port Police would not be able to maintain an adequate level of service without requiring construction of additional facilities that could cause significant environmental impacts.

The Final EIR found emergency response time for each public service provider in the proposed project area adequate. The proposed would not increase the demand for additional law enforcement officers and/or facilities such that the USCG, LAPD, or Port Police would be able to maintain an adequate level of service without additional facilities. However, project construction could have temporary impacts on emergency access to portions of the proposed project area; these impacts would be significant. With mitigation the impacts would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building. The renovation will not involve the large scale construction efforts or street and intersection improvements identified in the Final EIR and the Harbor Boulevard/7th Street/Sampson Way Intersection Improvements Addendum. During the renovation traffic on Timms Way may be temporarily impeded access to the northwest portion of SP Slip; however there is a readily available alternative route to this portion of the slip. The LAMI operation in the proposed

Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. During renovation, the *Swift of Ipswich* will be secured within LAMI facility. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact PS-2: 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.

The Final EIR found that construction impact will not impact response times to the area. The proposed Project would not increase the demand for fire services to a degree that would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. However, project construction might temporarily impact LAFD emergency access to portions of the proposed project area; with mitigation these impacts would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building and adjoining areas. The renovation will not involve the large scale construction efforts or street and intersection improvements identified in the Final EIR. During the renovation traffic on Timms Way may be temporarily impeded access to the northwest portion of SP Slip; however there is a readily available alternative route to this portion of the slip. The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. During renovation, the *Swift of Ipswich* will be secured within LAMI facility. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact PS-3: The proposed Project would not require or result in the construction or expansion of utility lines that would cause significant environmental effects.

The Final EIR found project construction and development may require upgrades and relocations of utility lines to provide for and adjust to the development of additional cruise berths in the Inner and Outer Harbors. However, these possible upgrades or relocations would not cause significant environmental effects. During construction mitigation would limit the amount of waste created the impact would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of Building G. This building was previously connected to utility services (i.e. water, power, and sewer). As part of the renovation the building and facility will be reconnected to these services. The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the renovation of the *Swift of Ipswich*. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact PS-4: The proposed Project has sufficient water supplies available to serve the project from existing entitlements and resources; it would not exceed wastewater requirements, require new wastewater treatment facilities, require new landfills, or exceed existing landfill capacities.

The Final EIR project would result in an increased water demand from the baseline level; however a Water Supply Assessment confirms that adequate supplies exist to serve the proposed project. In addition, coordination with LADWP would ensure that the increased demands would be accommodated by existing infrastructure. The Project would not exceed the capacity of the TITP or conveyance system to accommodate anticipated increases. The minimal amount of increased wastewater generated by proposed project construction and operations would not exceed the 30-mgd capacity of the TITP or sewer trunk lines in the proposed project area. Impacts on water and wastewater capacity and infrastructure are less than significant.

The Final EIR found the project would result in an increased water demand from the baseline level of 486.80 acre-feet per year, of approximately 217.76 acre-feet per year in 2037. However a Water Supply Assessment confirms that adequate supplies exist to serve the proposed project. In addition, coordination with LADWP would ensure that the increased demands would be accommodated by existing infrastructure. The project would not exceed the capacity of the TITP or conveyance system to accommodate anticipated increases. The minimal amount of increased wastewater generated by proposed project construction and operations would not exceed the 30-mgd capacity of the TITP or sewer trunk lines in the proposed project area. Impacts on water and wastewater capacity and infrastructure are less than significant.

The Final EIR found the amount of solid waste generated by the demolition of the existing 150,000 square foot Ports O' Call Village and construction of 250,000 square feet of development would result in a substantial contribution to the solid waste stream, possibly contributing to the exceedance of solid waste facility capacities. Implementation of mitigation measures would reduce this impact to less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building. The LAMI operation had previously been located with the SPW Project boundary in temporary trailers at Berth 85. As part of the SPW Project, LAMI's operation was to be relocated to Berth 86. The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. Except for a small amount of water required for dust control during renovation, the water and wastewater flows of the proposed LAMI Relocation Project will be unchanged from those analyzed the Final EIR. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

The renovation of the 4,423 square feet Building G in the proposed LAMI Relocation Project will generate construction waste above that analyzed in the Final EIR. However the amount is a minimal in light of the estimated 150,000 square feet of Ports O' Call Village that would be redeveloped and an additional 225,000 square feet of new construction. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

The waste generation from the proposed LAMI Relocation Project was analyzed in the Final EIR. The addition of two employees would generate but a small amount of waste in relation to the 25.4 tons per year estimated for the SPW Project operation. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

Impact PS-5: The proposed Project would not require new, offsite energy supply and distribution infrastructure, or capacity-enhancing alterations to existing facilities that are not anticipated by adopted plans or programs.

Energy (diesel fuel and electricity) would be required to support proposed construction activities. Energy demands during construction activities would be short-term and temporary; they are not anticipated to result in substantial waste or inefficient use of energy, because energy-efficiency and conservation strategies. Project operations would generate demands for electricity would be 72.96 to 73.09 million kWh per year in 2037, 12.89 to 13.02 million kWh per year more than the 2006 baseline demand (60.07 million kWh per year). The increased natural gas demand of 0.01% from baseline demand would not supersede project natural gas supply. While incorporation of these energy design measures would reduce impacts related to reducing energy consumption, impacts would remain significant. Implementation of mitigation will reduce impacts to less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building and adjoining areas. The additional energy needed by the construction equipment can be readily met by existing energy sources and infrastructure. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

The LAMI operation had previously been located with the SPW Project boundary in temporary trailers at Berth 85. The LAMI operation in the proposed Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W and the transport and renovation of the *Swift of Ipswich*. The renovation of the *Swift of Ipswich* will require a crane to place the vessel within the faculty boundaries and then to return the ship to the water after renovation is complete. Otherwise the renovation of the *Swift of Ipswich* uses equipment used in the routine maintenance of LAMI vessels. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

3.14 Water Quality, Sediments and Oceanography

Impact WQ-1: The proposed Project would not cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources.

The Final EIR found that do to existing storm drains systems and flat terrain the Project would not increase potential for flooding or increase risks to humans, property, or sensitive biological resource over that of the baseline. Therefore, impacts from flooding would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building. Operation would be that as describe in the Final EIR, but at Berth 73W. The site is served by

storm drains and the pavement will remain intact. The proposed Project would not increase the potential for flooding or increase risks to humans, property, or sensitive biological resource over that of the baseline described in the Final EIR. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

Impact WQ-2: The proposed Project would not substantially reduce or increase the amount of surface water in a water body.

The Final EIR found the Project increase the surface water area of the Main Channel of 268 acres by 6.82 acres or 2%. This change would have a beneficial impact on the utilization of the surface water resource in the proposed project area because current utilization of this resource is non-consumptive, oriented to shipping and vessel traffic. These uses would benefit from availability of the new harbors proposed under the proposed Project. Impacts would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building but no in or over water construction. Operation would be that as describe in the Final EIR, but at Berth 73W. The proposed Project would not change the amount of surface water of the Harbor. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

Impact WQ-3: The proposed Project would not result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the velocity or direction of water flow.

The Final EIR found the Project would create any barriers to water movement that would result in a permanent adverse change in surface water movement. Impacts would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of an existing building but no in or over water construction. No impediment to surface water movement would be constructed. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

Impact WQ-4a: In-water construction for the proposed Project would not result in discharges that create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or water quality control plan for the receiving water body.

The Final EIR found changes related to the Project are not expected to create pollution, contamination, or a nuisance or cause exceedances of any water quality standards, and impacts to water quality from in-water construction activities would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building but no in or over water construction. The proposed Project does not introduce a new significant impact or substantially increase pervious identified impacts.

Impact WQ-4b: Stormwater discharged during upland construction of the proposed Project would not result in discharges that create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or water quality control

The Final EIR found construction activities associated with upland and road improvements for the Project have the potential to adversely affect the quality of stormwater runoff. However, implementation of a SWPPP incorporating BMPs, would control runoff of eroded soils and pollutants. Therefore, runoff from upland construction activities would not create pollution, contamination, a nuisance, or violate any water quality standards, and impacts to water quality would be less than significant.

Construction in the proposed LAMI Relocation Project involves the renovation of a building. The proposed Project is subject to the same SWPPP and BMP requirements as that described in the Final EIR. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact WQ-4c: The proposed Project would not result in accidental discharges that create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or water quality control plan for the receiving water body.

The Final EIR found spill prevention and cleanup procedures for the proposed Project would be addressed in a SWPPP that would be implemented by the construction contractor. The plan would define actions to minimize the potential for spills and provide efficient responses to spill events to minimize the magnitude of the spill and extent of impacts. Therefore, accidental spills of pollutants would cause less than significant impacts.

Construction in the proposed LAMI Relocation Project involves the renovation of a building and adjoining paved areas. The requirements identified in the Final EIR apply to the proposed Project. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

Impact WQ-4d: Operation of the proposed Project would result in discharges that create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or water quality control plan for the receiving water body.

The Final EIR found upland Project operations would not result in direct discharges of wastes and stormwater discharges would comply with the NPDES discharge permit limits. The impact is less than significant.

The Final EIR found leaching of contaminants such as copper from anti-fouling paint could also cause increased pollutant loading in the harbor, which is listed as impaired with respect to copper. There are no available mitigations to eliminate the leaching of contaminants from anti-fouling paint on vessel. Therefore, the impact to water quality from leaching is unavoidable and significant.

Except for the transport and renovation of the *Swift of Ipswich* the proposed project operation would be that as described in the Final EIR, but at Berth 73W rather than Berth 87. The operation of the LAMI vessels was analyzed in the Final EIR. The proposed Project does not introduce a new significant impact or substantially increase previous identified impacts.

4.15 Environmental Justice

4.15.1.1 Summary of San Pedro Waterfront EIS/EIR Findings

The SPW Project EIS/EIR determined the SPW Project would result in disproportionately high and adverse effects on minority and low-income populations from:

- exceedance of significance thresholds of air pollutant emissions during construction and operation of the SPW Project;
- exposure to toxic air contaminants (TACs);
- exceedance of noise standards during construction;
- a permanent increase in ambient noise levels due to vehicular traffic;
- the temporary diminished quality of recreational resources; and
- increased traffic volumes that would degrade levels of service along roadway segments and at intersections within the project vicinity.

4.15.1.2 Impact from LAMI Relocation Project

The LAMI Relocation Project will be the same as described in the Final EIR except for the change of location from Berth 87 to Berth 73W, renovation of Building G and adjoining lot and the transport and renovation of the *Swift of Ipswich* to Berth 73W.

Exposure of sensitive receptors to TACs is largely associated with operation of the cruise terminals and, therefore, the LAMI Relocation Project would not result in a substantial contribution to impacts related to TACs. However, while the LAMI Relocation Project would not substantially contribute to other impacts identified above; implementation of the LAMI Relocation Project would add to disproportionately high and adverse impacts on minority and low-income populations in some cases. The LAMI Relocation Project would not result in new significant impacts, substantially increase the severity of a previously analyzed impact, or require new mitigation measures that have not already been evaluated in the Final EIR. Therefore, there is no substantial change from the findings in the Final EIR.

4.17 Growth Inducement

4.17.1.1 Summary of San Pedro Waterfront EIS/EIR Findings

The SPW Project EIS/EIR determined while the project would not introduce new housing, it could have direct and indirect growth-inducing effects through transportation system improvements and new investment in surrounding communities based on the new amenities the SPW Project would bring to the area. In addition, while the SPW Project would introduce new employment opportunities, it was determined that the majority of new employees would come from the diverse worker population already residing within Southern California and would not require a substantial influx of new residents into the area to fill new jobs. As such, the SPW Project would not adversely affect the existing housing stock in the surrounding area. The other impacts of growth, such as those related to air quality, traffic congestion, increases in noise, and increased public services and utility consumption, were addressed throughout the SPW Project EIS/EIR.

4.17.1.2 Impact of LAMI Project

The LAMI Project would not contribute to the direct or indirect population growth that would occur under the overall SPW Project because it would not involve the development of transportation system improvements. The LAMI Project is a relocation of their facility from the planned Berth 87 to Berth 73W and would not result in new jobs would not require a large influx of new employees moving into the region.

4.18 Cumulative Analysis

4.18.1 Introduction

This section presents information and analysis of the potential cumulative environmental impacts, if any, of the proposed modifications to the previous project design analyzed in the SPW Project EIS/EIR for the Ports O'Call area with the SPPM Project. The SPPM Project's cumulative effects were largely covered and analyzed in the SPW Project EIS/EIR, which identified redevelopment of Ports O'Call as a project element. The analysis contained within this section addresses the changes to cumulative impacts identified in the SPW Project EIS/EIR that could potentially occur as a result of the LAMI Relocation Project.

4.18.2 Summary of SPW EIS/EIR Findings

The SPW Project EIS/EIR includes a comprehensive list of related and cumulative projects (Table 4-1 and Figure 4-1 of the SPW Project EIS/EIR), in which the cumulative contribution of the SPW Project was considered. Resource areas where the SPW Project was determined to contribute to a cumulatively considerable adverse effect included:

- aesthetics (nighttime lighting),
- air quality (construction emissions),
- biological resources (pile driving and mudflat habitat),
- cultural resources (archaeological resources),
- geology (fault rupture, ground-shaking, liquefaction, or other seismically induced ground failure, and tsunami risks),
- noise (construction noise),
- recreation (construction),
- transportation and circulation (ground), and
- water quality, sediments, and oceanography (stormwater runoff).

4.18.3 Impacts of the LAMI Relocation Project

The modifications proposed by the LAMI Relocation Project are minor. The project would be in with the boundaries of the SPW Project differing only in the final location, renovation of Building G, transport of the *Swift of Ipswich* to San Pedro and completing its renovation.

- Aesthetics (nighttime lighting) would be minimal with the addition of two light fixtures to Building G and two on existing poles in the Lot1 and Lot 2 areas.
- Air quality (construction emissions), emission from the renovation of Building G and the transport of the *Swift of Ipswich* are minimal. The transport of the *Swift of Ipswich* to San Pedro is a one-time event. The renovation of the *Swift of Ipswich* would entail the same activities found in the on-going maintenance for LAMI's vessels.
- Biological resources (pile driving and mudflat habitat), there is no work in the LAMI Relocation Project that involve in-water or over-water construction.
- Cultural resources (archaeological resources), there is no known archaeological resources in the LAMI Relocation Project area and minimal excavation.
- Geology (fault rupture, ground-shaking, liquefaction, or other seismically induced ground failure, and tsunami risks), the LAMI Relocation Project will not add to the existing risks associated with geology.
- Noise (construction noise), the noise levels of the renovation of Building G are lower than ambient levels and will not add significantly from the existing noise environment.
- Recreation (construction), renovation of Building G will not impact any recreational facilities or opportunities.
- Transportation and circulation (ground), Construction would increase traffic to a minor degree but would occur before the most of the SPW construction begins. Operationally, except for the transport of the *Swift of Ipswich* by truck and the two additional employees, no new traffic will be generated by the LAMI Relocation Project.

- Water quality, sediments, and oceanography (stormwater runoff), the LAMI Relocation Project involves the relocation of the proposed location for LAMI from Berth 87 to Berth 73W but there will be no change in the area covered by asphalt. There will be no increase in stormwater runoff from the Project.

The proposed LAMI Relocation Project would not result in new significant impacts, substantially increase the severity of a previously analyzed cumulative impact, or require new mitigation measures that have not already been evaluated in the SPW Project EIS/EIR.

5.1 Printed References

ICF International, 2015. Historical Survey and Evaluation of the McJilton Machine Shop (Building G), Berth 73W at the Port of Los Angeles

Jones & Stokes, 2004. Architectural Survey and Evaluation of Two Buildings at Berth 73, Port of Los Angeles.