

**Addendum 2 to the
Fisherman's Pride Processor's Inc.
Final Initial Study and Mitigated Negative
Declaration**

APP No. 200330-056

SCH No. 2013121027

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1. Introduction

The Fisherman's Pride Processor's Inc. Final Initial Study/Mitigated Negative Declaration (IS/MND) was adopted by the Los Angeles Board of Harbor Commissioners (Board) on January 28, 2014 (SCH# 2013121027 and APP No. 130417-062). On February 6, 2014, the Board also adopted Permit No. 905 to Fisherman's Pride Processors, Inc. doing business as Neptune Foods (FPP) and approved the project to construct and operate modernized seafood processing at the former Chicken of the Sea facility, including minor facility upgrades and improvements to the Permit 905 premises. Such construction of facility upgrades was completed in 2017, and FPP has been operating a fish processing facility on the FPP site since. On February 23, 2015, the Executive Director authorized Revocable Permit (RP) 15-01 to FPP for 19,116 sf in Building 14 at 338 Cannery Street, for activities of equipment storage incident to seafood processing.

An Addendum (2019 Addendum) was considered by the Board on November 5, 2019, pursuant to CEQA, and revised the approved project description by adding space beyond the Permit 905 premises. The 2019 project included the issuance of a new RP 19-13, adjustments to the FPP site boundary, and continued maintenance of the FPP site for 6 months, which allowed FPP to continue to conduct seafood packaging and product and equipment storage in an expanded premises area including other adjacent buildings and pavement. The building areas on the site are not eligible under any criterion for listing in the National Register of Historic Places (NRHP) or the California Register of Historic Places (CRHR) or as a City of Los Angeles Historical Cultural Monument (HCM), as documented in the 2019 Final Historical Re-Evaluation of the Cannery Block (formerly Chicken of the Sea) conducted by ICF International, Inc. (ICF). In November 2019, the Board retroactively approved RP 19-13 to FPP for a 6-month term commencing September 27, 2019 for 38,690 sf of warehouse and 16,275 sf of paved yard space.

In March 2020, SA 20-13 was issued to FPP for a 6-month term effective March 27, 2020 for storage at the concrete warehouse and paved yard for approximately 32,617 sf, pursuant to a CEQA exemption under Los Angeles City CEQA Guidelines Article III, Class 4 (6), for temporary use of land having no permanent effects on the environment and negligible or no expansion in use. Renewals for SA 20-13 have been granted from April to June, extending temporary storage use. Additionally, on May 28, 2020, an Amendment was authorized for Permit 905 that entitled use of an approximately 4,950 sf Fish Butchering Room formerly included in RP 19-13, pursuant to a CEQA exemption under Los Angeles State CEQA Guidelines §15301 Existing Facilities, for operation, repair, maintenance, or permitting of existing public or private structures, facilities, or mechanical equipment, involving negligible or no expansion of existing or former use. The Permit 905 Amendment was approved on May 28, 2020, retroactive to an effective date of March 27, 2020. The Fish Butchering Room was inadvertently omitted from the 2019 Addendum as a 6-month Space assignment evaluation, but it was assessed for the long term (4 years remaining of 10-year term ending 2024 with two 5-year options) in the Permit 905 Amendment CEQA exemption.

In 2020, FPP requested a new permit for long-term use of the previously assessed area within the previous premises boundaries of three terminated entitlements: RP 19-13, RP 15-01, and SA 20-13. All previous entitlements will be terminated when the new proposed permit is executed. The 2019 Addendum stated that FPP vacated and terminated RP 15-01; however, RP 15-01 actually continued past September 2019 and will be terminated effective with the new proposed RP. Renewals for SA 20-13 were granted in April to June 2020, extending temporary storage use until the new proposed RP is executed. The overall purpose of the Proposed Revised Project and new permit would allow FPP to occupy approximately 55,000 sf of property in order to continue to store materials, racking, and equipment related to the processing of fish products. This Proposed Revised Project includes the issuance of a new month-to-month RP, which is subject to the Board's review for potential continuation or modification after 5 years, if not terminated earlier. There would be no additional fish processing operations within the new RP premises, and FPP advises that additional storage area is needed to improve support for existing operations; therefore, there

would be a negligible increase in storage use. Additionally, the Proposed RP area has been previously assessed for storage under the 2014 IS/MND and 2019 Addendum and would use such previously evaluated storage areas, with no alteration of the existing facility. Additional information on the Project's completed construction and maintenance activities can be found in Section 2.1.2. The Final IS/MND was prepared by the City of Los Angeles Harbor Department (LAHD) as Lead Agency under the CEQA to address the potential environmental effects of the proposed project and recommend mitigation measures to avoid or minimize the significant effects. Accordingly, this Addendum is being prepared pursuant to the requirements of CEQA Guidelines Section 15164 and confirms that no new significant impacts or increases in severity of previously- identified impacts or changes to mitigation occur as a result of the Proposed Revised Project.

2. Background

2.1.1 Facility Overview

FPP, doing business as Neptune Foods, offers processed seafood including, but not limited to, fish, shrimp, oyster, and lobster. The company was founded in 1956 (Neptune Foods, 2010). FPP operates a fish processing facility in Fish Harbor under Permit 905, which was granted in 2014 for a 10-year term with two, five-year options, and was modified by an Amendment approved on May 28, 2020, retroactive to an effective date of March 27, 2020. As explained below, FPP has also operated on the site in additional areas under RP 15-01, RP 19-13, and SA 20-13.

2.1.2 Previously Assessed and Approved Project Footprint

The Board adopted the Final IS/MND, adopted a Mitigation Monitoring and Reporting Program, and approved the proposed Project in 2014. The approved proposed Project contained the following components at 338 Cannery Street:

Construction Activities

Upgrades proposed for the site included the following:

- Convert approx. 91,500 sq. ft. of industrial space into a seafood processing facility
- Convert approx. 56,700 sq. ft. of vacant land into parking and ancillary facilities
- Demolish unsafe and unsanitary interior office and restroom spaces
- Construct new office, restroom, shower, lounge space, mechanical and storage spaces
- Repave parking and loading areas
- Enhance the exterior of the existing buildings
- Add a new compressor room to the south side of Building 9

Such construction of facility upgrades was completed in 2017, and FPP has been operating a fish processing facility on the FPP site since.

On February 23, 2015, the Executive Director authorized RP 15-01 to FPP, for 19,116 square feet (sf) in Building 14 at 338 Cannery Street, for activities of equipment storage incident to seafood processing pursuant to a CEQA exemption under Los Angeles City CEQA Guidelines Article III, Class 1(14) for issuance of permit to use existing facility involving negligible or no expansion of use.

The 2019 Addendum was considered by the Board on November 5, 2019, pursuant to CEQA, and revised the Project description by adding space beyond the Permit 905 premises; therefore changing the FPP premises boundaries. The 2019 Addendum stated that FPP vacated and terminated RP 15-01; however, RP 15-01 actually continued past September 2019. The 2019 project resulted in the issuance of RP 19-13. RP 19-13 entitled FPP to conduct seafood packaging and product and equipment storage in designated areas consisting of 38,690 sf of warehouse and 16,275 sf of paved yard space over a 6-month term. RP 19-13 was approved in November 2019, retroactive to an effective date of September 27, 2019.

In March 2020, SA 20-13 was issued to FPP for a 6 month term for storage effective March 27, 2020 at the concrete warehouse and paved yard for approximately 32,617 sf, pursuant to a CEQA exemption under Los Angeles City CEQA Guidelines Article III, Class 4 (6), for temporary use of land having no permanent effects on the environment. Renewals for SA 20-13 were granted in April to June 2020, extending temporary storage use until the new proposed RP is executed.

Additionally, on May 28, 2020, an Amendment was authorized for Permit 905 which entitled use of an approximately 4,950 sf Fish Butchering Room formerly included in RP 19-13, pursuant to a CEQA exemption under Los Angeles State CEQA Guidelines §15301 Existing Facilities, for operation, repair, maintenance, or permitting of existing public or private structures, facilities, or mechanical equipment, involving negligible or no expansion of existing or former use (see Figure 1). The existing facility under this exemption was constructed in 1974 and used by various fish processing tenants for fish butchering operations until 2010, similar to the proposed use of the fish butchering room added by the Permit 905 Amendment. The Permit 905 Amendment was approved on May 28, 2020, retroactive to an effective date of March 27, 2020. The Fish Butchering Room was inadvertently omitted from the 2019 Addendum as a 6-month Space assignment evaluation, but it was assessed for the long term (4 years remaining of 10 year term ending 2024 with two 5-year options) in the Permit 905 Amendment CEQA exemption.

In 2020, FPP requested a new permit for long-term use of the previously assessed areas within the previous premises boundaries of three terminated entitlements: RP 19-13, RP 15-01, and SA 20-13. When the new Proposed RP is executed, all previous entitlements would be terminated. The 2019 Addendum stated that FPP vacated and terminated RP 15-01; however, RP 15-01 actually continued past September 2019 and will be terminated effective with the new proposed RP. The Proposed RP premises has been previously assessed for storage under the 2014 Final IS/MND and 2019 Addendum and would use such previously evaluated storage areas, with no alteration of the existing facility. Figure 1 below highlights the areas of Permit 905 and recent Amendment area, RP-15-01, RP 19-13, and SA 20-13. Figure 2 below highlights the Proposed RP area in closer detail. The premises consists of two warehouses and an associated paved yard area. The concrete warehouse is approximately 20,540 sf, the metal warehouse is approximately 21,847 sf, and the paved land is approximately 12,077 sf. Figure 3 shows the Proposed Revised Project Footprint, which includes Permit 905 and the Proposed RP. The regional location of Proposed Revised Project is shown in Figure 4.

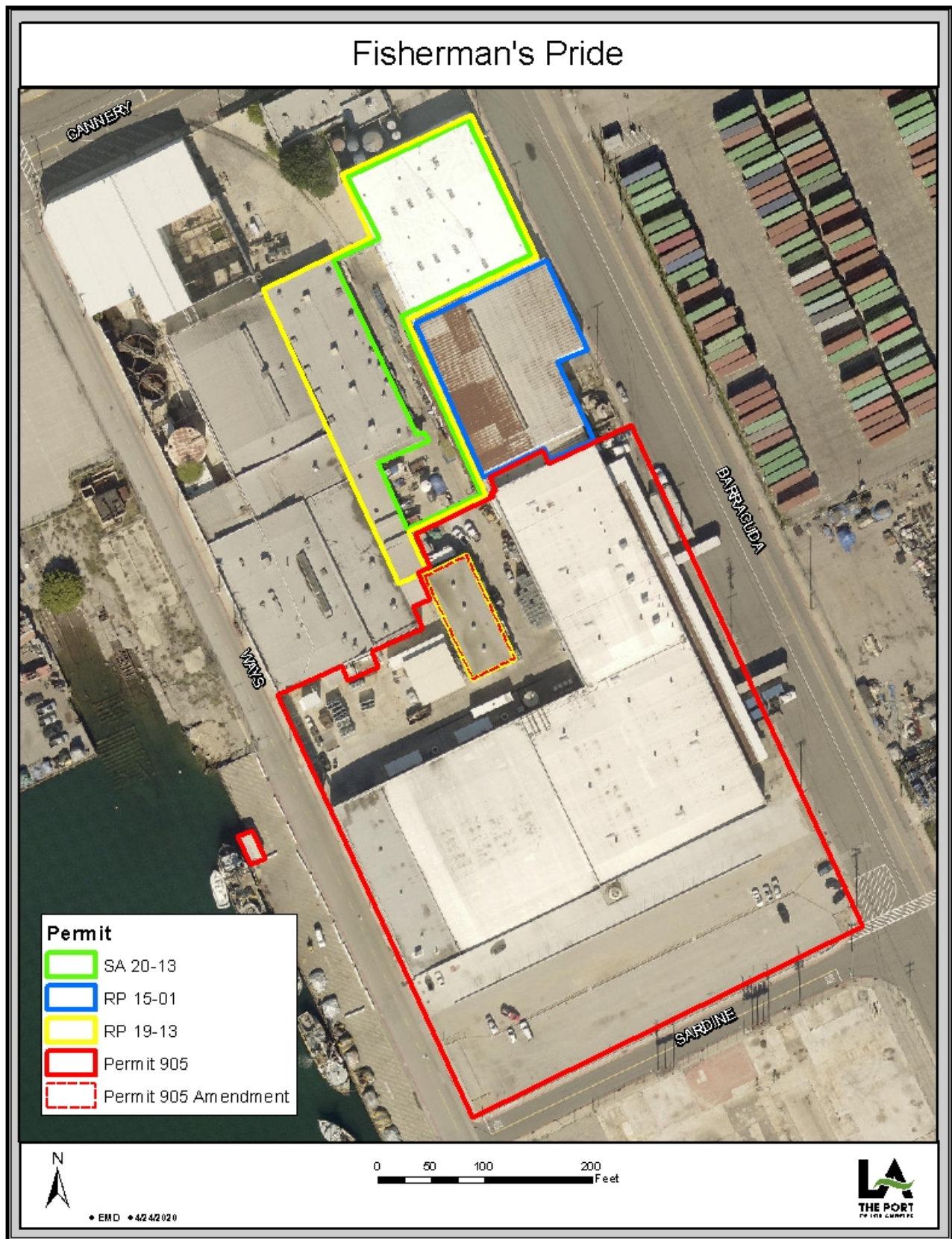


Figure 1 – Previously Assessed Permit Areas



Figure 2 –Proposed Revocable Permit Area



Figure 3 –Proposed Revised Project Footprint

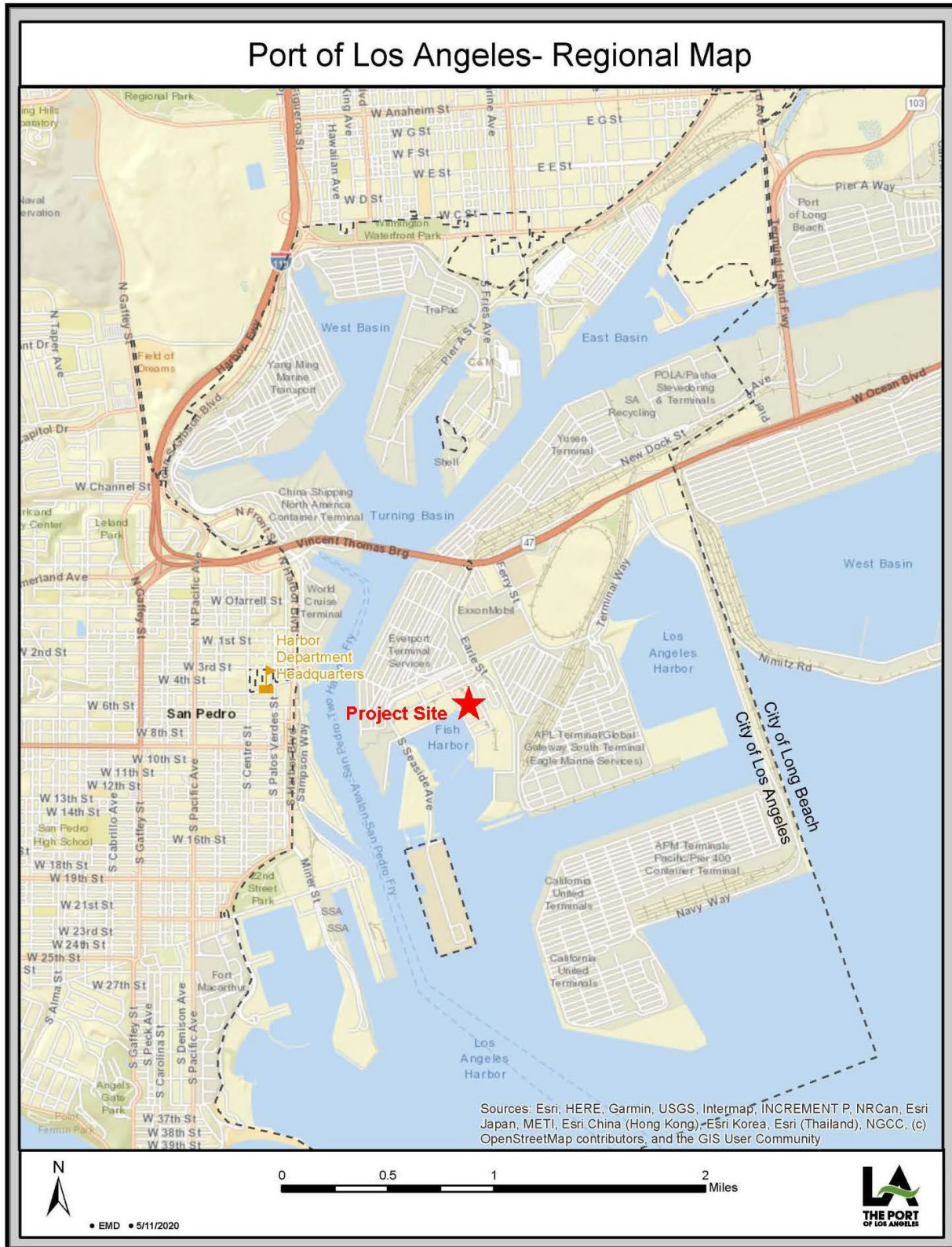


Figure 4 - Regional Location of the Proposed Revised Project

3. Revised Proposed Project

The Final IS/MND assessed a Project footprint totaling approximately 160,000 sf in the former Chicken of the Sea (COS) Buildings 9, 10 and 12 with additional parking lot and courtyard space at 338 Cannery Street in a lease term of ten-years with two, five-year extension options (Figure 1). FPP currently occupies an approximately 193,825 sf area (Figures 1 and 3 – red area) under Permit 905, approximately 19,116 sf under RP 15-01 (Figure 1– blue area), and approximately 32,617 sf under SA 20-13 (Figure 1– green area), which were previously assessed under the Final IS/MND and 2019 Addendum. The Proposed Revised Project includes the issuance of a month-to-month RP, which provides that the Board shall review for potential continuation or modification after 5 years, if not terminated earlier. When the new Proposed RP is executed, entitlements RP 15-01 and SA 20-13 would be terminated. The RP would allow FPP to occupy approximately 55,000 sf of property in order to continue to store materials, racking, and equipment related to the processing of fish products. There would be no additional fish processing operations within the new RP premises, and FPP advises that additional storage area is needed to improve support for existing operations; therefore, there would be a negligible increase in storage use. Figure 3 depicts the approximately 193,825 sf area (red area) under Permit 905 plus the Proposed RP's additional approximately 55,000 sf (green area), totaling approximately 248,825 sf. Prior to its 5th anniversary, the RP would need to go to the Board for review regarding its potential continuation or modification. This Proposed RP has been previously assessed and is a continuation of current storage use with no alteration of the facility.

This Addendum serves to clarify that FPP will be continuing to occupy areas of the property that were previously assessed under the 2014 Final IS/MND and 2019 Addendum. As included in the record of the 2019 Addendum, these areas are not eligible for listing in the NRHP, CRHR, or as a HCM (ICF 2019).

4. Purpose

This Addendum has been prepared in accordance with the requirements of the CEQA (Public Resources Code [PRC] 21000 et seq.), and the State CEQA Guidelines (California Code of Regulation Title 14, Section 15000 et seq.), and focuses on changes to the original project description with the 2019 Addendum and any impacts that would occur as a result of the Proposed Revised Project. The scope of analysis contained within this Addendum addresses all environmental resource areas. All previously identified mitigation measures for the Final IS/MND will be incorporated into the Proposed RP as applicable.

Pursuant to State CEQA Guidelines Section 15164, this analysis has determined that none of the conditions set forth in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. There are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects as a result of the Proposed Revised Project. There are no known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the Final IS/MND. Similarly, there are no known mitigation measures or alternatives that are considerably different than those required by the adopted Final MND that would substantially reduce one or more significant effects on the environment identified in the adopted Final IS/MND. Therefore, neither a subsequent EIR nor subsequent negative declaration, as defined under CEQA Section 15162, is required. An Addendum to the Final IS/MND, as permitted under Section 15164, is appropriate.

An Addendum need not be circulated for public review but can be included in or attached to the adopted Final IS/MND. The decision-making body considers the Addendum prior to making a decision on the project along with the previously adopted MND.

Specifically, 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.

5. Scope and Content

This Addendum describes all of the affected environmental resources and evaluates the changes in the impacts that were previously described in the 2014 Final IS/MND and 2019 Addendum with respect to the approved project changes.

For purposes of determining whether new or substantially more severe “significant effects” would occur under CEQA Guidelines Section 15162, the criteria for determining whether environmental effects would be significant in this analysis are the same as the significance thresholds contained within the adopted MND, with the exception of the wildfire changes from the 2018 CEQA Guidelines Checklist.

The analysis in this Addendum focuses on the changes to the impacts that would occur as a result of the Proposed Revised Project. The following resource topics were evaluated in the preparation of the Final IS/MND. As such, the following resources areas have been re-evaluated as part of this Addendum:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The following resource topic area has been recently added to the CEQA Guidelines Checklist and was not evaluated in the preparation of the Final IS/MND. As such, the following resource area has been evaluated as part of this Addendum:

- Wildfire

6. Previous Environmental Documents Incorporated by Reference

Consistent with Section 15150 of the California State CEQA Guidelines, the following document, available for review at the Port of Los Angeles Environmental Management Division, was used in preparation of this Addendum and is incorporated herein by reference:

- **Final Historical Re-evaluation of the Cannery Block (formerly Chicken of the Sea), 338 Cannery Street, Terminal Island** (APP No. 190320-512). This document was prepared as over 10 years had passed since the 2008 Final Architectural Survey and Evaluation. This document includes an evaluation that considers additional historical context, revised site history, and changes to integrity. As a result, this evaluation concludes that the Cannery Block is not eligible for listing in the CRHR under any criterion because the property lacks sufficient integrity to convey significance as a cannery block and/or associations with any specific canning companies.
- **Final Architectural Survey and Evaluation of the Chicken of the Sea Plant 338 Cannery Street, Terminal Island Port of Los Angeles** (APP No. 060131-563). This document includes the methods and findings of an intensive architectural survey and evaluation of the property at 338 Cannery Street. Architectural Historians who meet the Secretary of the Interior's professional qualification standards for historian and architectural historian, conducted survey and evaluation work at the site. The 2008 evaluation determined that the property was eligible for listing in the NRHP and CRHR and as a local HCM under Criterion A/1 for its association with the canning industry and the economic development of the Port of Los Angeles' Terminal Island's Fish Harbor, with a period of significance from 1950 to 1967 that represented the property's height of operation.
- **Fisherman's Pride Processor's Inc. Final Initial Study/Mitigated Negative Declaration** (SCH No. 2013121027 and APP No. 130417-062). This document addressed all potential environmental impact areas from the original project and included the full project description, existing setting, and the environmental checklist. This document determined that all areas were considered less than significant with the incorporation of mitigation measures. This document is incorporated by reference as all environmental analyses contained therein are being utilized for a comparison against the Proposed Revised Project change to ensure that no new impact is created. This document was circulated for a 30-day public review and comment period. This document can be accessed through the Environmental Management Division at 222 West 6th Street, 9th Floor, San Pedro, CA or via the LAHD website under the Environmental Documents tab.
- **Addendum to the Fisherman's Pride Processor's Inc. Final Initial Study and Mitigated Negative Declaration** (SCH No. 2013121027 and APP No. 190904-120). This document revised the approved Project description by adding space beyond the Permit 905 premises, which included the issuance of a new RP, expansion to the FPP site boundary, and continued maintenance of the FPP site for 6 months. This document was prepared pursuant to the requirements of CEQA Guidelines Section 15164 and confirms that no new significant impacts or increases in severity of previously- identified impacts or changes to mitigation occur as a result of the revised project. This document can be accessed through the Environmental Management Division at 222 West 6th Street, 9th Floor, San Pedro, CA or via the LAHD website under the Environmental Documents tab.

7. Required Permits and Approvals

The following permits and approvals would be required for the Proposed Revised Project:

- LAHD Revocable Permit

8. Environmental Analysis

The analysis contained herein demonstrates and provides substantial evidence that no significant impacts are present, nor would the severity of other impact areas be increased by the Proposed Revised Project. Below is a discussion of all resource areas analyzed in the Final IS/MND and a discussion of why the impact determinations made in the MND and 2019 Addendum would not be affected by the Proposed Revised Project.

8.1 Aesthetics

The Proposed Revised Project would not modify the existing structures in any way. Warehouses in the area are used for storage and the Proposed Revised Project would be consistent with this use. Therefore, there are no significant impacts related to the existing visual character and quality of the site.

8.2 Agriculture and Forestry Resources

The Proposed Revised Project would not have any impact on Agriculture and Forestry resources as the project area is not located in any area zoned for agricultural use and does not change the existing use of the surrounding area in any way.

8.3 Air Quality

The Final IS/MND for the FPP Project conservatively assessed a 4.12 acre parcel for the full operation of a fish processing facility. The Proposed Revised Project includes the addition of approximately 1.26 acres for storage only (Figure 2). The additional acres of land being added to the original permit area is comprised of approximately 0.98 acres of warehouse space and approximately 0.28 acres of paved land. It is not anticipated that this increased area will cause an increase in truck trips, employee trips, or boat trips. This Proposed RP area has been previously assessed for storage use, and FPP proposes a negligible increase in current storage use to improve support for existing levels of fish processing, with no alteration of the facility. As such, the Proposed Revised Project does not create air emissions greater than what was previously evaluated in the Final IS/MND for the FPP Project.

8.4 Biological Resources

The Proposed Revised Project would not cause any change in impact determinations from the Final IS/MND. Interaction with threatened or endangered species as a result of this project is highly unlikely and foraging, resting, and breeding habitat is unlikely to be present at the proposed project site because it is a fully developed paved area with no suitable habitat. Therefore, there are no impacts to biological resources.

8.5 Cultural Resources

The ICF Historical Re-Evaluation concluded that the Cannery Block is not eligible for listing in the NRHP or CRHR or as a local HCM under any criterion because the property lacks sufficient integrity to convey significance as a cannery block and/or associations with any specific canning companies (ICF 2019). Due to ineligibility, there are no impacts to cultural resources.

The Proposed Revised Project is located on Terminal Island, which is made mostly of manmade fill material and is paved. The Final IS/MND identified that the entire project site is fully developed and that the site has been extensively disturbed. Because the site is comprised of fill and is extensively disturbed, there is extremely low potential for discovering archaeological or ethnographic cultural resources. Further, the Proposed Revised Project does not include construction or alteration of the facility. As such, it is unanticipated and highly unlikely that cultural resources will be discovered during the use of this site for the Proposed Revised Project. Therefore, impacts to cultural resources remain less than significant and are also less than significant in the Proposed RP area.

8.6 Energy

In the Proposed Revised Project, there will be no new construction on the premises [or increase in fish processing machinery]. There will be a nominal increase in energy consumption considering the added warehouse space will need basic utility connection. The energy usage needed for the Proposed Revised Project will not result in an excess amount that should require any mitigation. As such, there are no impacts to energy consumption.

8.7 Geology and Soils

The Proposed Revised Project would not result in exposure of people or structures to substantial adverse effects, substantial soil erosion or loss of topsoil, or located on a geological unit that is unstable or would become unstable. The approximately 1.26 acres of property is already fully paved, will not undergo development activities, and is not anticipated to create any additional impacts to those assessed in the Final IS/MND for the FPP Project.

8.8 Greenhouse Gas Emissions

Since there will not be any new development or processing machinery, the Proposed Revised Project would not result in any major changes to what was previously analyzed in the Final IS/MND for the FPP Project. As was explained in Section 8.3 above, operations for the Proposed RP area is a continuation of current storage use with no alteration of the facility. Therefore, there will not be a significant increase in GHG emissions generated as a result of the Proposed Revised Project and there is no increase in annual GHG emissions compared to what was previously analyzed. Therefore, there would be no change in impact determination.

8.9 Hazards and Hazardous Materials

The Proposed Revised Project does not change the impacts previously assessed in the Final IS/MND for the FPP Project because there is no new development and the area is fully paved. The Proposed RP area will not be used for any fish processing and will therefore, not increase the production of any organic waste or byproducts. Any soil disturbance or development of the site must go through the Application for Port Permit process and will require Harbor Department Environmental Management Division consultation and oversight. As such, no change in impact determinations are anticipated as a result of the Proposed Revised Project.

8.10 Hydrology and Water Quality

The Proposed Revised Project would not violate any water quality standards or waste discharge requirements because the Proposed RP area is already fully developed with structures and pavement. Although additional warehouses and a paved area are included in the Proposed Revised Project, all necessary regulations such as: Standard Urban Stormwater Mitigation Plan, appropriate Best Management Practices, Storm Water Pollution Prevention Plan, and National Pollution Discharge Elimination System would not change from what was previously assessed in the Final IS/MND. Therefore, impacts to hydrology and water quality would remain less than significant.

8.11 Land Use and Planning

The Proposed Revised Project would not cause a physical divide to an established community, as the construction and operation of this land would not cause a disruption of access between land use types. Additionally, the Proposed Revised Project would not conflict with any plan, policy, or regulation as the site is consistent with City zoning and the Port Master Plan's land use. Furthermore, this area is not located within any habitat conservation plan or natural community conservation plan. Therefore, the Proposed Revised Project would have no impact to land use and planning.

8.12 Mineral Resources

There are no known mineral resources near the Proposed Revised Project that would be impacted due to this development. Therefore, the Proposed Revised Project would continue to have no impact to mineral resources.

8.13 Noise

The Proposed Revised Project does not include any use of large equipment or new development that would require heavy machinery. The proposed RP area consists of paved land and warehouses currently used to store materials, racking, and equipment related to the processing of fish products. There will not be a significant increase in noise compared to what was previously assessed in the Final IS/MND. Therefore, the Proposed Revised Project would have a less than significant impact on noise.

8.14 Population and Housing

The Proposed Revised Project would not induce population growth, displacement of existing housing or a substantial number of people. Therefore, the Proposed Revised Project would not create an impact to population and housing.

8.15 Public Services

The Proposed Revised Project would not result in any impacts to the performance of fire protection, police protection, schools, parks, or other public facilities.

8.16 Recreation

The Proposed Revised Project would not increase demand on existing recreational facilities nor require the construction of new recreational facilities. As such, the Proposed Revised Project would have no impact on recreation.

8.17 Transportation

The Proposed Revised Project would not require any additional employees than what was previously analyzed in the Final IS/MND for the FPP Project. The Proposed RP area under the Proposed Revised Project is currently used to store materials, racking, and equipment related to the processing of fish products. There is no anticipation of the additional area to be used for parking. As such, the Proposed Revised Project would remain less than significant.

8.18 Tribal Cultural Resources

See discussion under Section 8.5, Cultural Resources. Additionally, no development is proposed and therefore the potential to encounter tribal cultural resources as a result of the Proposed Revised Project is unlikely. Therefore, there would be no impact to tribal cultural resources.

8.19 Utilities and Service Systems

The Proposed Revised Project would not have any impact on the current wastewater treatment facilities nor would it require the construction of an additional wastewater facility. No new demands on water supply are anticipated. Additionally, minimal solid waste would be generated from the development of the site.

8.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Port of Los Angeles is not located in or near a state responsibility area or lands classified as very high fire hazard severity zones (California Department of Forestry and Fire Protection, 2020; Los Angeles Fire Department, 2019). Therefore, this section of the CEQA Guidelines checklist does not apply. However, the Proposed Revised Project would not impair an adopted emergency response plan or emergency evacuation plan or exacerbate wildfire risks. Therefore, the Proposed Revised Project would have no impact on wildfire.

9. Conclusions

The Proposed Revised Project would modify the footprint of the FPP site with a new RP to occupy approximately 55,000 sf of property in order to allow continued storage of materials, racking, and equipment related to the processing of fish products. The new RP includes areas that were previously permitted through terminated entitlements RP 19-13, RP 15-01, and SA 20-13. All previous entitlements will be terminated when the new proposed permit is executed. As a result, these areas have been previously assessed for storage under the 2014 Final IS/MND and 2019 Addendum and would use such previously evaluated storage areas, with no alteration of the existing facility. Additionally, there would be no additional fish processing operations within the new RP premises, and FPP advises that additional storage area is needed to improve support for existing operations; therefore, there would be a negligible increase in storage use. None of the conditions as described under Section 15162 of the State CEQA Guidelines requiring a subsequent EIR or negative declaration have occurred under the Proposed Revised Project. No substantial changes to impact areas previously analyzed in the Final IS/MND would occur as a result of the Proposed Revised Project. Furthermore, there are no known mitigation measures or project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the adopted Final IS/MND. For these reasons, the proposed modifications would create no potential adverse impacts or substantial changes to impact areas previously analyzed in the Final IS/MND.

10. References

- California Department of Forestry and Fire Protection. 2020. California State Responsibility Areas for Fire Protection.
<https://www.arcgis.com/home/item.html?id=5bc422648cf045f38d10e1630fb71a71>
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- Los Angeles Fire Department. 2019. Fire Zone Map.
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