

LAHD Responses to Los Angeles Conservancy regarding the PMP Amendment (January 8, 2009)

1. Potential Impact of filing in the slipways [Berth 243-245] on the historic district as a whole has not been considered as part of the proposed Main Channel Deepening Project

Contrary to the comment, the shipyard was not “artificially” divided into three separate parcels. As discussed in both the Draft and Final SEIS/SEIR, the Cultural Resources analysis was based on a number of reports including *Phase I Cultural Resources Reconnaissance Survey of 7,500 Acres of Land and Water for the Port of Los Angeles* (Fugro West, 1995). The Phase I report evaluated prehistoric, historic, and underwater archaeological literature reviews and previous studies to identify cultural resources in the Port. A later Phase II study evaluated the potential significance of all historic buildings and structures on Port lands (Fugro West, 1997). Another Phase II study evaluated the historic and architectural significance of wooden wharves (Jones and Stokes, 2000).

As discussed in the SEIS/SEIR, through historical surveys, the Los Angeles Harbor Department (LAHD) evaluated the entire Southwest Marine Shipyard, encompassing the areas of Berth 240 and Berths 243-245, for historical significance. An architectural survey was performed (Jones and Stokes 2000) to determine the historical significance of the Southwest Marine site. That survey determined that the site was eligible for listing as a historical district due to ship building activities during World War II, established the historic district boundary, and listed elements on the site that were contributors to the district. A report prepared in 2008 (*Jones & Stokes 2008*) updated (*Jones & Stokes 2009*) and confirmed these findings.

The identified contributing elements of the historic district include the following (Attachment A):

- Administration building (Building 1)
- Substation No. 5 (Building 6)
- Hospital & employment office (Building 31)
- Transportation/transformer station (Building 32)
- Anglesmith shop (Building 33)
- Foremen’s building (Building 34)
- Plate shop (Building 35)
- Machine shop (Building 36)
- Outfitting building (Building 38)
- Employee building (Building 39)
- Warehouse (Building 40)
- Paint shop (Building 52),
- Structural platton (Building 54)
- Six Colby cranes constructed prior to 1945

The compressor building (Building 26), Buildings 61 and 62, along with the Clyde crane were constructed, altered, or moved during the period of significance (1941-1945) and are not contributing elements to the historic district (Jones and Stokes 2000a). The wharves at Berths 243-245 are also not contributing elements. The wharves no longer retain integrity from their period of significance and are not contributors to the Southwest Marine National Register of Historic Places (NRHP) district. A recent report (*Jones and Stokes 2009*) has looked once again at the site,

specifically at the question of the historical significance of the slips at Berth 243-245. This report confirmed that 1) the historic district boundary first delineated in 2000 and updated in 2008 is correct, 2) that the basins at Berths 243–245 have undergone extensive demolition and reconfiguration since the period of significance closed in 1945, and 3) that, as a result, the basins do not contribute to the significance of the district.

Consistent with NEPA and Section 106 of the National Historic Preservation Act (NHPA), the US Army Corps of Engineers (USACE) has requested the concurrence of the State Historic Preservation Office (SHPO) of this determination in a letter dated March 16, 2009, which is included in Appendix J of the Final SEIS/SEIR and included as Attachment B.

In regards to the assertion that the wharves at Berths 243-245 were identified as part of the historic district in the Southwest Marine DEIR, Attachment A shows the historic district as discussed in the DEIR. As shown, the wharves were not identified as contributing to the historic district. Cranes on the wharves were identified as contributing to the historic district. However, as discussed in the SEIS/SEIR, the cranes are mobile and have been moved a number of times when the shipyard was operational. There is no plan at this time to remove any cranes from the site.

2. A comparable collection of shipyard buildings and waterside features can be found at Bethlehem Steel's sister facility at Pier 70 in San Francisco.

Please see the response to comment number 1 above; a number of historic surveys have found that the wharves at Berths 243-245 do not contribute to the historic district. While we appreciate the information on the Port of San Francisco's Bethlehem Steel Facility, your comments point out that the wharves at the facility were also not found to be significant contributors to the historic district ("It is particularly noteworthy that Pier 70 historic district includes altered and filled-in slipways within its boundaries, albeit as non-contributing elements"). Retaining the wharves at the Bethlehem Steel facility is within the Port of San Francisco's discretion to do so. LAHD also retains discretion on how to use its land if uses are consistent with the Port's Master Plan and the State Tidelands Trust. The proposed Project would construct a confined disposal facility (CDF) at Berths 243-245, which is an approved use of LAHD land. This CDF would improve water and eliminated potential for bioaccumulation of existing heavy metals and organochlorides through capping of existing contaminated sediments within Berths 243-245. Creating a CDF would also avoid having to send 288,000 cubic yards of clean sediment for ocean disposal, which is consistent with the US Environmental Protection Agency (USEPA) guidance to avoid ocean disposal (Attachment C).

As discussed in the SEIS/SEIR, Berths 243-245 is located within Port Development Area 7, and is designated Industrial in the Port Master Plan and General/Bulk Cargo and Commercial/Industrial (Non-Hazardous) in the Port Master Plan. Consistent with these land use designations, the site is zoned Heavy Industrial. No specific future use has been identified for the area beyond the CDF designation. The CDF would be covered with clean dredge material placed as surcharge to an elevation of approximately +30 feet MLLW, which would remain in place until a future geotechnical investigation/monitoring determines the fill has been consolidated. In the future, if LAHD decides to remove the surcharge material, an appropriate CEQA document would be prepared to analyze potential impacts of surcharge removal.

3. The Los Angeles Conservancy would like to continue to actively participate in the review process for the above referenced project as a consulting party under Section 106 of the NHPA.

Please see response to Comment 1 and Attachment B. Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The USACE is the federal lead for the Project and has initiated Section 106 consultations. As shown in Attachment B, comments from LA Conservancy were forwarded to SHPO for consideration.