## 3 SECTION SUMMARY

- 4 This section addresses potential impacts on public services (fire and police protection and emergency
- 5 medical services) that could result from implementation of the proposed Project or an alternative.
- 6 Section 3.13, Public Services, provides the following:
  - A description of existing public services serving the Port;
    - A discussion on the methodology used to determine whether the proposed Project or an alternative would result in an impact on public services;
- An impact analysis of both the proposed Project and alternatives; and
  - A description of any mitigation measures proposed to reduce any potential impacts, as applicable.
- 12 Key Points of Section 3.13:
- 13 The proposed Project would not increase the demand for additional law enforcement officers and/or
- 14 facilities such that the U.S. Coast Guard (USCG), Los Angeles Police Department (LAPD), the
- Los Angeles Harbor Department Police (Port Police), and Los Angeles Fire Department (LAFD) would
- not be able to maintain adequate levels of service without additional facilities. Project operations would
- 17 not affect emergency response times because the site would have the same land use and similar layout and
- same distances to fire stations as the existing terminal.

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## 1 3.13.1 Introduction

This section addresses potential impacts on public services (fire and police protection and emergency medical services) that could result from the proposed Project.

## 3.13.2 Environmental Setting

The environmental setting discussed herein for the proposed Project is localized to the Port of Los Angeles. Public services for this area and the surrounding communities are provided by the Port Police, LAPD, LAFD, and the USCG. Public services in the area have been actively developing in concert with growth in the communities and the region. A discussion of the current provisions to deliver public services within the Port and surrounding areas is provided below, along with any planning efforts to accommodate anticipated increases in demand due to future growth.

#### 3.13.2.1 Public Services

#### **Fire Protection and Emergency Medical Services**

LAFD provides fire protection and emergency services for the proposed project site, which is located within the Harbor Industrial Division service district.

Currently, LAFD has two divisions with 14 battalions that serve the City of Los Angeles (City). There are 106 fire stations spread throughout the City (LAFD 2013a). Paramedic and emergency medical technician (EMT) ambulances, battalion chiefs, division chiefs, and special apparatus are assigned to the various stations. In the proposed project vicinity, LAFD facilities include fireboat companies in addition to land-based fire stations. In the Port area, Battalion 6 is responsible for Terminal Island and all of the surrounding water, all of San Pedro and its waterfronts, Wilmington, Harbor City, and Harbor Gateway. There are 10 fire stations within these geographic areas, with fire boats, hazardous material squads, paramedic and rescue vehicles, three-truck companies, an urban search and rescue team, rehab, and a foam tender apparatus (Roupoli pers. comm.; LAFD 2013b). The fire stations that serve the Port area are:

- Station 40, 330 Ferry Street on Terminal Island, with one fire engine with a captain, an engineer, and two paramedic firefighters;
- Station 49, 400 Yacht Street, Berth 194 in Wilmington East Basin, with one fire engine with a captain, an engineer, and two paramedic firefighters, in addition to two fireboats:
- Station 36, 1005 North Gaffey Street, San Pedro, with a staff of six firefighters and equipped with a single engine, paramedic rescue, and reserve foam rig;
- Station 111, 1444 S. Seaside Avenue on Terminal Island, with a staff of three and equipped with one fireboat;
- Station 110, 2945 Miner Street, San Pedro (just north of Berth 44 in the West Channel, adjacent to the former San Pedro Boatworks and the Cabrillo Way Marina), with a staff of three and equipped with one fireboat; and
- Station 112, 444 S. Harbor Boulevard, Berth 86, San Pedro (located along the Main Channel at the foot of 5<sup>th</sup> Street), with a staff of 15, including an emergency

 medical services supervisor. Station 112 has a single-engine company, a paramedic rescue ambulance, and 1 fireboat.

Figure 3.13-1 identifies fire stations near the proposed project site.

For the proposed project area, Station 40 (approximately 0.5 mile southwest of the project site) would be the primary responding fire station, and Station 49 (approximately 1.0 mile northeast of the project site on the other side of the harbor) would be the secondary responding fire station (Milick pers. comm. 2013a). In addition, there is a Long Beach fire station on Terminal Island, Station 24, at 111 Pier S. Avenue, which is just over 1.0 mile to the east of the proposed project site. This fire station could also respond to the project site, as LAFD and the Long Beach Fire Department have a mutual aid agreement (Milick pers. comm. 2013b).

LAFD assigns fire protection standards for response times for both engine and truck companies (LAFC, Division 9, Section 57.09.07A). The citywide LAFD average response time is 6 to 8 minutes. LAFD's performance standard for fire protection services by land is a 5-minute or less response time 80% of the time. In 2011, the average response time for Station 40 was 6 minutes 37 seconds, and for Station 49 was 6 minutes 35 seconds (Milick pers. comm. 2013a). According to LAFD, the current level of service in the proposed project area is considered adequate (Milick pers. comm. 2013c). At this time, new hires, expansion of existing facilities, or construction of new facilities is not planned. Any future expansion decisions would be incident driven.

Owing to a budget shortfall, LAFD has been operating under a 2011–2012 Deployment Plan that went into effect in July 2011 and adjusts operations to perform at maximum efficiency based on modeled response times, call frequency, and incident types within each fire station district. This information is used to refine resource deployment and tailor operational plans to best meet the needs of each district by maximizing public safety and maintaining typical response times of five minutes. No fire stations were closed under these reduced service operations, and each fire station continues to be staffed by a full complement of firefighters and emergency medical personnel. Additionally, resources and response factors are continually evaluated, and LAFD may realign any apparatus or personnel as required to maintain response times for the City (LAFD 2013c).

As mentioned above, the fire and EMT response time to the proposed project vicinity is within seven minutes by land, which is within the citywide average response time. In addition, according to LAFD, the current level of service in the proposed project area is considered adequate. Therefore, existing fire response times, fire protection services, and facilities are considered adequate.

#### **Police Protection**

The Port Police and LAPD provide police protection for the proposed project area, with the Port Police being responsible for patrol and surveillance within the Port property boundaries, including Port-owned properties within the communities of Wilmington, San Pedro, and Harbor City. The Port Police works cooperatively with various agencies to provide adequate protection for the Port with surge capacity for emergencies. These agencies include the LAPD, which has overlapping jurisdiction for criminal (not administrative) enforcement on all LAHD properties within the City of Los Angeles; the USCG for commercial vessel operations; the Long Beach Police Department, because of

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their geographical interconnectedness; and the Los Angeles County Sheriff, which has overlapping jurisdiction as well as abutting jurisdiction on Los Angeles County waters outside the breakwater.

In addition to Port Police and LAPD protection, each tenant occupying a berth or berths in the Port maintains its own internal security staff.

#### **Port Police**

The Port Police is responsible for patrol and surveillance within the Harbor District, including Port-owned properties within the communities of Wilmington, San Pedro, and Harbor City. The Port Police enforces federal, state, and local public safety statutes as well as environmental and maritime safety regulations. Its primary goal is to protect the Port against all criminal activity to ensure free flow and protection of commerce, and to identify and apprehend persons who would commit criminal acts within the Harbor District (LAHD 2013). The Port Police Headquarters office building is located directly west of the Harbor Administration Building at 330 South Centre Street in San Pedro, approximately 4.9 driving miles from the proposed project site (see Figure 3.13-1). It is equipped with the latest in surveillance, command and control, and interoperable communications technologies and will be directly linked with the Long Beach Harbor Patrol command center. This building opened in July 2011 and would dispatch the primary responders to the proposed Project for landside emergency calls. Waterside support would be provided by the police dock at Berth 84, on Mormon Island less than one mile north of the proposed project site. Marine Unit boats and a small office are located at Berth 84, with additional offices in the Crowley Building nearby.

There is a Wilmington substation at 300 Water Street near Berth 195, and a Port Police training facility at 300 Ferry Street (2.9 driving miles from the project site). Dive Unit facility boats and offices/lockers are located at 954 South Seaside Avenue on Terminal Island. The Dive Unit also responds to waterside incidents and emergencies.

The Port Police staff/sworn officer totals are based on current Homeland Security data and levels of security at other ports of corresponding size and activity, rather than on the number of employed officers necessary for the amount of proposed development or anticipated population for a given area. Response time goals for the Port Police are presented below in Table 3.13-1. As of August 2013, the Port Police employs a total of 121 sworn officers: 90 patrol officers, 17 sergeants, 8 lieutenants, 3 captains, 1 deputy chief, 1 assistant chief, and 1 chief. The Port Police also employs 95 non-sworn personnel: 40 security guards and 55 civilian administrative staff. The Port Police maintains six patrol areas, with the proposed Project located within Area 3, Terminal Island (landside), and Area 6, Terminal Island (waterside). The number of officers assigned to these patrols varies depending on events and national security intelligence. At all times, some officers would be assigned to both land- and waterside patrols within the proposed project area (Grant pers. comm. 2013a).

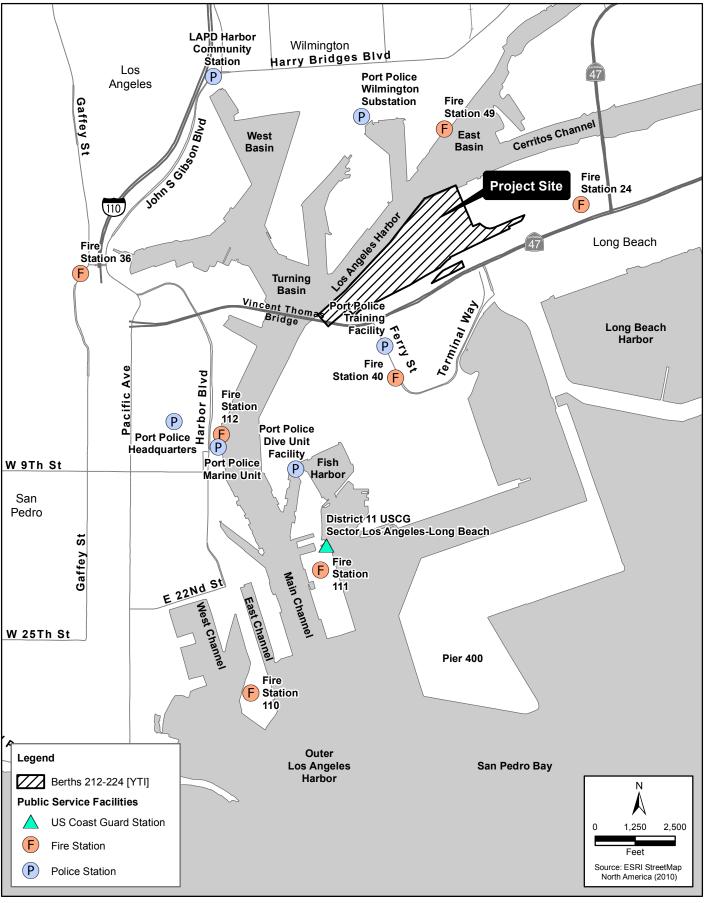




Figure 3.13-1
Public Service Facilities
Berths 212-224 [YTI] Container Terminal Improvements Project

Table 3.13-1: Port Police Standard Acceptable Response Times (minutes)

Activity	Landside Response Time	Waterside Response Time	
Emergency	2	15	
Immediate	5	20	
Alarm	5	20	
Non-Emergency	20	30	
Report Calls	20	30	
Source: Grant pers. comm. 2013a.			

The average response time by Port Police to the project site falls within the acceptable response times as provided above in Table 3.13-1 for the different types of activities (Grant pers. comm. 2013a).

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## Los Angeles Police Department

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The proposed project site is located in the LAPD Harbor Division Area, which encompasses 27 square miles. The LAPD Harbor Community station at 2175 John S. Gibson Boulevard would serve the project site, if needed (see Figure 3.13-1). This station is located at the entrance to the Port of Los Angeles, and serves a population of approximately 171,000 persons, which is the largest area in South Bureau. The area comprises four distinct communities: San Pedro, Wilmington, Harbor City, and the Harbor Gateway (LAPD 2013).

At the Harbor Community station's opening in May 2009, staff included 260 patrol officers, detectives, and support personnel (Felch 2009)<sup>1</sup>. During periods of statistically high crime activity, the number of field officers has increased.

Officers employ radio-dispatched cruisers and traffic control motorcycles to patrol the proposed project vicinity. LAPD provides support to the Port Police and responds to incidents within the Port, including under the following circumstances: (1) complex crimes including homicides and major traffic incidents; (2) special investigations including narcotics, organized crime, and terrorism; and (3) unusual occurrences as identified by the City protocol, such as events that require special resources, expertise, or staffing beyond current competencies. LAPD also provides air support to the Port Police under a Memorandum of Understanding (Grant pers. comm. 2013b). LAPD's performance standard for police services is a 7-minute response time for priority calls (such as crimes in progress and violent crimes). Actual response time in the Harbor Division Area for 2012 averaged 6.2 minutes, with the most recent average for the month of July in 2013 being 6 minutes, which is considered adequate and is lower than the preferred time of 7 minutes (Parnell pers. comm.; Hearn pers. comm.).

#### U.S. Coast Guard

USCG is a federal agency responsible for a broad scope of regulatory, law enforcement, humanitarian, and emergency-response duties. The USCG mission includes maritime safety, maritime law enforcement, natural resources protection, maritime mobility,

<sup>&</sup>lt;sup>1</sup> Updated staffing information for the LAPD Harbor Community station is not available for release.

national defense, and homeland security. USCG maintains a post in the Port on Terminal Island.

The primary responsibility of USCG is to ensure the safety of vessel traffic in the channels of the Port and in coastal waters. USCG District 11 supports the Port and the proposed project area and handles marine safety issues such as inspection of U.S. and foreign vessels; maritime security; vessel traffic management; search and rescue; response to and planning for pollution incidents; response to vessel or Port emergencies and natural disasters; inspections of waterfront facilities and hazardous material containers; monitoring of oil transfers and explosive loads; licensing of mariners; investigation of marine casualties; and enforcement of fisheries, drug, and other maritime laws (USCG 2013a).

The District 11 USCG unit, officially known as Sector Los Angeles-Long Beach (LA-LB), is on Terminal Island at 1001 South Seaside Avenue, southwest of the proposed project site. The Area of Responsibility of Sector LA-LB extends over 320 miles of shoreline, from the northern boundary at Cambria inland to the Nevada state line to the southern boundary at San Clemente inland to Arizona, and covers over 64,000 square miles of ocean. The LA-LB port complex is one of the key areas in Sector LA-LB's Area of Responsibility. The Sector's primary missions are search and rescue, maritime law enforcement, and homeland security (USCG 2013b). It employs approximately 210 active duty and civilian personnel, and there are approximately 170 people assigned to the Sector's 10 subunits. Sector LA-LB's sub-units consist of 4 Coastal Patrol Boats, 3 Small Boat Stations, an Aids to Navigation Team, a Marine Safety Detachment, and the Vessel Traffic Service (VTS) (DiManno pers. comm. 2013a). The USCG operates the VTS in cooperation with the Marine Exchange. This voluntary service is intended to enhance vessel safety in the main approaches to the Port. Section 3.11, Marine Transportation, provides additional information.

USCG evaluates the location of an operation to ensure that it can adequately respond in a timely fashion. According to USCG policy, response time must be within 20 minutes. Following a call, the amount of time it would take a USCG asset to arrive on scene would vary depending on availability and location of the responding unit. Considering that a Coast Guard Sector is on Terminal Island near the construction site, response time to a call from the proposed project area would be well within USCG policy goals (DiManno pers. comm. 2013b).

## 3.13.3 Applicable Regulations

LAHD is directed by internal standards and policies that guide the provision of service to its customers. Each agency charged with protecting the public (LAFD, Port Police, LAPD, and USCG) maintains specific standards, such as response times and levels of service, that must be adhered to during construction and operation of a project.

The following subsections discuss the various codes, regulations, and policies applicable to fire, police, and emergency services at the state, regional, and local levels.

#### 3.13.3.1 California State Fire Code

By State law, the State Fire Marshal (SFM) is responsible for coordination of the State's fire and life safety codes. The SFM must review the proposed regulations of State

agencies that promote fire and life safety before the regulations can be submitted for approval. The SFM Code Development and Analysis Program staff regularly reviews Title 19 of the California Code of Regulations, titled *Public Safety* (which discusses fire safety standards), for relevancy, necessity, conflict, duplication, and overlap. They also implement legislative mandates to develop regulations relating to fire and life safety involving the various occupancy classifications under the authority of the California SFM. This encompasses the actual administrative processing of regulations from concept to promulgation in the California Code of Regulations.

## 3.13.3.2 City of Los Angeles Municipal Code

The City of Los Angeles Municipal Code, last amended in April 2013, contains 19 chapters, including a chapter on fire and police protection, titled *Public Safety and Protection* (Chapter 5) (City of Los Angeles 2013). Article 2, titled *Police and Special Officers*, contains regulations governing administrative issues, such as requirements for police badges and uniforms, and Article 7, titled *Fire Protection and Prevention*, contains the Fire Code for the City. The Los Angeles Fire Code prescribes laws that may be enforced by the LAFD to help safeguard life and property from fire, explosion, panic, or other hazardous conditions that may arise in the City. The Fire Code includes information pertaining to administrative issues, such as the requirements for filling out and submitting Hazardous Materials Release Response Plans and Inventory Statements, and technical requirements associated with the storage, management, and disposal of hazardous materials, such as underground chemical storage tanks, asbestos-containing materials/asbestos-containing building material, and various other combustible and flammable materials.

## 3.13.3.3 Port of Los Angeles Tariff No. 4

The Port of Los Angeles Tariff No. 4 describes the rates, charges, rules, and regulations for the Port. It presents general rules and regulations regarding hazardous substances, including dangerous cargo and explosives on vessels, explosives on wharves, acids, flammables, dangerous cargo, radioactive and/or fissile materials, and handling of gasoline and other flammable products. Tariff No. 4 also includes information about pilotage, dockage, wharfage, passengers, free time, wharf demurrage, wharf storage, space assignments, container cranes, and other operational rules and regulations.

## 3.13.3.4 Maritime Transportation Security Act

The MTSA and its international equivalent, the ISPS Code (adopted by the IMO), require Port authorities and facility operators to designate and train company, vessel, and facility security officers and develop security plans for facilities and vessels based on security assessments and surveys. MTSA regulations also guide implementation of security measures specific to the operations of each facility and compliance with maritime security levels. Regulations regarding the submittal of security plans became effective December 31, 2003, and operational compliance was mandated by July 1, 2004.

# 3.13.3.5 City of Los Angeles General Plan: Safety Element and Fire Protection and Prevention Plan

The Safety Element of the City of Los Angeles General Plan sets forth specific policies and objectives related to safety. These policies and objectives emphasize hazard mitigation, emergency response, and disaster recovery (City of Los Angeles 1996). Fire

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prevention, fire protection, and emergency medical services within the City operate under the Fire Protection and Prevention Plan, which is an Element of the City of Los Angeles General Plan (City of Los Angeles 2010). The Fire Protection and Prevention Plan serves as a guide for the construction, maintenance, and operation of fire protection facilities in the City. It sets forth policies and standards for fire station distribution and location, fire suppression water flow (or "fire flow"), fire hydrant standards and locations, firefighting equipment access, emergency ambulance services, and fire prevention activities. Population density, nature of on-site land uses, and traffic flow are also considered by LAFD in evaluating the adequacy of fire protection services for a specific area or land use.

## 3.13.4 Impacts and Mitigation Measures

## 3.13.4.1 Methodology

The proposed Project and alternatives were evaluated to determine if fire and police protection and USCG facilities are adequately staffed and located so they could respond to an emergency situation in a timely manner without the provision of additional physical facilities. Agencies were contacted to obtain information regarding their existing and projected service capacity, as well as the projected impacts that could result from implementation of the proposed Project or an alternative.

#### **CEQA Baseline**

Section 15125 of the CEQA Guidelines requires EIRs to include a description of the physical environmental conditions in the vicinity of a project that exist at the time of the NOP. These environmental conditions normally would constitute the baseline physical conditions by which the CEQA lead agency determines if an impact is significant. The NOP for the proposed Project was published in April 2013. For purposes of this Draft EIS/EIR, the CEQA baseline takes into account the throughput for the 12-month calendar year preceding NOP publication (January through December 2012) in order to provide a representative characterization of activity levels throughout the complete calendar year preceding release of the NOP. In 2012, the YTI Terminal encompassed approximately 185 acres under its long-term lease, supported 14 cranes (10 operating), and handled approximately 996,109 TEUs and 162 vessel calls. The CEQA baseline conditions are also described in Section 2.7.1 and summarized in Table 2-1.

The CEQA baseline represents the setting at a fixed point in time. The CEQA baseline differs from the No Project Alternative (Alternative 1) in that the No Project Alternative addresses what is likely to happen at the proposed project site over time, starting from the existing conditions. Therefore, the No Project Alternative allows for growth at the proposed project site that could be expected to occur without additional approvals, whereas the CEQA baseline does not.

#### **NEPA Baseline**

For purposes of this Draft EIS/EIR, the evaluation of significance under NEPA is defined by comparing the proposed Project or other alternative to the NEPA baseline. The NEPA baseline conditions are described in Section 2.7.2 and summarized in Table 2-1. The NEPA baseline condition for determining significance of impacts includes the full range

of construction and operational activities the applicant could implement and is likely to implement absent a federal action, in this case the issuance of a USACE permit.

Unlike the CEQA baseline, which is defined by conditions at a point in time, the NEPA baseline is not bound by statute to a "flat" or "no-growth" scenario. Instead, the NEPA baseline is dynamic and includes increases in operations for each study year (2015, 2016, 2017, 2020, and 2026), which are projected to occur absent a federal permit. Federal permit decisions focus on direct impacts of the proposed Project to the aquatic environment, as well as indirect and cumulative impacts in the uplands determined to be within the scope of federal control and responsibility. Significance of the proposed Project or the alternatives under NEPA is defined by comparing the proposed Project or the alternatives to the NEPA baseline.

The NEPA baseline, for purposes of this Draft EIS/EIR, is the same as the No Federal Action Alternative. Under the No Federal Action Alternative (Alternative 2), no dredging, dredged material disposal, in-water pile installation, or crane installation/extension would occur. Expansion of the TICTF and extension of the crane rail would also not occur. The No Federal Action Alternative includes only backlands improvements consisting of slurry sealing, deep cold planning, asphalt concrete overlay, restriping, and removal, relocation, or modification of any underground conduits and pipes necessary to complete repairs. These activities do not change the physical or operational capacity of the existing terminal.

The NEPA baseline assumes that by 2026 the terminal would handle up to approximately 1,692,000 TEUs annually, accommodate 206 annual ships calls at two berths, and be occupied by 14 cranes (10 operating).

## 3.13.4.2 Thresholds of Significance

The following significance criteria are based on the *L.A. CEQA Thresholds Guide* (City of Los Angeles 2006) and other criteria applicable to Port projects. According to the *L.A. CEQA Thresholds Guide*, a project would normally be considered to have a significant impact on fire protection and law enforcement services based on several underlying factors that can affect the need for additional infrastructure to maintain these public services. Although the *L.A. CEQA Thresholds Guide* does not address thresholds of significance in regards to the Port Police and USCG, these law enforcement agencies would serve the proposed Project and would potentially be affected by construction or operation of the proposed Project or other alternative. Accordingly, LAHD has included USCG and Port Police in this discussion. Therefore, the proposed Project or an alternative would have a significant impact on *public services* if it would:

- **PS-1:** Burden existing USCG, LAPD, or Port Police staff levels and facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects
- **PS-2:** Require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service

## 3.13.4.3 Impact Determination

### **Proposed Project**

Construction of the proposed Project would include improvements to Berths 214–216 and 217–220 that would involve dredging to increase the depth of the berths and installing sheet and/or king piles. All of the dredged material, approximately 27,000 cubic yards (cy), would be disposed of at an approved site, which may include LA-2, the Berths 243–245 confined disposal facility (CDF), or another approved location. Additional improvements at the terminal would include extending the 100-foot gauge crane rail, expanding the Terminal Island Container Transfer Facility (TICTF) on-dock rail by adding a single operational rail track, relocation of two Port-owned cranes, relocation and realignment of existing cranes, delivery and installation of up to 4 new cranes, raising and extending up to six YTI cranes, and backland surface improvements.

The proposed Project would be constructed in two phases; Phase I is expected to take approximately 12 months beginning in mid-2015, and Phase II is expected to take approximately 10 months beginning in mid-2016. During Phase I of construction, Berths 212–213 and Berths 214–216 would remain in operation. During Phase II of construction, Berths 212–213 and the newly improved Berths 217–220 would be in operation.

Impact PS-1: The proposed Project would not increase the demand for additional law enforcement officers and/or facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.

The Port Police provides primary law enforcement services to the Port area and LAPD provides support to the Port Police under special circumstances. During construction and other improvement activities, demand on police services would be expected to remain similar to that under existing conditions. During the construction period, construction sites would be fenced and access would be limited to authorized personnel. The current routine patrols of the area would continue, and any unauthorized personnel or people found loitering would be asked to leave. As such, Port Police and LAPD response times would not be affected by construction of the proposed Project.

Due to the continued operation of two berths during each construction phase, USCG's ability to respond to the project site would not be affected because USCG would have the ability to dock at the proposed project site during construction, if necessary. Because construction of the proposed Project would not change the baseline demands of how many law enforcement personnel are needed within the Port area, and the proposed project site is within the current USCG coverage area, USCG would not need to increase personnel or equipment during construction of the proposed Project (DiManno pers. comm. 2013b). Therefore, project construction would not affect demand for law enforcement such that new personnel, equipment, or facilities would be required.

The proposed terminal operations would result in increased vessel traffic in the proposed project area by up to 44 annual ship calls beginning in 2015 and when functioning at maximum capacity in 2026; however, there would not be substantial related increases in demands for law enforcement because the proposed project site already includes existing

basic security equipment. Security infrastructure for the terminal includes: surveillance and access control systems that enhance perimeter security; water and shoreside surveillance; physical security (e.g., fencing, gates, lighting, signage); access control (a system/procedure for controlling who has physical access to the facility); surveillance systems (e.g., cameras); and communication systems (e.g., two-way radios, phones, Internet access). Improvements to the existing security infrastructure would occur as needed. In addition to City and Port Police protection, additional security service would be provided at the project site by the terminal's internal security staff.

Because the Port Police provides primary law enforcement services to the Port area, and the LAPD provides support to the Port Police under special circumstances, proposed project development would not affect LAPD response times. In addition to working with the LAPD, the Port Police also coordinates with the Long Beach Police Department and the Los Angeles County Sheriff for landside assistance and with USCG for commercial vessel operations (Grant pers. comm. 2013a).

Given the Port Police's existing patrol of land and water, and the assignment at all times of some officers to the proposed project area (both land- and waterside), the proposed project area would be adequately served. Moreover, as discussed in the paragraph above, the Port Police currently works cooperatively with various agencies to provide adequate protection when additional support is needed to respond to an emergency situation. The proposed Project would not burden the Port Police such that it would not be able to maintain its current level of service to the Port area. However, the Port Police continues to assess the needs of the Port, including the proposed project area, and would make adjustment to its operations as appropriate.

USCG determines response times based on the distance that is required to travel to the various Port facilities. Proposed development would not affect USCG response times because the proposed Project would be within the same operating distance as current conditions and within the jurisdiction of Sector LA-LB, which is on Terminal Island near the project site (see Figure 3.13-1). Also, due to adequate staffing and availability of resources, the increase in vessel calls under the proposed Project would not reduce USCG resources nor increase its response time.

Thus, proposed project operations would not increase the demand for law enforcement services.

#### **CEQA Impact Determination**

As previously described in Section 3.13.2.1, existing response times provided by USCG, LAPD, and Port Police are considered adequate. Construction of the proposed Project would not increase the demand for additional law enforcement services. The proposed Project would be within the same operating distance as the existing container terminal and on-site facilities served by USCG and, therefore, would not increase emergency response times. Proposed project operations would result in an increase of up to 44 ship calls per year beginning in 2015 and when functioning at maximum capacity in 2026, compared to the existing 162 ship calls under the CEQA baseline. Due to adequate staffing levels and availability of resources, the increase of approximately 4 ship calls per month would not reduce available USCG resources or increase response times, and USCG would continue to have access to the proposed project site. Port Police and LAPD would maintain adequate levels of service and would not need to construct additional

facilities, and the proposed Project would not impact their response times. Consequently, impacts on law enforcement services would be less than significant under CEQA.

Mitigation Measures

No mitigation is required.

#### Residual Impacts

Impacts would be less than significant.

#### **NEPA Impact Determination**

As previously described in Section 3.13.2.1, existing response times provided by USCG, LAPD, and Port Police are considered adequate. The demand for law enforcement services would not increase during construction activities, and adequate response times would be maintained by USCG, LAPD, and Port Police. The proposed Project would be within the same operating distance as the existing container terminal and on-site facilities served by USCG and, therefore, would not increase emergency response times.

Proposed project operations would result in a maximum of 206 ship calls per year between 2015 and 2026, which is the same as the NEPA baseline. However, ships calling will be larger in 2026, resulting in an additional 221,000 TEUs by 2026 over the NEPA baseline. Because there would be no additional ship calls when compared to the NEPA baseline and the larger ship sizes do not present any operational constraints, availability of law enforcement resources would not be affected and no increases in response times would be expected. Port Police and LAPD would maintain adequate levels of service and would not need to construct additional facilities, while USCG would have access to the proposed project site and the proposed Project would not impact its response times. Consequently, impacts on law enforcement services would be less than significant under NEPA.

#### Mitigation Measures

No mitigation is required.

#### Residual Impacts

Impacts would be less than significant.

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 proposed Project would result in a temporary increase in construction workers in the area; however, construction activities would comply with all applicable State and local codes and ordinances to ensure adequate fire protection. Proposed project construction activities would be subject to emergency response systems implemented by the Port Police and LAFD and through implementation of the Work Area Traffic Control Handbook (WATCH Manual). Traffic controls such as maintaining emergency vehicular access, hand signaling controls, lighting devices, and sign placement would be implemented to ensure minimum response times during utility construction. LAFD would be notified in advance of construction activities and, as a standard practice, would review the terminal plans to ensure adequate fire prevention measures are incorporated

into the proposed Project, including emergency access provisions. Consequently, construction of the proposed Project would not result in any changes to existing fire protection facilities, and LAFD would be able to accommodate proposed project construction-related fire protection demands.

The level of service provided by LAFD on Terminal Island and the Port is considered adequate (Milick pers. comm. 2013c). LAFD emergency response times during project operations could be affected by changes to land use and accessibility to the site (USACE and POLA 2007). Land use designations would remain the same under the proposed Project. Fire Station 40 (land-based) is approximately 0.5 mile southwest of the project site on Ferry Street, and Station 49, equipped with 2 fireboats, is approximately 1.0 mile northeast of the project site. Additionally, a Long Beach Fire Station, Station 24, is just over 1.0 mile to the east of the proposed project site. All of these facilities could respond to dispatches from the project site quickly. The proposed Project is approximately 3.1 driving miles from the closest fire station (Fire Station 40), indicating an average driving time of 9 minutes; this is 1 minute over the LAFD citywide average of 6 to 8 minutes. However, considering that the current level of LAFD service on Terminal Island and the Port is sufficient, impacts on LAFD response time from the proposed Project are not expected.

For the reasons described above, operation of the proposed Project would not result in an increase in average emergency response times, and LAFD would be able to accommodate proposed Project-related fire protection demands.

#### **CEQA Impact Determination**

Construction of 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. Implementation of a traffic control plan and compliance with the WATCH Manual during construction activities would ensure that construction of the proposed Project would not substantially reduce public services in a manner that would result in changes to existing fire protection facilities, and impacts from construction would be less than significant.

Project operations would not affect emergency response times because the site would have the same land use, a similar layout, and the same distances to fire stations as the existing facilities. Because 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, impacts would be less than significant under CEQA.

#### Mitigation Measures

No mitigation is required.

#### Residual Impacts

Impacts would be less than significant.

#### **NEPA Impact Determination**

Construction of 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,

1 consolidation, or relocation of an existing facility to maintain service. Implementation of 2 a traffic control plan and compliance with the WATCH Manual during construction 3 activities would ensure that construction of the proposed Project would not substantially 4 reduce public services in a manner that would result in changes to existing fire protection 5 facilities, and impacts from construction would be less than significant. 6 Project operations would not affect emergency response times because the site would 7 have the same land use and a similar layout as the existing terminal. Because the 8 proposed Project would not increase the demand for fire services to a degree that would 9 require the addition of a new fire station or the expansion, consolidation, or relocation of 10 an existing facility to maintain service, less than significant impacts would occur under 11 NEPA. 12 Mitigation Measures 13 No mitigation is required. Residual Impacts 14 15 Impacts would be less than significant. Alternative 1 – No Project 16 17 Under Alternative 1, none of the proposed construction activities would occur in water or 18 in waterside or backland areas. The Port would not implement any terminal 19 improvements. No new cranes would be added and no dredging would occur. The No 20 Project Alternative would not include the 100-foot gauge crane rail extension, expansion 21 of the TICTF on-dock rail yard, or backland repairs. 22 Under the No Project Alternative, the existing YTI Terminal would continue to operate as an approximately 185-acre container terminal. Based on the Port's throughput 23 24 projections, the YTI Terminal is expected to operate at its existing capacity of 25 approximately 1,692,000 TEUs with 206 ship calls by 2026. 26 The No Project Alternative would not preclude future improvements to the proposed 27 project site. However, any future changes in use or new improvements with the potential 28 to significantly impact the environment would need to be analyzed in a separate 29 environmental document. 30 Impact PS-1: Alternative 1 would not increase the demand for additional law enforcement officers and/or facilities such that USCG. 31 LAPD, or Port Police would be unable to maintain adequate levels of 32 service without additional facilities, the construction of which could 33 cause significant environmental effects. 34 **CEQA Impact Determination** 35 36 Alternative 1 would not add improvements to the existing YTI Terminal, which would

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continue to operate as a container terminal through 2026. Operations under Alternative 1 would result in an increase of up to 44 ship calls per year (approximately 4 ship calls per

month) beginning in 2015 and when functioning at maximum capacity in 2026, compared

availability of adequate staffing and sufficient resources, this would not decrease USCG

to the existing 162 ship calls under the CEQA baseline period. However, due to the

1 2 3 4 5	resources or increase its response times. Further, the Port Police and LAPD would maintain adequate levels of service and would not need to construct additional facilities, while USCG would have access to the proposed project site. Therefore, no additional demand on law enforcement personnel or facilities would be created and no impacts would occur under CEQA.
6	Mitigation Measures
7	No mitigation is required.
8	Residual Impacts
9	No impacts would occur.
10	NEPA Impact Determination
11 12 13	The impacts of the No Project Alternative are not required to be analyzed under NEPA. NEPA requires the analysis of a No Federal Action Alternative (Alternative 2 in this document).
14	Mitigation Measures
15	Mitigation measures are not applicable.
16	Residual Impacts
17	An impact determination is not applicable.
18 19 20	Impact PS-2: Alternative 1 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.
21	CEQA Impact Determination
22 23 24 25 26 27	Alternative 1 would not add improvements to the existing YTI Terminal, which would continue to operate as a container terminal through 2026. Continuing operations at the existing terminal under Alternative 1 would not affect emergency response times, as there would be no change to the terminal's distance from fire stations. Therefore, no additional demand on fire service personnel or facilities would be created and no impacts would occur under CEQA.
28	Mitigation Measures
29	No mitigation is required.
30	Residual Impacts
31	No impacts would occur.
32	NEPA Impact Determination
33 34 35	The impacts of the No Project Alternative are not required to be analyzed under NEPA. NEPA requires the analysis of a No Federal Action Alternative (Alternative 2 in this document).

1	Mitigation Measures
2	Mitigation measures are not applicable.
3	Residual Impacts
4	An impact determination is not applicable.
5	Alternative 2 – No Federal Action
6 7 8 9 10 11 12 13	Alternative 2 is a NEPA-required no-action alternative for purposes of this Draft EIS/EIR. This alternative includes the activities that would occur absent a USACE permit and could include improvements that require a local permit. Absent a USACE permit, no dredging, dredged material disposal, in-water pile installation, or crane installation/extension would occur. Expansion of the TICTF and extension of the crane rail also would not occur. The No Federal Action alternative includes only backlands improvements consisting of slurry sealing; deep cold planing; asphalt concrete overlay; restriping; and removal, relocation, or modification of any underground conduits and pipes necessary to complete repairs. These activities would not change the capacity of the existing terminal.
16 17 18 19 20	The site would continue to operate as an approximately 185-acre container terminal where cargo containers are loaded to/from vessels, temporarily stored on backlands, and transferred to/from trucks or on-dock rail. Based on the throughput projections, the YTI Terminal is expected to operate at its existing maximum throughput capacity of approximately 1,692,000 TEUs with 206 ship calls by 2026.
21 22 23 24 25	Impact PS-1: Alternative 2 would not increase the demand for additional law enforcement officers and/or facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.
26	CEQA Impact Determination
27 28 29 30 31	Alternative 2 would include only minor backlands improvements to the existing 185-acre YTI Terminal, which would continue to operate as a container terminal until 2026. This alternative would not include additional improvements to the terminal or change the capacity of the terminal. Therefore, no additional demand on law enforcement personnel or facilities would be created and no impacts would occur under CEQA.
32	Mitigation Measures
33	No mitigation is required.
34	Residual Impacts
35	No impacts would occur.
36	NEPA Impact Determination
37 38 39	Alternative 2 would include only backlands improvements consisting of slurry sealing; deep cold planing; asphalt concrete overlay; restriping; and removal, relocation, or modification of any underground conduits and pipes necessary to complete repairs. No

1 construction of in-water or over-water features would occur under Alternative 2. The No 2 Federal Action Alternative would involve the same construction activities as would occur 3 under the NEPA baseline. Therefore, there would be no incremental difference between 4 Alternative 2 and the NEPA baseline. As a consequence, Alternative 2 would result in no 5 impact under NEPA. 6 Mitigation Measures 7 No mitigation is required. 8 Residual Impacts 9 No impacts would occur. Impact PS-2: Alternative 2 would not require the addition of a new 10 fire station or the expansion, consolidation, or relocation of an 11 existing facility to maintain service. 12 **CEQA Impact Determination** 13 Alternative 2 would include only minor backlands improvements to the existing YTI 14 15 Terminal, which would continue to operate as a container terminal until 2026. This 16 alternative would not include additional improvements or change the capacity of the terminal. Therefore, no additional demand on fire service personnel or facilities would 17 18 be created and no impacts would occur under CEQA. 19 Mitigation Measures 20 No mitigation is required. 21 Residual Impacts 22 No impacts would occur. 23 **NEPA Impact Determination** 24 Alternative 2 would include only backlands improvements consisting of slurry sealing; 25 deep cold planing; asphalt concrete overlay; restriping; and removal, relocation, or 26 modification of any underground conduits and pipes necessary to complete repairs. No 27 construction of in-water or over-water features would occur under Alternative 2. The No 28 Federal Action Alternative would involve the same construction activities as would occur 29 under the NEPA baseline. Therefore, there would be no incremental difference between 30 Alternative 2 and the NEPA baseline. As a consequence, Alternative 2 would result in no impact under NEPA. 31 Mitigation Measures 32 33 No mitigation is required. 34 Residual Impacts 35 No impacts would occur.

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## Alternative 3 – Reduced Project: Improve Berths 217–220 Only

This alternative includes all components of the proposed Project except dredging and pile driving at Berths 214–216. The following components of the proposed Project are unchanged under the Reduced Project Alternative:

- modifying up to six existing cranes;
- replacing up to four existing non-operating cranes;
- dredging 6,000 cy from a depth of -45 to -47 feet MLLW (with an additional 2 feet of overdredge depth, for a total depth of -49 feet MLLW), and installing 1,200 linear feet of sheet piles and king piles to support and stabilize the existing wharf structure at Berths 217–220:
- disposing of dredged material at LA-2, the Berths 243–245 CDF, or another approved upland location;
- extending the existing 100-foot gauge landside crane rail through Berths 217–220;
- performing ground repairs and maintenance activities in the backlands area; and
- expanding the TICTF on-dock rail by adding a single rail loading track.

Under this alternative, there would be three operating berths after construction, similar to the proposed Project, but Berths 214–216 would remain at their existing depth. This alternative would require less dredging (by approximately 21,000 cy) and pile driving and a shorter construction period than the proposed Project. Based on the throughput projections, this alternative is expected to operate at its capacity of approximately 1,913,000 TEUs by 2026, similar to the proposed Project. However, while the terminal could handle similar levels of cargo, the reduced project alternative would not achieve the same level of efficient operations as achieved by the proposed Project. This alternative would not accommodate the largest vessels (13,000 TEUs). The depth achieved at Berths 217–220 would only be capable of handling vessels up to 11,000 TEUs, requiring additional vessels to call on the terminal to meet future growth projections up to the capacity of the terminal. Therefore, under this alternative, 232 vessels would call on the terminal in 2020 and 2026, compared to 206 vessels for the proposed Project. Additionally, because of the higher number of annual vessel calls, this alternative would result in a maximum of five peak day ship calls (over a 24-hour period) compared to four for the proposed Project.

Impact PS-1: Alternative 3 would not increase the demand for additional law enforcement officers and/or facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.

Under Alternative 3, 232 vessels would call on the terminal in 2020 and 2026, compared to 206 vessels for the proposed Project. However, due to adequate staffing levels and availability of resources, this increase would not reduce available USCG resources or increase response times. Also, as previously described in Section 3.13.2.1, existing response times provided by USCG, LAPD, and Port Police are considered adequate. Thus, the Port Police and LAPD would continue to maintain adequate levels of service

and would not need to construct additional facilities, while USCG would continue to have access to the proposed project site and Alternative 3 would not impact its response times.

#### **CEQA Impact Determination**

As previously described in Section 3.13.2.1, existing response times provided by USCG, LAPD, and Port Police are considered adequate. Construction proposed under Alternative 3 would not increase the demand for additional law enforcement services. The operating distance served by USCG would remain the same under Alternative 3 as under the CEQA baseline and, therefore, would not increase emergency response times. Due to adequate staffing levels and availability of resources, the increase in vessel calls to 5 per month under Alternative 3 would not reduce available USCG resources or increase response times. Port Police and LAPD would maintain adequate levels of service and would not need to construct additional facilities, while USCG would have access to the proposed project site and Alternative 3 would not impact its response times. Consequently, impacts on law enforcement services would be less than significant under CEQA.

#### Mitigation Measures

No mitigation is required.

#### Residual Impacts

Impacts would be less than significant.

#### **NEPA Impact Determination**

The demand for law enforcement services would not increase during construction activities, and adequate response times would be maintained by USCG, LAPD, and Port Police. Alternative 3 would be within the same operating distance as the existing container terminal and on-site facilities served by USCG and, therefore, would not increase emergency response times.

Alternative 3 would result in 26 additional ship calls to the proposed project site compared to the NEPA baseline, though vessels would be larger in size as compared to the NEPA baseline. However, due to adequate staffing and availability of resources, this increase would not result in a related increase in response times, and the availability of law enforcement resources would not be affected. Port Police and LAPD would maintain adequate levels of service and would not need to construct additional facilities, while USCG would have access to the proposed project site and its response times would not be impacted under Alternative 3. Consequently, impacts on law enforcement services would be less than significant under NEPA.

#### Mitigation Measures

No mitigation is required.

#### Residual Impacts

Impacts would be less than significant.

Impact PS-2: Alternative 3 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

Under Alternative 3, 232 vessels would call on the terminal in 2020 and 2026. Construction activities would comply with all applicable State and local codes and ordinances to ensure adequate fire protection. Therefore, construction under Alternative 3 would not result in any changes to existing fire protection facilities, and LAFD would be able to accommodate proposed project construction-related fire protection demands.

The level of service provided by LAFD on Terminal Island and the Port is considered adequate (Milick pers. comm. 2013c), LAFD emergency response times would not be impacted as land use designations would remain the same under Alternative 3, and Station 40, Station 49, and Station 24 could respond to the proposed project site quickly. Alternative 3 would be approximately 3.1 driving miles from the closest fire station (Fire Station 40), indicating an average driving time of 9 minutes; this is 1 minute over the LAFD citywide average of 6 to 8 minutes. However, considering that the current level of LAFD service on Terminal Island and the Port is sufficient, impacts on LAFD response time from Alternative 3 are not expected.

Thus, Alternative 3 would not result in an increase in average emergency response times, and LAFD would be able to accommodate proposed Alternative 3-related fire protection demands.

#### **CEQA Impact Determination**

Construction under Alternative 3 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. Implementation of a traffic control plan and compliance with the WATCH Manual during construction activities would ensure that construction of Alternative 3 would not substantially reduce public services such that it would result in changes to existing fire protection facilities, and impacts from construction would be less than significant. LAFD would be notified in advance of construction activities and, as a standard practice, would review the terminal plans to ensure adequate fire prevention measures are incorporated into Alternative 3, including emergency access provisions.

Project operations and increase in ship calls under Alternative 3 (70 more ship calls over the CEQA baseline) would not affect emergency response times because the site would have the same land use, a similar layout, and the same distances to fire stations as the existing facilities. Because Alternative 3 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, impacts would be less than significant under CEQA.

#### Mitigation Measures

No mitigation is required.

1		Residual Impacts
2		Impacts would be less than significant.
3		NEPA Impact Determination
4 5 6 7		Construction under Alternative 3 would comply with all applicable State and local codes and ordinances to ensure adequate fire protection, and thus 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.
8 9 10 11 12		Project operations would not affect emergency response times because the site would have the same land use and a similar layout as the existing terminal. Because Alternative 3 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, less than significant impacts would occur under NEPA.
13		Mitigation Measures
14		No mitigation is required.
15		Residual Impacts
16		Impacts would be less than significant.
17	3.13.4.4	Summary of Impact Determinations
18 19 20 21 22 23		Table 3.13-2 summarizes the CEQA and NEPA impact determinations of the proposed Project and alternatives related to Public Services as described in the detailed discussion above. This table is meant to allow easy comparison between the potential impacts of the proposed Project and alternatives with respect to this resource. Identified potential impacts may be based on federal, state, or City significance criteria; LAHD criteria; and the scientific judgment of the report preparers.
24 25 26 27		For each impact threshold, the table describes the impact, notes the CEQA and NEPA impact determinations, describes any applicable mitigation measures, and notes the residual impacts (i.e., the impact remaining after mitigation). All impacts, whether significant or not, are included in this table.

Los Angeles Harbor Department Section 3.13 Public Services

Table 3.13-2: Summary Matrix of Potential Impacts and Mitigation Measures for Public Services Associated with the Proposed Project and Alternatives

Alternative	<b>Environmental Impacts</b>	<b>Impact Determination</b>	Mitigation Measures	Impacts after Mitigation
Proposed Project	<b>PS-1:</b> The proposed Project would not increase the demand for additional law enforcement officers and/or facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.	CEQA: Less than significant NEPA: Less than significant	No mitigation is required.	CEQA: Less than significant NEPA: Less than significant
	<b>PS-2:</b> 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.	CEQA: Less than significant NEPA: Less than significant	No mitigation is required.	CEQA: Less than significant NEPA: Less than significant
Alternative 1 – No Project	<b>PS-1:</b> Alternative 1 would not increase the demand for additional law enforcement officers and/or	CEQA: No impact	No mitigation is required.	CEQA: No impact
	facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.	NEPA: Not applicable	Mitigation not applicable	NEPA: Not applicable
	<b>PS-2:</b> Alternative 1 would not require the addition of a new fire station or the expansion,	CEQA: No impact	No mitigation is required.	CEQA: No impact
	consolidation, or relocation of an existing facility to maintain service.	NEPA: Not applicable	Mitigation not applicable	NEPA: Not applicable
Alternative 2 – No Federal Action	<b>PS-1:</b> Alternative 2 would not increase the demand for additional law enforcement officers and/or facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.	CEQA: No impact NEPA: No impact	No mitigation is required.	CEQA: No impact NEPA: No impact
	<b>PS-2:</b> Alternative 2 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.	CEQA: No impact NEPA: No impact	No mitigation is required.	CEQA: No impact NEPA: No impact

Los Angeles Harbor Department Section 3.13 Public Services

Table 3.13-2: Summary Matrix of Potential Impacts and Mitigation Measures for Public Services Associated with the Proposed Project and Alternatives

Alternative	<b>Environmental Impacts</b>	Impact Determination	Mitigation Measures	Impacts after Mitigation
Alternative 3 – Reduced Project: Improve Berths 217–220 Only	<b>PS-1:</b> Alternative 3 would not increase the demand for additional law enforcement officers and/or facilities such that USCG, LAPD, or Port Police would be unable to maintain adequate levels of service without additional facilities, the construction of which could cause significant environmental effects.	CEQA: Less than significant NEPA: Less than significant	No mitigation is required.	CEQA: Less than significant NEPA: Less than significant
	<b>PS-2:</b> Alternative 3 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.	CEQA: Less than significant NEPA: Less than significant	No mitigation is required.	CEQA: Less than significant NEPA: Less than significant

## 3.13.4.5 Mitigation Monitoring

In the absence of significant impacts, mitigation measures are not required.

## 3.13.5 Significant Unavoidable Impacts

No significant unavoidable impacts on Public Services would occur during construction or operation of the proposed Project or an alternative.