



Please Join Us to Learn About a New Port of Los Angeles Project on the LA Waterfront

The proposed USS *Iowa* Project would create an educational and historical landside and floating museum open to the public at Berth 87 along the waterfront at the Port of Los Angeles. The USS *Iowa* would be preserved and protected while keeping with our best tradition of imparting the lessons of history to succeeding generations.

The USS *Iowa* project consists of the following elements:

Preparation and transport of *Iowa* from the National Defense Reserve Fleet in Suisun Bay to the Port of Los Angeles (including off shore hull cleaning);

Mooring the ship at Berth 87 in the North Harbor area of the Port of Los Angeles;

Restriping of an existing parking lot for 300 spaces;

Delivery and set up of a prefabricated 480 sq ft, single story Ticket Booth/Office;

Delivery and set up of a prefabricated 480 sq ft, single story Restroom facility;

Delivery and set up of a prefabricated parking kiosk;

Delivery and set up of a two prefabricated Entry Platforms to accommodate access and egress from the *Iowa*;

Construction of an approximately 33,800 sq ft footprint landside Visitor Center during Phase 2; and

Ongoing operations and maintenance.

The USS *Iowa* Project is in the early stage of Environmental Impact Report (EIR) preparation. You may view the complete Notice of Preparation online at http://www.portoflosangeles.org/NOP/USSIOWA/nop_ussiowa.asp. Everyone is invited to attend the meeting to share their ideas on the scope of the environmental analysis. Public comments will be accepted through September 29, 2011.

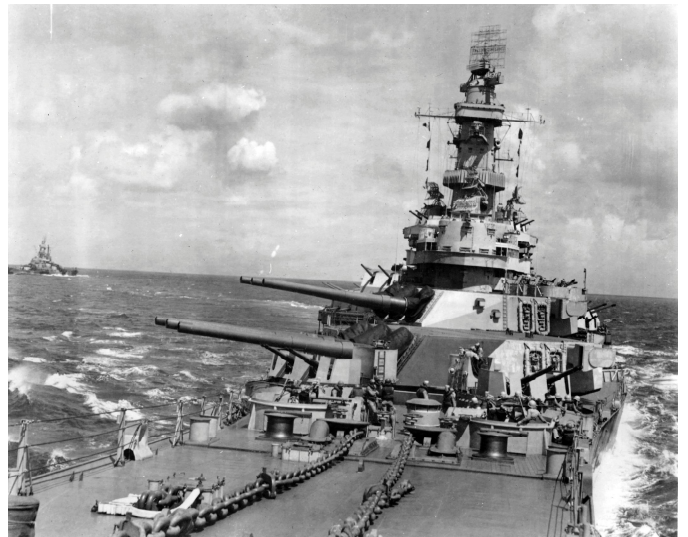


Public Meeting – NOP

USS *Iowa* Project

Tuesday, September 13, 2011
at 6:00 pm

Port of Los Angeles
Administration Building
Board Room
425 South Palos Verdes Street
San Pedro, CA 90731



CALIFORNIA STATE LANDS COMMISSION

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September 19, 2011

File Ref: W9777.234

W9777.291

Mr. Christopher Cannon
Director of Environmental Management
Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

**RE: Comments on the Notice of Preparation for the USS *Iowa* Project;
ADP: 110321-038**

Dear Mr. Cannon:

The Marine Invasive Species Program Staff of the California State Lands Commission (Commission) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the USS *Iowa* Project (ADP: 110321-038).

Since 1999, the Commission's Marine Invasive Species Program (MISP) has been and remains a national and world leader in the development of effective science-based management strategies for preventing species introductions through vessel vectors, including both ballast water and biofouling. The MISP is legislatively mandated to move the state expeditiously toward elimination of the discharge of nonindigenous species (NIS) into the waters of the state and pursues aggressive strategies to do so, including a proposed set of regulations governing the management of biofouling for vessels operating in California. With this purpose in mind, MISP Staff offer the following comments on the USS *Iowa* Project NOP.

General Comments:

1. The description of the Environmental Setting of Suisun Bay is not complete, as it fails to recognize and reference the fact that San Francisco Estuary (including Suisun Bay) is one of the most heavily invaded estuaries in the world (Cohen and Carlton 1995, Cohen and Carlton 1998). Many of the NIS currently established in San Francisco Estuary may not be established in the Port of Los Angeles (POLA), or southern California in general, and therefore have the potential to be

introduced to these areas through the actions described in the NOP unless properly managed. A description of the NIS currently established throughout the San Francisco Estuary and the Port of Los Angeles can be found in Appendix S1 of Ruiz et al. (2011). Davidson et al. (2008), including Appendix S1, provides a description of the biofouling organisms associated with two vessels within the Suisun Bay Reserve Fleet (SBRF) and offers insight into the potential for these organisms to be transported to southern California along with their host structure (i.e. the USS *Iowa*). One of the many species of concern is the Overbite Clam (*Corbula amurensis*), which has been documented as being associated with vessels from the SBRF (Davidson et al. 2008). This clam is believed to be a major contributor to the decline of several pelagic fish species in California's Sacramento-San Joaquin River Delta, including the threatened delta smelt (Feyrer et al. 2003, Sommer et al. 2007). These details should be included in the Environmental Setting description, as the presence of NIS on the USS *Iowa* may present an elevated risk of NIS introduction, unless properly managed prior to arrival to the POLA. Although management and removal of NIS from the *Iowa* is described in the NOP, an accurate description of the risk of transporting NIS to the POLA must be included here.

2. Two options are offered for "Preparation Prior to Berthing," offshore cleaning in Federal waters outside the POLA and outside state waters (option 1) and dry docking in San Francisco Bay (option 2). Option 2 would obviously be the most effective and protective option for removing the risk of biofouling-mediated NIS introduction into southern California, as the organisms will be removed in the same general water body where they currently reside (i.e. the NIS on the vessel would be removed in the same area that they originally became associated with the vessel). The removal of organisms while the vessel is in dry dock would also allow for the organisms to be captured, retained, and disposed of on land, thereby reducing the risk of their spread. For these reasons, Staff of the MISP considers Option 2 to be the preferred option. However, it is our understanding that none of the dry docks in the San Francisco Bay area are able to accommodate the *Iowa*, therefore Option 2 is not a feasible option and should be removed from future documents. This leaves Option 1 as the only viable option, and it should be described as such. Option 1, as described, does not violate the requirements of the Marine Invasive Species Act or related regulations, but it does present an elevated level of risk when compared to Option 2 because the organisms will be discharged into waters adjacent to waters of the state and because in-water cleaning is generally not as effective as dry docking in removing all of the organisms from every underwater surface. If Option 1 is chosen, care must be taken to remove biofouling organisms from every underwater surface, including bilge keels, the rudder and associated articulations, and the propellers and shafts, among others.
3. The impact associated with Biological Resources subpart (a) should be listed as Less Than Significant with Mitigation Incorporation, rather than its current

designation as Less Than Significant. As discussed in General Comment #1 above, there is a significant risk of introducing NIS into the POLA through the transport of the *Iowa* from the SBRF to the Port. This risk can be mitigated through proper management, preferably by dry docking the vessel but also through very detailed in-water cleaning as described in Option 1. It seems very appropriate for this impact to therefore be categorized as being less than significant only with the mitigation described (removal of biofouling organisms).

Specific Comments:

Page 9, Paragraph 1 – A statement such as “Congress has stipulated that the USS *Iowa* must reside in the State of California as a resource to West Coast populations” should include a reference to the appropriate action (e.g. legislation, resolution) through which this stipulation was raised.

Page 12, “*Preparation and Transport*” – Will the vessel need to be ballasted for transport? If so, the ballast water taken on in Suisun Bay will not be able to be legally discharged unless it is exchanged at least 50 nautical miles from any shoreline. Please see the California Code of Regulations Title 2, Division 3, Chapter 1, Article 4.6 for more information:

(http://www.slc.ca.gov/Spec_Pub/MFD/Ballast_Water/Documents/Article4_6.pdf).

Page 13, Paragraph 1, Lines 4-5 – California Public Resources Code (PRC) 71204(e) requires that the vessel’s anchor and anchor chain be rinsed when retrieving (in Suisun Bay) to remove fouling organisms at their place of origin.

Page 51, “Less Than Significant Impact,” Paragraph 1, Lines 6-9 – This statement is incorrect, and improperly cited. California PRC 71204(f) requires removal of fouling organisms from the submerged portions of a vessel on a regular basis, with the term regular basis defined therein. The Marine Invasive Species Act, or any State law, does NOT require “off-shore hull cleaning.”

Page 51, “Less Than Significant Impact,” Paragraph 1, Lines 9-10 - This statement is incorrect. The Marine Invasive Species Program is not monitored by the California State Lands Commission. The administration, policy development, and enforcement portions of the MISPP reside within the California State Lands Commission.

Page 51, “Less Than Significant Impact,” Paragraph 1, Lines 10-13 - This statement is incorrect. The off-shore cleaning location is outside of State waters (3 nautical miles) but is still within federal waters (12 nautical miles), therefore the area is not within international waters. Federal requirements, including those described in the US Environmental Protection Agency’s Vessel General Permit will still apply.

Mr. Christopher Cannon
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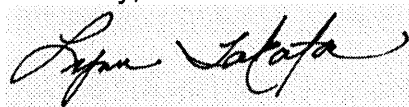
Page 51, "Less Than Significant Impact," Paragraph 1, Line 11 – The statement that "organisms will not survive" in waters 100 feet deep is not wholly accurate. Many of these organisms, including released larvae or organism fragments, may survive the cleaning process and are likely to be very capable of surviving at a depth of 100 feet. Additionally, planktonic (i.e. free-floating) larvae are fully capable of being moved by ocean currents into coastal areas.

Closing

The risk of introducing nonindigenous species into the Port of Los Angeles as a result of transporting the USS *Iowa* from Suisun Bay and into southern California is significant. Proper management of the biofouling organisms associated with the *Iowa* will mitigate this risk, with management via dry docking preferable to management via in-water cleaning. The Environmental Impact Report that will be prepared for this action must describe this risk and potential mitigation in detail.

Thank you for consideration of these comments. If you have any questions, please do not hesitate to contact me at Lynn.takata@slc.ca.gov.

Sincerely,



Lynn Takata
Marine Invasive Species Program Manager
Marine Facilities Division, California State Lands Commission

CC: Donald Hermanson, Chief, Marine Facilities Division

Literature Cited:

Cohen, A.N., and J.T. Carlton. 1995. Nonindigenous Aquatic Species in a United States Estuary: A Case Study of the Biological Invasions of the San Francisco Bay and Delta. Washington, D.C.: US Fish and Wildlife Service, December, 1995.

Cohen, A.N. and J.T. Carlton. 1998. Accelerated invasion rate in a highly invaded estuary. *Science* 279: 555-558

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Davidson, I.C., L.D. McCann, P.W. Fofonoff, M.D. Sytsma, and G.M. Ruiz. 2008. The potential for hull-mediated species transfers by obsolete ships on their final voyages. *Diversity and Distributions* 14: 518-529.

Ruiz, G.M., P.W. Fofonoff, B. Steves, S.F. Foss, and S.N. Shiba. 2011. Marine invasion history and vector analysis of California: a hotspot for western North America. *Diversity and Distributions* 17: 362-373.



9/26/11

Christopher Cannon, Director of Environmental Management
Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

Subject: Comments Submittal Applicable to NOTICE OF PREPARATION (NOP) FOR THE USS IOWA PROJECT ENVIRONMENTAL IMPACT REPORT (EIR) ADP:110321-038

Dear Mr. Cannon,
Please consider the recommendations below applicable to the Subject NOP as based on the listed background statements.

Background

- 1) The Port of Los Angeles Community Advisory Committee Recommendation Nos. 104 and 105 demonstrated the community's great interest to ensure that the Harbor communities could begin to benefit from placement of the USS Iowa at Berth 87 as soon as possible and at the least cost possible.
- 2) The San Pedro Waterfront Project EIS/EIR, certified by the Board of Los Angeles Harbor Commissioners 9/29/09, included analysis of Berth 87 as the site for the SS Lane Victory project, similar to the proposed project, and included planning for increased Cruise ship activity/impacts.
- 3) The purpose of the Initial Study (IS) Checklist includes (7) to determine whether a previously prepared EIR could be used for the project, and (8) to assist in the preparation of an EIR, if required, by focusing the EIR on the effects determined to be significant, identifying the effects determined not to be significant, and explaining the reasons for determining that potentially significant effects would not be significant.
- 4) The project site at Berth 87 contains an existing parking lot and is currently used for temporary cargo and cruise ship docking.

Recommendations

- 1) The environmental documentation should be done as a focused supplemental EIR. This would be supplemental to the recently approved EIR for the San Pedro Waterfront Project which evaluated many of the same conditions that the Iowa Project would create. We don't see the need to "reinvent the wheel" with a full start from scratch EIR.
- 2) The focused supplemental EIR should be created because of one of the following two findings regarding Environmental Factors Potentially Affected:
 - a. The proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed; or,
 - b. Although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.
- 2) The impact to AESTHETICS should be revised from Potentially Significant to Less Than Significant or No Impact as the visual character/quality of the site and its surroundings and the view from Harbor Boulevard, identified as a major scenic highway in the San Pedro Community Plan General Plan Land Use Map, is currently impacted by parking and cargo ship and cruise ship docking. If the referenced potential impacts were significant, we would expect an EIR to already be filed to address the current usages and impacts.

Kevin Grant for handling, 10 03 11 ya'


Further Comment

We note that in our ten years of reviewing environmental documents for proposed POLA projects, the Iowa Project stands out as the single project that has the most broad community support.

We note that the NOP states that "The proposed project would increase vehicular traffic and pedestrian traffic to the proposed project site as visitor travel to the Port of Los Angeles to tour the historic battleship. *Wasn't one of the goals of the San Pedro Waterfront Project to increase visitor travel to the Port of LA? Wasn't one of the ideas the notion that more visitors would mean more economic activity in San Pedro?*

Was increase in visitor travel not analyzed adequately in the San Pedro Waterfront Project EIR?

Thank you for consideration of the above comments and recommendations.


John G. Miller, M.D. FACEP
Chairman PCAC EIR Subcommittee

You are Invited to Attend a Public Comment Meeting

Re: Notice of Preparation (NOP) for the USS Iowa Project



Public Commenting Meeting

Date:

Tuesday, September 13, 2011

Time:

6:00 pm

Location:

Port of Los Angeles Administration Building
Board Room
425 South Palos Verdes Street
San Pedro, CA 90731

The Los Angeles Harbor Department has prepared a Notice of Preparation (NOP) for the proposed USS Iowa Project located at the Port of Los Angeles.

A public meeting will be held to solicit comments. Copies of the NOP are available for review at: Los Angeles Public Library, San Pedro Branch, 921 South Gaffey Street, San Pedro, California and Los Angeles Harbor Department, Environmental Management Division, 425 South Palos Verdes Street, San Pedro, California.

Copies of the NOP can also be obtained at http://www.portoflosangeles.org/NOP/USSIOWA/nop_ussiowa.asp; by sending a request to Christopher Cannon, Director of Environmental Management, Los Angeles Harbor Department, 425 South Palos Verdes Street, San Pedro, CA 90731; or by calling (310) 732-3675.

Written comments should be sent to the address above or via email to CCannon@portla.org no later than September 29, 2011. Comments sent via email should include the project title in the email's subject line and a valid mailing address with the email.



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USS IOWA PROJECT

Public Scoping Meeting For the Environmental Impact Report (EIR)

**Lead Agency:
Los Angeles Harbor Department
Environmental Management Division**

September 13, 2011



Tonight's Agenda

- What is a Public Scoping Meeting?
- Environmental Review Process
- Overview of Proposed Project
- Identification of Issues to be Reviewed in EIR
- Public Comments

What is a Public Scoping Meeting?

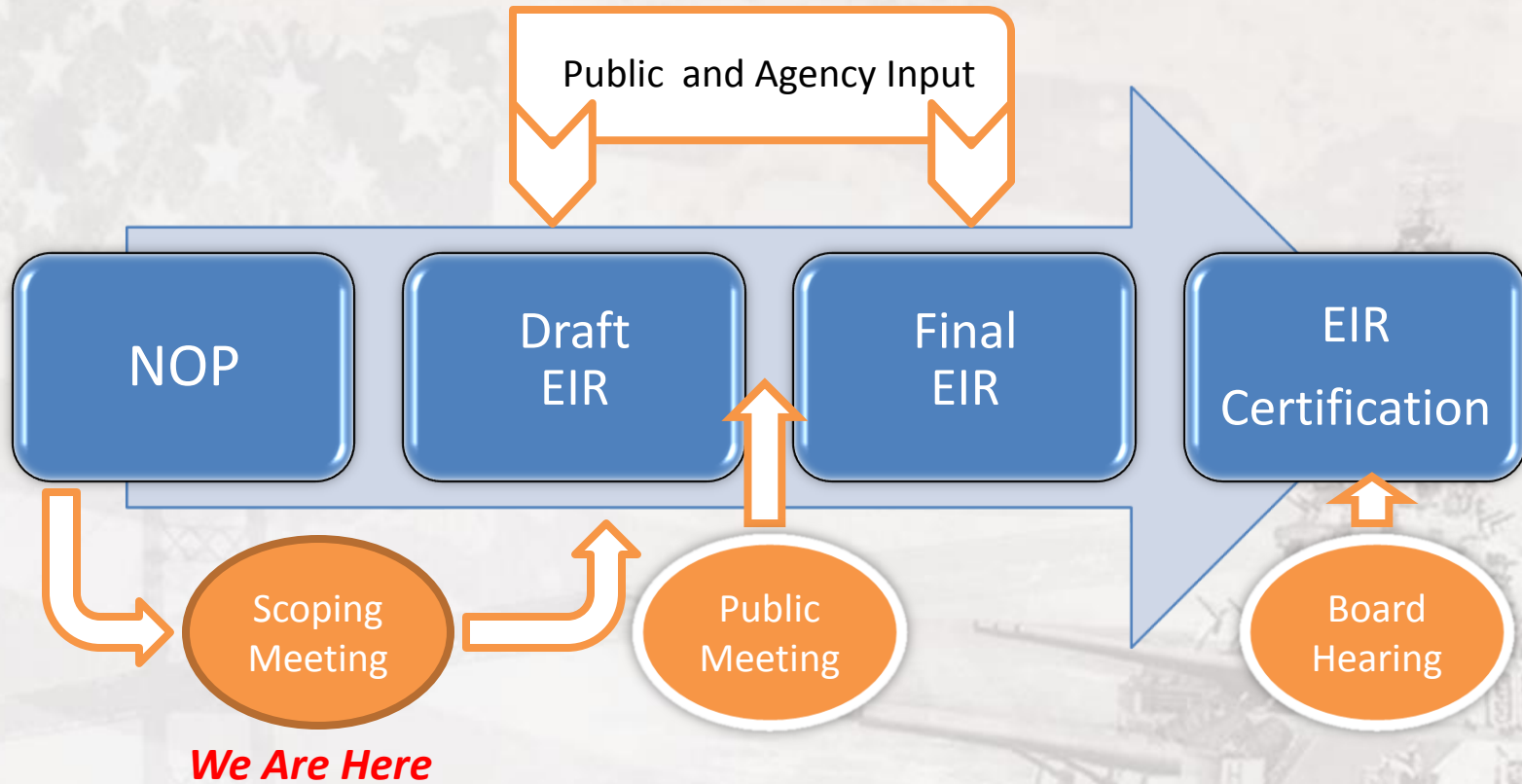
- **Inform the public** of the Port's intent to complete an EIR.
- **Present an overview** of the environmental process and identify issues to be addressed in the EIR.
- **Obtain public comments** regarding potential environmental issues of concern associated with the proposed project.

CEQA* Objectives

- Disclose potential environmental effects
- Identify how to avoid or reduce impacts
- Identify alternatives
- Foster interagency coordination in project review
- Enhance public participation

* California Environmental Quality Act

Environmental Review Process

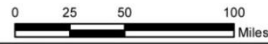


Project Site Existing Conditions

- Located within the Port of Los Angeles, San Pedro Waterfront Plan area
- Berth 87 (approx 4.5 acres)
 - Currently used for cargo and cruise ship docking.
- Navy fuel surgeline (pipeline) runs through site (16 foot easement)
- Adjacent to site:
 - North: Cruise Ship Terminal Building
 - South: Maritime Museum
 - East: Main Channel
 - West: Harbor Boulevard (residential)



06/10/2011 ANS-102853 Regional Location Map.mxd CLP



Source: ESRI Street Map

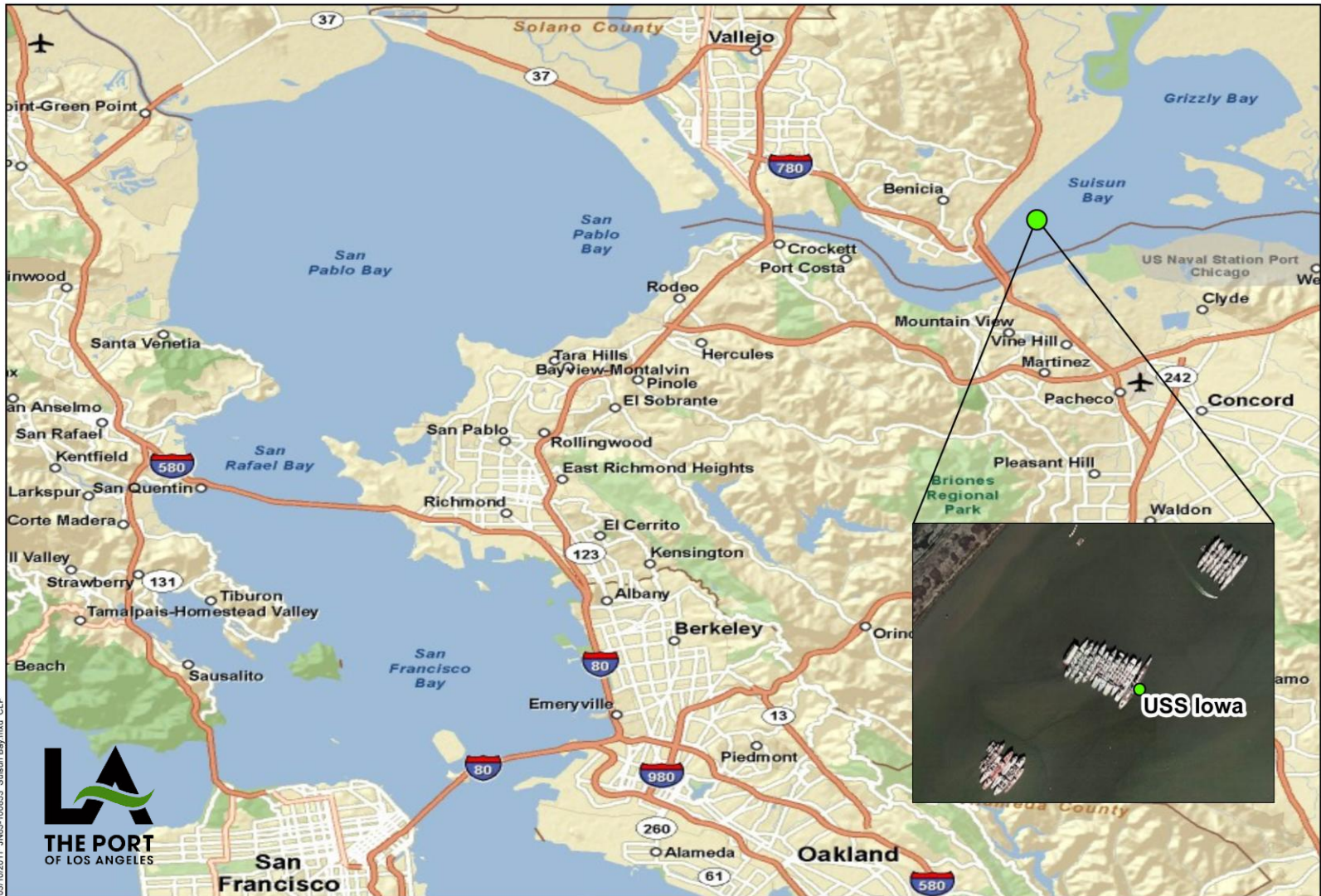
USS Iowa Project - Initial Study
Regional Location Map



September 13, 2011

USS IOWA PROJECT





05/10/2011 J:\NS-108953 Suisun Bay.mxd CLP

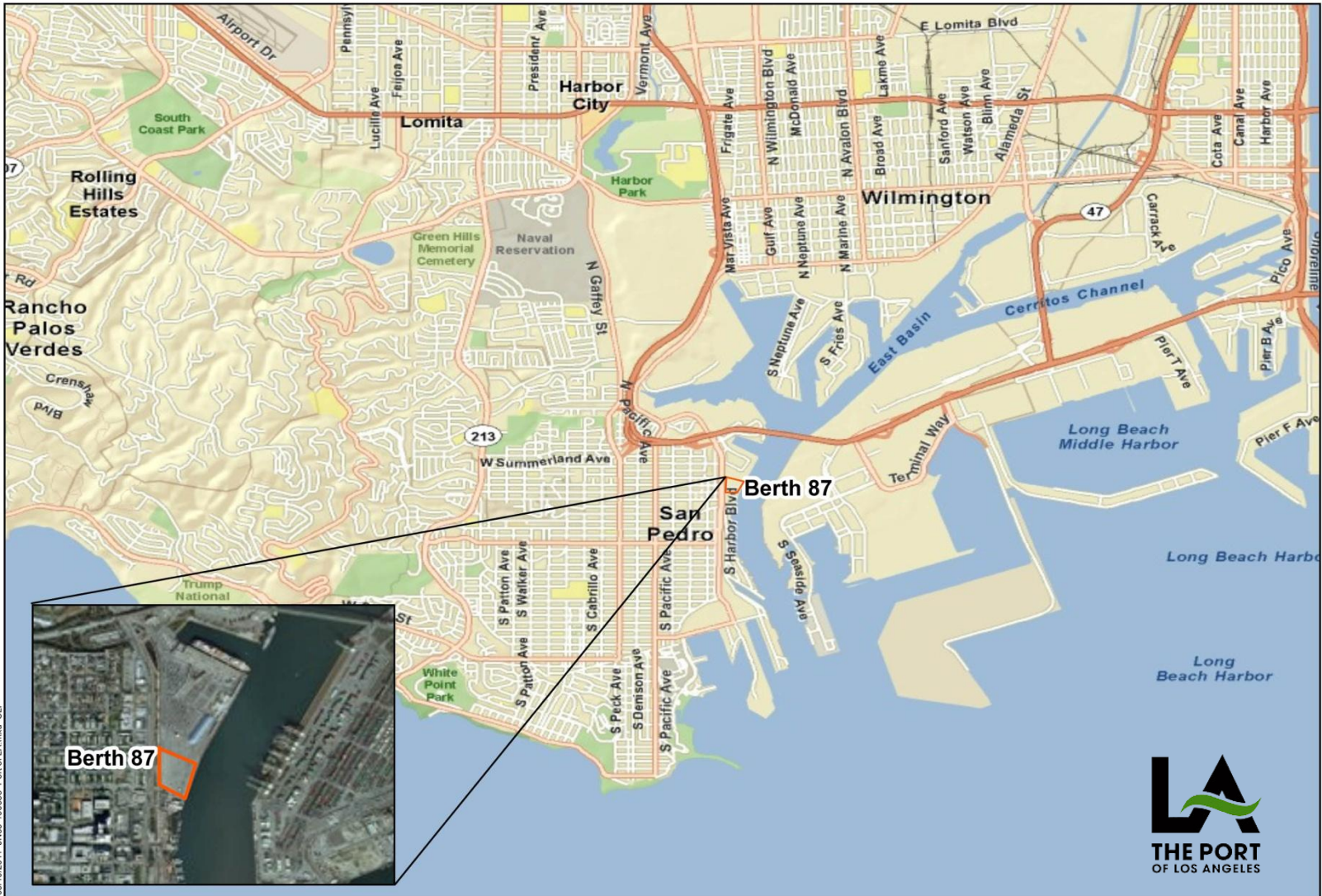


Source: ESRI Imagery

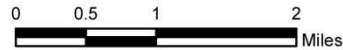
USS Iowa Project - Initial Study
 Suisun Bay - Current Home of the USS Iowa

September 13, 2011

USS IOWA PROJECT



05/10/2011 J:\MS-100853 Port of LA.mxd CLP



Source: ESRI Imagery

USS Iowa Project - Initial Study
Port of Los Angeles - Berth 87

September 13, 2011

USS IOWA PROJECT



USS Iowa Project - Initial Study

Berth 87 & Proposed Site Plan

September 13, 2011

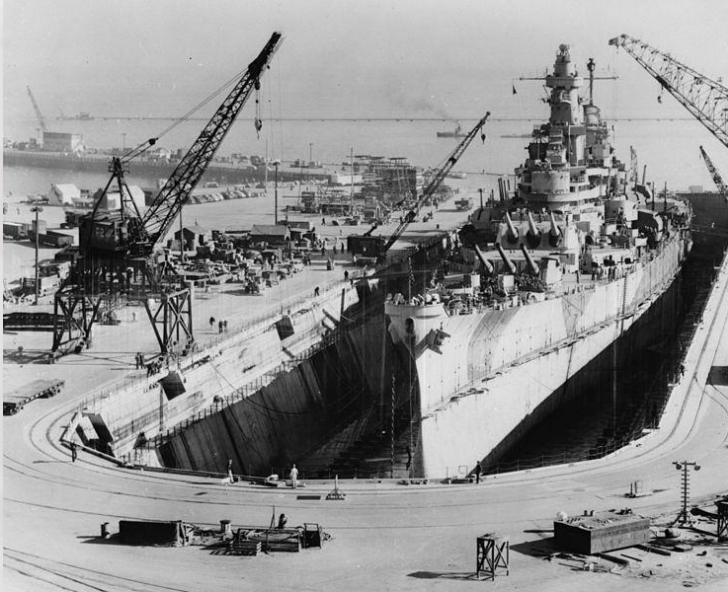
USS Iowa

Proposed Project Characteristics

The USS Iowa project consists of the following elements:

- Preparation and transport of Iowa from the National Defense Reserve Fleet in Suisun Bay to the Port of Los Angeles;
- Mooring the ship at Berth 87 in the North Harbor area of the Port of Los Angeles;
- Delivery and set up of a prefabricated 480 sq ft, single story Ticket Booth;
- Delivery and set up of a prefabricated 480 sq ft, single story Restroom facilities;
- Delivery and set up of two prefabricated Entry Platforms to accommodate access and egress from the Iowa;
- Construction of an approximately 33,800 sq ft (footprint) landside Museum and Education Center during Phase 2, and;
- Ongoing operations and maintenance.

Issues Identified in the NOP for the EIR



- **Air Quality & Climate Change**
- **Aesthetics**
- **Traffic**
- **Cumulative Impacts**

Issues Identified in the NOP for the EIR

- **Air Quality & Climate Change**
 - Region already in non-attainment.
 - Air pollutants from towing ship from Suisun Bay to POLA.
 - Air pollutants from tourist and staff traffic.
 - Operational air impacts.
- **Aesthetics**
 - Viewshed impacts at Berth 87

Issues Identified in the NOP for the EIR

- **Traffic**

- Project would increase vehicular and pedestrian traffic based on approximately 430,000 visitors – 1st year, 386,000 per year thereafter.
- Potential significant traffic impacts at up to four intersections in the vicinity of the project site along key access routes.

- **Cumulative Impacts**

Receive Public Comments/Testimony

Send Written Comments by:
September 29, 2011

Send Written Comments to:
Christopher Cannon
Director of Environmental Management
Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

Questions and Comments

