

# **Final Initial Study/ Mitigated Negative Declaration**

## **Star-Kist Cannery Facility Project**

APP No. 190311-032  
SCH No. 2019129042

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October 2022

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## **1.0 FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

### **1.1 PROPOSED PROJECT**

The Los Angeles Harbor Department (LAHD) has prepared this Final Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Star-Kist Cannery Facility Project (Project), which involves demolition of the former Star-Kist cannery facilities on an approximately 14-acre site on Terminal Island at the Port of Los Angeles (Port). Although the ultimate future use of the site is unknown, the potential future use of the site as cargo support, which can vary from container or chassis storage to chassis repair and maintenance, is a reasonably likely future use and representative of the types of industrial uses allowed in this location according to the applicable zoning and the Port Master Plan (PMP). Therefore, this Final IS/MND considers the impacts from development and operations of a chassis repair and maintenance depot for purposes of analyzing the impacts of potential future development of the site. Phase 1 of the proposed Project would result in demolition of Main Plant No. 4 (Plant), a small wharf structure, and a bridge connecting the Plant to the northern portion of the East Plant. After demolition, the Plant site would be secured by laying down a compacted and bound crushed miscellaneous base (CMB) and installing lighting, fencing, and low-impact development (LID) best management practices (BMPs) (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects). Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 site and demolition of the East Plant. Similar to Phase 1, after demolition activities have been completed, the Phase 2 site would be graded and covered with CMB. LID BMPs, perimeter fencing, and exterior perimeter lighting would be installed. At this time, only Phase 1 activities are proposed to occur in the immediate future. When future funding becomes available, Phase 2 could occur. As discussed above, the future use of the site is not known at this time; however, for the purposes of the California Environmental Quality Act (CEQA), this document considers the potential future use of the site is as a chassis repair and maintenance depot.

### **1.2 DETERMINATION**

Based on the analysis provided in this Final IS/MND, LAHD finds that the proposed Project would not have a significant effect on the environment.

### **1.3 FINAL IS/MND ORGANIZATION**

This Final IS/MND has been prepared in accordance with the requirements of CEQA (California Public Resources Code [PCR] 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] 15000 et seq.). The Final IS/MND includes the following discussion including responses to comments on the Recirculated Draft IS/MND.

**Responses to Comments:** This section describes the distribution of the Recirculated Draft IS/MND for public review, the comment letters received on the Recirculated Draft IS/MND by interested agencies, organizations, and individual members of the public, and LAHD's response to these comments.

**Clarifications and Modifications:** There were several modifications to the document in Section 2.2.1 (Construction) in the Project Description, ~~and~~ Section 4.4. (Biological Resources), Section 6.4 (Biological Resources) to clarify Project activity compliance with the Migratory Bird Treaty Act. These modifications do not constitute a significant change or significant new information. Therefore, no recirculation is required.

The following sections were included in the Draft and/or Recirculated Draft IS/MND and are included in this final document:

- **Section 1. Introduction.** This section provides an overview of the proposed Project and the CEQA environmental documentation process.
- **Section 2. Project Description.** This section provides a detailed description of the proposed Project's objectives and components.
- **Section 3. Initial Study Checklist.** This section presents the CEQA checklist for all impact areas and mandatory findings of significance.
- **Section 4. Environmental Analysis and Discussion of Impacts.** This section presents the environmental analysis for each issue area identified on the environmental checklist. If the proposed Project does not have the potential to significantly impact a given issue area, the relevant section provides a brief discussion of the reasons why no impacts are expected.
- **Section 5. Proposed Finding.** This section presents the proposed finding regarding environmental impacts.
- **Section 6. Preparers and Contributors.** This section provides a list of key personnel involved in the preparation of the Draft, Recirculated Draft, and/or Final IS/MND.
- **Section 7. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used throughout the Draft, Recirculated Draft, and/or Final IS/MND.
- **Section 8. References.** This section provides a list of reference materials used during the preparation of the Draft, Recirculated Draft, and/or Final IS/MND.

## 2.0 RESPONSE TO COMMENTS

### 2.1 DISTRIBUTION OF THE RECIRCULATED DRAFT IS/MND

This chapter contains responses to comments on the Recirculated Draft IS/MND for the Project, although CEQA does not require a lead agency to respond to comments on MNDs. Nevertheless, to promote transparency and be responsive to the agencies and organizations that took the time to submit comment letters, LAHD has prepared responses. Furthermore, as a courtesy and upon community request, LAHD extended the comment period from the required 30 days for IS/MNDs submitted to the State Clearinghouse to 45 days, beginning on November 5, 2021, and closing on December 21, 2021 (see State CEQA Guidelines [14 CCR 15000 et seq.], Section 15105(b) and Section 15073(a)). The Recirculated Draft IS/MND was distributed to approximately 90 interested and/or involved public agencies, organizations, and commercial entities for review. It was also made available for public review online on the Port website (<http://www.portoflosangeles.org>). A copy of the document was also available for pickup at the LAHD Environmental Management Division. In addition, the Recirculated Draft IS/MND was filed with the Los Angeles County Clerk and the State Clearinghouse.

### 2.2 COMMENTS ON THE RECIRCULATED DRAFT IS/MND

During the 45-day public review period, responsible agencies and the public had an opportunity to provide written comments on the information contained within the Recirculated Draft IS/MND. These comments and responses are included in the record and shall be considered by LAHD during deliberation as to whether or not the necessary approvals should be granted for the proposed Project. As stated in Section 21064.5 of the CEQA Guidelines, a project is approved only when LAHD “finds that there is no substantial evidence that the project will have a significant effect on the environment and that the Recirculated Draft IS/MND reflects the lead agency’s independent judgement and analysis.” LAHD received 18 comment letters, as presented on the following pages, during the review period. The comment letters have been noted and will be considered by the decision-makers together with the Recirculated Draft IS/MND prior to taking any action on the proposed Project (see State CEQA Guidelines, Section 15074(b)). Copies of comment letters received can be found in Appendix A.

**Table 2-1. List of Commenters**

<b>Letter Number</b>	<b>Commenter</b>	<b>Agency/Organization</b>	<b>Date</b>
<b>Agencies</b>			
A1	Miya Edmonson, IGR/CEQA Branch Chief	California Department of Transportation	December 2, 2021
A2	Lijin Sun, Program Supervisor, CEQA IGR	South Coast Air Quality Management District	December 7, 2021
A3	Craig Shuman, Marine Regional Manager	California Department of Fish and Wildlife	December 17, 2021
A4	Janice Hahn, Supervisor, Fourth District	Los Angeles County Board of Supervisors	December 21, 2021
A5	Lenise Marrero, Acting Division Manager, Wastewater Engineering Services Division	City of Los Angeles Bureau of Sanitation	January 10, 2022

Letter Number	Commenter	Agency/Organization	Date
<b>Organizations</b>			
O1	Marnie Primmer, Executive Director	Future Ports	November 19, 2021
O2	Simie Seaman, President	Wilmington Historical Society	December 5, 2021
O3	Brandy Salas, Admin Specialist	Gabrieleno Band of Mission Indians – Kizh Nation	December 7, 2021
O4	Christian Guzman, President	Northwest San Pedro Neighborhood Council	December 14, 2021
O5	Rudy Svorinich, Jr., President	Dalmatian-American Club of San Pedro, Inc.	December 17, 2021
O6	Adrian Scott Fine, Senior Director of Advocacy	Los Angeles Conservancy	December 21, 2021
<b>Individuals</b>			
I1	Pat Nave	–	November 9, 2021
I2	Mary Bumbak	–	December 1, 2021
I3	Darleen Davis	–	December 1, 2021
I4	Olivia Fernandez	–	December 4, 2021
I5	Maria Enriquez	–	December 5, 2021
I6	Anthony Misetich	–	December 5, 2021
I7	Stephanie Mardesich	–	December 12, 2021

### Response to Comment Letter A1, California Department of Transportation

A1-1 This comment is introductory. It states that the mission of California Department of Transportation (Caltrans) is to provide a safe and reliable transportation network that serves all people and respects the environment.

No response to this comment is required.

A1-2 This comment states that vehicle miles traveled (VMT) became the standard transportation analysis metric in CEQA for land use projects after July 1, 2020.

This comment is acknowledged. The Project uses the VMT metric in the analysis in Section 4.17 of the Recirculated Draft IS/MND.

A1-3 This comment states that the Project would generate fewer than 250 trips per day. The commenter does not expect Project approval to result in a direct adverse impact on existing state transportation facilities.

This comment is acknowledged and consistent with the analysis presented in the Recirculated Draft IS/MND.

- A1-4 This comment is a reminder that the transport of heavy construction equipment and/or materials requiring the use of oversized vehicles on state highways will need a Caltrans transportation permit.

This comment is acknowledged. The Final IS/MND, in its list of project permits and approvals, includes this potential Caltrans permit for the transport of heavy construction equipment and/or materials requiring the use of oversized vehicles on state highways

Response to Comment Letter A2, South Coast Air Quality Management District

- A2-1 This comment is introductory. It summarizes the proposed Project description and key air quality analysis assumptions and introduces South Coast Air Quality Management District's (SCAQMD's) Community Emissions Reduction Plan (CERP) for the designated Assembly Bill (AB) 617 Wilmington, Carson, West Long Beach (WCWLB) community.

No response to this comment is required.

- A2-2 The commenter requests that a discussion of the CERP be included in the Final IS/MND. The commenter would like LAHD to consider whether additional air quality measures from Chapter 5 of the CERP can be identified for the proposed Project.

LAHD acknowledges that the proposed Project site is within the WCWLB community. At the request of the commenter, a discussion of the WCWLB CERP is included in this response.

AB 617, signed into law in 2017, established the Community Air Protection Program, which requires new community-focused and community-driven actions to reduce air pollution and improve public health in communities that experience disproportionate burdens from their exposure to air pollutants. The California Air Resources Board (CARB) has since designated 10 communities for air monitoring and emissions reduction programs, including the WCWLB community. The WCWLB community includes the neighborhood of Wilmington, within the city of Los Angeles; the city of Carson; and the neighborhood of West Long Beach, within the city of Long Beach (South Coast Air Quality Management District 2019). SCAQMD and the WCWLB Community Steering Committee are working together to implement the CERP. The purpose of the CERP is to focus and accelerate new actions that go beyond existing state and regional programs to provide direct reductions in air pollution emissions and exposures within the WCWLB community. The CERP includes 18 actions across six air quality priorities. Actions to reduce emissions from Port sources include working to support the California Air Resources Board's rule development for the At-Berth, Commercial Harbor Craft, Cargo Handling Equipment, and Drayage Truck Regulations; developing a memorandum of understanding to implement the Port's clean air action plans; and conducting focused enforcement activities involving trucks and oil tankers (South Coast Air Quality Management District 2019). The CERP, however, does not outline any specific actions or requirements for LAHD in Chapter 5.

As shown in the air quality analysis in the Recirculated Draft IS/MND, the Project will result in less-than-significant impacts to air quality; therefore, air quality-related CEQA mitigation

measures are not required or warranted here (refer to Recirculated Draft IS/MND, Tables 4.3-2, 4.3-3, 4.3-6, and 4.3-7). Nonetheless, LAHD is committed to reducing air pollution and supporting the community's air quality priorities. The proposed Project would comply with LAHD's *Sustainable Construction Guidelines for Reducing Air Emissions*, which require the use of U.S. Environmental Protection Agency/CARB Tier 4 Final construction equipment for achieving the greatest reduction in air emissions during construction (see Recirculated Draft IS/MND, pp. 4-5, 4-7). Likewise, all potential future operations at the proposed Project site would comply with the *San Pedro Bay Ports Clean Air Action Plan*, which contains strategies to reduce emissions from sources in and around regional ports and plans for zero-emissions infrastructure and encourages freight and energy efficiency, including the Clean Truck Program (see Recirculated Draft IS/MND, pp. 4-5, 4-7). These plans and programs would reduce air pollution generated by the proposed Project as well as any associated community health risk, consistent with the goals and actions contained within the WCWLB CERP, specifically the actions identified in Chapter 5 that relate to a reduction in mobile source emissions.

- A2-3 This comment recommends that LAHD require 100 percent of cargo handling equipment (CHE) use zero-emissions technologies and that this requirement be included as a lease measure or proposed Project design feature for future development.

Because the future use associated with the proposed Project is not currently known, the CHE for future potential operations was based on equipment lists for similar project types, which currently operate CHE that is fossil-fuel powered. As noted by the commenter, the commercial, as well as technological, feasibility of zero-emissions CHE is advancing rapidly. Given the increasing penetration of zero-emissions CHE, analyzing potential future operational emissions from CHE that is exclusively fossil-fuel powered results in the most conservative analysis as it presents the highest operational impacts. As shown in Table 4.3-3 in the Recirculated Draft IS/MND, emissions from future potential operations at the site with CHE that is fossil-fuel powered would be below SCAQMD's significance thresholds. Because modeled operational emissions are not expected to result in a cumulatively considerable net increase in any criteria air pollutant, thereby resulting in less-than-significant impacts to air quality, mitigation, including a requirement for 100 percent zero-emissions CHE, is not required. Further, because of rapidly advancing technology, noted by the commenter, retaining flexibility is important so as to not bind the Project to any specific technology that may be outdated at the time of future operation.

LAHD appreciates this comment and is committed to emissions abatement. All potential future operations at the proposed Project site would comply with adopted state and local regulations as well as the applicable emissions reduction strategies of the *San Pedro Bay Ports Clean Air Action Plan*. See also Response to Comment A2-2. The use of zero-emissions CHE at the proposed Project site in response to regulations and/or market conditions would result in lower emissions levels than those presented in Table 4.3-3, which are already less than significant.

- A2-4 This comment concludes the letter. It relays lead agency CEQA obligations and requests that a written response be provided to all comments.



As explained above, although not required by CEQA, written responses to SCAQMD's comments contained in its letter are provided as part of the Final IS/MND. As well, prior to deciding whether to adopt the MND and approve the proposed Project, LAHD considered each comment together with the IS/MND, pursuant to State CEQA Guidelines, Section 15074(b). Further, as discussed in State CEQA Guidelines, Section 15088(b), "The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report." Accordingly, LAHD shall provide the Final IS/MND and Responses to Comments to all of the public agencies who commented, no less than 10 days prior to certifying the IS/MND.

#### Response to Comment Letter A3, California Department of Fish and Wildlife

- A3-1 This comment is introductory. It summarizes the proposed Project description, construction elements that could affect marine life and/or habitats, and the California Department of Fish and Wildlife's (CDFW's) role as a Trustee Agency.

No response to this comment is required.

- A3-2 This comment summarizes the biological role and significance of Los Angeles Harbor. For a discussion of the candidate, sensitive, or special-status species and associated habitat that are known to occur on or near the Project site, please refer to Section 4.4(a).

No response to this comment is required.

- A3-3 The CDFW offers comments and recommendations related to the identification and mitigation of potentially significant impacts on fish and wildlife. In this comment, the CDFW identifies potential effects from pile pulling, including underwater noise, turbidity, siltation, and leaching of contaminants (e.g., creosote) that could preclude eelgrass from growing. The CDFW recommends comparing the sound exposure levels from pile removal to the Interim Criteria for Injury to Fish of 206 decibels (peak) and 187 decibels (accumulated) and, if these levels are anticipated to be exceeded, then it recommends mitigation measures, including in-water sound measurements, direct pull or vibratory pile removal, soft starts and buffer zones for fish, and silt curtains to protect kelp and eelgrass, if present.

Potential effects to biological species resulting from pile pulling, including underwater noise, are addressed in Section 4.4(a) of the Recirculated Draft IS/MND and determined to be less than significant; therefore, sound pressure and exposure levels are not anticipated to reach a level that is injurious to fish and mitigation is not required (see also Section 4.13 for a broader discussion on noise impacts to the ambient environmental and sensitive receptors). Notably, the sound-exposure-level thresholds identified by the CDFW are usually associated with pile driving, which generates considerably more underwater sound than pile removal. As well, it is anticipated that piles will be removed using the vibratory pile driver method that is recommended by the CDFW in its suggested mitigation (see Recirculated Draft IS/MND, p. 4-17.)

Effects from turbidity associated with pile removal are addressed in Section 4.10(a) of the Recirculated Draft IS/MND and effects from siltation are addressed in Section 4.10(c)(1), and both were determined to be less than significant; therefore, no mitigation is required.

Effects to eelgrass from pile removal are specifically addressed in Section 4.4(a) of the Recirculated Draft IS/MND and were determined to be less than significant; therefore, no mitigation is required. A 2018 survey provides the most recent available data for the proposed Project area and demonstrates that the nearest known patch of eelgrass to the Project site is 540 feet away (Recirculated Draft IS/MND, p. 4-17.) Nonetheless, the Project must operate under the U.S. Army Corps of Engineers (USACE) Regional General Permit (RGP) 65, which requires a pre-construction survey, to determine if any batches of eelgrass exist within proximity to construction at the time of construction, and a post-construction survey in accordance with the National Oceanic and Atmospheric Administration's (NOAA's) California Eelgrass Mitigation Policy (CEMP) (see Recirculated Draft IS/MND, pp. 2-4, 4-18; see also USACE 2012, p. 6; NOAA 2014). This is the same measure recommended by the commenter (see Comment A3-4).

RGP 65 also requires the use of best management practices "to minimize the suspension of sediments and disturbance of the substrate when removing wooden piles and to ensure that no construction debris, soil, sand, sawdust, rubbish, cement or concrete washings, oil or petroleum products, or other material not suitable for the marine environment be allowed to enter or be placed where it may be washed...into waters of the United States" (Recirculated Draft IS/MND, p. 4-18). Best management practices may include silt turbidity curtains, as recommended by the CDFW in its suggested mitigation, depending on circumstances. Any piles that cannot be pulled out would be abandoned in place at minus 2 feet below the existing mudline (see Recirculated Draft IS/MND Section 2.3.2), as recommended by the CDFW in its suggested mitigation. Therefore, the potential for any leaching of contaminants to the environment from piles would be greatly reduced and is considered a less-than-significant impact to biological resources. . Ultimately, the proposed Project is expected to benefit any eelgrass that may be present in the Project area because it would increase available benthic habitat in the current footprint of the piles, once removed, which would promote eelgrass growth, and removing piles would reduce shading on eelgrass, which also would promote growth (see Recirculated Draft IS/MND, p. 4-18).

- A3-4 The CDFW summarizes concerns about potential effects on eelgrass and eelgrass habitat, including temporary damage (e.g., construction-related turbidity) and permanent damage (e.g., from anchor chain scars or propeller wash). The CDFW recommends that multiple measures be identified in the Final IS/MND, including the following: ensure that vessels avoid eelgrass beds, use best management practices to ensure that no debris falls on the beds, and use silt curtains to limit turbidity. In addition, the CDFW requests that, if eelgrass will be directly affected, mitigation should occur using guidance from CEMP, including development of a mitigation plan in consultation with the CDFW and other agencies. The CDFW advises that, if a transplant occurs, then a Scientific Collecting Permit would be required for harvesting.

LAHD recognizes the importance of eelgrass habitat within Southern California. Potential effects on eelgrass during construction were identified in Section 6.4(b) of the Recirculated Draft IS/MND and determined to be less than significant. The Recirculated Draft IS/MND also identified measures in Section 6.4(b) to survey and protect eelgrass. These included the performance of pre-construction as well as subsequent surveys, as required by the California Eelgrass Mitigation Policy.

The CDFW has concerns with the eelgrass data summarized in the Recirculated Draft IS/MND, which were from a survey conducted in 2018. This comment is acknowledged. The data from the 2018 survey are the most recent available data for the proposed Project area. As summarized above, as well as Section 6.4(b), a pre-construction eelgrass survey utilizing guidance from the CEMP would be performed to determine the presence or absence of eelgrass in the project vicinity and to determine the potential for impacts resulting from the proposed Project. Overall, the proposed Project would result in reduction in potential shading on habitat as a result of pile removal. Adverse effects on sensitive habitats, specifically here eelgrass, from construction-related activities were determined to be less than significant, and, therefore, no mitigation is required (see Section 4.4(b)). Refer to Response to Comment A3-3 for a discussion that addresses this comment, including, notably, that the Project is expected to promote the growth of eelgrass. If an eelgrass transplant is required due to effects of the proposed Project, this would be done in accordance with the California Eelgrass Mitigation Policy. Harvesting would be done with a Scientific Collecting Permit.

- A3-5 The CDFW is concerned about potential effects from invasive species, particularly *Caulerpa* spp, as a result of dredging and pile construction. The agency recommends a pre-construction *Caulerpa* survey, and, if *Caulerpa* is located in the proposed Project area, the CDFW requests that it and the National Marine Fisheries Service (NMFS) be notified within 24 hours and the species left undisturbed.

LAHD recognizes the importance of identifying *Caulerpa* and preventing an introduction of the invasive species within Southern California. A *Caulerpa* survey will be done in conjunction with the eelgrass survey, discussed above, and agency notifications would be made pursuant to *Caulerpa Control Protocol*. As part of the pre-construction eelgrass surveys, the proposed Project area would be surveyed to identify *Caulerpa*, according to the guidelines in the *Caulerpa Control Protocol* (National Marine Fisheries Service 2021). If found, the CDFW and National Marine Fisheries Service would be promptly notified, and a control and eradication framework would be developed, according to the *Caulerpa Control Protocol*. Pursuant to this comment, the following text has been added to Recirculated Draft IS/MND Section 6.4(b):

The invasive alga *Caulerpa* become established in Newport Bay, California, in 2022. *Caulerpa* is a non-native species that can preclude native species from inhabiting the seafloor. The *Caulerpa* Control Protocol establishes guidelines for pre-construction surveys, reporting, and agency notifications. In conjunction with the pre-construction eelgrass survey, a surveillance-level *Caulerpa* survey would also be conducted to detect the presence of this invasive species. The survey, reporting, and agency notifications (if detected) would adhere to the *Caulerpa* Control Protocol.

- A3-6 The CDFW relays that any data recorded for CEQA purposes on special-status species or special communities should be uploaded to the California Natural Diversity Database.

LAHD acknowledges and understands this requirement.

- A3-7 The CDFW summarizes the potential for filing fees.

No response to this comment is required.

- A3-8 The CDFW expresses appreciation for the opportunity to comment and provides relevant contact information.

No response to this comment is required.

#### Response to Comment Letter A4, Los Angeles County Board of Supervisors

- A4-1 This comment opposes demolition of the Plant. The comment acknowledges that LAHD requires additional storage for shipping operations but urges the department to balance operations with preserving the heritage of the community. The comment expands on community ties and describes a recent experience with Croatia's ambassador, who recounted the founding of the company by Martin Bogdanovich. The commenter concludes by requesting that LAHD find a new use for the Plant that would "preserve its historic integrity."

Although a comment expressing opposition to (or support of) a project does not require a response under CEQA, LAHD appreciates this comment and understands that the commenter wishes to avoid demolition of the Plant. Refer to Response to Comment O6-1 for a detailed discussion on why the Plant, which includes associated hardscape, docks, and wharves, is not considered an historical resource. Refer also to Responses to Comments O6-2 to O6-3. As well, notably, Martin Bogdanovich passed away in 1944, well before construction of the facility in 1952 and was not associated with it or the company at that time (see Recirculated Draft IS/MND, Appendix C, p. 9-2).

LAHD is committed to preservation and stewardship of the Port's historical resources. LAHD follows the 2013 *Built Environment Historic, Architectural, and Cultural Resource Policy* (Cultural Policy), which directs it to inventory resources, evaluate and reevaluate resources, and preserve and reuse historic buildings, structures, objects, and districts where feasible (Cultural Policy [III.A-III.D; IV.A-IV.D; and V.A-V.H]). Although the Plant is not a historical resource, and therefore not subject

to preservation policies in the Cultural Policy, LAHD solicited two Requests for Information (RFI) prior to the 2021 Draft IS/MND on May 2, 2016 and May 14, 2018 regarding the potential reuse of the Plant. In response to this comment, and others like it, LAHD then solicited a third RFI in 2022.

The Los Angeles Board of Harbor Commissioners will make the final decision regarding the proposed Project. This comment-and-response document is available to the Board of Harbor Commissioners to inform their decision.

#### Response to Comment Letter A5, City of Los Angeles Bureau of Sanitation

A5-1 This comment determined the project is unrelated to sewers and does not require any hydraulic analysis.

LAHD acknowledges the comment. No response is required.

#### Response to Comment Letter O1, FuturePorts

O1-1 This comment describes the mission of FuturePorts and states the organization's support for the proposed Project.

LAHD acknowledges the comment. No response is required.

#### Response to Comment Letter O2, Wilmington Historical Society

O2-1 This comment opposes demolition of the Plant because it was important to the local and national tuna canning industry.

See Responses to Comments A4-1, O6-1, and O6-2.

#### Response to Comment Letter O3, Gabrieleno Band of Mission Indians – Kizh Nation

O3-1 This comment thanks LAHD for providing a letter and requests a diagram of the proposed Project.

LAHD provided a Project site map to the commenter; the commenter did not provide additional comments.

#### Response to Comment Letter O4, Northwest San Pedro Neighborhood Council

O4-1 This comment suggests that the evaluation of the proposed Project should include a discussion as to how the proposed use conforms to the adopted plan. The comment also notes that water frontage is a rare and valuable asset.

This comment is acknowledged. Section 4.11(b) of the Recirculated Draft IS/MND states that:

Although the ultimate future use of the site is unknown, the analysis in this Recirculated Draft IS/MND assumes that the site would be developed with the potential future use of the site as cargo support, which can vary from container or chassis storage to chassis repair

and maintenance, and is representative of the types of industrial uses allowed in this location according to the applicable zoning and the PMP. Therefore, it is expected that the Project would not conflict with the applicable zoning or PMP policies for Planning Areas 3 and 4.

Section 4.11(b) goes on to state:

The Port of Los Angeles Plan is designed to be consistent with the PMP discussed above. The proposed Project would be consistent with allowable land uses and the goals and policies of the City of Los Angeles General Plan, the Port of Los Angeles Plan, as well as ongoing implementation of other key Port plans and policies, including the Terminal Island Land Use Plan Summary (Port of Los Angeles 2012), which describes land use and management priorities.

Thus, the Recirculated Draft IS/MND already provides an analysis of how the Project would conform to adopted Port plans and policies. No revisions to the CEQA document are required.

- O4-2 This comment is concerned with the proposed Project's impact on other possible uses for Terminal Island. Specifically, the commenter states that the proposed Project appears to consolidate Projects 14 and 15 from Appendix G, *Cumulative Projects*, and asks what will happen to those projects.

The proposed Project does not consolidate Project Numbers 14 and 15, listed in Appendix G of the Recirculated Draft IS/MND. Project Numbers 14 and 15 are located at 915 Earle Street and 849–921 E. New Dock Street, which are adjacent to the Project site, and, like the proposed Project, are separate and discrete projects. Projects 14 and 15 have already been environmentally analyzed, certified, approved, and construction already may be under way on these projects before certification and/or construction of the proposed Project.

- O4-3 This comment asks if the proposed use for the proposed Project site (i.e., chassis repair and storage) are “transfers of existing facilities” on Terminal Island.

As discussed in the proposed Project description and Section 4.11(b) of the Recirculated Draft IS/MND, the ultimate future use for the site is unknown. Subsequent to demolition, it is anticipated that the site will be developed consistent with the applicable zoning designation and the PMP. Uses, among others, may include cargo support, which can vary from container or chassis storage to chassis repair and maintenance. There is no indication, and it is not anticipated, that such uses would involve a transfer of existing facilities on Terminal Island. Actions that are not reasonably foreseeable consequences of a project need not be discussed in a CEQA document (see, e.g., State CEQA Guidelines, Section 21065).

- O4-4 This comment asks if the proposed Project would involve the transfer of existing facilities on Terminal Island and how the land made available would be used. The commenter estimates that approximately 14 acres would be made available by moving the chassis repair and storage facilities.

As discussed in Response to Comment O4-3, future land uses are unknown; however, it is not anticipated that the proposed Project site will be used for the transfer of existing uses on Terminal Island.

- O4-5 This comment asks if LAHD is planning to expand other terminals to make way for rail expansion, container storage, new equipment, sustainable industries, or other operational activities.

Appendix G of the Recirculated Draft IS/MND provides a complete list of proposed and in-progress projects on LAHD property, including project descriptions, locations, and status.

- O4-6 This comment suggests that the Recirculated Draft IS/MND did not evaluate all the growth-inducing impacts of the proposed Project and that LAHD might be “piecemealing” development on Terminal Island. The commenter states that, because of these concerns, a more complete CEQA analysis is required.

Section 4.14(a) of the Recirculated Draft IS/MND discusses the Project’s potential to induce growth. It looked to several potential growth-inducing elements that are included in State CEQA Guidelines Appendix G Checklist, such as the development of new homes or the extension of roadways and other infrastructure. The Recirculated Draft IS/MND accurately determines that the Project lacks any element that would induce substantial unplanned growth in the area. Therefore, this Project will have a less-than-significant impact on growth.

As noted in Response to Comment O4-4, LAHD has disclosed all proposed and in-progress projects in Appendix G of the Recirculated Draft IS/MND. Each of these projects are separate and discrete and in varying stages of development, approval, and construction, and do not constitute “piecemealing” (see Recirculated Draft IS/MND, p. 4-63). Here, the proposed Project is a separate and discrete action, independent from the other projects listed in Appendix G of the Recirculated Draft IS/MND, including those immediately adjacent to the Project site (see Response to Comment O4-2). The Project would redevelop a singular former operation and make way for a future productive use specific to the Project site. It serves its own useful purpose, will proceed on its own, and is not a consequence of any other previously approved Project. The Project, therefore, does not meet this legal criteria for piecemealing. Therefore, because the Project does not meet any legal criteria for piecemealing, and is indeed not piecemealed development, additional CEQA analysis is not required. LAHD has evaluated all impacts of the proposed Project.

- O4-7 This comment states that all activities on the proposed Project site “should be zero emission” and include the use of solar panels.

Please refer to Section 6.8(b) of this Recirculated Draft IS/MND. As discussed therein, the proposed Project conforms to state and local greenhouse gas (GHG)/climate change regulations, policies, and strategies. As such, the proposed Project would have less-than-significant GHG impacts, and no mitigation is required. Because no mitigation is required under CEQA, the decision to require the proposed Project to have net zero GHG emissions and use solar panels as part of its design is entirely up to the Board of Harbor Commissioners.

- O4-8 This comment indicates a community desire to preserve fishing history at the proposed Project site and urges LAHD to find a way to preserve it as a public exhibition.

Please refer to Response to Comment A4-1. In addition, refer to Responses to Comments O6-1 and O6-2 additional information on ineligibility and for information on LAHD's efforts to solicit proposals regarding re-use of the building.

Response to Comment Letter O5, Dalmatian-American Club of San Pedro, Inc.

- O5-1 This comment opposes demolition of the Plant. It describes the Plant's importance to members of the Dalmatian-American Club (Club) and the local community because Martin Bogdanovich, founder of the French Sardine Company (later re-branded as Star-Kist after his passing), was also one of the Club's founding members. Many of those associated with the Club worked in the canning industry. The comment understands that LAHD requires additional storage for shipping operations but urges LAHD to find a new use for the Plant.

See Responses to Comments A4-1, O6-1, and O6-2.

Response to Comment Letter O6, Los Angeles Conservancy

- O6-1 The comment expresses the Los Angeles Conservancy's (Conservancy's) disappointment in the proposed Project and disagreement regarding the existing Plant's status as a historical resource. Specifically, the Conservancy believes that the Plant is a historical resource pursuant to CEQA and the Project should be environmentally reviewed in an environmental impact report (EIR).

The Plant's eligibility for listing as a historical resource pursuant to State CEQA Guidelines Section 15064.5 is discussed in Section 4.5(a) of the Recirculated Draft IS/MND. The analysis provided in Section 4.5(a) is supported by the 2021 *Final Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California* (2021 reevaluation) (ICF 2021), included as Appendix C to the Recirculated Draft IS/MND. The 2021 reevaluation's finding was established by four architectural historians who meet or exceed the Secretary of the Interior's Professional Qualification Standards (PQS) for architectural history, history, and art history (see Recirculated Draft IS/MND, Appendix C, p. 4-1). Furthermore, LAHD conducted a third party consultant peer review of the 2021 reevaluation, at which time a PQS architectural historian from Applied Earthworks agreed with the methodology, research, and conclusions (see Attachment H).

This expert analysis concludes that an inaccurate and deficient report had been prepared more than a decade prior (see Recirculated Draft IS/MND, Appendix C, Chapter 2) and that the existing Plant is ineligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) or as a local Historic-Cultural Monument (HCM), under all criteria. The 2021 reevaluation acknowledges the important history of the Fish Harbor tuna canning industry, the Star-Kist company, and the Plant. However, the analysis provided in the 2021 reevaluation shows, in great detail, that the Plant lacks the requisite



integrity under NRHP/CRHR A/1 (because the Plant has been substantially altered since construction) and lacks significance *and* integrity under NRHP/CRHR B/2, C/3, and D/4. It is also not eligible as an HCM for these same reasons (see, e.g., Recirculated Draft IS/MND, Appendix C, pp. 1-1 and 1-2, 6-1 to 6-12, 7-1 to 7-8, 8-1 to 8-4, and 9-1 to 9-7; see also Recirculated Draft IS/MND, p. 4-21).

The 2021 reevaluation provides a detailed integrity discussion and thorough analysis. To determine if the Plant retained integrity, the 2021 reevaluation identified potentially important dates associated with its historic context. Dates and date ranges included a justification are based on historical facts and concluded that any significant history associated with the Plant terminated in 1969 (see Recirculated Draft IS/MND, Appendix C, pp. 4-2 and 4-3). As a result of substantial alterations since 1970, the Plant lacks integrity of setting, design, materials, workmanship, feeling, and association to historically significant periods between 1952 and 1969 and, hence, does not convey historical significance (see Appendix C, pp. 7-1 to 7-7, 8-1 to 8-4, and 9-1 to 9-5). Further, the Plant does not qualify as a CEQA historical resource. Therefore, the Plant is not considered a historical resource and no significant impacts to cultural resources will result from the proposed Project. Thus, in light of the whole record and based on the careful judgment of LAHD after consideration of the most recent expert analysis and data from ICF, pursuant to criteria in State CEQA Guidelines Section 15064 preparation of an EIR is not required because there would be no significant impacts to historic resources resulting from the proposed Project. See also Response to Comment O6-13.

- O6-2 The comment expresses the Conservancy's concerns regarding preservation and stewardship of LAHD's historical resources. In addition, the Conservancy notes that it previously collaborated with LAHD in 2013 on the 2030 Master Plan Update as well as the May 2013 Cultural Policy (Los Angeles Harbor Department 2013). The Conservancy believed that the inclusion of cultural resources in the Master Plan Update and development of the Cultural Policy represented a "win-win" situation for both LAHD and the Conservancy.

LAHD is committed to both preservation and stewardship of its historical resources as well as collaboration with the Conservancy. Goal 5 of the PMP requires the Port to "identify and pursue the preservation of the historic resources within its jurisdiction." LAHD follows the Cultural Policy, which the Conservancy helped establish, that directs LAHD to maintain a list of historical resources and update that list every 5 years (Cultural Policy [III.A and IV.C]). The Cultural Policy also directs LAHD to reevaluate buildings, structures, objects, and districts included in the inventory but not listed in federal, state, or local registers if the previous evaluation was more than 5 years old at the time of environmental review (Cultural Policy [V.E.1]) and promote and establish priorities for the preservation and adaptive reuse, where feasible, of *historic* buildings, structures, objects and districts owned, or located on property owned, by the Harbor Department" (Cultural Policy [V.A], *italics added*) (see Recirculated Draft IS/MND, Appendix C, Attachment C, for a copy of the Cultural Policy; see also Responses to Comments A4-1 and O6-1). As discussed in Response to Comment O6-1, the Plant neither meets the criteria for listing in the NRHP or CRHR or designation as an HCM, nor qualifies as a historical resource.

The Plant, and other extant Star-Kist facilities, were previously evaluated in the 2008 *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California* (2008 evaluation) (Jones & Stokes 2008; see also Recirculated Draft IS/MND, Appendix C, Attachment B). Although the 2008 evaluation concluded, inaccurately, that the Plant was eligible for the NRHP and CRHR and as an HCM (see Recirculated Draft IS/MND, Appendix C, Chapter 3 [2008 Evaluation: Summary of Deficiencies]), the Plant was not formally listed in the NRHP or CRHR or designated as an HCM at that time or anytime thereafter. Therefore, reevaluation of the Plant in 2021 complies with the Cultural Policy to reevaluate all structures not listed in federal, state, or local registers where the previous evaluation is over five years old. The Cultural Policy requires that LAHD prioritize the preservation of *historical* resources but does not advocate that it preserve facilities not meeting the qualifying criteria. Refer to Response to Comment O6-1 for more detail on the 2021 reevaluation.

- O6-3 The comment notes that the Plant was previously evaluated as eligible for the NRHP and CRHR and as an HCM at the time of the Master Plan Update in 2013 and that the Conservancy believes that the Plant has “attained greater significance due to [...] rarity.”

Refer to Response to Comment O6-1.

None of the registration programs that qualify resources as historical resources include rarity in their criteria for significance. However, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, provides guidance for evaluating the integrity of rare property types (National Park Service 1997). It states that “...when evaluating the integrity of a property that is a rare surviving example of its type” the property “...*must* have the essential physical features that enable it to convey its historical character or information” (National Park Service 1997, p. 47, italics added). If other comparative examples are equally rare and in poor condition, then this “...may justify accepting a greater degree of alterations or fewer features...”, *but only* “...provided that *enough of the property survives* for it to be a significance resource.” As explained in detail in the 2021 reevaluation in Appendix C of the Recirculated Draft IS/MND, the Plant is *substantially* altered such that it lacks the integrity required to convey significance and to be considered a significant resource. Although there are few extant canning facilities present at the Port of Los Angeles, the Plant is so altered that it lacks the “essential physical features” needed to meet the rarity threshold discussed in *National Register Bulletin 15*.

- O6-4 The comment disagrees with the 2021 reevaluation and expresses an opinion that the Plant retains “substantial integrity” and, therefore, conveys significance for its canning history. The comment also urges LAHD to prepare an EIR with project alternatives.

The comment regarding integrity is a statement of opinion and does not provide documentation or analysis to dispute the conclusions in the Recirculated Draft IS/MND. As discussed above, expert evaluations made by five PQS architectural historians concluded that the Plant lacks the integrity required to convey significance. Refer to Responses to Comments O6-1 through O6-3 for more detail. An EIR need not be prepared in the absence of a historical resource and/or significant

impacts, and alternatives are not required to be identified or analyzed as part of an IS/MND. See also Response to Comment O6-1.

- O6-5 The comment expresses an opinion that the 2021 ICF reevaluation does not identify what alterations have occurred to warrant the change between the prior the Star-Kist and Fisherman's Pride processing Plant (i.e., Chicken of the Sea [henceforth referred to as the "Cannery Block"]) evaluations (which concluded that both canneries were eligible for the NRHP and CRHR and as an HCM) and the recent reevaluations that concluded both canneries were not eligible under any criteria.. Specifically that LAHD "was operating as if" the both canneries were historical resources up until 2018 prior to the reevaluations because LAHD identified it as eligible for the NRHP on its 2015 inventory of cultural resources.

This statement of opinion does not provide documentation or analysis to dispute the conclusions in the Recirculated Draft IS/MND. ICF's 2021 reevaluation of the Plant, included as Appendix C of the Recirculated Draft IS/MND, was warranted under LAHD's Cultural Policy and explains in detail why the Plant is no longer considered to qualify as a historic resource. Refer also to Responses to Comments O6-1 to O6-4.

The 2021 reevaluation considers in-depth research; development of an additional, new historic context; and a detailed assessment of integrity not originally included in the 2008 evaluation, as well as contemporaneous, but minor alterations since 2008 (see Recirculated Draft IS/MND, p. 2-2), which all together resulted in the conclusion that the facility lacks the integrity to convey historical significance (see Appendix C, pp. 2-1 to 2-7, 4-1 to 4-4, 6-1 to 6-12, 7-1 to 7-8, 8-1 to 8-4, and 9-1 to 9-5). Refer to Response to Comment O6-1 for an explanation on how the 2021 reevaluation analyzed integrity and significance. Thus, the change between the 2008 evaluation and the 2021 reevaluation is primarily one of analytical comprehensiveness and accuracy, although the facility has in fact undergone some material changes since 2008 as a result of vandalism and security measures in response to vandalism.

ICF performed a comprehensive assessment in 2021, going through regulatory criteria and their aspects in detail, using conventional and field-accepted methodology that resulted in approximately 40 pages of analysis. Whereas the 2008 evaluation performed a more cursory or generalized analysis that spanned only approximately 13 pages. The 2008 evaluation, for example, did not establish a clearly stated period of significance, did not analyze the seven aspects of integrity, did not support its claims regarding that the Plant is a significant example of a master architect's work, did not substantiate important statements about the Plant as representative of its type, etc. (Recirculated Draft IS/MND, Appendix C, pp. 2-2 to 2-7).

LAHD acknowledges that the 2015 inventory, referenced by the commenter, denoted that the Plant was eligible for the NRHP. But, this classification was based on the inaccurate and deficient 2008 evaluation. Since that time, and based on the 2021 reevaluation, LAHD now understands that this Plant is not eligible for the NRHP, CRHR, or as an HCM.

The Cannery Block, referenced by the commenter, was reevaluated in 2019 in a report titled *Final Historical Reevaluation of the Cannery Block (formerly Chicken of the Sea)*,

*338 Cannery Street, Terminal Island* (2019 reevaluation) (ICF 2019). As noted in the 2019 reevaluation, several changes occurred to the Cannery Block between the previous evaluation in 2008 and the reevaluation in 2019. As with the Plant, the 2019 reevaluation considers in-depth research, development of a new historic context, and a detailed assessment of integrity not originally included in the previous evaluation (see 2019 reevaluation, pp. 25–55).

- O6-6 The comment asks about material changes to the Plant and Cannery Block since their previous evaluations and reevaluations. The comment also notes that the Plant and the Cannery Block are significant for their association with events and patterns of events rather than architecture and asks, “what material circumstances have substantially changed, and how was [integrity] evaluated for a resource that is primarily conveying its significance through historic and cultural associations?”

As discussed in the Responses to Comments O6-4 and O6-5, the Plant did not undergo major alterations between 2008 and 2021.

As discussed in the responses to comments O6-1 and O6-4, the Plant is associated with the Fish Harbor tuna canning industry and the Star-Kist company; however, it lacks sufficient integrity to convey that significance and, therefore, does not meet the NRHP, CRHR, or HCM eligibility or listing criteria. Integrity is analyzed from a date or a range of dates associated with an important historic context. As noted by the Conservancy in the comment letter, its thresholds may vary depending on the significance of the resource. To determine if the Plant retained integrity, the 2021 reevaluation identified potentially important dates associated with its historic context. Dates and date ranges included a justification, based on historical facts, and concluded that any significant history associated with the Plant terminated in 1969 (see Appendix C, pp. 4-2 and 4-3). Given the numerous alterations since 1970, the Plant lacks integrity of setting, design, materials, workmanship, feeling, and association to 1952–1969 and cannot convey its historical significance (see Appendix C, pp. 7-1 to 7-7, 8-1 to 8-4, and 9-1 to 9-5).

See Responses to Comments O6-5 for information on the Cannery Block.

- O6-7 The comment asks if LAHD consulted with Los Angeles Office of Historic Resources (OHR) and SurveyLA, pursuant to the Cultural Policy, and whether OHR and SurveyLA concur with the LAHD’s findings.

LAHD’s Cultural Policy does not require LAHD to consult with, or obtain concurrence from, either OHR or SurveyLA regarding its evaluations and reevaluations. It also does not require LAHD to consult with other potentially interested parties. Nevertheless, LAHD distributed the Recirculated Draft IS/MND to the State Historic Preservation Office (SHPO) and various Departments of the City of Los Angeles (City) at the start of the public comment period for its review and comments. The SHPO and the City declined to provide any comments on the Project or the Recirculated Draft IS/MND. Furthermore, although SurveyLA discussed LAHD in its 2018 historical resources document, it did not survey or evaluate any resources on LAHD property (SurveyLA 2018, pp. 2 and 102). SurveyLA has stated that LAHD inventories its own resources (SurveyLA 2018, p. 102).

- O6-8 The comment states that the reevaluation is a “wrongful determination” and that LAHD is purposely attempting to avoid an EIR and erase resources associated with the Port’s canning history with the reevaluation.

See Responses to Comments O6-1, O6-2, O6-4, O6-5, and O6-6.

- O6-9 The comment provides a summary of the history of Fish Harbor, including information on the pre–World War II Japanese American community on Terminal Island and postwar development and growth in the canning industry.

LAHD acknowledges that the history of Fish Harbor is significant, as detailed in Appendix C, Chapter 6 and Chapter 9, of the Recirculated Draft IS/MND. As a summary of history, this comment does not warrant further response.

- O6-10 The comment discusses the Plant and Cannery Block and states that the two resources were previously found eligible under multiple NRHP, CRHR, and HCM criteria. Moreover, it states that the resources “hold cultural significance for their associations with Japanese American heritage on Terminal Island and are representative of the companies that fostered a major U.S. industry.” The comment also specifically calls out the Plant’s architectural significance because of its architect and size.

Refer to Responses to Comments O6-1 to O6-5 for details on the 2021 reevaluation of the Project site and the prior inaccurate evaluation in 2008, as well as LAHD’s adherence to its Cultural Policy.

Fish harbor’s early history is the history of Japanese American and their vibrant “Furustato” community on Terminal Island. Men owned and worked on fishing vessels while women and children worked as “Tuna Nurses,” packing various types of fish products (California Japantowns n.d.). In 1942, the federal government forcibly removed all members of the community. The Navy took over the Port and razed the homes, businesses, and social centers of the community (Meares 2018; Los Angeles Conservancy 2020). LAHD regained control of the Port after World War II; subsequently LAHD expanded Fish Harbor and reclaimed land along its east side c. 1950 and leased the land to Star-Kist. Star-Kist opened the Plant on this newly reclaimed land in December 1952 – over a decade *after* the Japanese American community was removed and their village destroyed (Nishkian and Zelson 1952, p. 15-20; Los Angeles Department of Building and Safety Permit No. 1951LA15652.). Therefore, the Plant is not associated with Japanese American heritage on Terminal Island. Moreover, as discussed in the Responses to Comments A4-1, O6-1 and O6-2, it lacks sufficient integrity to convey significance.

Likewise, the Cannery Block was also substantially altered after the potentially important dates associated with its historic context. The Cannery Block originally contained four fishing- and canning-related business; however, beginning in the late 1960s, building permits, historic photographs, and historic aerials indicate that the Cannery Block underwent substantial demolition, new construction, and alterations to support a single canning business (Sanborn Fire Insurance Company 1950; Nationwide Environmental Title Research, LLC 1952, 1963, 1972, and 1980).

Because the substantial alterations date to over 25 years *after* the government forcibly removed the Japanese American community on Terminal Island, the Cannery Block does not retain an association with that pre–World War II community. In addition, it also lacks an association with “the major U.S. [canning] industry” because its alterations date to a period when overseas tuna canning production superseded U.S. operations (Belnap 1969:4) (Recirculated Draft IS/MND, Appendix C, pp. 4-2 to 4-5, 7-1 to 7-7, and 8-1 to 8-4; ICF 2019, pp. 25 to 29 and 41 to 48).

The 2021 reevaluation acknowledges that John K. Minasian, architect for the Plant, was a master engineer, as evidenced from his skillful work on projects such as the 1962 Space Needle in Seattle, Washington. However, as discussed in the 2021 reevaluation, the Plant is not a good or representative example of his engineering prowess. Moreover, newspapers of the era reported that the Plant “[was] said to be the largest example of precast “tilt-up” method of construction ever built by a private industry on the west coast” (*Los Angeles Times* 1952:147). Although it had a large footprint, it was a one-story, tilt-up concrete building that did not require skilled or innovative architecture or engineering. Therefore, the 2021 reevaluation concluded that the Plant was not significant as a representative example of Minasian’s innovative engineering work (see Appendix B, pp. 2-2 to 2-7, 4-3, and 9-1 to 9-5).

- O6-11 The comment suggests that extant canning resources have “gained importance” as others have been demolished. The comment also cites the 2008 evaluation and asks, “what has changed?” to determine that the Plant is not significant at the national, state, or local level.

See Responses to Comments O6-1, O6-3 to O6-5.

- O6-12 The comment reiterates the question about changes to the Plant since 2008, but focuses primarily on CEQA regulations. Specifically, the comment states that CEQA requires agencies to consider feasible alternatives and mitigation if significant adverse impacts would occur.

See Responses to Comments A4-1, O6-1, and O6-2 for discussions on why the Plant is not a historical resource pursuant to CEQA and Response to Comment O6-5 for information on the differences between the 2008 evaluation and the 2021 reevaluation.

As previously demonstrated, the Plant is not eligible for the NRHP, CRHR, or as a local HCM and does not qualify as a historical resource. Therefore, no significant adverse environmental impacts would occur with Plant demolition. Because there will not be any significant adverse impacts to cultural resources, alternatives and mitigation measures to preclude or avoid such impacts are not required under CEQA. Although alternatives are not required as part of the proposed Project, LAHD publicly solicited RFIs on May 2, 2016, May 14, 2018, and March 10, 2022, to obtain ideas on potential reuse of the Plant. Refer to Response to Comment O6-15 for more details on this effort.

- O6-13 The comment provides detail regarding CEQA regulations, specifically that the “fair argument” standard of review applies to negative declarations. The comment states that a fair argument gives “no deference” to an agency and “mandates the preparation of and EIR if there is any substantial evidence in the ‘whole record’ of proceedings that supports a ‘fair argument’ that a project ‘may’ have a

significant effect on the environment.” The commenter goes on to assert that there is a “fair argument” here that the Plant is a historical resource that will be impacted by the Project.

The comment does not provide any substantial evidence, facts, or expert opinion supported by facts to dispute the conclusions in the Recirculated Draft IS/MND, specifically the analysis and conclusions reached by ICF in its evaluation of the Project site for historic resources (see Recirculated Draft IS/MND, Appendix C; see also PRC Section 21080(d)). Substantial evidence does not include arguments, speculation, unsubstantiated opinion or narrative, clearly inaccurate or erroneous evidence, or socioeconomic impacts not related to the physical environment (see CEQA Guidelines Section 15384).

The work prepared by ICF, described in Responses to Comments A4-1, O6-1, and O6-2, has been corroborated by a professional peer review, also described in Response to Comment O6-1. These two sets of experts on cultural resources agree that the Plant is not eligible for the NRHP, CRHR, or as a local HCM, that it does not qualify as a historical resource, and that the 2008 evaluation by Jones and Stokes was inaccurate and deficient (see Response to Comment O6-5). Thus, there can be no “reasonable possibility” that a significant impact to a historical resource would occur as a result of the Project’s demolition of the Plant. Therefore, LAHD does not believe that the Conservancy has raised a fair argument that a significant impact to a historical resource may occur. The facts and analysis contained in the Recirculated Draft IS/MND and 2021 reevaluation in Appendix C, along with other supporting documentation, provide substantiation for the conclusion that the proposed Project would not result in a significant impact on the environment.

- O6-14 The comment conveys the Conservancy’s belief that the Plant is a historical resource pursuant to CEQA; therefore, LAHD must prepare an EIR.

See Responses to Comments O6-1, O6-4, and O6-13.

- O6-15 The comment expresses concern that LAHD had not consulted with the Conservancy since an initial meeting regarding the proposed Project on March 10, 2020. It notes LAHD’s previous collaboration with the Conservancy on the Master Plan Update and Cultural Policy. The comment also states that the Conservancy believes that LAHD is reevaluating resources, deeming them ineligible “without substantial evidence and justification.”

LAHD is committed to consultation and collaboration with the Conservancy. Although CEQA does not require a lead agency to meet individually with nonprofit organizations regarding Project-related determinations, LAHD met with the Conservancy four times regarding the proposed Project—first on March 10, 2020, and then again on January 26, 2022, June 30, 2022, and August 15, 2022. Further, LAHD plans to meet with the Conservancy periodically in the future as part of its ongoing commitment to consultation and collaboration, although no specific meeting is set at this time.

As discussed in the Responses to Comments O6-1, O6-2, O6-4, O6-5, O6-6, and O6-10, LAHD complies with its Cultural Policy. Furthermore, the 2021 reevaluation provides substantial evidence and justification for its ineligible finding (see Recirculated Draft IS/MND, Appendix C, pp. 1-1

and 1-2, 6-1 to 6-12, 7-1 to 7-8, 8-1 to 8-4, and 9-1 to 9-7). For more details, refer specifically to Response to Comment O6-1.

- O6-16 The comment expresses concern regarding the 2021 reevaluation's potential district evaluation. Specifically, the Conservancy is concerned that the potential district evaluation will lead to the demolition of other buildings at Fish Harbor. The Conservancy also noted that the buildings at Fish Harbor are not significant for their architecture and, therefore, should not be held to the same standard as buildings that are significant for their architecture.

The 2021 reevaluation considers whether the Plant is eligible as a district contributor in order to provide a complete historical analysis of the Plant. The potential district evaluation in Chapter 10 of the 2021 reevaluation considers only districts where the Plant may have the potential to be contributor to a historic district (see Recirculated Draft IS/MND, Appendix C, pp. 10-1 to 10-27). The 2021 reevaluation identified four potential historic district themes that are associated with the Plant and extant Fish Harbor buildings. Only one of the four themes was associated with building type and architectural style (see Recirculated Draft IS/MND, Appendix C, p. 10-2). Based on the identified themes and their respective periods of significance, as well as an analysis of district boundaries, construction dates, and integrity, the 2021 reevaluation concludes that the Plant is not a contributor to a historic district.

The 2021 reevaluation is specific to the proposed Project and associated Plant and does not speak to NRHP, CRHR, or local eligibility or historical resource status pursuant to CEQA for other facilities at Fish Harbor. Any subsequent projects must undergo their own environmental review wherein issues associated with cultural resources must be evaluated, separate and independent from the proposed Project. LAHD understands the Conservancy's desire to preserve the "collection of properties at Fish Harbor" this it believes "tells a uniquely layered history." However, LAHD has no regulatory or other legal obligation to preserve a Plant that does not meet listing or designation requirements and does not qualify as a historical resource, as occurs for the Plant. LAHD, however, does have an obligation to ensure that Fish Harbor remains an active and functioning component of the Port of Los Angeles.

- O6-17 The comment states that the Conservancy disagrees with the 2021 reevaluation, including the district evaluation, and the Cannery Block reevaluation because it believes that the resources retain sufficient integrity to convey significance, as concluded in the previous evaluations.

The comment regarding integrity is a statement of opinion and without facts to dispute the conclusions in the Recirculated Draft IS/MND. The comment does not provide analysis for this assertion.

See Response to Comment O6-1. See also Responses to Comments O6-4, O6-5, O6-6, O6-10, O6-13, and O6-16.

- O6-18 The comment reiterates the Conservancy's concern regarding the potential district evaluation and states that the Conservancy believes that the 1952 portion of the Plant retains sufficient integrity to convey significance on the national, state, and local levels under multiple criteria.



See Response to Comment O6-1. See also Responses to Comments O6-4, O6-5, O6-6, O6-10, O6-13, and O6-16.

- O6-19 The comment provides information on the Conservancy and requests a meeting to discuss the proposed Project.

LAHD acknowledges this comment. LAHD met with the Conservancy on March 10, 2020, January 28, 2022, June 30, 2022, and August 15, 2022, to consult on the proposed Project. See Response to Comment O6-15.

#### Response to Comment Letter I1, Pat Nave

- I1-1 This comment letter, dated December 14, 2021, states that the December 6, 2021, public comment deadline did not provide the Northwest San Pedro Neighborhood Council adequate time to comment on the Project and requests a 90-day extension.

LAHD extended the public review period an additional 15 days, ending on December 21, 2021. The Northwest San Pedro Neighborhood Council provided a comment letter on December 14, 2021, but did not provide additional comments after that date.

#### Response to Comment Letter I2, Mary Bumbak

- I2-1 This comment opposes demolition of the Plant. The commenter shares her personal ties to the Plant and discusses the importance of it to the community. The commenter urges LAHD to find a new use for it.

See Responses to Comments A4-1, O6-1, and O6-2.

#### Response to Comment Letter I3, Darlene Davis

- I3-1 This comment opposes demolition of the Plant. The commenter urges LAHD not to demolish the Plant, given its historical importance to San Pedro.

See Responses to Comments A4-1, O6-1, and O6-2.

#### Response to Comment Letter I4, Olivia Fernandez

- I4-1 This comment opposes the demolition of the Plant. This comment urges LAHD to not demolish the Plant given its historical importance to the local community. The comment also laments the loss of other LAHD resources.

See Responses to Comments A4-1, O6-1, and O6-2.

#### Response to Comment Letter I5, Maria Enriquez

- I5-1 This comment opposes demolition of the Plant. The commenter states that other historical sites have been demolished or remodeled in the harbor area and urges LAHD to not demolish the Star-Kist cannery facilities.

See Responses to Comments A4-1, O6-1, and O6-2.

Response to Comment Letter I6, Anthony Misetich

- I6-1 This comment opposes demolition of the Plant. The commenter provides a brief history of the Plant and highlights its association with locals who worked at the cannery and Martin Bogdanovich, founder of the company. The commenter also notes that the Plant is significant for its architect, John K. Minasian, and its architecture. For these reasons, the commenter asks that the Plant be preserved in accordance with the Cultural Policy.

See Responses to Comments A4-1, O6-1, and O6-2 for information on why the Plant is not a historical resource and Response to Comment O6-10 for information on why the Plant is not a good example of John K. Minasian's engineering work.

- I6-2 This comment states that the building can be repurposed to can other food products and suggests a Request for Proposal to find a suitable company for the Plant.

See Responses to Comments A4-1, O6-1, and O6-2.

Response to Comment Letter I7, Stephanie Mardesich

- I7-1 This comment opposes demolition of the Plant. The commenter provides a brief history of her familial ties to the local canning industry.

LAHD recognizes that the commenter and others have familial and community ties to the Plant. See Responses to Comments A4-1, O6-1, and O6-2.

- I7-2 This comment provides information on the Cultural Policy, as excerpted from a May 2013 press release that noted that LAHD would prepare and maintain an inventory, complete a survey of resources, and (as highlighted by the commenter) establish priorities for preservation and reuse where possible.

LAHD has complied with its Cultural Policy. Specific to the commenter's highlighted text, LAHD has solicited a total of three RFIs for ideas on reuse of the Plant but received no germane submissions. See also Responses to Comments A4-1 and O6-2.

- I7-3 This comment suggests that LAHD has overlooked the Cultural Policy, especially the item highlighted by the commenter regarding reuse. The comment also includes a statement from the Recirculated Draft IS/MND's introduction to illustrate that the proposed Project, including associated public nuisance issues, contradicts the Cultural Policy. It suggests that LAHD has let the Plant become a public nuisance.

LAHD has complied with its Cultural Policy. See Responses to Comments A4-1 O6-2, and I7-2.

As noted in the Recirculated Draft IS/MND, preventing public nuisance conditions, such as vandalism, is one of several objectives of the proposed Project (Recirculated Draft IS/MND, p. 1-1). Although securing the Plant is challenging (see Recirculated Draft IS/MND, p. 2-3), LAHD has provided measures to secure the Plant, including locking and securing all entry points, installing

fencing around portions of the Plant, installing motion detectors to alert of illegal ingress, removing roof access ladders, and providing a periodic police presence.

- 17-4 This comment advocates for reuse of the Plant, suggesting that it could be used for other types of canning. The comment also urges LAHD to consider more restoration and preservation for its resources rather than demolition.

See Responses to Comments A4-1, O6-1, and O6-2.

## **3.0 INTRODUCTION**

LAHD prepared this Final IS/MND to address the environmental effects of the proposed Project. The proposed Project would occur on a 14-acre site that was home to the former Star-Kist facilities on Terminal Island. LAHD is the lead agency under the CEQA.

The primary objectives of the proposed Project are to create a parcel of land that is more marketable for future development, to reuse and capitalize the site more efficiently, and to alleviate public nuisance. LAHD has solicited multiple requests for information for the proposed Project site but received no viable responses and has had no success in finding a feasible future use due to the complex's incurable functional obsolescence as well as irreparable infrastructure. However, for the purposes of CEQA, this Final IS/MND assumes the potential future use of the Project site for cargo support, which can vary from container or chassis storage to chassis repair and maintenance, consistent with the PMP. For the purposes of this evaluation, it is assumed that the site will be developed with a chassis repair and maintenance depot.

### **3.1 CEQA PROCESS**

This document was prepared in accordance with CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.). One of the main objectives of CEQA is to disclose the potential environmental effects of proposed activities to the public and decision-makers. CEQA requires the potential environmental effects of a project to be evaluated prior to implementation.

On December 12, 2019, LAHD circulated an IS/Negative Declaration (ND), which determined that the proposed Project would not have a significant effect on the environment. During the 30-day public review period for the 2019 IS/ND, responsible agencies and the public had an opportunity to provide written comments on the information contained within the Draft IS/ND. Based on comments received, LAHD determined to recirculate the document pursuant to section 15073.5 of the State CEQA Guidelines (14 CCR 15000 et seq.) to include an updated, revised analysis that responds to specific concerns raised by commenters on the 2019 IS/ND and to include analysis of reasonably foreseeable future uses of the Project site. The Recirculated Draft IS/MND included a discussion of the proposed Project's effects on the existing environment.

Under CEQA, the lead agency is the public agency with primary responsibility for approval of a project. Pursuant to Section 15367 of the State CEQA Guidelines, LAHD is the lead agency for the proposed Project. LAHD prepared this Final IS/MND to comply with CEQA. LAHD will consider the information in this document when determining whether to approve the proposed Project.

This Final IS/MND meets CEQA content requirements by including a project description, a description of the environmental setting and potential environmental impacts, a discussion of consistency with plans and policies, and the names of the document preparers.

In accordance with CEQA and the State CEQA Guidelines, the Recirculated Draft IS/MND was initially circulated for public review and comment for a period of 30 days, but was later extended 15 days for a total of 45. The public review period for the Recirculated Draft IS/MND began on November 4, 2021, and

concluded on December 21, 2021. In addition, the Recirculated Draft IS/MND was distributed to interested parties involved public agencies, organizations, and private individuals for review. The document is available online at <https://www.portoflosangeles.org/environment/environmental-documents>. Due to the COVID-19 pandemic, print documents are available for distribution to interested parties and available for pickup at the Port of Los Angeles Environmental Management Division. Approximately 90 notices were sent to community residents, stakeholders, and local agencies.

During the 45-day public review period, the public and interested agencies and organizations had an opportunity to provide written comments on the information contained within the Recirculated Draft IS/MND. The public comments on the Recirculated Draft IS/MND, as well as the responses to those comments, are included in the record and considered by LAHD during its deliberation as to whether the necessary approvals should be granted for the proposed Project. The proposed Project would be approved only if LAHD finds that there is no substantial evidence that a project will have a significant effect on the environment and that the MND reflects the lead agency's independent judgment and analysis (14 CCR 15070).

In reviewing the Recirculated Draft IS/MND, affected public agencies and interested members of the public should have focused on the sufficiency of the document with respect to identifying and analyzing potential impacts on the environment and the ways in which the potential significant effects of a project are proposed to be avoided or mitigated. Comments on the Recirculated Draft IS/MND were submitted in writing prior to the end of the 45-day public review period and postmarked by December 21, 2021.

Please submit written comments to:

Chris Cannon, Director  
Los Angeles Harbor Department  
Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, California 90731

Written comments may also be sent by email to [ceqacomment@portla.org](mailto:ceqacomment@portla.org). Comments sent by email should include the Project title in the subject line.

For additional information, please contact LAHD, Environmental Management Division, at 310.732.3675.

### **3.2 PREVIOUS ENVIRONMENTAL DOCUMENTATION**

As previously noted, in 2019, LAHD prepared a preliminary design to address the environmental effects of the 2019 proposed Project. As originally proposed, the preliminary design involved demolition of the former Star-Kist cannery facilities along with three small warehouses and accessory structures along the southern portion of the East Plant on an approximately 16.5-acre site on Terminal Island within the Port of Los Angeles (Port). The preliminary design did not include any proposed foreseeable future use.

As a first step in complying with CEQA, LAHD prepared an IS/ND to address the environmental effects of the 2019 proposed Project. The Draft IS/ND determined that the 2019 proposed Project would not have a significant effect on the environment. The Draft IS/ND was circulated for a period of 30 days for public review

and comment, in accordance with the CEQA statutes and guidelines. The public review period for the Draft IS/ND began December 12, 2019, and closed on January 13, 2020. The Draft IS/ND was specifically distributed to interested and/or involved public agencies, organizations, neighbors, and private individuals and made available at publicly accessible locations for review. In addition, the Draft IS/ND was filed with the Los Angeles County Clerk, the City of Los Angeles Clerk, and the State Clearinghouse and was made available online at <https://www.portoflosangeles.org>. During the 30-day public review period, responsible agencies and the public had an opportunity to provide written comments on the information contained within the Draft IS/ND. LAHD received comments from the Los Angeles Bureau of Sanitation, California Coastal Commission (CCC), Los Angeles Conservancy, Caltrans, and the Gabrieleño Band of Mission Indians-Kizh Nation. A complete record of the public comments received on the Draft IS/ND is included in Appendix A.

Comments from the CCC are addressed in Section 2.0, *Project Description*, Section 4.1, *Aesthetics*, and Section 4.4, *Biological Resources*. Comments from the Los Angeles Conservancy are addressed in Section 4.5, *Cultural Resources*, and comments from the Gabrieleño Band of Mission Indians-Kizh Nation are addressed in Section 4.18, *Tribal Cultural Resources*. Comments from the Los Angeles Bureau of Sanitation and Caltrans are noted and identified that the proposed Project as defined in the 2019 Draft IS/ND was unrelated to sewers, did not require a hydraulic analysis, and would not adversely affect any state transportation facilities.

To the extent that the comments and recommendation received remain relevant to the revised proposed Project and this analysis, they have been addressed/incorporated into this Final IS/MND. The Draft IS/ND was recirculated to incorporate previous comments and recommendations received into the proposed Project and to include an assessment of the potential future uses/development of the Project site.

### 3.3 DOCUMENT FORMAT

This IS/MND contains the following eight sections:

**Section 1.0, Introduction.** This section provides an overview of the proposed Project and the CEQA environmental documentation process.

**Section 2.0, Project Description.** This section provides a detailed description of the proposed Project's objectives and components.

**Section 3.0, Initial Study Checklist.** This section presents the CEQA checklist for all impact areas and mandatory findings of significance.

**Section 4.0, Impacts and Mitigation Measures.** This section presents the environmental analysis for each issue area identified in the checklist. If the proposed Project does not have the potential to have a significant impact on a given issue area, then the relevant section provides a brief discussion of the reasons why no impacts are expected. If the proposed Project could have a potentially significant impact on a resource, then the discussion provides a description of potential impacts and the mitigation measures and/or permit requirements to reduce those impacts to a less-than-significant level.

**Section 5.0, Proposed Finding.** This section presents the proposed finding regarding environmental impacts.

**Section 6.0, Preparers and Contributors.** This section provides a list of the key personnel who were involved in preparation of the Draft, Recirculated, and/or Final IS/MND.

**Section 7.0, Acronyms and Abbreviations.** This section provides a list of the acronyms and abbreviations used throughout the Draft, Recirculated, and/or Final IS/MND.

**Section 8.0, References.** This section provides a list of the reference materials used during preparation of the Draft, Recirculated, and/or Final IS/MND.

The environmental analysis included in Section 4.0, *Impacts and Mitigation Measures*, is consistent with the CEQA IS format presented in Section 3.0, *Initial Study Checklist*. Impacts are separated into the following categories:

**Potentially Significant Impact.** This category is applicable only if there is substantial evidence that an effect may be significant and no feasible mitigation measures can be identified to reduce impacts to a less-than-significant level. No impacts were identified that fall into this category.

**Less-than-Significant Impact after Mitigation Incorporated.** This category applies where the incorporation of mitigation measures would reduce an effect from a “potentially significant impact” to a “less-than-significant impact.” The lead agency must describe the mitigation measures and briefly explain how they would reduce the effect to a less-than-significant level (mitigation measures from earlier analyses may be cross referenced).

**Less-than-Significant Impact.** This category is identified when a proposed project results in impacts that are below the threshold of significance and no mitigation measures are required.

**No Impact.** This category applies when a proposed project would not create an impact with respect to a specific environmental issue area. “No impact” answers do not require a detailed explanation if they are adequately supported by information sources cited by the lead agency that show that the impact does not apply to a specific project (e.g., a project that falls outside a fault rupture zone). A “no impact” answer should be explained where it is based on project-specific factors and general standards (e.g., a project that would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

## **4.0 PROJECT DESCRIPTION**

This Final IS/MND is being prepared to evaluate the potential environmental impacts that may result from the proposed Project, which involves demolition of the former Star-Kist cannery facilities on an approximately 14-acre site on Terminal Island at the Port. Although the ultimate future use of the site is unknown, the potential future use of the site as cargo support, which can vary from container or chassis storage to chassis repair and maintenance, is a reasonably likely future use and representative of the types of industrial uses allowed in this location according to the applicable zoning and the PMP. Therefore, this analysis considers the impacts from development and operations of a chassis repair and maintenance depot for purposes of analyzing the impacts of potential future development of the site. Phase 1 of the proposed Project would result in demolition of the Plant, a small wharf structure, and a bridge connecting the Plant to the northern portion of the East Plant. After demolition, the Plant site would be secured by laying down a compacted and bound CMB and installing lighting, fencing, and LID BMPs (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects). Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 site and demolition of the East Plant. Similar to Phase 1, after demolition activities have been completed, the Phase 2 site would be graded and covered with CMB. LID BMPs, perimeter fencing, and exterior perimeter lighting would be installed. At this time, only Phase 1 activities are proposed to occur in the immediate future. When future funding becomes available, Phase 2 could occur. As discussed above, the future use of the site is not known at this time; however, for the purposes of CEQA, this document considers the potential future use of the site is as a chassis repair and maintenance depot.

This section describes the location for the proposed Project and discusses the Project's background and objectives. This document has been prepared in accordance with CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.).

### **4.1 PROJECT LOCATION**

#### **4.1.1 Regional Setting**

The proposed Project would be at the Port, on San Pedro Bay, 20 miles south of downtown Los Angeles (Figure 4-1 and Figure 4-2). The Port encompasses 7,500 acres, including 43 miles of waterfront. It has approximately 270 commercial berths and 27 terminals, including leased facilities to handle containers, automobiles, dry bulk, breakbulk and liquid bulk products, and cruise ships, as well as extensive transportation infrastructure for intermodal cargo movement by truck and rail. The Port also accommodates boat repair yards and provides slips for 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous types of small-service craft, and 15 charter vessels for sport fishing and harbor cruises. The Port also accommodates water-dependent recreational, visitor-serving, community, and educational facilities, such as a public beach, the Cabrillo Beach Youth Waterfront Sports Center, Cabrillo Marine Aquarium, Los Angeles Maritime Museum, 22<sup>nd</sup> Street Park, and Wilmington Waterfront Park.



LAHD, a proprietary department of the City of Los Angeles, is charged with operation, maintenance, and management of the Port. As landlord, LAHD leases properties to more than 300 tenants, including private terminal, tug, marine cargo, and cruise industry operators. LAHD administers the Port under California Constitution Article X, California PRC Section 6306 (“Tidelands Trust Statute”), and grants to the City from the California legislature. LAHD is chartered to develop and operate the Port in a manner that benefits maritime uses, including the support and access facilities needed to accommodate the demands of import and export waterborne commerce.

#### **4.1.2 Project Setting**

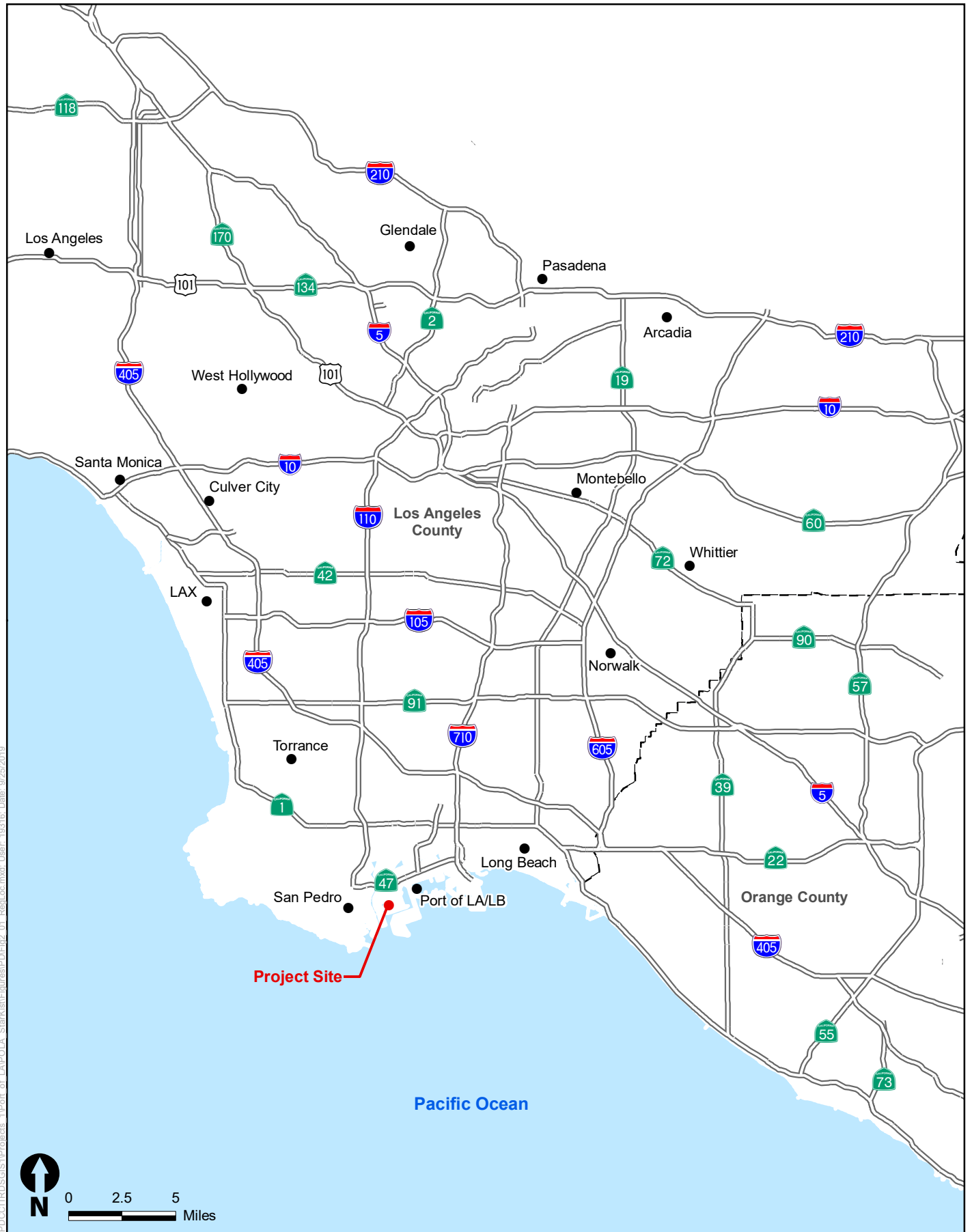
The proposed Project site is at 1000, 1040, 1050, 1054, and 1098 S. Ways Street and 936 and 1099 S. Barracuda Street. The site is bounded by Bass Street to the north, Earle Street to the east, Marina Street to the south, and Ways Street to the west. Access to the Project site is provided from State Route (SR) 47, the Harbor Freeway (Interstate [I] 110), the Long Beach Freeway (I-710), and the San Diego Freeway (I-405). Figure 4-3 shows the location of the Project site.

From 1952 to 1984, the proposed Project site was used as a cannery facility for Star-Kist tuna operations, with the buildings and additions constructed between 1952 and 1980. Star-Kist also built facilities, such as those for can storage and the company’s pet food production, adjacent to the Project site after 1970. In addition, the company built three plants and a laboratory prior to the construction of the buildings at the Project site, which were northeast of the Project site in the north area of Fish Harbor. Of the many Star-Kist facilities at Fish Harbor, Terminal Island, only Plant No. 4, the East Plant, and the Empty Can Warehouse remain extant to date.

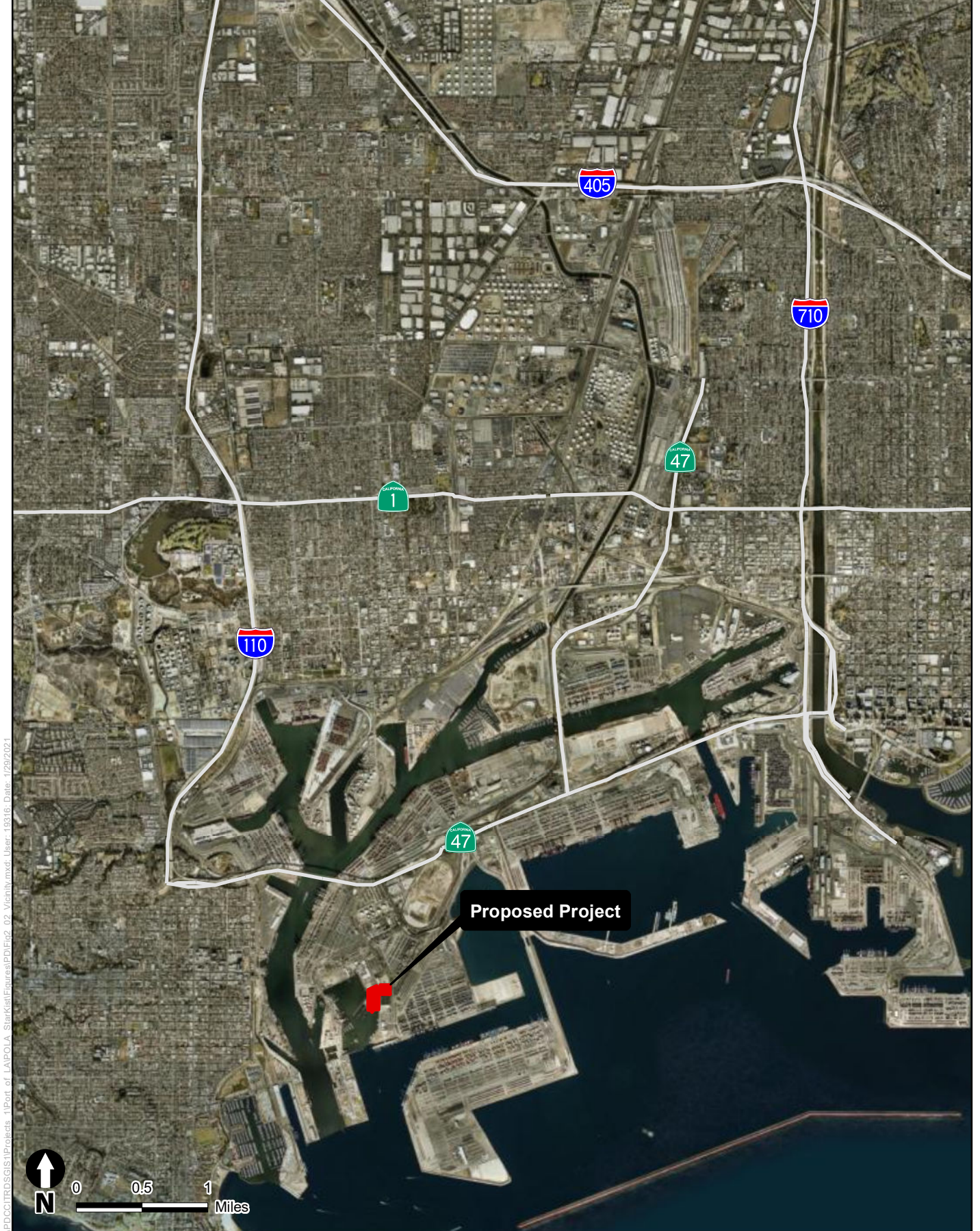
The proposed Project site totals approximately 14 acres and includes two main buildings: Plant No. 4 and the northern can manufacturing plant portion of the East Plant. These two separate buildings are linked by a bridge in the northern portion of the Project site. The bridge, which is approximately 350 feet south of Bass Street, crosses over the closed-off portion of Barracuda Street and connects Plant No. 4 to the northern portion of the East Plant. In addition to providing pedestrian access between the two buildings, the bridge carries pipes from Plant No. 4’s power-related infrastructure to the East Plant; it very likely had a past use (i.e., transferring fish products from one building to the other). The bridge is clad in seamed metal siding and features regularly placed vents below its low-pitched side-gabled roofline. The site also includes a small approximately 2,221-square-foot wooden waterside dock that is supported by approximately 20 wooden piles within Fish Harbor. A small canning operation was still in operation in the northern portion of the East Plant until December 2018. Other than this small canning operation, the Project site has been largely vacant for the last 10 years.

#### **4.1.3 Land Use and Zoning**

The proposed Project would be within an area covered by the City of Los Angeles General Plan (General Plan), Port of Los Angeles Plan (1982). The Port of Los Angeles Plan is one of 35 community plans that make up the general plan of the city (City of Los Angeles 1982). The plan provides an official 20-year guide to continued development and operation of the Port. The Project site has a general plan designation of General/Bulk Cargo for Hazardous Industrial and Commercial and Commercial Fishing (City of Los Angeles 2019a). Figure 4-4 shows the general plan land use designations for the Project site and surrounding area.







**Figure 4-2 Vicinity Map**





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Figure 4-3 Local Setting



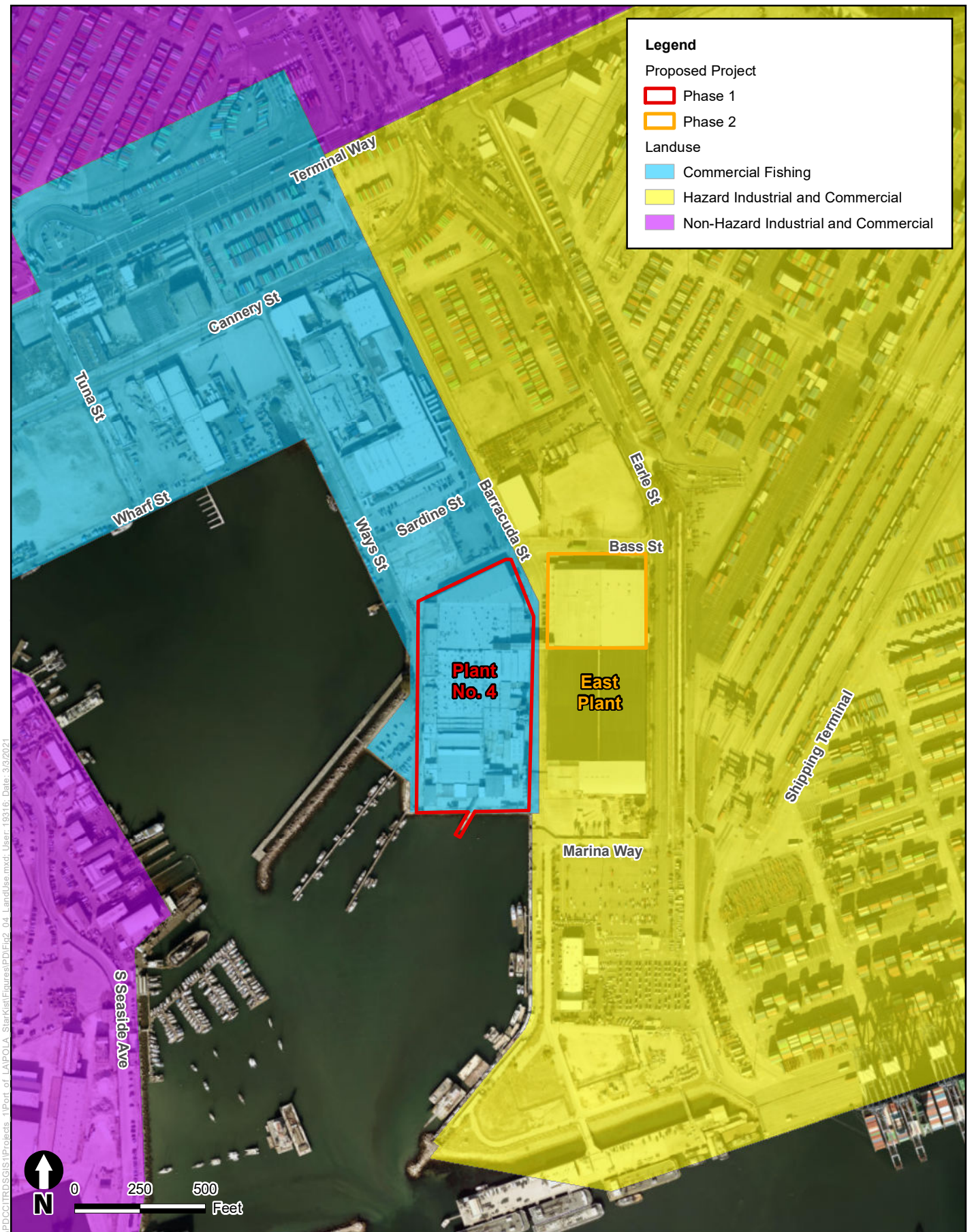


Figure 4-4 General Plan Land Use Designations

The PMP (Port of Los Angeles 2018) establishes policies and guidelines to direct future development of the Port. The original plan became effective in April 1980, after it was approved by the Board of Harbor Commissioners and certified by CCC. The PMP includes five planning areas. The Project site falls into two separate planning areas: Planning Area 3, Terminal Island, and Planning Area 4, Fish Harbor.

Planning Area 3 is the largest planning area, consisting of approximately 1,940 acres and more than 9.5 miles of usable waterfront. This planning area focuses on container operations. The land use designation for the eastern portion of the Project site has a PMP designation of Container, which allows water-dependent uses that focus on container handling and movement, including a container terminal, a chassis storage area, an on-dock rail yard, and omni-terminal uses.

Planning Area 4 consists of approximately 92 acres, with a total of 48 acres dedicated to commercial fishing. The land use designation for the western portion of the Project site has a PMP designation of Commercial Fishing or Maritime Support. The Commercial Fishing designation allows facilities that support commercial fishing and processing operations; the Maritime Support designation allows water-dependent and non-water-dependent operations that support cargo handling and other maritime activities (Port of Los Angeles 2018). Figure 4-5 shows the PMP land use designations for the Project site and surrounding area.

The Project site is zoned [Qualified] Heavy Industrial ([Q] M3-1) and is within the Harbor Gateway State Enterprise Zone (ZI-2130) as well as the Preliminary Fault Rupture Study Area (ZI-2442) (City of Los Angeles 2019a). Figure 4-6 shows the zoning designations for the Project site and surrounding area.

## **4.2 PROJECT OBJECTIVES**

The objectives of the proposed Project are to create a parcel of land that is more marketable for future development, to reuse and capitalize the site more efficiently, and to remove safety hazards and an attractive nuisance. LAHD has solicited multiple requests for proposals for the proposed Project site but has received no viable responses and has had no success in finding a feasible future use. Demolition of this property would remove a dilapidated building near the Palos Verdes fault zone. The buildings are challenging to secure and have been subjected to multiple incidents of vandalism and breaking and entering.

The proposed Project would be consistent with the goals and policies of the 2018 PMP as well as ongoing implementation of other key Port plans and policies, including the Terminal Island Land Use Plan Summary (Port of Los Angeles 2012), which describes land use and management priorities.

## **4.3 PROJECT DESCRIPTION**

### **4.3.1 Project Elements**

Phase 1 of the proposed Project would result in demolition of the Plant, a small wharf structure, and a bridge connecting Plant No. 4 to the northern portion of the East Plant. After demolition, the Plant site would be secured by laying down compacted and bound CMB and installing lighting, fencing, and LID BMPs. Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 Project site and

demolition of the East Plant. Similar to Phase 1, after demolition activities have been completed, the Phase 2 site would be graded and covered with CMB. LID BMPs, perimeter fencing, and exterior perimeter lighting would be installed.

At this time, only Phase 1 activities are proposed to occur in the immediate future. When future funding becomes available, Phase 2 may occur. As discussed above, the future use of the site is not known at this time; however, for the purposes of CEQA, this document considers the potential future use of the site as a chassis repair and maintenance depot. It is assumed that a concrete pad and canopy would be installed on the Phase 1 site only to facilitate the potential chassis repair and maintenance depot. Operation of a potential future chassis repair and maintenance depots would likely involve stacking chassis at a potential maximum of five high, which would be approximately 20 feet high. It is possible that the chassis maintenance depots at the Plant No. 4 site and the East Plant site would operate independently or under one operator. Impacts are not anticipated to differ in either situation. This document addresses the environmental effects of demolition, development, and the potential future operation of both phases.

#### **4.3.2 Phase 1 – Demolition of the Star-Kist Main Plant and Site Preparation**

Phase 1 would encompass approximately 9.2 acres and involve demolition of Plant No. 4 and the small waterside dock along with the bridge that connects Plant No. 4 to the East Plant. Prior to demolition, lead and asbestos abatement would be required at the buildings, which would take approximately 75 days. Demolition activities would last approximately 60 days and include the removal of an approximately 2,221-square-foot waterside dock, including approximately 20 wooden piles. The piles would be removed by pulling them from the sea floor using a vibratory pile extractor wherever possible. Any piles that cannot be pulled out would be abandoned in place at minus 2 feet below the existing mudline. Work vessels would include a derrick barge with a crane for the pile removal and a material barge to haul wharf debris to another area of the Port for disposal. Both of these barges would be supported by a tugboat. Prior to demolition of the small waterside dock, a pre-construction eelgrass survey would be required.

Once all structures are demolished, the Phase 1 site would be graded. Newly exposed dirt would be covered with compacted and bound CMB and therefore would be impermeable. This would require compliance with LID BMPs (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects), including use of a potential infiltration basin along the entire demolition perimeter. For the purposes of this analysis, it is assumed that the infiltration basin would be 6 feet wide by 3 feet deep and would be filled with clean rock or gravel. Security fencing and perimeter lighting would also be installed at the site. Phase 1 is anticipated to begin in April 2023 and would take approximately 10 months to complete (April 2023 through February 2024). ~~fall 2022 and would take approximately 10 months (August 2022 through May 2023).~~ Construction activities would take place between 7 a.m. and 6 p.m. Monday through Friday and as needed between 8 a.m. and 6 p.m. on Saturdays.

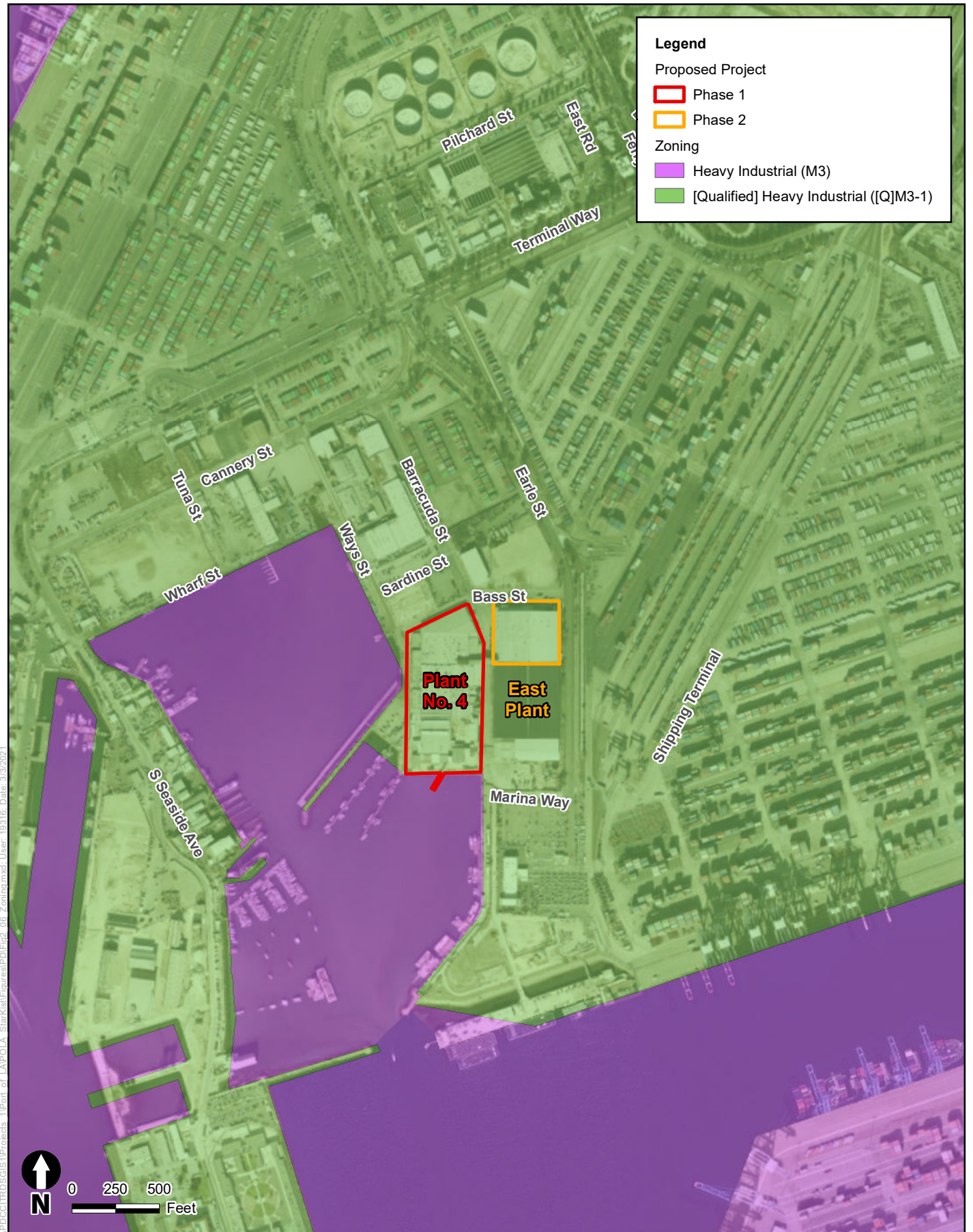
As a project design feature for the proposed Project, a Soil Management Plan would also be prepared and implemented during all soil disturbance activities conducted on the site to minimize personnel and environmental exposure to hazardous materials. More details can be found in Section 4.7, *Geology and*





Figure 4-5 Port Master Plan Land Use Designations





**Figure 4-6 Zoning**

*Soils.* Additionally, an Asbestos Management Program and the Lead Management Program would be prepared and implemented to avoid incidental and/or accidental disturbance of asbestos-containing building materials (ACBMs). More details can be found in Section 4.9, *Hazards and Hazardous Materials*.

#### **4.3.3 Phase 2 – East Plant Demolition and Site Development**

Once funding becomes available, Phase 2 development could occur. Phase 2 would encompass approximately 4.7 acres of land and involve installation of a concrete pad and canopy structure at the phase 1 Project site and demolition of the northern portion of the East Plant. Installation of the concrete pad and canopy structure at the Phase 1 Project site would likely be the first step of Phase 2, followed by demolition of the northern portion of the East Plant. Once the northern portion of the East Plant is demolished, the sites would be graded, and newly exposed dirt would be covered with compacted and bound CMB. CMB would be bound and compacted and would therefore be impermeable and would require LID compliance (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects). LID would very likely include an infiltration basin along the entire demolition perimeter. For the purposes of this analysis, it is assumed that the infiltration basin would be 6 feet wide by 3 feet deep and would be filled with clean rock or gravel. Security fencing and perimeter lighting would also be installed at the site in the same manner described in Phase 1. The maintenance area would be paved with appropriate BMPs to prevent any spills from reaching the harbor.

Infiltration basin Phase 2 construction would take approximately 6 months. Construction activities would take place between 7 a.m. and 6 p.m. Monday through Friday and as needed between 8 a.m. and 6 p.m. on Saturdays. Phase 2 funding has not been secured at this time, but it is assumed that this portion of the Project would not begin until fiscal year 2024/2025 ~~2022/2023~~.

As a project design feature for the proposed Project, a Soil Management Plan would also be prepared and implemented during all soil disturbance activities conducted on the site to minimize personnel and environmental exposure to hazardous materials. More details can be found in Section 4.7, *Geology and Soils*.

#### **4.3.4 Potential Future Operation of Phase 1 and Phase 2 Parcels**

Although the ultimate future use of the site is unknown, for the purposes of analysis, a reasonably likely proposed future use is described here and analyzed in this document as part of Phase 2. Consistent with the site's applicable zoning and the PMP, this document assumes that the site would be used as cargo support, such as for containers, chassis storage, or chassis repair and maintenance. LAHD believes this is a reasonable assumption regarding the future use of the site due to increased demand and interest in off-terminal chassis repair and maintenance depots. Additionally, operations of a chassis repair and maintenance depot are similar in nature to other maritime support uses. To facilitate the chassis repair and maintenance depot(s), it is assumed that the maintenance areas would be covered with a canopy structure(s) and paved with appropriate BMPs to prevent any spills from reaching the harbor prior to site occupancy. It is further assumed that the potential chassis repair and maintenance depot(s) would operate with a stop/start function. The stop and start function allows truckers to pick up and drop off chassis. This involves renting and returning chassis on a regular basis. As an example of typical operations, trucks traveling to a terminal to pick up cargo would first pick up a chassis from the proposed Project site and proceed to their respective container terminals to pick up

their containers. In reverse, the trucks traveling to a terminal to drop off cargo would first visit the container terminal to offload cargo, and upon leaving their respective container terminals would then drop off the chassis at the proposed Project site.

Operating a chassis repair and maintenance depot with a stop/start function would enable increased inventory storage capabilities for chassis. The analysis herein assumes that the potential future use would have storage on site, which would allow for stacking chassis up to five chassis high. This assumption is based on the weight constraints and demands of compacted CMB. Assuming chassis are stacked a maximum of five high when stored, a total of approximately 400 chassis can be stored per acre of land. Therefore, the existing 14 acres (9.2 acres from Phase 1 and 4.7 acres from Phase 2) provides for maximum storage capacity of up to 5,600 chassis. Yard equipment to support operations would likely include two 30,000-pound forklifts and two 10,000-pound forklifts, a top pick, and one utility tractor rig. A mobile fuel service truck would likely deliver diesel and propane for onsite equipment.

Consistent with similar nearby repair and maintenance facilities, chassis operations under this potential future development scenario are anticipated to occur year-round, Monday through Friday from 7:00 a.m. to 3:00 a.m. Operations are assumed to require approximately 20 employees over two work shifts (7:00 a.m. to 5:00 p.m. and 5:00 p.m. to 3:00 a.m.). It is assumed that maintenance and repair would be performed on site and would follow federal inspection requirements as defined in the Federal Motor Carrier Safety Administration Rules covered within 40 Code of Federal Regulations Part 300–399.

Under the assumption that the site would be used as a chassis depot with a stop and start function, the 14-acre site would accommodate approximately 720 daily truck trips (one-way trips) to and from the site. However, the truck trips to and from the Project site would be made by drayage trucks already traveling to the Harbor District and are considered minor diversions from their existing trips. Any drayage truck traveling on Port property or public streets in the Harbor District must be registered in the Port Drayage Truck Registry.<sup>1</sup>

The Phase 1 and Phase 2 properties are being assessed as two separate facilities, but could be operated by one entity. The Phase 2 site could become an extension of the Phase 1 site, but could also occur independently. Operations at either site would occur under a new permit for up to 20 years.

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<sup>1</sup> Beginning in 2018, only trucks that are model year 2014 or newer are allowed to sign up in the Port Drayage Truck Registry. As part of the Clean Truck Program, all trucks operating within Port Property must be registered on the Port Drayage Truck Registry. Port Tariff No. 4, Section 2041, states: “1. While on any Port Property or public streets in the Harbor District, Licensed Motor Carriers, Drayage Truck Owners and Drayage Truck Operators shall (i) operate only Drayage Trucks that comply with Terminal access requirements of Item 2010 and (ii) shall not transfer, switch or cause cargo originating from or destined for Port Property to be moved to Drayage Trucks that do not comply with Terminal access requirements of Item 2010.”

#### 4.4 PROJECT PERMITS AND APPROVALS

Under CEQA, the lead agency is the public agency with primary responsibility for approval of a proposed project. Pursuant to the State CEQA Guidelines (14 CCR 15367), the CEQA lead agency for the proposed Project is LAHD.

The following permits and approvals, and/or agency oversight, may be required to implement the proposed Project.

- LAHD Coastal Development Permit, appealable to CCC
- Los Angeles Regional Water Quality Control Board (LARWQCB) Section 401 Permit (Clean Water Act)
- LARWQCB Stormwater Pollution Prevention Plan (SWPPP)
- LARWQCB National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activities
- U.S. Army Corps of Engineers Regional General Permit No. 65 (RGP 65) (Wharf Maintenance)
- City of Los Angeles Department of Building and Safety
- U.S. Army Corps of Engineers Section 404 Permit (Clean Water Act)
- Caltrans permit for the transport of heavy construction equipment and/or materials requiring the use of oversized vehicles on state highways

## 5.0 INITIAL STUDY CHECKLIST

1.	<b>Project Title:</b>	Star-Kist Cannery Facility Project
2.	<b>Lead Agency Name and Address:</b>	Los Angeles Harbor Department Environmental Management Division 425 South Palos Verdes Street San Pedro, California 90731
3.	<b>Contact Person and Phone Number:</b>	Nicole Enciso 310.732.3675
4.	<b>Project Location:</b>	1000, 1040, 1050, 1054, and 1098 S. Ways Street and 936 and 1099 S. Barracuda Street
5.	<b>Project Sponsor's Name and Address:</b>	Los Angeles Harbor Department Engineering Division 425 South Palos Verdes Street San Pedro, California 90731
6.	<b>Port Master Plan Designation:</b>	Container, Commercial Fishing and Maritime Support
7.	<b>Zoning:</b>	[Q] M3-1, Qualified Heavy Industrial ZI-2130, Harbor Gateway State Enterprise Zone ZI-2442, Preliminary Fault Rupture Study Area
8.	<b>Description of Project:</b>	The proposed Project involves demolition of the former Star-Kist cannery facilities on an approximately 14-acre site within Terminal Island. Phase 1 would involve demolition of Plant No. 4 and small wharf structure. The site would then be graded, and newly exposed dirt would be covered with compacted and bound CMB. LID BMPs, perimeter fencing, and exterior perimeter lighting would be installed. Phase 2 would only occur if funding becomes available. Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 site and demolition of the East Plant. After demolition, the East Plant site would be graded and covered with compacted and bound CMB. LID BMPs, perimeter fencing, and exterior perimeter lighting would be installed. Although the ultimate future use of the site is unknown, for purposes of analysis, it is assumed that the site would operate as a chassis repair and maintenance depot with a stop/start function.
9.	<b>Surrounding Land Uses/Setting:</b>	The character of the surrounding area is primarily industrial. The properties to the north, east, and south are all zoned for heavy industrial uses, similar to the Project site. The nearest sensitive receptors to the Project site are all to the south and west. The closest are the residences (staff housing) on Reservation Point, more than 3,500 feet south of the Project site. Additional noise-sensitive land uses include Bloch Field, Gibson Park, and the Gibson Senior Citizen Community Garden, approximately 4,800 feet west of the Project site on South Harbor Boulevard.
10.	<b>Other Public Agencies Whose Approval Is Required:</b>	<ul style="list-style-type: none"> <li>• U.S. Army Corps of Engineers</li> <li>• Los Angeles Regional Water Quality Control Board</li> <li>• City of Los Angeles Department of Building and Safety</li> <li>• California Department of Transportation</li> </ul>

## 5.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below could be affected by the Project, involving at least one impact considered a “potentially significant impact,” as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

**5.2 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)**

On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

I find that although the proposed Project could have a significant effect on the environment, there would not be a significant effect in this case because revisions to the Project have been made or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒

I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated impact” 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 the attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required. ☐



Signature  
Chris Cannon, Director  
Environmental Management Division  
Los Angeles Harbor Department

10/5/2022

Date

## Environmental Checklist

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:</b>				
a. Have a substantial adverse effect on a scenic vista?				X
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?			X	
<b>2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:</b>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b. Conflict with existing zoning for agricultural use or a Williamson act contract?				X



	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d. Result in the loss of forestland or conversion of forestland to non-forest use?				X
e. Involve other changes in the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?				X
<b>3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</b>				
a. Conflict with or obstruct implementation of the applicable air quality plan or clean air programs?			X	
b. Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is designated a nonattainment area under an applicable federal or state ambient air quality standard?			X	
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors) that adversely affect a substantial number of people?			X	
<b>4. BIOLOGICAL RESOURCES. Would the project:</b>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?				X
<b>5. CULTURAL RESOURCES. Would the project:</b>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c. Disturb any human remains, including those interred outside of dedicated cemeteries?			X	
<b>6. ENERGY. Would the project:</b>				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			X	

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X
<b>7. GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES. Would the project:</b>				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismically related ground failure, including liquefaction?			X	
iv) Landslides?				X
b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e. Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>8. GREENHOUSE GAS EMISSIONS: Would the project:</b>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
<b>9. HAZARDS AND HAZARDOUS MATERIALS: Would the project:</b>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?				X
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard for the public or the environment?				X
e. Be located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and result in a safety hazard or excessive noise for people residing or working in the project area?				X
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>10. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or the addition of impervious surfaces, in a manner that would:			X	
i) Result in substantial erosion or siltation on-site or off-site;				X
ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site;				X
iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) Impede or redirect floodflows?				X
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
<b>11. LAND USE AND PLANNING. Would the project:</b>				
a. Physically divide an established community?				X
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>12. MINERAL RESOURCES. Would the project:</b>				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X
<b>13. NOISE. Would the project:</b>				
a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project, in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?			X	
b. Generate excessive ground-borne vibration or ground-borne noise levels?			X	
c. Be located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?				X
<b>14. POPULATION AND HOUSING. Would the project:</b>				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?				X
b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>15. PUBLIC SERVICES. Would the project:</b>				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?				X
iv) Parks?				X
v) Other public facilities?			X	
<b>16. RECREATION. Would the project:</b>				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X
<b>17. TRANSPORTATION. Would the project:</b>				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				X
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?				X
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d. Result in inadequate emergency access?				X

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>18. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, that is:</b>				
a. Listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or				X
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X
<b>19. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	



	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact after Mitigation Incorporated</i>	<i>Less-than-Significant Impact</i>	<i>No Impact</i>
<b>20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b. Because of slopes, prevailing winds, or other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c. Require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?				X
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X
<b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?			X	
b. Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c. Does the project have environmental effects that will have substantial adverse effects on human beings, either directly or indirectly?			X	

## 6.0 IMPACTS AND MITIGATION MEASURES

### 6.1 AESTHETICS

#### Would the project:

##### a. Have a substantial adverse effect on a scenic vista?

**No Impact.** The Project site is inside a working port and not within or near any protected or designated scenic vistas. The Project site is within Terminal Island, which connects the Port of Los Angeles and the Port of Long Beach. The Project site, which is part of an industrial area, totals 14 acres and has two main buildings: Plant No. 4 and the northern portion of the East Plant. The Project site is surrounded by other Port-related uses and industrial facilities. Development components of Phase 1 and Phase 2 of the proposed Project would be consistent in nature to the existing visual landscape and industrial Port area. Fencing, lighting, and industrial structures exist in and around Terminal Island and would not disrupt the visual character of the area. Additionally, there is no scenic vista located on Terminal Island. As such, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista. Operation of a potential future chassis repair and maintenance depot(s) would include a canopy and would likely involve stacking chassis at a potential maximum of five high, which would be approximately 20 feet high. The canopy and the stacking of chassis would be similar in nature to the existing visual landscape and would blend into the panorama of other Port uses and activities. Other potential future industrial uses at the site would have similar visual effects as a chassis maintenance and storage depot. Therefore, no impacts would occur, and no mitigation is required.

##### b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?

**No Impact.** The Project site is not near an eligible or designated state scenic highway. Therefore, the proposed Project would not have the potential to damage scenic resources within a state scenic highway. Caltrans is responsible for official nomination and designation of eligible scenic highways. The nearest officially designated State Scenic Highway is approximately 21 miles north of the proposed Project (SR-1, from Venice Boulevard to the city boundary at Santa Monica) (Los Angeles Department of City Planning 2016). The Project site is not visible from this location; therefore, proposed Project activities would not affect the quality of scenic views from this location.

No scenic trees or rock outcroppings exist at the Project site. Construction and potential future operation activities at the Project site would be consistent with the existing visual context of a working port. Therefore, there would be no impacts on scenic resources from the proposed Project. No mitigation is required.

**c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**No Impact.** As described above in the responses to questions 4.1a and 4.1b, the Project site is in an industrial and built-out area of the Port where there are no designated scenic vistas or scenic resources. The Project site has a general plan designation of General/Bulk Cargo for Hazardous Industrial and Commercial and Commercial Fishing (City of Los Angeles 2001), and is zoned for heavy industrial uses ([Q] M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles 2019a). There are no applicable regulations related to scenic resources at the Project site. The landscape at the Port is highly engineered to support maritime freight-related operations. The appearance of many freight operations is industrial and functional in nature and characterized by exposed infrastructure, open storage, unfinished or unadorned building materials, and safety-related high-visibility colors for mobile equipment such as cranes, containers, and railcars.

The Project site is in an industrialized area within the Port. Existing features at the Project site include two main buildings (Plant No. 4 and the East Plant), accessory structures, and a small dock. The existing visual quality is low because the Project site was used as a cannery facility for Star-Kist tuna operations, beginning in the 1950s and continuing into the 1980s. A small canning operation was still operating in the northern portion of the East Plant until December 2018. Other than this small canning operation, the Project site has been largely vacant for the last 10 years. The Project site has experienced multiple incidents of vandalism and breaking and entering during its time of vacancy.

A key objective of the proposed Project is to create a more marketable and visually appealing site for future development. The proposed Project would remove all existing features within the Project footprint; however, it would not result in a substantial change in the visual character or quality of the site. Future use of the site as a potential chassis repair and maintenance depot(s), or similar industrial use, would be similar in nature to the existing visual landscape and would blend into the panorama of other Port uses and activities. Therefore, the proposed Project would not result in degradation of the existing visual character or quality of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and no mitigation is required.

**d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?**

**Less-than-Significant Impact.** The Project site, which has nighttime lighting along the roadway, is on Terminal Island, an area where extensive lighting exists for nearby container terminal operations. Under both Phase 1 and Phase 2, once all properties are demolished, the site would be graded, and newly exposed dirt would be covered with compacted and bound CMB. Perimeter fencing and exterior lighting around the Project site would be installed. Future use of the site could include the installation of a canopy structure and concrete pad for repair and maintenance operations.

Such uses would not include elements that could cause glare, such as windows, light-colored building surfaces, or metal or other reflective surfaces. Exterior perimeter lighting would be installed for security purposes; would be directed downward, with appropriate shielding; and would not be aimed so as to create

glare. Although installation of exterior lighting around the perimeter of the Project site would create a new source of light, extensive lighting currently exists for nearby container terminal operations, roadway lighting, and other Port operations, and the addition of perimeter lighting around the Project site would not create a new source of substantial lighting compared with existing conditions. Therefore, the proposed Project would not create a substantial new source of light or glare that would adversely affect daytime or nighttime views in the area. Project-related impacts would be less than significant, and no mitigation is required.

## 6.2 AGRICULTURE AND FORESTRY RESOURCES

### Would the project:

**a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** The California Department of Conservation's Farmland Mapping and Monitoring Program develops maps and statistical data for analyzing impacts on California's agricultural resources. The Farmland Mapping and Monitoring Program categorizes agricultural land according to soil quality and irrigation status; the best land is identified as Prime Farmland. According to the Farmland Mapping and Monitoring Program, Phase 1 and Phase 2 of the Project site is an area that has been designated as Urban and Built-Up Land, which is defined as land with structures that have a variety of uses, including industrial, commercial, institutional, and railroad or other transportation uses (California Department of Conservation 2011). There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance in the Project vicinity or on the Project site. Therefore, the proposed Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to nonagricultural use. No impacts would occur, and no mitigation is required.

**b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?**

**No Impact.** Phase 1 and Phase 2 of the Project site is zoned for heavy industrial uses ([Q] M3-1). There are no agricultural zoning designations or agricultural uses within the Project limits or adjacent areas. The Williamson Act applies to parcels with at least 20 acres of Prime Farmland or at least 40 acres of land that is not designated as Prime Farmland. The Project site is not within a Prime Farmland designation, nor does it consist of more than 40 acres of farmland (California Department of Conservation 2011). No Williamson Act contracts apply to the Project site. As such, the proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur, and no mitigation is required.

**c. Conflict with existing zoning for, or cause rezoning of forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**No Impact.** Phase 1 and Phase 2 of the Project site is currently zoned as for heavy industrial uses ([Q]M3-1) (City of Los Angeles 2019a). It does not support timberland or forestland. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. No impact would occur, and no mitigation is required.

**d. Result in the loss of forestland or conversion of forestland to non-forest use?**

**No Impact.** The proposed Project would occur at a former tuna cannery, which has no forestland. The proposed Project would not result in a loss of forestland or the conversion of forestland to non-forest use. No impact would occur, and no mitigation is required.

**e. Involve other changes in the existing environment that, because of their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?**

**No Impact.** As discussed above, no farmland or forestland occurs within the surrounding area or at Phase 1 or Phase 2 of the Project site. The proposed Project would not disrupt or damage the existing environment or result in the conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. No impact would occur, and no mitigation is required.

**6.3 AIR QUALITY**

This section summarizes potential air quality emissions associated with construction activities of the proposed Project and potential future use of the site as a chassis repair and maintenance depot(s).

**Would the project:****a. Conflict with or obstruct implementation of the applicable air quality plan?**

**Less-than-Significant Impact.** The federal Clean Air Act (CAA) of 1969 and its subsequent amendments form the basis for the nation's air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the CAA. A key element of the CAA is the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. The CAA delegates enforcement of the NAAQS to the states. In California, CARB is responsible for enforcing air pollution regulations. CARB, in turn, delegates to local air agencies the responsibility of regulating stationary emission sources. SCAQMD monitors air quality within the Project site and the South Coast Air Basin (Basin), which includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties.

EPA, CARB, and SCAQMD use ambient air quality monitoring data to determine whether geographic areas achieve the NAAQS and California Ambient Air Quality Standards (CAAQS). Areas with pollutant concentrations within the NAAQS and CAAQS are designated as attainment areas, whereas areas that do not meet the NAAQS and/or CAAQS are designated as nonattainment or maintenance areas. For regions that do not attain the NAAQS, the CAA requires preparation of a State Implementation Plan. The Project area is currently federally designated a nonattainment area for the ozone, fine particulate matter (PM<sub>2.5</sub>), and lead<sup>2</sup> NAAQS and a maintenance area for the carbon monoxide (CO) and nitrogen dioxide (NO<sub>2</sub>) NAAQS (EPA 2021). At the state level, the Project area is currently designated a nonattainment area for ozone, PM<sub>2.5</sub>, and coarse particulate matter (PM<sub>10</sub>), and attainment for CO, lead, and NO<sub>2</sub> (California Air Resources Board 2020).

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<sup>2</sup> The Los Angeles area is in nonattainment for the lead NAAQS, mainly due to two lead-acid battery recyclers. Lead would not be generated by the proposed Project and is not considered to be a pollutant of concern for the proposed Project. Accordingly, lead is not analyzed further.

**Air Quality Management Plan.** The 2016 Air Quality Management Plan (AQMP) focuses on attainment of the ozone and particulate matter NAAQS through the reduction of ozone and PM<sub>2.5</sub> precursor nitrogen oxides (NO<sub>x</sub>) as well as direct control of particulate matter (SCAQMD 2017). The AQMP proposes emission reduction measures to bring the Basin into attainment with respect to the ambient air quality standards. AQMP attainment strategies include mobile-source control measures and clean fuel programs, which are enforced at the state and federal levels, for engine manufacturers and petroleum refiners and retailers. Construction activities of the proposed Project and potential future operations would be required to comply with these regulations as they are developed. Compliance with AQMP requirements would ensure that the Project's construction activities and potential future operations at the site would not obstruct implementation of the AQMP. Therefore, the proposed Project's construction and potential future operations would not conflict with or obstruct implementation of the AQMP, the State Implementation Plan, or the CAA. Impacts would be less than significant, and no mitigation is required.

**Clean Air Action Plan.** LAHD, in partnership with the Port of Long Beach and cooperation with SCAQMD, CARB, and EPA, adopted the *San Pedro Bay Ports Clean Air Action Plan* (CAAP) on November 20, 2006, and adopted an updated CAAP in November 2010 and November 2017 (San Pedro Bay Ports 2006, 2010, 2017). The CAAP is designed to reduce air pollution and health risks posed by air pollution from all port-related emission sources, including ships, trains, trucks, terminal equipment, and harbor craft. The CAAP contains strategies to reduce emissions from sources in and around the Ports and plans for zero-emissions infrastructure and encourages freight and energy efficiency.

The scope and framework of the 2017 CAAP update provides new and updated strategies and emission reduction targets to cut emissions from sources operating in and around the ports, setting the ports firmly on the path toward zero-emissions goods movement. Specifically, the 2017 CAAP update calls for clean vehicles and equipment technology and fuels, additional freight infrastructure investment and planning, and increased freight efficiency. The Project would use off-road equipment and on-road vehicles during construction. Project construction activities would comply with the requirements of LAHD's *Sustainable Construction Guidelines for Reducing Air Emissions*. Potential future operations would comply with strategies of the CAAP, including the Clean Truck Program. Accordingly, the Project would not impede or conflict with the implementation of the strategies outlined in the 2017 CAAP update. Impacts would be less than significant, and no mitigation is required.

**b. Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is designated a nonattainment area for an applicable federal or state ambient air quality standard?**

**Less-than-Significant Impact.** SCAQMD has established air quality significance thresholds that are applicable to both construction and operational emissions generated by projects within its jurisdiction. These significance thresholds were derived using regional emissions modeling to determine maximum allowable mass quantities of pollutant emissions that could be generated by individual projects without adversely affecting air quality and creating public health concerns based on existing pollution levels. These regional pollutant emission thresholds are shown in Table 6.3-1.

**Table 6.3-1. SCAQMD Regional Air Quality Significance Thresholds**

Pollutant	Mass Daily Thresholds (lb/day)	
	Construction	Operation
Volatile Organic Compounds (VOC) <sup>a</sup>	75	55
Nitrogen Oxides (NO <sub>x</sub> )	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO <sub>x</sub> )	150	150
Suspended Particulate Matter (PM <sub>10</sub> )	150	150
Fine Particulate Matter (PM <sub>2.5</sub> )	55	55
Lead (Pb) <sup>b</sup>	3	3

Source: SCAQMD 2019.

<sup>a</sup> The terms VOC and reactive organic gases (ROG) are used interchangeably. SCAQMD uses VOC, and CalEEMod uses ROG.

<sup>b</sup> The Project would result in no lead emissions sources during the construction period or operations. As such, lead emissions are not evaluated herein.

lb = pounds

### ***Construction***

Construction of the proposed Project would generate emissions of volatile organic compounds (VOCs), NO<sub>x</sub>, CO, sulfur oxides, PM<sub>10</sub>, and PM<sub>2.5</sub> that could result in short-term air quality effects during the construction period. Emissions would originate from off-road equipment exhaust, employee and haul truck vehicle exhaust and fugitive dust, demolition, site grading, and earth movement activities. It is anticipated that Phase 1 construction would begin in April 2023 and be completed in February 2024. ~~August 2022 and be completed by June 2023.~~ Following the completion of Phase 1, Phase 2 construction would begin during the 2024/2025 fiscal year. ~~June 2023 and be completed by January 2024.~~ The actual construction schedule may differ from the one used in the analysis, depending on requirements of the Project proponent, the availability of funding for Phase 2, and construction contractor. However, any postponement of construction activities would most likely result in lower impacts as increasingly stringent regulatory requirements are implemented compared with those assumed in the analysis years.

The proposed Project's short-term construction emissions were estimated using a combination of emission factors and methodologies from the California Emissions Estimator Model (CalEEMod), version 2016.3.2, CARB's most recent Emission FACTors model (EMFAC2021), and EPA's AP-42 Compilation of Air Pollutant Emission Factors. The modeling was conducted based on Project-specific construction data (e.g., schedule, equipment, truck volumes) provided by LAHD. Where Project-specific information was not available, reasonable assumptions based on similar projects and default model settings were used to estimate criteria air pollutant and ozone precursor emissions.

Key assumptions include:

- Use of Tier 4 EPA/CARB Tier 4 Final off-road engines to comply with LAHD's Sustainable Construction Guidelines for Reducing Air Emissions
- Phase 1 would include the demolition of a 365,000-square-foot building and the existing wharf.
- Phase 2 would include the demolition of a 125,000-square-foot building.
- Phase 1 would import 10,000 cubic yards of base and export 10,150 cubic yards of soil
- Phase 2 would import 4,000 cubic yards of base and export 4,000 cubic yards of soil.
- Phase 2 would include approximately 1,320 cubic yards of concrete for the concrete pad at the Phase 1 site.
- Construction estimates take into account watering of exposed areas three times per day for fugitive dust control per SCAQMD Rule 403.

The construction analysis was conducted in accordance with guidelines of LAHD's *Sustainable Construction Guidelines for Reducing Air Emissions*. Details regarding the methods and activity assumptions by source type are provided in Appendix B.

Construction-related criteria pollutant impacts were based on the maximum daily construction emissions within the Basin, then compared to SCAQMD's regional emission thresholds. Table 6.3-2 summarizes the results for construction activities related to Phase 1 and Phase 2 and shows that the maximum daily emissions would be below the significance thresholds for all pollutants. Therefore, the project-related construction activities would not result in a cumulatively considerable net increase in any criteria air pollutant for which the Basin is designated as nonattainment with respect to the federal or state ambient air quality standard. This impact would be less than significant.

### ***Operations***

As discussed above in Section 2.2.3, it is not known at this time what precise future use would occur at the project site. Based on the applicable zoning and the PMP, it is reasonably probable that the site (Phase 1 and Phase 2 parcels) would be used for cargo support, such as container or chassis storage to chassis repair and maintenance. For the purposes of this analysis, it is assumed that the site would be developed with a chassis repair and maintenance depot(s) with a stop/start function and with onsite storage capabilities for chassis. Future development of the site would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with employee trips, onsite and offsite drayage truck trips, fuel truck trips, and operation of CHE. Based on the proposed construction schedule, future potential operations could occur as early as 2023; therefore, the emissions analysis of the future potential operations used a calendar year of 2023. An analysis year of 2023 would most likely result in the highest impacts for operations because future operational years would have cleaner vehicle fleets, resulting in lower emissions from vehicles.



**Table 6.3-2. Regional Criteria Pollutant Construction Emissions**

Phase Name	Estimated Daily Regional Pollutant Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
Phase 1-Mobilize	0.26	5.22	8.91	0.01	1.01	0.15
Phase 1-Lead and Asbestos Removal	0.22	2.64	2.68	0.02	1.71	0.34
Phase 1-Wharf Demolition	2.07	40.07	35.62	0.06	2.64	1.47
Phase 1-Building Demolition	1.52	44.47	53.03	0.15	24.07	3.67
Phase 1-Grading/Compaction	0.51	15.38	16.10	0.07	6.98	1.03
Phase 1-Install CMB	0.51	15.38	16.10	0.07	6.92	1.02
Phase 1-Perimeter Lighting and Fencing	0.15	2.52	5.03	<0.01	0.59	0.11
Phase 1-Clean Up	0.09	0.36	1.22	<0.01	0.74	0.12
Phase 1-Demobilize	0.25	5.12	8.85	0.01	1.01	0.15
Phase 2-Concrete Pad at Phase 1 Site	0.72	11.87	18.43	0.04	0.51	0.20
Phase 2-Install Canopy at Phase 1 Site	1.42	18.33	31.33	0.05	0.75	0.36
Phase 2-Mobilize	0.16	2.82	4.88	<0.01	1.00	0.14
Phase 2-Lead and Asbestos Removal	0.18	0.88	2.42	<0.01	1.38	0.25
Phase 2-Building Demolition	0.69	19.63	26.18	0.07	10.34	1.57
Phase 2-Grading/Compaction	0.63	16.64	20.70	0.06	5.63	0.85
Phase 2-Install CMB	0.48	13.76	15.72	0.06	5.57	0.83
Phase 2-Perimeter Lighting and Fencing	0.15	2.52	5.03	<0.01	0.59	0.11
Phase 2-Clean Up	0.09	0.35	1.14	<0.01	0.74	0.12
Phase 2-Demobilize	0.16	2.81	4.82	<0.01	1.00	0.14
<b>Maximum Daily Emissions</b>	<b>2.07</b>	<b>44.47</b>	<b>53.03</b>	<b>0.15</b>	<b>24.07</b>	<b>3.67</b>
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix B

Note: Totals may not add exactly due to rounding.

CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; PM10 = particulate matter less than 10 microns in diameter; PM2.5 = particulate matter less than 2.5 microns in diameter; VOC = volatile organic compounds; SO<sub>x</sub> = oxides of sulfur; lb = pounds

Operations emissions were estimated using emission factors and methodologies from CalEEMod, EMFAC2021, the *San Pedro Bay Ports Emissions Inventory Methodology Report*, and the *Port of Los Angeles 2019 Inventory of Air Emissions* (San Pedro Bay Ports 2019; Port of Los Angeles 2019).

**Employee Trips:** The use of the site as a chassis repair and maintenance depot(s) is reasonably anticipated to employ 20 employees, resulting in a total of 40 one-way trips (20 inbound and 20 outbound). Emission factors for employee trips were generated from EMFAC2021 for a light-duty fleet that includes the following vehicle categories: light-duty autos, light-duty trucks, medium-duty trucks, and motorcycles. The employee trip length was based on the default CalEEMod value of 16.6 miles.

**Fuel Truck Trips:** The future use of the site as a chassis repair and maintenance depot would require trucks to deliver diesel and propane fuel to the Project site. It is assumed one truck would deliver diesel and another truck would deliver propane, resulting in a total of four one-way daily trips (two inbound and two outbound). Emission factors for fuel trucks were generated from EMFAC2021 for a heavy-duty truck fleet that includes the following vehicle categories: medium heavy-duty trucks and heavy heavy-duty trucks. The one-way trip length for fuel trucks was assumed to be 7 miles.

**Drayage Truck Trips:** The potential future use of the site as a chassis repair and maintenance depot(s) is assumed to accommodate approximately 720 daily truck trips per day to and from the site. However, the truck trips to and from the site would be truck trips already traveling to the Harbor District and are considered minor diversions from their existing trips. Operations at the Phase 1 site could accommodate 490 daily truck trips and operations at the Phase 2 site could accommodate 230 truck trips. Emission factors for drayage trucks were generated from EMFAC2021 with a vehicle category of T7 Port Class 8. Trucks would travel within the site and outside of the site. It was assumed that trucks within the site would travel at 5 miles per hour and trucks outside of the site would travel at 30 miles per hour. Daily VMT data were provided by the Port based on the assumption that trip diversion is assumed to be 0.35 mile per truck trip for Phase 1 within the Project site, 0.15 mile per truck trip for Phase 2 within the Project site, and 3.1 miles per truck trip outside the site for Phase 1 and Phase 2.

**Cargo-Handling Equipment:** CHE emissions for future potential operations of the site were based on the equipment list provided by LAHD along with emission factors and methodologies consistent with the *San Pedro Bay Ports Emissions Inventory Methodology Report* and the *Port of Los Angeles 2019 Inventory of Air Emissions*. The CHE list for operations includes: two propane-fueled 10,000-pound forklifts, two diesel-fueled 30,000-pound forklifts, one top pick, and one utility tractor rig. Based on similar project types, maximum daily operations of CHE are as follows: 6 hours per day for each propane-fueled forklift, 11 hours per day for each diesel-fueled forklift, 8 hours per day for the top pick, and 14 hours per day for the utility tractor rig. The model year and emissions tier for each piece of CHE is based on the averages shown in the *Port of Los Angeles 2019 Inventory of Air Emissions*. The operational emissions conservatively assume a CEQA baseline of zero. See Appendix B for air quality modeling input and output parameters, detailed assumptions, and daily operational emissions estimates.

Table 6.3-3 summarizes the results and shows that emissions from future potential operations at the site would be below the SCAQMD significance thresholds. Therefore, potential future operational activities are not expected to result in a cumulatively considerable net increase in any criteria air pollutant for which the Basin is designated as nonattainment with respect to the federal or state ambient air quality standard. This impact would be less than significant.

**Table 6.3-3. Regional Criteria Pollutant Operational Emissions**

Source	Estimated Daily Regional Pollutant Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
Employees	0.13	0.14	1.86	<0.01	0.47	0.12
Fuel Trucks	<0.01	0.15	0.04	<0.01	0.03	<0.01
Drayage Trucks-On site	0.19	6.13	2.76	0.01	0.11	0.03
Drayage Trucks-Off site	0.23	14.92	3.38	0.09	2.30	0.66
Cargo Handling Equipment	3.08	16.45	19.48	0.05	0.27	0.24
<b>Total Daily Emissions</b>	<b>3.63</b>	<b>37.79</b>	<b>27.52</b>	<b>0.15</b>	<b>3.17</b>	<b>1.06</b>
SCAQMD Regional Operational Thresholds	55	55	550	150	150	55
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix B.

Note: Totals may not add exactly due to rounding.

CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; PM10 = particulate matter less than 10 microns in diameter; PM2.5 = particulate matter less than 2.5 microns in diameter; VOC = volatile organic compounds; SO<sub>x</sub> = oxides of sulfur; lb = pounds

Because construction activities at the Phase 2 site would begin after the completion of Phase 1 construction, there is the potential for operations activities at the Phase 1 site to overlap with construction activities at the Phase 2 site. It should be noted that Phase 2 construction activities would include installation of a concrete pad and canopy at the Phase 1 site. The installation of the concrete pad and canopy would occur prior to any Phase 1 operations or construction activities at the Phase 2 site. Once the concrete pad and canopy construction are completed, construction activities at the Phase 2 site and operations activities at the Phase 1 site could overlap. For this overlapping scenario, maximum daily emissions from construction activities at the Phase 2 site and Phase 1 operations activities were combined and compared to SCAQMD's regional operational thresholds. As shown in Table 6.3-4, the overlapping scenario would not result in an exceedance of SCAQMD thresholds. Therefore, the Project-related construction activities at the Phase 2 site and anticipated future operations activities associated with the Phase 1 site would not result in a cumulatively considerable net increase in any criteria air pollutant for which the Basin is designated as nonattainment with respect to the federal or state ambient air quality standard. This impact would be less than significant.

SCAQMD's cumulative air quality impact methodology indicates that if an individual project results in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Because the proposed Project's construction and potential future operational pollutant emissions would not exceed the applicable SCAQMD's regional significance thresholds, the proposed Project's emissions would not be cumulatively considerable. This impact would be less than significant.

**Table 6.3-4. Regional Criteria Pollutant from Overlap of Construction and Potential Future Operational Emissions**

Source	Estimated Daily Regional Pollutant Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
Phase 1 Operations	0.69	19.63	26.18	0.07	10.34	1.57
Phase 2 Construction	3.50	31.43	25.61	0.12	2.42	0.84
<b>Total Daily Emissions</b>	<b>4.19</b>	<b>51.06</b>	<b>51.78</b>	<b>0.19</b>	<b>12.76</b>	<b>2.42</b>
SCAQMD Regional Operational Thresholds	55	55	550	150	150	55
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix B.

Note: Totals may not add exactly due to rounding.

CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; PM10 = particulate matter less than 10 microns in diameter; PM2.5 = particulate matter less than 2.5 microns in diameter; VOC = volatile organic compounds; SO<sub>x</sub> = oxides of sulfur; lb = pounds

### c. Expose sensitive receptors to substantial pollutant concentrations?

**Less-than-Significant Impact.** In addition to regional air quality impacts, projects in the Basin are required to analyze local air quality impacts. SCAQMD has developed Localized Significance Thresholds (LSTs) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs were developed based on the ambient concentrations of that pollutant for each of the 38 source receptor areas in the Basin. The localized thresholds, which are found in the mass rate look-up tables in SCAQMD's *Final Localized Significance Threshold Methodology* document, were developed for the analysis of projects that are less than or equal to 5 acres in size and applicable only to the following criteria pollutants: NO<sub>x</sub>, CO, PM10, and PM2.5. The analysis of localized air quality impacts focuses only on the onsite activities of a project.

The mass rate look-up tables developed by SCAQMD present LST values in the form of allowable emissions (in pounds per day) as a function of receptor distance from a project's site boundary. These LST values were developed by SCAQMD for 1-acre, 2-acre, and 5-acre sites. The LSTs established for each of the aforementioned site acreages represent the level of pollutant emissions that would not exceed the most stringent applicable federal or state ambient air quality standards. The nearest sensitive receptors would be the liveaboard<sup>3</sup> tenants at Al Larson Marina, approximately 294 meters (965 feet) southwest of the Project site and the nearest worker receptor would be approximately 50 meters away. Although workers are not considered a sensitive receptor by SCAQMD, the LST analysis conservatively used a receptor distance of 50 meters. As the Project site is approximately 14 acres in size, the applicable LSTs for the Project would be a 5-acre site with a receptor distance of 50 meters. The construction and operational LSTs for a 5-acre site in Source Receptor Area 4 (South Coastal Los Angeles County), which is where the Project site is located, are shown in Table 6.3-5.

<sup>3</sup> Liveaboards are considered people who makes a small yacht in one of the Port marinas their primary residence.

**Table 6.3-5. SCAQMD Localized Air Quality Significance Thresholds**

Pollutant Monitored within Source Receptor Area 4 South Coastal Los Angeles County	14-acre Site <sup>a</sup>
	Allowable Emissions (pounds/day) as a Function of Receptor Distance (feet) from Site Boundary
	(50 meters)
<b>Construction Screening Thresholds</b>	
Nitrogen Oxides (NO <sub>x</sub> ) <sup>b</sup>	118
Carbon Monoxide (CO)	1,982
Respirable Particulate Matter (PM <sub>10</sub> )	42
Fine Particulate Matter (PM <sub>2.5</sub> )	10
<b>Operational Screening Thresholds</b>	
Nitrogen Oxides (NO <sub>x</sub> ) <sup>b</sup>	118
Carbon Monoxide (CO)	1,982
Respirable Particulate Matter (PM <sub>10</sub> )	10
Fine Particulate Matter (PM <sub>2.5</sub> )	3

Source: SCAQMD 2008a.

<sup>a</sup> LST values are based on a 5-acres site in SRA 4 with a receptor distance of 50 meters.

<sup>b</sup> The localized thresholds listed for NO<sub>x</sub> in this table take into consideration the gradual conversion of NO to NO<sub>2</sub>. The analysis of localized air quality impacts associated with NO<sub>x</sub> emissions focuses on NO<sub>2</sub> levels because of their association with adverse health effects.

### **Construction**

Table 6.3-6 summarizes onsite peak daily emissions associated with construction of the proposed Project. As shown in the table, daily emissions generated on site by such construction activities would not exceed any of the applicable SCAQMD LSTs. Therefore, Project construction would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

### **Operations**

Similar to the analysis of construction emissions, the daily amount of localized pollutant emissions generated on site during potential future operations was also assessed for its potential localized air quality impacts on nearby sensitive receptors. The potential operational emissions that would result from the future use of the site as a chassis repair and maintenance depot(s) were assessed against SCAQMD's applicable operational LSTs for a 5-acre site in Source Receptor Area 4 with a receptor distance of 50 meters. Table 6.3-7 presents the potential future onsite operational emissions that would result from the future operations of the site as a chassis repair and maintenance depot(s). As shown, these potential future operations-related emissions generated on site would not exceed SCAQMD's applicable operational LSTs.

**Table 6.3-6. Localized Criteria Pollutant Construction Emissions**

Construction Phase	Estimated Maximum Daily Onsite Emissions (lb/day)			
	NO <sub>x</sub>	CO	PM10	PM2.5
Phase 1-Mobilize	4.75	8.02	0.78	0.09
Phase 1-Lead and Asbestos Removal	0.13	0.06	0.81	0.09
Phase 1-Wharf Demolition	39.26	34.71	2.36	1.40
Phase 1-Building Demolition	29.93	48.70	21.31	2.84
Phase 1-Grading/Compaction	8.99	13.97	5.45	0.57
Phase 1-Install CMB	8.99	13.97	5.39	0.57
Phase 1-Perimeter Lighting and Fencing	2.28	3.85	0.31	0.04
Phase 1-Clean Up	0.08	0.04	0.46	0.05
Phase 1-Demobilize	4.74	8.02	0.78	0.09
Phase 2-Concrete Pad at Phase 1 Site	10.71	17.13	0.08	0.08
Phase 2-Install Canopy at Phase 1 Site	17.97	29.01	0.22	0.22
Phase 2-Mobilize	2.44	4.04	0.77	0.08
Phase 2-Lead and Asbestos Removal	0.12	0.06	0.76	0.08
Phase 2-Building Demolition	14.77	24.28	9.12	1.21
Phase 2-Grading/Compaction	11.59	18.78	4.38	0.48
Phase 2-Install CMB	8.71	13.80	4.32	0.46
Phase 2-Perimeter Lighting and Fencing	2.28	3.85	0.31	0.04
Phase 2-Clean Up	0.08	0.04	0.46	0.05
Phase 2-Demobilize	2.44	4.04	0.77	0.08
<b>Maximum Daily Emissions</b>	<b>39.26</b>	<b>48.70</b>	<b>21.31</b>	<b>2.84</b>
<i>Applicable LSTs<sup>a</sup></i>	118	1,982	42	10
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix B.

Note: Totals may not add exactly due to rounding.

CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; PM10 = particulate matter less than 10 microns in diameter; PM2.5 = particulate matter less than 2.5 microns in diameter; lb = pounds

<sup>a</sup> LST values are based on a 5-acre site in Source Receptor Area 4 with a receptor distance of 50 meters.

**Table 6.3-7. Localized Criteria Pollutant Operational Emissions**

<b>Emissions Source</b>	<b>Estimated Maximum Daily Onsite Emissions (lb/day)</b>			
	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Employees	0.01	0.19	0.05	0.01
Fuel Trucks	0.02	<0.01	<0.01	<0.01
Drayage Trucks-Onsite	6.13	2.76	0.11	0.03
Cargo-Handling Equipment	16.45	19.48	0.27	0.24
<b>Project Total</b>	<b>22.61</b>	<b>22.43</b>	<b>0.42</b>	<b>0.29</b>
Applicable LSTs <sup>a</sup>	118	1,982	10	3
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix B.

Note: Totals may not add exactly due to rounding.

CO = carbon monoxide; NO<sub>x</sub> = oxides of nitrogen; PM<sub>10</sub> = particulate matter less than 10 microns in diameter; PM<sub>2.5</sub> = particulate matter less than 2.5 microns in diameter; lb = pounds

<sup>a</sup> LST values are based on a 5-acre site with a receptor located at 50 meters in Source Receptor Area 4.

In summary, the estimated localized construction and operational emissions associated with the proposed Project and reasonably anticipated future industrial development of the site would not exceed any of SCAQMD's applicable LSTs for criteria pollutants. The LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to a violation of any short-term NAAQS or CAAQS, and have been developed by SCAQMD for each of the source receptor areas in the Basin. As noted previously, the NAAQS and CAAQS are health-protective standards that define the maximum amount of ambient pollution that can be present without harming public health. Consequently, projects with emissions below the applicable LSTs would not be in violation of the NAAQS or CAAQS and, thus, EPA and CARB health protective standards. Because the proposed Project's localized construction and potential future operational emissions would not exceed the LSTs, the proposed Project would not cause or contribute to a violation of any health-protective CAAQS and NAAQS and impacts would be less than significant.

### **Toxic Air Contaminants**

Sensitive receptors include schools, residences (which, for the proposed Project site, include liveaboards on boats used as residences), hospitals, and convalescent facilities. LAHD also includes offsite workers who can be affected by project activities in CEQA analyses. The nearest sensitive receptors to the Project site are all south and west of the Project site. The closest potential residential land uses are liveboard tenants at the Al Larson Marina approximately 294 meters (965 feet) southwest of the Project site. Additional sensitive land uses include residences (staff housing) on Reservation Point, approximately 3,850 feet south of the Project site; single- and multi-family homes on South Beacon Street, approximately 4,785 feet west of the project site; and various sensitive land uses (Bloch Field, Gibson Park, and the Gibson Senior Citizen Community Garden), approximately 4,800 feet west of the Project site on South Harbor Boulevard.

## Construction

With regard to emissions of air toxics, carcinogenic risks, and non-carcinogenic hazards, the use of heavy-duty construction equipment and haul trucks during construction activities would release diesel particulate matter (DPM) to the atmosphere through exhaust emissions. DPM is a known carcinogen, and extended exposure to elevated concentrations of DPM can increase excess cancer risks in individuals. However, carcinogenic risks are typically assessed over timescales of several years to decades, as the carcinogenic dose response is cumulative in nature. Short-term exposures to DPM, such as Project construction activities, would have to involve extremely high concentrations in order to exceed the SCAQMD significance threshold of 10 excess cancers per million. SCAQMD has determined that toxic air contaminant impacts are localized in nature and that exposure declines by approximately 90 percent at 300 to 500 feet from the source of the emissions (SCAQMD 2005). The nearest sensitive receptors would be approximately 294 meters (965 feet) southwest of the Project site. Furthermore, the Project would comply with the LAHD *Sustainable Construction Guidelines*, which require the use of Tier 4 Final construction equipment, which would reduce DPM emission significantly. Overall, construction would not expose sensitive receptors to substantial concentrations of DPM and the risk of adverse health effects during the construction period would be minimal. This impact would be less than significant.

## Operations

Future potential use of the site as a chassis repair and maintenance depot(s) is anticipated to result in DPM emissions generated by drayage trucks and CHE. Similar to construction, the closest sensitive receptors would be approximately 294 meters (965 feet) southwest of the Project site and DPM concentrations at these locations would be substantially reduced compared to DPM emissions in the vicinity of the Project site. Drayage trucks would continue to comply with the Clean Truck Program, which would reduce future DPM emissions. Given the distance between sensitive receptors and the DPM emissions sources, it is unlikely that future operational activities at the Project site would result in elevated health risk at sensitive receptors. This impact would be less than significant.

### **d. Result in other emissions (such as those leading to odors) that adversely affect a substantial number of people?**

**Less-than-Significant Impact.** Construction under the proposed Project and future potential operational activities at the site would increase air pollutants with the combustion of diesel fuel from off-road equipment and on-road vehicle use. Some individuals might find diesel combustion emissions to be objectionable in nature, although quantifying the odorous impacts of these emissions on the public is difficult because of the complex mixture of the chemicals in diesel exhaust and differing odor thresholds. It is difficult to quantify the potential for changes in perceived odors, even when air contaminant concentrations are known.

The mobile nature of most of the emission sources associated with potential future industrial development of the site would serve to disperse emissions. In addition, the distance between emission sources and the nearest sensitive receptor (965 feet) is expected to be far enough to allow adequate dispersion. Furthermore, the existing industrial setting for the proposed Project represents an already complex odor environment. For example, at the nearby container terminals, freight movement activities use diesel trucks and diesel CHE, which generate exhaust odors similar to those that would be generated by the proposed Project.



Within this context, the proposed Project would not be likely to result in changes to the overall odor environment in the vicinity. Therefore, the proposed Project would not result in emissions adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

## 6.4 BIOLOGICAL RESOURCES

### Would the project:

- a. **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Less-than-Significant Impact after Mitigation Incorporated.** No candidate, sensitive, or special-status species are known to occur on the Project site, and there is no federally designated critical habitat in the harbor. There are several state- or federally listed species and other sensitive species that have the potential to occur in the Project area or have been observed in the Port Complex or in nearby habitats. These include four species of sea turtle; one threatened (western snowy plover [*Charadrius nivosus nivosus*]) and one endangered (California least tern [*Sterna antillarum browni*]) bird species; eight other bird species with state and/or federal protection or designation, including the delisted California brown pelican (*Pelecanus occidentalis californicus*); the delisted gray whale; and two pinnipeds protected by the Marine Mammal Protection Act (California sea lion [*Zalophus californianus*] and Pacific harbor seal [*Phoca vitulina*]) (MBC Applied Environmental Sciences 2016; California Department of Fish and Wildlife 2021; California Native Plant Society 2021; National Marine Fisheries Service – WCRC 2021; U.S. Fish and Wildlife Service 2021).

Because of the heavy industrial use within the Project area and the developed nature of the existing facilities, the Project site is most likely not a nesting area for listed bird species. The Project is more than 1 mile from the tern colony on Pier 400. No impact on nesting by California least tern or other sensitive bird is anticipated as a result of either Project construction or future facility operation activities. No listed or special-status bird species nest within or adjacent to the Project site; as such, no impacts would occur. No mitigation is required.

The proposed Project under both phases would include the installation of perimeter fencing and exterior lighting around the entirety of the Project site. Night lighting from the exterior lighting around the site could result in disturbance of bird species, including masking natural photoperiodic cues, which can alter day and night patterns, interfere with the sleep-wake cycle, and affect the timing of reproductive behavior and individual mating patterns of songbirds. However, as mentioned above, no listed or special-status wildlife species nest or breed within or adjacent to the Project site. Furthermore, it is uncommon for California least terns to forage within Fish Harbor (MBC Applied Environmental Sciences 2016), and the birds that do feed within the harbor (primarily gulls) are already habituated to artificial lighting because the Project area is already illuminated from surrounding Port operations. Although installation of exterior lighting around the perimeter of the Project site would create a new source of light, extensive lighting currently

exists for nearby container terminal operations, roadway lighting, and other Port operations, and the addition of perimeter lighting around the Project site would not create a new source of substantial lighting compared with existing conditions. In addition, implementation of light pollution reducing measures (e.g., light shielding, pointed downward, placed low to the ground, long wavelength light sources) as required by **Mitigation Measure MM-BIO-1** would further reduce any potential impacts on listed or special-status wildlife bird species with the potential to occur within or adjacent to the Project site to less-than-significant levels.

The perimeter fencing that would be installed around the future facility would be located in a fully developed, industrial area that does not contain any habitat to support listed or special-status species or the movement of native wildlife within the regional area. As such, no fencing-related impacts are anticipated as a result of the Project. No mitigation is required.

A small pier would be demolished under Phase 1 and some wooden piles may be removed using a vibratory pile driver to shake the piles loose. Work vessels would include a derrick barge with a crane for the pile removal and a material barge to haul wharf debris to another area of the Port for disposal. Both of these barges would be supported by a tugboat. In-water construction activity could temporarily affect special-status marine mammals and turtles that have the potential to occur in the Project area; however, no pile driving would occur. Therefore, noise associated with pile driving would not occur and would not harass or harm special-status marine mammal and turtle species. In addition, wharf demolition would be short term in nature. Therefore, impacts associated with listed or special-status marine mammal and turtle species would be less than significant. No mitigation is required.

There would be no future potential operation-related impacts on listed or special-status marine mammal and turtle species as a result of the Project as in-water work would only occur during construction of Phase 1.

### ***Mitigation Measures***

**MM-BIO-1:** To minimize the effect of nighttime lighting on wildlife species, exterior lighting around the perimeter of the Project site will be designed to avoid light intrusion and spillage into surrounding areas, particularly Fish Harbor, through the use of shielding, height minimization (i.e., low to ground), and directional placement (i.e., downward facing lights). Exterior lighting will also use bulbs that are of a spectrum, wavelength, and intensity that minimize disruption to wildlife. Prior to issuance of construction permits, exterior lighting plans and specifications will be identified in construction site plans and will be provided to LAHD for review and approval.

**b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Less-than-Significant Impact.** No riparian habitat or other upland sensitive natural community is present at the Project site or in the vicinity; therefore, no impact on any riparian habitat or other upland sensitive natural community would occur as a result of Project construction activities associated with either phase or future facility operation activities.

Eelgrass is known to occur within San Pedro Bay near the Project area. An eelgrass survey conducted as part of the 2018 Biological Surveys of the Los Angeles And Long Beach Harbors reported the nearest patch about 540 feet west of the edge of the wharf (Wood et al. 2021). Removal of the wharf structure under Phase 1 is expected to be performed under RGP 65, which requires pre- and post-construction eelgrass surveys, in compliance with the California Eelgrass Mitigation Policy and the LARWQCB 401 Certification, which details water quality standards. Specifically, Condition 15 of RGP 65 states:

Prior to each qualifying maintenance event, a pre-project eelgrass survey should be conducted in accordance with the California Eelgrass Mitigation Policy (CEMP), as applicable. Qualifying maintenance events are those involving repair or replacement of more than 10 piles, where pile driving is in water shallower than -15 feet Mean Lower Low Water, and occurring in the front, waterside half of the wharf where light conditions would allow for eelgrass growth. If the pre-project survey demonstrates eelgrass presence within the project vicinity, a post-project survey should be conducted and impacts to eelgrass mitigated in accordance with the CEMP.

Adherence to permit conditions would ensure no permanent impact on eelgrass. In-water work under Phase 1 and associated monitoring is reported monthly to the LARWQCB. RGP 65 requires BMPs to minimize the suspension of sediments and disturbance of the substrate when removing wooden piles and ensure that no construction debris, soil, sand, sawdust, rubbish, cement or concrete washings, oil or petroleum products, or other material not suitable for use in the marine environment be allowed to enter into or be placed where it may be washed by rainfall or runoff into waters of the United States. Therefore, impacts associated with wharf and pile removal would be less than significant. No mitigation is required.

*Caulerpa* is a non-native species that can preclude native species from inhabiting the seafloor. The *Caulerpa* Control Protocol establishes guidelines for pre-construction surveys, reporting, and agency notifications. In conjunction with the pre-construction eelgrass survey, a Surveillance-Level *Caulerpa* survey will also be conducted to detect the presence of this invasive species. The survey, reporting, and agency notifications (if detected) will adhere to the *Caulerpa* Control Protocol.

The Project would result in an increase in benthic habitat equal to the current footprint of the piles. The area of the wharf to be removed is approximately 2,254 square feet. Construction activities associated with Phase 1 could temporarily affect marine biota in the Project area as a result of the suspension of contaminated sediments. RGP 65 details BMPs to minimize the suspension of sediments and disturbance of the substrate when removing wooden piles. Therefore, these impacts are expected to be short term in nature and occur over a relatively small, localized area. The Project is expected to result in an increase in benthic habitat and a reduction of shading in the Project area. Adverse effects on sensitive habitats from construction-related activities would be less than significant, and no mitigation is required. There would be no future potential operation-related impacts on sensitive aquatic habitats as a result of the Project, as in-water work would only occur during construction of Phase 1.

**c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** The proposed Project would not affect federally protected wetlands (as defined by Section 404 of the Clean Water Act) during in-water construction activities (i.e., pile and wharf removal as part of Phase 1) or reasonably foreseeable future construction and facility operation activities because there are no federally protected wetlands in the Project area. The only federally protected wetlands in the Los

Angeles Harbor are the Anchorage Road Salt Marsh and the Cabrillo Salt Marsh, approximately 2.3 miles southwest and 1.7 miles northeast of the Project site, respectively. Neither of these wetlands would be affected or otherwise disturbed by the proposed Project. Therefore, no impacts would be associated with federally protected wetlands, as defined by Section 404 of the Clean Water Act. No mitigation is required.

**d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**Less-than-Significant Impact after Mitigation Incorporated.** Native birds are expected to forage in the ornamental and ruderal vegetation adjacent to the Project site but nesting is unlikely. Two large buildings and support structures could provide nesting areas for native bird species, including house finches, black phoebes, American crows, and western gulls. Nesting by nonnative European starlings, rock doves, and house sparrows is probably common on the structures. Although none of these species is considered sensitive, native bird nests are protected by the Migratory Bird Treaty Act (MBTA) and additional protections are provided to nesting colonies of some native species that may occur in the Project area. The MBTA prohibits the harassment or removal of nests occupied by migratory birds protected by the act during the breeding season. Potential impacts associated with removal of vegetation would be less than significant.

Bird species using the area may be deterred from nesting within the Project site due to future facility operation-related noises (e.g., movement of trucks and chassis, chassis repair) that would continue into nighttime hours. However, any individuals that occur within the Project area are already acclimated to noise disturbances from surrounding Port operations (e.g., cargo movement by truck and rail, harbor activity, industrial facilities), so Project noises may not disturb them and it is possible that they may continue to use the Project site during future operations. In addition, these species are common in the area, so loss of nesting habitat within the Project site would not result in negative impacts on regional populations, and the species that have a potential to nest within the Project site (e.g., house finch, American crow, house sparrow) are adaptable and acclimated to human environments and disturbances, so they could nest somewhere else in the surrounding area. As such, future facility operation-related noise impacts on nesting birds protected by the MBTA are expected to be less than significant.

The proposed Project under both phases would include the installation of perimeter fencing and exterior lighting around the entirety of the Project site. Night lighting from the exterior lighting around the site could result in disturbance of common nesting bird species that are protected under the MBTA that occur within and adjacent to the Project site, including masking natural photoperiodic cues, which can alter day and night patterns, interfere with the sleep-wake cycle, and affect the timing of reproductive behavior and individual mating patterns of songbirds. However, birds nesting within the Project site are already acclimated to artificial and nighttime lighting, and the birds that feed within Fish Harbor (primarily gulls) are already habituated to artificial lighting because the Project area is already illuminated from surrounding Port operations. Although installation of exterior lighting around the perimeter of the Project site would create a new source of light, extensive lighting currently exists for nearby container terminal operations, roadway lighting, and other Port operations, and the addition of perimeter lighting around the Project site would not create a new source of substantial lighting compared with existing conditions. In addition, implementation

of light pollution reducing measures (e.g., light shielding, pointed downward, placed low to the ground, long wavelength light sources) as required by **Mitigation Measure MM-BIO-1** would further reduce any potential impacts on common bird species nesting within buildings and foraging in Fish Harbor to less-than-significant levels.

Terrestrial migration corridors within the Port Complex are well outside of the Project area and would not be affected as a result of either Project construction or future facility operation activities. There would be no impacts on terrestrial migration corridors as a result of the Project.

A small pier would be demolished under Phase 1 and some wooden piles may be removed using a vibratory pile extractor to shake the piles loose. Work vessels would include a derrick barge with a crane for the pile removal and a material barge to haul wharf debris to another area of the Port for disposal. Both of these barges would be supported by a tugboat. Construction activity could temporarily affect marine mammal and fish movement patterns in the vicinity of the Project; however, no pile driving would occur. Therefore, noise associated with pile driving would not occur and would not harass or harm marine mammal and fish species. In addition, wharf demolition would be short term in nature. Therefore, impacts associated with movement of any native resident or migratory fish or wildlife species would be less than significant. No mitigation is required.

There would be no future potential operation-related impacts on fish movement patterns or marine mammals as a result of the Project, as in-water work would only occur during construction of Phase 1.

**e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**No Impact.** The only biological resources protected by City of Los Angeles ordinance (City of Los Angeles 2015) are certain tree species. These include valley oak (*Quercus lobata*) and California live oak (*Quercus agrifolia*) or any other tree of the oak genus indigenous to California, excluding scrub oak (*Quercus dumosa*), Southern California black walnut (*Juglans californica* var. *californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*), none of which exists on the Project site. Therefore, no impacts on protected biological resources as a result of Project construction activities or future facility operation activities would occur, and no mitigation is required.

**f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?**

**No Impact.** The Project site is not within the area of an adopted natural community conservation plan or habitat conservation plan. Only one conservation plan, the Rancho Palos Verdes Natural Community Conservation Plan/Habitat Conservation Plan, has been approved near the Port. This plan was designed to protect coastal scrub habitat and is approximately 4 miles east of the Project site (California Department of Fish and Wildlife 2015).

There are no habitat conservation plans in place for the Port. However, a memorandum of understanding is in place in order for LAHD, the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and the U.S. Army Corps of Engineers to protect the California least tern. It requires a 15-acre

nesting site to be protected during the annual nesting season (May through October). The least tern colony nesting site on Pier 400 is designated as a Significant Ecological Area by the County of Los Angeles (County of Los Angeles, Department of Regional Planning 2015). The Project site is more than 1 mile from the least tern colony and does not contain nesting habitat or foraging habitat for the species. As such, neither Project-related construction nor reasonably foreseeable future facility operation activities would have an impact on habitat conservation plans, natural community conservation plans, the memorandum of understanding, or the Significant Ecological Area for California least tern. Therefore, no impact would occur, and no mitigation is required.

## 6.5 CULTURAL RESOURCES

This section identifies the cultural resources study area and analyzes effects within the study area.

### Study Area

The Project proposes to demolish Star-Kist Plant No. 4 and the East Plant. After demolition, the Project plans to grade the site and apply compacted and bound CMB. Although it is not known at this time to what use the site would ultimately be put, for the purposes of this analysis, it is assumed that the site would be used to operate a truck chassis repair depot in support of cargo shipping. Therefore, the cultural resource study area encompasses the Project site. No built environment resources in the vicinity have the potential to be affected by the proposed Project (Figure 6.5-1).

### Would the project:

#### a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

**No Impact.** The study area does not include CEQA historical resources.

The Environmental Management Division of LAHD prepared a technical report, *Final Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities* (2021 assessment) (Appendix C), that reevaluated Plant No. 4 and the East Plant for individual inclusion in the NRHP and the CRHR and as an HCM. The 2021 assessment (Appendix C) also analyzed Plant No. 4 and East Plant as potential district contributors to a Star-Kist related historic district meeting NRHP, CRHR, and Los Angeles Historic Preservation Overlay Zone (HPOZ) district criteria. The assessment (Appendix C) concluded that neither Plant No. 4 nor the East Plant meet the NRHP, CRHR, or Los Angeles (HCM and HPOZ) individual or Star-Kist related district eligibility requirements.

The 2021 assessment identified that a report titled *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California* (2008 assessment) of Plant No. 4, which concluded that the building was eligible under all NRHP, CRHR, and HCM criteria, had inaccuracies and deficiencies. The 2008 assessment lacked a clearly defined period of significance, a construction history, a detailed list of alterations, an integrity analysis, or historic context on the building type or style. It also did not support claims of significance regarding persons, architecture, or information potential.

The 2021 assessment provided a detailed construction history, list of alterations, integrity analysis, and new historic context for history, including the recent past, and building type and style. Ultimately, the 2021 assessment concluded that Plant No. 4 lacked sufficient integrity to convey significance for tuna canning-related events or patterns of events and that it lacked significance for important persons, architecture, or information potential either individually or as a district contributor. It concluded that the East Plant lacked significance under all criteria. Therefore, Plant No. 4 and the East Plant are not CEQA historical resources and the proposed Project would result in no impact.

**b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**No Impact.** An archaeological inventory report (Appendix D) conducted for the proposed Project did not identify any archaeological resources in or within a 0.25-mile radius of the proposed Project. The archaeological inventory report (Appendix D) report included a records search conducted at the South Central Coastal Information Center of the California Historical Resources Inventory System, at California State University, Fullerton. The records search included a review of all available cultural resources surveys and excavation reports as well as site records within a 0.25-mile radius of the study area. The NRHP, CRHR, California Inventory of Historic Resources, California Historical Landmarks, California Points of Historical Interest, State Historic Resources Commission, and Caltrans Historic Highway Bridge Inventory were also consulted. The records search revealed that seven previous studies have taken place within a 0.25-mile radius. Additionally, no prehistoric sites or isolates have been previously recorded within the study area or within a 0.25-mile radius of the study area.

The archaeological inventory report (Appendix D) also described the setting of the study area, which is composed of modern fill or nonnative sediments, and no native soils or sediments are present. As such, there is little to no potential for encountering buried, intact cultural resources. Because of the distance of Project activities from historic resources, no archaeological resources would be affected by the proposed Project.

Because of the distance of Project activities to known archaeological resources, and the presence of nonnative fill and sediments in the study area, no archaeological resources would be affected by the Project. No impacts would result, and no mitigation is required.

**c. Disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less-than-Significant Impact.** No prehistoric sites or cemeteries have been identified in the study area or within a 0.25-mile radius of the study area. Based on the results of the cultural resource records search, background research, and Native American consultation process, there is no evidence of any human remains, including those interred outside of dedicated cemeteries, within the study area that would be affected by the proposed Project.

While it is unlikely that human remains are present in the Project area, Health and Safety Code Section 7050.5 and State CEQA Guidelines Section 1506.5(e) describe the process to be followed in the event human remains are discovered during Project implementation. In the event of discovery of human remains during ground-disturbing activities during Project construction, no further disturbance shall occur until the



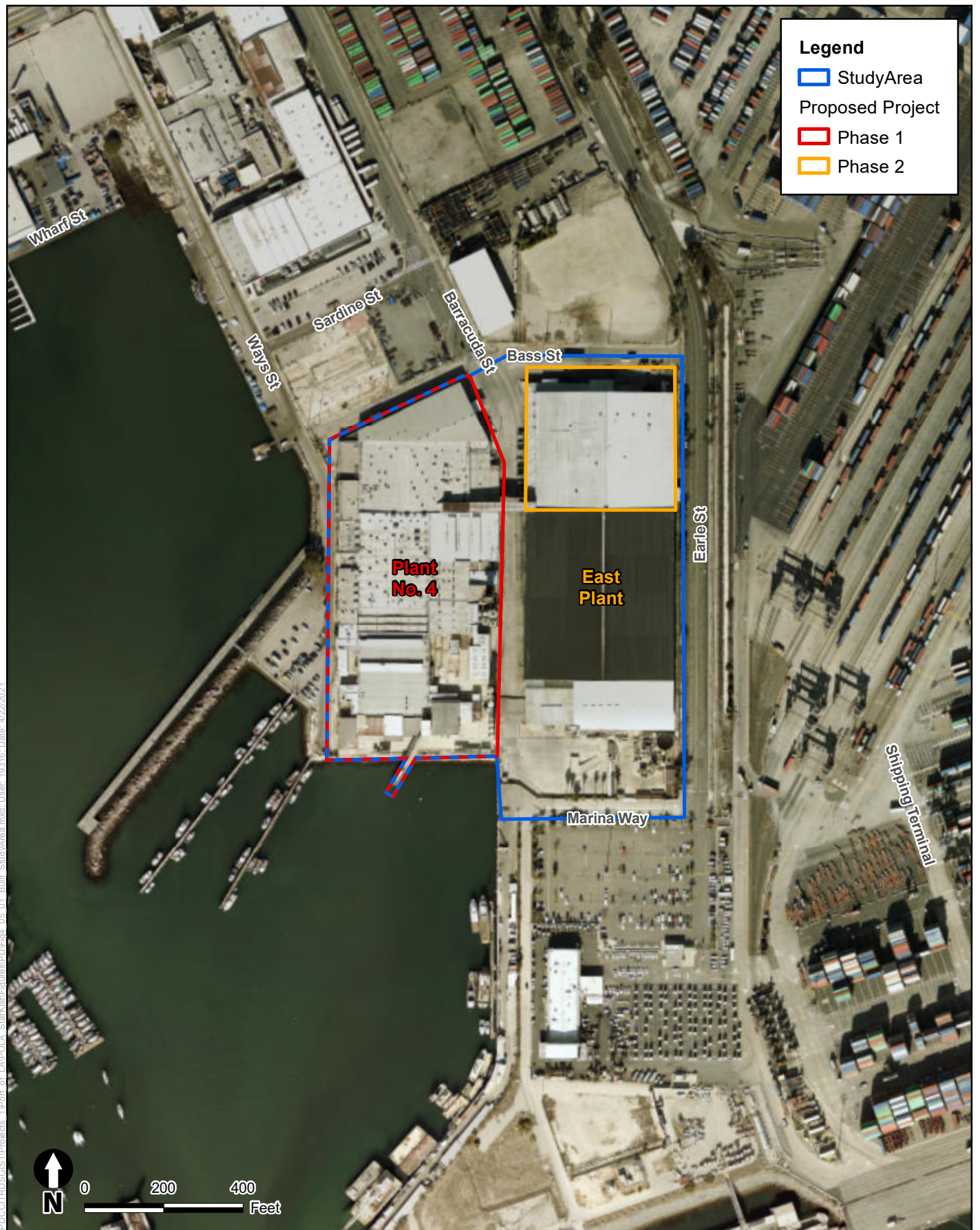


Figure 6.5-1 Study Area



Los Angeles County Medical Examiner-Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. Therefore, impacts associated with the disturbance of human remains would be less than significant because the Project would be required to comply with these laws and regulations. No mitigation is required.

## 6.6 ENERGY

### Would the project:

#### a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

**Less-than-Significant Impact.** The proposed Project would require the use of non-renewable energy resources in the form of fossil fuels used to operate equipment and to fuel vehicle trips during construction and operation. Diesel and gasoline fuels would be consumed during the proposed Project's construction activities. Energy expenditures during construction would be temporary, lasting for approximately 17.5 months (10.5 months for Phase 1 and an additional 7 months for Phase 2), and would be necessary to achieve the overall objectives of creating a parcel of land that is more marketable for future development, reusing and capitalizing on the existing area more efficiently, and removing safety hazards. Construction would not result in wasteful or inefficient use of energy. No electricity or natural gas would be used during construction. Table 6.6-1 shows energy fuel consumption during construction. Construction fuel consumption represents total fuel use over the 17.5-month construction period.

During the proposed Project's 17.5-month construction period, diesel and gasoline would be used to fuel the onsite construction equipment, offsite hauling vehicles, and working automobiles. Construction of the proposed Project would consume an estimated 90,935 gallons of diesel and 7,545 gallons of gasoline (see Appendix B). In Los Angeles County, approximately 575,000,000 gallons of diesel and approximately 3,559,000,000 gallons of gasoline are consumed annually (California Energy Commission 2019). The proposed Project diesel consumption would represent less than 0.01 percent of Los Angeles County use, and gasoline consumption would represent 0.0001 percent of Los Angeles County use. Energy expenditures during construction would be short in nature and would last 17.5 months. Therefore, energy consumed during Project construction would be minimal and impacts would be less than significant.

Potential future use of the site is anticipated to result in an increase in fuel and energy consumption from truck traffic to the Project site, onsite CHE equipment, and new exterior lighting. As previously noted, for the purposes of this analysis, it is assumed that the site would be developed with a chassis repair and maintenance facility, consistent with the underlying zoning and the PMP. Table 6.6-2 shows estimated fuel consumption during such potential future operations. Annually, anticipated future operations would consume an estimated 218,622 gallons of diesel, 9,728 gallons of gasoline, and 5,652 gallons of propane (see Appendix B). As discussed above, in Los Angeles County, the proposed Project operations diesel and gasoline consumption would represent less than 0.01 percent of County use (California Energy Commission 2019). Additionally, Los Angeles County consumes approximately 590,000,000 gallons of propane annually (Argonne National Laboratory 2018). The potential future propane consumption would also represent less than 0.01 percent of propane use in the county.

**Table 6.6-1. Construction Fuel Consumption**

Phase Name	Diesel (gallons)			Gasoline (gallons)
	Off-road Equipment	Vendor Trucks	Haul Trucks	Worker Vehicles
Phase 1-Mobilize	266	58	0	45
Phase 1-Lead and Asbestos Removal	0	520	4,495	2,036
Phase 1-Wharf Demolition	614	0	77	45
Phase 1-Building Demolition	18,655	416	23,578	1,629
Phase 1-Grading/Compaction	1,731	139	4,430	271
Phase 1-Install CMB	1,731	139	4,360	271
Phase 1-Perimeter Lighting and Fencing	724	69	18	407
Phase 1-Clean Up	0	35	0	68
Phase 1-Demobilize	266	58	0	45
Phase 2-Concrete Pad at Phase 1 Site	1,167	379	0	124
Phase 2-Install Canopy at Phase 1 Site	3,809	134	0	543
Phase 2-Mobilize	133	58	0	45
Phase 2-Lead and Asbestos Removal	0	208	324	814
Phase 2-Building Demolition	7,773	347	8,078	679
Phase 2-Grading/Compaction	1,148	69	1,744	136
Phase 2-Install CMB	865	69	1,744	136
Phase 2-Perimeter Lighting and Fencing	241	23	18	136
Phase 2-Clean Up	0	35	0	68
Phase 2-Demobilize	133	58	0	45
Subtotal	39,257	2,812	48,866	7,545
<b>Total Fuel Consumption</b>		<b>90,935</b>		<b>7,545</b>

Source: Energy calculations provided in Appendix B.

**Table 6.6-2. Total Annual Fuel Use during Potential Future Project Operations**

Source	Gallons		
	Diesel	Gasoline	Propane
Employees	--	9,728	--
Fuel Trucks	1,555	--	--
Drayage Trucks-On site	6,273	--	--
Drayage Trucks-Off site	135,263	--	--
Cargo-Handling Equipment	75,531	--	5,652
<b>Project Total</b>	<b>218,622</b>	<b>9,728</b>	<b>5,652</b>

Source: Energy calculations provided in Appendix B.

Potential future operations would consume electricity during operations from installation of new exterior lighting encompassing the perimeter of the site. Approximately 211,919 kilowatt-hours of electricity would be generated annually during potential future operations of the entire Project site. Light-emitting diode light fixtures would be used at the Project site and would meet the latest efficiency standards. These energy uses do not constitute wasteful, inefficient, or unnecessary consumption; therefore, impacts would be less than significant and no mitigation is required. No natural gas would be consumed during operations. Energy consumed during project operations would be minimal and impacts would be less than significant.

Implementation of the State of California's Low Carbon Fuel Standard regulations and the state's long-term goal for carbon neutrality will cause motor vehicle fuels used in California to transition to renewable fuel sources. Therefore, while the proposed Project is not currently committing to the use of renewable fuels, such as biodiesel, over time some or perhaps all of the Project's onsite and offsite fuel use would be in the form of renewable fuels that would decrease the Project's use of nonrenewable fuels. The California Building Standards Code, Title 24, establishes energy conservation standards for new construction as well as additions and alterations to existing buildings. In addition, the state mandates energy-efficient building and infrastructure requirements. The proposed Project would incorporate renewable energy materials into project operation and avoid wasteful use of energy resources. Therefore, the proposed Project would not use non-renewable resources in a wasteful or inefficient manner during construction and operations.

The construction and operation energy use does not constitute wasteful, inefficient, or unnecessary consumption. Impacts are less than significant, and no mitigation is required.

**b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**No Impact.** Construction would be consistent with the policies in the Port's CAAP. As described above in response to question 4.6a, the proposed Project would have only short-term, minimal impacts on energy resources during construction activities. Future development would be required to comply with state and local plans for renewable energy and energy efficiency. Therefore, no impact would occur, and no mitigation is required.

## **6.7 GEOLOGY AND SOILS**

### **Would the project:**

**a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less-than-Significant Impact.** The Palos Verdes Fault Zone traverses the Port in a northwest-to-southeast manner from the West Turning Basin to Pier 400 and beyond. The Palos Verdes Fault Zone roughly encompasses a 50-mile-long area that travels through the communities of San Pedro, Palos Verdes Estates, Torrance, and Redondo Beach (California Institute of Technology 2013). According to Figure 2, *Palos Verdes Fault Zone*, of the 2018 PMP, the Palos Verdes fault crosses

the Project area. In addition to the Palos Verdes Fault Zone, the northern terminus of the Wilmington blind thrust fault line is immediately adjacent to and just northeast of the Project site. According to the 2017 *Activity and Earthquake Potential of the Wilmington Blind Thrust, Los Angeles, CA Final Technical Report* submitted to the U.S. Geological Survey, the fault line is between Cannery Street and the Project site (Wolfe et al. 2017).

The proposed Project would involve demolition and development activities that would be conducted in two phases. Once demolition of the Plant and the small waterside dock is complete under Phase 1, the Project site would be graded and covered with compacted and bound CMB and the installation of perimeter fencing and exterior lighting would occur. Additionally, LID BMPs (including an infiltration basin along the entire demolition perimeter) would be constructed on site. Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 site and demolition of the northern portion of the East Plant. Once the northern portion of the East Plant is demolished, the site would be graded and covered with compacted and bound CMB, requiring LID compliance (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects). Although the ultimate future use of the site is unknown, for purposes of analysis, it is assumed that the site would be developed for cargo support under Phase 2. In particular, this analysis assumes that the Project site would be developed with a chassis repair and maintenance depot(s). Based on the underlying zoning and the PMP, it is not anticipated that development of any new structures on the site would be used for permanent human occupancy; therefore, potential impacts on people and structures would be low. Additionally, it is not anticipated that the potential future uses of the site would contain features that would directly or indirectly cause or intensify effects associated with fault rupture. As such, impacts related to the rupture of a known earthquake fault would be less than significant and no mitigation is required.

## 2. Strong seismic ground shaking?

**Less-than-Significant Impact.** The Project area is within the Palos Verdes Fault Zone and immediately adjacent to the Wilmington blind thrust fault line; therefore, potential hazards exist because of seismic activity associated with active faults and the presence of engineered fill<sup>4</sup> throughout the Project area. The next-closest fault zone to the Project site is the Newport-Inglewood Fault Zone (approximately 7.6 miles to the northeast).

As discussed in the response to question 4.7a-1, no structures intended for permanent human occupation would be built as part of the proposed Project or reasonably foreseeable future uses of the site; therefore, the potential risk to personnel working within the Project area would be low. Should the site be developed with a chassis repair and maintenance depot or similar cargo-related support facility under Phase 2, activities are expected to occur under a canopy and not in a dedicated, permanent facility. The potential future use of the site as cargo support would not contain

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<sup>4</sup> According to the 2018 PMP, the Port has been physically modified through past dredge and fill projects. The Natural Resources Conservation Service's *Web Soil Survey* identifies soils in the Project area as urban land, 0 to 2 percent slopes, dredged fill substratum.

features that would directly or indirectly cause or intensify effects of seismic ground shaking. Therefore, impacts related to seismic ground shaking would be less than significant, and no mitigation is required.

### 3. Seismically related ground failure, including liquefaction?

**Less-than-Significant Impact.** Liquefaction occurs when saturated, low-density, loose materials (e.g., sand or silty sand) are weakened and transformed from a solid to a near-liquid state as a result of increased pore water pressure. The increase in pressure is caused by strong ground motion from an earthquake. Liquefaction most often occurs in areas underlain by silts and fine sands and where shallow groundwater exists. The Project site is identified as an area that is susceptible to liquefaction, per the California Geological Survey's Earthquake Zones of Required Investigation. This is due to the presence of engineered fill and shallow groundwater at the Project site. However, the proposed Project would involve demolition activities, grading, the installation of LID BMPs, (likely) development of a cargo support facility, perimeter fencing, and exterior lighting as part of two phases. Although it is not known what future development would occur on the site, it is reasonably anticipated that operations would consist of chassis storage, repair, and maintenance. It is not anticipated that the Project site would be developed with structures intended for permanent human occupation or contain features that would directly or indirectly cause or intensify ground failure conditions. Therefore, impacts related to seismically related ground failure, including liquefaction, would be less than significant, and no mitigation is required.

### 4. Landslides?

**No Impact.** The proposed Project site is on Terminal Island, which is flat and has no substantial natural or graded slopes. Furthermore, the Project site is not in a California Geological Survey–designated landslide zone. No impacts related to landslides would occur, and no mitigation is required.

#### b. Result in substantial soil erosion or the loss of topsoil?

**Less-than-Significant Impact.** Construction would result in pavement and soil disturbance during the proposed Project's demolition and grading activities. However, BMPs would be employed during construction (such as sediment and erosion control measures) to prevent pollutants from leaving the site, as required by the Project-specific SWPPP to be prepared under the Construction General Permit<sup>5</sup> (Order 2009-0009-DWQ). Once demolition activities are complete, the Project site would be graded and covered with CMB, which would prevent onsite soils from eroding, as they would no longer be exposed. Moreover, the CMB would be bound and compacted and would require LID compliance (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects). As mentioned under question 4.7a-1 above, LID BMPs installed as part of Phases 1

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<sup>5</sup> Dischargers whose projects disturb 1 or more acres of soil or whose projects disturb less than 1 acre but are part of a larger common plan of development that, in total, disturbs 1 or more acres are required to obtain coverage under the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires development of a SWPPP by a certified Qualified SWPPP Developer.

and 2 of the proposed Project would include an infiltration basin along the entire demolition perimeter. Furthermore, none of the activities anticipated to be conducted as part of the site's development under Phase 2 (e.g., storage, repair, and maintenance) are expected to contribute to erosional processes in any way. Therefore, the proposed Project would not result in significant soil erosion or the loss of topsoil, and no mitigation is required.

**c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

**Less-than-Significant Impact.** According to the Natural Resources Conservation Service's Web Soil Survey, artificial fill underlies the Project site. Artificial fill could be susceptible to unstable conditions such as lateral spreading, subsidence, liquefaction, or collapse. However, all phases of the proposed Project would comply with applicable engineering standards and the Los Angeles Building Code. In addition, Project activities under both phases would involve demolition, grading, the installation of LID BMPs, likely development of support structures, perimeter fencing, and exterior lighting. For the purposes of this analysis, it is assumed that the Project site would ultimately operate as a chassis storage, repair, and maintenance site. Given the industrial nature of the site, the Project site is not anticipated to be developed (under Phase 2) with structures meant for permanent human occupancy or contain features that would directly or indirectly exacerbate unstable soil or geologic conditions. Compliance with the aforementioned codes and standards would reduce potential impacts associated with unstable soils to less-than-significant levels, and no mitigation is required.

**d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less-than-Significant Impact.** Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a substantial increase in volume with an increase in water content as well as a substantial decrease in volume with a decrease in water content. Changes in the water content of highly expansive soils can result in severe distress for structures constructed on or against the soils. Previously imported fill that currently exists throughout the Port could have expansive characteristics (because imported fill can be partially composed of clay). However, all phases of the proposed Project would comply with applicable engineering standards and the Los Angeles Building Code. In addition, potential future operations activities at the Project site under Phase 2 (e.g., chassis storage, repair, and maintenance) are not reasonably anticipated to include structures meant for permanent human occupancy or contain features that would directly or indirectly create or exacerbate expansive soil conditions. Compliance with the aforementioned codes and standards would reduce potential impacts associated with expansive soils to less-than-significant levels, and no mitigation is required.

**e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?**

**No Impact.** Project features would not include the use of septic tanks or alternative wastewater disposal systems. No impacts would occur, and no mitigation is required.

**f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**No Impact.** A paleontological records request was submitted to the Los Angeles County Natural History Museum (LACM). The results were received by email on September 19, 2019 (see Appendix E). The result of the records search indicates that the Project site does not contain any important paleontological deposits at the current ground surface. The surface of the Project site comprises artificial fill deposits that extend to unknown depths across the Project site. However, older Quaternary-aged deposits occur at modest depths below the artificial fill deposits in the Project site area and could contain important vertebrate fossil remains. The closest older Quaternary fossil identification locality is LACM 4587, comprising specimens of ground sloth, fur seal, and whale found during dredging at Terminal Island. Another close older Quaternary locale is locality LACM 4167, which produced a fossil specimen of rockfish south-southwest of the Project site on Reservation Point. Onshore and west of the Project site, older Quaternary deposits of terrestrial Palos Verdes Sand and older marine San Pedro Sand have produced numerous locales, which included a mixture of terrestrial and marine taxa.

The proposed Project and reasonably foreseeable future use of the site would not extend to the modest depths of the older Quaternary-aged deposits; it would remain near the surface, within artificial fill. Therefore, the proposed Project would result in no impacts on paleontological resources, and no mitigation measures are required.

## **6.8 GREENHOUSE GAS EMISSIONS**

This section summarizes potential GHG emissions associated with construction activities related to Phase 1 and Phase 2 and potential future use of the site as a chassis repair and maintenance depot(s).

### **Construction**

Construction of the proposed Project would generate emissions of GHG emissions from off-road construction equipment and mobile sources including employee, vendor, and haul truck trips traveling to and from the Project site. Consistent with Section 4.3, *Air Quality*, construction GHG emissions were estimated for Phase 1 and Phase 2 construction activities. Similar to Section 4.3, *Air Quality*, GHG emissions were estimated using a combination of emission factors and methodologies from CalEEMod and EMFAC2021 and would comply with LAHD's *Sustainable Construction Guidelines for Reducing Air Emissions*. Sources contributing to GHG emissions during construction are described in detail Section 4.3, *Air Quality*. In accordance with SCAQMD guidance, the proposed Project's construction-related GHG emissions were amortized over the lifetime of the Project (20 years) as described in Section 2.0, *Project Description*, and added to operational emissions. Details regarding the methods and activity assumptions by source type are provided in Appendix B.

### **Operations**

Future potential development of the site is reasonably anticipated to result in GHG emissions associated with employee trips, onsite and offsite truck trips, fuel truck trips, operation of CHE, and electricity consumption for lighting. Similar to Section 4.3, *Air Quality*, GHG emissions associated with the potential

future use of the site as a chassis repair and maintenance depot(s) were estimated using a combination of emission factors and methodologies from CalEEMod, EMFAC2021, the *San Pedro Bay Ports Emissions Inventory Methodology Report*, and the *Port of Los Angeles 2019 Inventory of Air Emissions*. Details regarding the methods and activity assumptions by source type are provided in Appendix B.

**a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less than Significant Impact.** Construction activities associated with Phase 1 and Phase 2 would generate GHG emissions from off-road construction equipment and mobile sources including employee, vendor, and haul truck trips. GHG emissions are measured exclusively as cumulative impacts; therefore, the proposed Project's construction emissions are considered part of total GHG emissions for the Project lifecycle, which also includes GHG emissions during operations.

**CEQA Significance Thresholds**

State CEQA Guidelines Section 15064.4(b) sets forth the factors that should be considered by a lead agency when assessing the significance of impacts from GHG emissions on the environment. These factors include:

- The extent to which a project may increase or reduce GHG emissions compared with the existing environmental setting;
- Whether project emissions exceed a threshold of significance that the lead agency determines applicable to a project; and
- The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.

The guidelines do not specify significance thresholds. They allow lead agencies discretion in how to address and evaluate significance based on these criteria.

SCAQMD has adopted a CEQA significance threshold of 10,000 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) per year (MTCO<sub>2</sub>e/yr) for industrial projects where SCAQMD is the lead agency (South Coast Air Quality Management District 2008b). This Final IS/MND used this threshold to evaluate the proposed Project's GHG emissions under CEQA. Estimated GHG emissions below this threshold would be considered to produce less-than-significant impacts on GHG levels. LAHD has determined the SCAQMD-adopted industrial threshold of 10,000 MTCO<sub>2</sub>e/yr to be suitable for the proposed Project for the following reasons:

- SCAQMD used Governor Schwarzenegger's June 1, 2005, Executive Order S-3-05 as the basis for its development. Executive Order S-3-05 set targets of reducing GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and 80 percent below 1990 levels by 2050 (SCAQMD 2008b). The 2020 target is the core of the California Global Warming Solutions Act of 2006, widely known as AB 32 (South Coast Air Quality Management District 2008b).



- The SCAQMD industrial source threshold is appropriate for projects with mobile emission sources, such as the proposed Project. California Air Pollution Control Officers Association guidance considers industrial projects to include substantial GHG emissions associated with mobile sources (California Air Pollution Control Officers Association 2008). SCAQMD, on industrial projects for which it is the lead agency, uses the 10,000 MTCO<sub>2</sub>e/yr threshold to determine CEQA significance by combining a project's stationary-source and mobile-source emissions. Although the threshold was originally developed for stationary sources, SCAQMD staff views the threshold as conservative for projects with both stationary and mobile sources because it is applied to a larger set of emissions and therefore captures a greater percentage of projects than would be captured if the threshold was only used for stationary sources (SCAQMD 2008b).
- The SCAQMD industrial source threshold is appropriate for projects with sources that use primarily diesel fuel. Although most of the sources that were considered by SCAQMD in the development of the 10,000 MTCO<sub>2</sub>e/yr threshold were natural gas-fueled, both natural gas and diesel combustion produce carbon dioxide as the dominant GHG (The Climate Registry 2019). Furthermore, the conversion of all GHGs to CO<sub>2</sub>e ensures that all GHG emissions are weighted accurately.
- The proposed Project is at an existing industrial facility.

The proposed Project would result in a significant GHG impact if the GHG emissions increase exceeds this significance threshold.

In accordance with SCAQMD guidance, the proposed Project's construction emissions are amortized over a 20-year period, and the resulting annual emissions are combined with the proposed Project's annual operational GHG emissions. Table 6.8-1 shows the total GHG emissions per construction phase.

Potential future use of the Project site as a chassis storage and repair facility would result in GHG emissions from employee trips, onsite and offsite truck trips, fuel truck trips, operation of CHE, and electricity consumption for perimeter lighting. Table 6.8-2 presents the net increase in GHG emissions over existing conditions from this reasonably foreseeable future use of the site.

As shown in Table 6.8-2, the proposed Project's annual GHG emissions would not exceed SCAQMD's 10,000 MTCO<sub>2</sub>e/year threshold. Therefore, the proposed Project's direct and indirect GHG emissions would not have a significant impact on the environment. This impact would be less than significant.

**Table 6.8-1. Project Construction GHG Emissions**

<b>Construction Phase</b>	<b>Total MTCO<sub>2</sub>e per Phase</b>
Phase 1-Mobilize	3.33
Phase 1-Lead and Asbestos Removal	71.66
Phase 1-Wharf Demolition	12.96
Phase 1-Building Demolition	436.15
Phase 1-Grading/Compaction	65.35
Phase 1-Install CMB	65.35
Phase 1-Perimeter Lighting and Fencing	11.83
Phase 1-Clean Up	0.94
Phase 1-Demobilize	3.31
Phase 2-Concrete Pad at Phase 1 Site	16.30
Phase 2-Install Canopy at Phase 1 Site	43.30
Phase 2-Mobilize	2.14
Phase 2-Lead and Asbestos Removal	13.87
Phase 2-Building Demolition	165.67
Phase 2-Grading/Compaction	30.54
Phase 2-Install CMB	27.63
Phase 2-Perimeter Lighting and Fencing	3.94
Phase 2-Clean Up	0.93
Phase 2-Demobilize	2.13
<b>Total Emissions</b>	<b>977.33</b>
20-Year Amortization	48.87

Source: Modeling output provided in Appendix B.

MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent**Table 6.8-2. Annual Potential Future Operational GHG Emissions**

<b>Source</b>	<b>Annual GHG Emissions (MTCO<sub>2</sub>e/year)</b>
Employees	83.25
Fuel Trucks	16.63
Drayage Trucks-Onsite	207.90
Drayage Trucks-Offsite	1,563.21
Cargo-Handling Equipment	749.22
Electricity	63.87
Construction (20-year Amortization)	48.87
<b>Total Emissions</b>	<b>2,732.95</b>
Significance Threshold	10,000
<b>Exceeds Threshold?</b>	<b>No</b>

Source: Source: Modeling output provided in Appendix B.

MTCO<sub>2</sub>e = metric tons of carbon dioxide-equivalent

**b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less-than-Significant Impact.** The State of California is leading the way in the United States with respect to GHG reductions. Several legislative and municipal targets for reducing GHG emissions below 1990 levels have been established. Key examples include, but are not limited to:

- Senate Bill 32
  - 1990 GHG emissions levels by 2020
  - 40 percent below 1990 GHG emissions levels by 2030
- AB 32
  - 80 percent below 1990 GHG emissions levels by 2050
- San Pedro Bay Ports Clean Air Action Plan
  - 40 percent below 1990 GHG emissions levels by 2030
  - 80 percent below 1990 GHG emissions levels by 2050
- City of Los Angeles' Green New Deal (4-Year Update to the Sustainable City pLAN)
  - Reduce Port-related GHG emissions by 80 percent by 2050

Several state, regional, and local plans have been developed that set goals for the reduction of GHG emissions over the next few years and decades, but no regulations or requirements have been adopted by relevant public agencies to implement those plans for specific projects, within the meaning of State CEQA Guidelines Section 15064.4(b)(3).<sup>6</sup> However, there are GHG emissions reduction measures contained in state and local plans, strategies, policies, and regulations that directly or indirectly affect the proposed Project's construction and future potential operational emissions sources. A summary of Project compliance with all potentially applicable GHG emissions reductions measures is provided in Table 6.8-3.

**Table 6.8-3. Applicable GHG Emissions Reduction Strategies**

Strategy	Compliance with Strategy
<b>State AB 32 Plan Strategies (CARB 2017)</b>	
Vehicle Climate Change Standards	These are CARB-enforced standards; vehicles that access the project site and are required to comply with the standards and would comply with these strategies.
Limit Idling Time for Commercial Vehicles (13 CCR § 2485) and Off-Road Equipment (13 CCR § 2449)	<p>The construction contractors and the drayage truck operators would be required to comply with applicable idling regulations for on-road vehicles during Project construction and operation. Certain vehicle types, such as concrete mixer trucks that would be used during construction, are exempt from these idling restriction regulations. These vehicle types are exempt because idling would be necessary to complete the vehicle function.</p> <p>Additionally, the construction contractor and the Port would be required to comply with applicable off-road equipment idling regulations during Project construction and operation.</p>

<sup>6</sup> *Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* [Newhall Ranch] [2015] 62 Cal.4<sup>th</sup> 204, 223.

Strategy	Compliance with Strategy
Use of Low Carbon or Alternative Fuels (Low-Carbon Fuel Standard)	The Project's construction activities and potential future uses would consume transportation fuels. Construction would consume fuels for off-road equipment, worker vehicles, and heavy-duty trucks. Future potential operations would consume fuels for employee vehicles, drayage trucks, CHE, and fuel trucks. All the fuels consumed would be provided by fuel providers that are subject to the Low-Carbon Fuel Standard regulations.
Waste Reduction/Increase Recycling (including construction and demolition waste reduction)	Solid waste generated during construction of the proposed Project would be disposed of in accordance with the City of Los Angeles requirements discussed below under the Construction and Demolition (C and D) Waste Recycling Ordinance.
Electricity Use/Renewables Performance Standard	<p>Electricity consumed during potential future operations as the site would come from Los Angeles Department of Water and Power, a California publicly owned utility that is subject to the Renewables Performance Standard that requires increasing renewable energy procurement targets over time and so reduces GHG emissions from electricity generation.</p> <p>Therefore, the electricity used at the site would comply with state electricity sector GHG reduction strategies.</p>
<b>Port of Los Angeles and City of Los Angeles Plans and Strategies</b>	
<i>L.A.'s Green New Deal: Sustainable City pLAn</i> (City of Los Angeles 2019b)	<p>The City of Los Angeles' Sustainable City pLAn is intended to guide operational, policy, and financial decisions to create a more sustainable Los Angeles. Although the plan is mostly focused on city property, buildings, and public transportation, it includes the 80 percent from baseline emissions reduction goal and notes three primary GHG emissions reduction initiatives, two of which would apply to potential future operations emission sources at the site:</p> <ul style="list-style-type: none"> <li>• 100% zero emissions CHE by 2030</li> <li>• 100% zero emissions on-road drayage trucks by 2035</li> </ul> <p>The facility does not have control of the drayage trucks that access the site; however, as this initiative is implemented Port-wide, the facility's truck trip-related emissions would also be reduced.</p> <p>LAHD will address the implementation of this Port-wide CHE emissions reduction initiative for all affected tenants. Implementation will include the replacement of existing fossil fuel-powered CHE with electrically powered CHE and the use of renewable fuels to replace fossil fuel use. Potential future operations of the site would comply with the Port-wide emissions reduction initiative.</p>
<i>San Pedro Bay Ports Clean Air Action Plan</i> (San Pedro Bay Ports 2006)	The CAAP has several policy initiatives related to GHG emissions reductions. The policy initiatives that apply to the project's GHG emissions sources are the same as those listed above for the Sustainable City pLAn.

Strategy	Compliance with Strategy
City of Los Angeles Construction and Demolition (C and D) Waste Recycling Ordinance	The City of Los Angeles approved a citywide construction and demolition waste recycling ordinance in 2010. This ordinance requires all mixed construction and demolition (C&D) waste generated within city limits to be taken to City-certified C&D waste processors. LA Sanitation is responsible for the C&D waste recycling policy. All haulers and contractors responsible for handling C&D waste for the proposed Project would be required to obtain a Private Waste Hauler Permit from LA Sanitation prior to collecting, hauling, and transporting C&D waste, and C&D waste can only be taken to City-certified C&D processing facilities.
City of Los Angeles General Plan – Mobility Element (City of Los Angeles 2016)	The City of Los Angeles General Plan, Mobility Element was developed to improve the way people, goods, and resources are moved in Los Angeles. The proposed Project would be consistent with this general plan element.

In summary, the proposed Project would conform to state and local GHG emissions/climate change regulations, policies, and strategies; therefore, the proposed Project would have less-than-significant GHG impacts and no mitigation is required.

## 6.9 HAZARDS AND HAZARDOUS MATERIALS

### Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Less-than-Significant Impact.** Implementation of the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed Project would involve demolition activities, which would be conducted in two phases. Once demolition is complete under Phase 1, the Project site would be graded and covered with compacted and bound CMB. LID BMPs, including an infiltration basin along the entire demolition perimeter, would be constructed, and perimeter fencing and exterior lighting would be installed. Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 site and demolition of the northern portion of the East Plant. Similar to Phase 1, once the northern portion of the East Plant is demolished, the site would be graded and covered with compacted and bound CMB. LID BMPs, including an infiltration basin along the entire demolition perimeter, would be constructed, and perimeter fencing and exterior lighting would be installed. Because the CMB would be bound and compacted (and impermeable), LID compliance would be required, per Los Angeles County Code Title 12, Chapter 84, which requires the use of LID principles in all development projects, except road and flood infrastructure projects. Although the ultimate future use of the site is unknown, for purposes of analysis, it is assumed that the site would be developed for cargo support. Construction activities under both phases would involve the routine transport, use, and disposal of hazardous materials such as (but not limited to) fuel, solvents, paints, oils, and grease. Such transport, use, and disposal must comply with applicable federal and state regulations, such as the Resource Conservation and Recovery Act and U.S. Department of Transportation Hazardous Materials Regulations. Although small amounts of solvents, paints, oils, and grease would be transported, used, and disposed of during construction, these

materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. In addition, construction activities would be conducted using BMPs as required under the Construction General Permit (Order 2009-0009-DWQ). BMPs used during construction activities could include, but would not be limited to, practices related to controls for vehicle and equipment fueling and maintenance; material delivery, storage, and use; spill prevention and control; and solid and hazardous waste management. During waterside construction activities required as part of the proposed demolition of the existing facilities under Phase 1, a derrick barge would be employed for pile removal. Once the piles are removed, a material barge (and tugboat) would haul the waste material away for disposal. Although these vessels are expected to handle small quantities of hazardous materials (e.g., fuel, lubricants, hydraulic fluid, oil), the California Office of Spill Prevention and Response (OSPR) requires all marine facilities and tank vessels carrying petroleum products as cargo—and all non-tank vessels over 300 gross tons—to have a California-approved oil spill contingency plan (OSCP). Prior to all in-water construction activities under Phase 1, LAHD would develop a spill prevention, control, and countermeasure (SPCC) plan (an SPCC plan is prepared as part of EPA's oil spill prevention program, published under the authority of Section 311(j)(1)(C) of the Federal Water Pollution Control Act/Clean Water Act of 1974) and OSCP for review by OSPR detailing spill prevention and control measures and implementation procedures. Impacts would be less than significant, and no mitigation is required.

Although the ultimate future use of the site is unknown, as discussed above, this analysis assumes that the site would be developed as a chassis repair and maintenance site with a stop/start function (as part of Phase 2), allowing truckers to pick up and drop off chassis on a regular basis. In addition, such potential future operations would include maintenance and repair capabilities as well as chassis storage on site. Consequently, equipment required during potential future operations would likely include forklifts, a utility tractor rig, and a mobile fuel service truck (delivering diesel and propane for equipment). Therefore, repair and maintenance along with fueling activities are anticipated to require the handling of hazardous materials including fuels, solvents, paints, oils, and grease and could result in an accidental release. Similar to construction activities discussed above, the use of these materials during potential future operations at the site would be required to adhere to all applicable federal and state regulations and to requirements of the site-specific SPCC plan (per Section 311(j)(1)(C) of the Clean Water Act). If an accidental spill were to occur, the response actions required by SPCC regulations (aimed to contain, absorb, and clean up the release) would immediately be implemented. Moreover, the hazardous materials used during repairs and maintenance are not considered acutely hazardous and are expected to be used in small quantities. Equipment fueling is expected to occur intermittently, only as forklifts and the tractor rig are employed during operations, and is expected to follow previously mentioned regulations and requirements. Impacts would be less than significant, and no mitigation is required.

**b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Less-than-Significant Impact.** As mentioned under response to question 4.9a, hazardous materials would be used during construction of both phases of the proposed Project, including fuel, solvents, paints, oils, and grease. It is possible that any of these substances could be released during construction activities. However, compliance with federal, state, and local regulations, in combination with construction BMPs

and implementation of a SPCC plan, would ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to a hazardous materials release during the construction phase of the Project.

Similarly, repair, maintenance, and fueling activities conducted during future potential operations under Phase 2 could involve the handling of hazardous materials. The use of these materials would be required to adhere to all applicable federal and state regulations and directives included in a site-specific SPCC plan. Adherence to all applicable regulations and implementation of an SPCC plan would reduce potential impacts associated with the handling of hazardous materials during operations.

To date, several studies involving hazardous materials have been conducted within the Project footprint. The discussion below summarizes the studies conducted.

### ***Soil and Groundwater Investigation: Former Star-Kist Factory Facilities (2019)***

A site investigation (involving soil and groundwater sampling) was conducted by Eco & Associates, Inc. between June 7 and 14, and on August 6, 2019, primarily within Plant No. 4 and the southern portion of the East Plant. The primary objective of the investigation was to assess the possible presence and extent, if any, of affected soil and groundwater within the former Star-Kist factory facilities. The field investigation consisted of advancing 41 soil borings to a total depth of 5 feet below grade. In addition, five of the soil borings were converted to temporary wells and extended 3 to 5 feet into the groundwater table for sample collection. Samples were analyzed for total petroleum hydrocarbons (TPH), VOCs, semi-volatile organic compounds (SVOCs), herbicides and pesticides, polychlorinated biphenyls (PCBs), and Title 22 metals.

Per the investigation findings, it was determined that soil beneath the site has not been significantly affected by TPH, VOCs, SVOCs, PCBs, herbicides, or pesticides. However, three areas contained metals contamination that exceeded industrial screening levels and/or non-Resource Conservation and Recovery Act (i.e., California hazardous waste) or Resource Conservation and Recovery Act (i.e., federal hazardous waste) criteria. The metal-affected soil areas were found in the northern half of the study area. The investigation recommends that if soil is to be disturbed in these areas, the material should be segregated and soil disposed of in accordance with state and federal regulations. The investigation also concluded that groundwater beneath the site had not been significantly affected with the aforementioned contaminants; however, if dewatering is to occur during future site improvements, extracted water should be characterized and disposed of in accordance with state and federal regulations.

### ***Asbestos Air Quality Survey: 1050 Ways Street (2019)***

On February 21, 2019, California Asbestos Consultants conducted an asbestos air quality survey to confirm if airborne asbestos fibers are within the breathable air space of the 1050 Ways Street building (within the Plant No. 4 footprint). Samples were collected using non-aggressive air sampling techniques (e.g., low-flow sampling pumps) to represent background conditions of the building's air space.

The survey concluded that asbestos was not detected in any of the air samples; however, it was noted that asbestos-containing materials are present within the building and in poor condition. According to the survey report, damaged acoustical ceiling in the entryway of the building requires isolation and removal, and the area should be cleaned under negative pressure by an asbestos abatement contractor. Furthermore, asbestos-containing floor tile/mastic also requires removal upon acoustical ceiling work.

***Asbestos and Lead-Based Paint Inspection: 936, 938, and 1038 Barracuda Street (2018–2019)***

An asbestos inspection was performed by National Econ Corporation on February 20 and 21, 2018, and January 10, 2019, to identify visible and/or readily accessible suspect (friable and non-friable) ACBMs within 936,<sup>7</sup> 938, and 1038 Barracuda Street. The structures at 936 and 1038 Barracuda Street include the northern and southern portions of the East Plant, respectively. The structure at 938 Barracuda Street corresponds to the central portion of the East Plant; it is not within the Project footprint and not part of the proposed Project. One hundred thirty-four samples were collected during the survey, with asbestos being present in 32 of the samples analyzed. Asbestos was identified in the roof coating, roof mastic, resilient flooring, stucco with barrier paper, stucco, wall caulking, cove base mastic, window putty, and drywall/joint compound of the buildings surveyed. The ACBMs in these compounds were characterized as being in good to poor condition and considered non-friable material; however, they could become friable if damaged or disturbed.

Based on the findings, the inspection report recommended an Asbestos Management Program be prepared and implemented to avoid incidental and/or accidental disturbance of ACBMs. Also, if removal of ACBMs would be required in connection with demolition, renovation, or building repair, work should be performed by personnel who are appropriately trained, experienced, and registered to handle the material. It was noted that a portion of 1038 South Barracuda Street was inaccessible at the time of the inspection; further testing would be required in that area.

An interior and exterior lead-containing material inspection was performed by National Econ Corporation on February 20 and 21, 2018, and January 10, 2019, to determine if lead was present on painted components at 936, 938, and 1038 Barracuda Street. A total of 166 X-ray fluorescence (XRF) readings (employing a radiation monitoring device paint analyzer) were performed. In addition, 13 chip samples were collected in designated locations. The XRF readings of painted components indicated the presence of lead at 34 locations. In addition, 11 of the 13 paint chips indicated the presence of lead-containing material.

The lead-based paint (LBP) inspection report recommended that a Lead Management Program be prepared and implemented to avoid incidental and/or accidental disturbance of LBP. The program would provide guidelines to minimize lead exposure, which may be caused by age, normal wear and tear, delamination, building maintenance, repairs, renovation, and other activities that may affect LBP. The inspection report recommended removal of lead-containing material prior to demolition or major construction. It was noted that a portion of 1038 South Barracuda Street was inaccessible at the time of the inspection; further XRF and chip sampling would be required in that area.

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<sup>7</sup> A prior Limited Asbestos-Containing Materials Survey of the warehouse roof at 936 Barracuda Street was conducted on August 5, 2016, by California Asbestos Consultants. No suspect asbestos-containing materials were observed to sample at the time of the survey. Therefore, no further action was recommended at the time (as it pertained to the roof).



***Hazardous Materials Survey: 1050–1054 Ways Street (2010)***

A hazardous materials survey was conducted by TRC from December 13 to 16, 2010, at the former Star-Kist plant at 1050–1054 Ways Street (within the Plant No. 4 footprint). The study involved inspection, assessment, sampling, and quantification of asbestos, LBP, mercury fluorescent tube lights, mercury High-Intensity Discharge lamps, mercury thermostats, radioactive smoke detectors, lead-acid batteries, tritium-containing exit signs, Freon-containing systems, and PCB-containing light ballasts. The survey's objective was to quantify and locate known asbestos materials in the building as well as provide additional sampling of suspect asbestos, LBP components, and universal hazardous wastes.

Floor tile; roof and ceiling materials; acoustic plaster; mastic; heating, ventilating, and air-conditioning (HVAC) system components; window putty; flange gaskets; and cement panels within the former plant building were identified as containing asbestos.<sup>8</sup> The survey also noted that asbestos cement pipe is present below ground level and may be encountered during future site grading or excavation activities. Also, a subsurface steam line containing asbestos insulation (originating from the Cannery Steam Company) is on the northeast corner of the property. If the asbestos materials are likely to become friable during demolition activities, the survey report concluded that asbestos-containing materials should be removed prior to disturbance using California Division of Occupational Safety and Health Title 8, Section 1529, Class II removal procedures.

Lead paint test results indicated that several components throughout the former plant building were found to contain lead. The survey report stated that lead paint in poor condition should be stabilized or abated prior to demolition activities to prevent worker and environmental exposure. Demolition should be performed by a contractor who has experience and expertise in LBP abatement, handling, and disposal. All construction work where an employee can be exposed to lead (in any amount) should comply with California Division of Occupational Safety and Health regulations at 8 CCR 1532.1, and lead-containing waste should be characterized and profiled for proper disposal according to applicable federal, state, and local regulations.

The following materials were also identified during the hazardous materials survey: suspect PCB light ballasts, mercury tube lights and High-Intensity Discharge lamps, mercury thermostats, radioactive smoke detectors, lead-acid batteries, tritium-containing exit signs, and Freon-containing HVAC system components. The survey report recommended that hazardous materials identified in the structures should be removed and properly packaged prior to demolition of the facility. The packaged materials should be classified and handled according to federal, state, and local regulations prior to offsite disposal and/or recycling.

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<sup>8</sup> A subsequent Limited Asbestos Containing Materials Survey was conducted on September 12, 2013, by California Asbestos Consultants, including suspect asbestos materials from the roof of 1050 Ways Street. The survey was limited to skylight roofing materials, which were part of a renovation project at the time. Three samples were taken from composite roll core material on roof. No asbestos was identified in any of the samples; however, the report noted that other suspect asbestos-containing materials may be present and should be sampled prior to demolition.

## Conclusions

As previously mentioned, the proposed Project would involve two phases of demolition. As such, there is potential for personnel and environmental exposure to hazardous materials (i.e., elevated metal concentrations in soils, asbestos, lead and the various materials identified in the hazardous materials surveys). However, with implementation of a Soil Management Plan<sup>9</sup> during all soil disturbance activities, an Asbestos Management Program (which can include exposure monitoring, exposure response procedures, removal requirements, etc.), and a Lead Management Program (as required in the asbestos and LBP inspection report), along with adherence to applicable federal, state, and local regulations (as discussed above), impacts would be less than significant. No mitigation is required.

Future potential operational activities at the Project site under Phase 2 could include storage, repair, maintenance, and fueling activities. Because potentially contaminated onsite soils (under implementation of the Soil Management Plan) along with hazardous building materials (during implementation of the Asbestos and Lead Management Programs) would be remediated prior to the construction phases of future development of the Project site (demolition and hazardous building materials removal would occur prior to redevelopment, while the Soil Management Plan would be implemented during redevelopment soil disturbance activities), the handling and potential release of hazardous materials during future operations at the site would not contribute to or exacerbate these conditions. In addition, as mentioned, the use of these materials during future operations would be required to adhere to all applicable federal and state regulations and to requirements of the site-specific SPCC plan. Impacts would be less than significant.

**c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?**

**No Impact.** There are no schools within 0.25 mile of the proposed Project. The closest school is Port of Los Angeles High School, approximately 0.90 mile to the west, beyond the main channel and North Harbor Boulevard. No impact would occur, and no mitigation is required.

**d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**No Impact.** The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., “Cortese List”) maintained by the California Department of Toxic Substances Control or the State Water Resources Control Board. As such, the proposed Project would not create a significant hazard to the public or the environment. There would be no impact, and no mitigation is required.

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<sup>9</sup> A site-specific Soil Management Plan dated January 10, 2020, was prepared by Eco & Associates, Inc. for the proposed Project. The Soil Management Plan would be implemented during all soil disturbance actions conducted on site. The Soil Management Plan includes provisions for worker health and safety, proper handling of affected soil that may be encountered, contingency measures, and construction best practices as they relate to potentially affected soil. The Soil Management Plan also identifies procedures for soil management, including identification of pollutants and disposal methods.

- e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and result in a safety hazard or excessive noise for people residing or working in the project area?**

**No Impact.** The proposed Project is not within an airport land use plan or within 2 miles of a public airport or a public use airport. The closest airport is Torrance Municipal Airport – Zamperini Field, approximately 5.4 miles to the northwest. No impact would occur, and no mitigation is required.

- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less-than-Significant Impact.** Construction activities occurring within the Port require the contractor to coordinate with the LAHD Port Police (Port Police), Los Angeles Police Department (LAPD), U.S. Coast Guard (USCG), and fire protection/service providers, as appropriate, regarding traffic management issues. If necessary, traffic control equipment would be in place to direct local traffic around the work area. Furthermore, work conducted as part of the proposed Project would be in accordance with the requirements of the Port's Risk Management Plan.<sup>10</sup>

Operational activities associated with the proposed Project under Phase 2 would include storage, repair, and maintenance of truck chassis, along with fueling activities. All these activities would be conducted within the footprint of the Project site and would not interfere with access to nearby arterials (such as Ways Street, Barracuda Street, or Earle Street) as potential evacuation or emergency response routes in the area. Additionally, the proposed Project under both phases does not include any features that would permanently restrict access into the area (such as permanent street closures or reduction in roadway lanes). The proposed Project would comply with all aforementioned requirements, would not interfere with local arterials, and, therefore, would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and no mitigation is required.

- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

**No Impact.** The Project site is in a fully developed portion of Terminal Island; therefore, there are no wildlands within or adjacent to the Project site. Furthermore, the Project area is not in a Very High Fire Hazard Severity Zone (California Department of Forestry and Fire Protection 2021). No impacts related to wildland fires would occur, and no mitigation is required.

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<sup>10</sup> The intent of the Risk Management Plan is to assess potential risks from the storage and transfer of hazardous commodities at the liquid bulk terminals at the Port. The Risk Management Plan's policy objective concerns minimization or elimination of overlapping hazard footprints on vulnerable resources (i.e., areas with substantial residential, visitor, recreational, or high-density working populations or critical facilities).

## 6.10 HYDROLOGY AND WATER QUALITY

The following descriptions include a summary of the regulatory programs applicable to the Project.

### Coastal Nonpoint-Source Pollution Control Program

The Coastal Nonpoint-Source Pollution Control Program is a joint program between EPA and the National Oceanic and Atmospheric Administration. Established during reauthorization of the Coastal Zone Management Act of 1972, the program provides a more comprehensive solution to the problem of polluted runoff in coastal areas. The program sets economically achievable measures to prevent and mitigate runoff pollution problems stemming from agriculture, forestry, urban developments, marinas, hydromodification (e.g., stream channelization), and the loss of wetland and riparian areas. The plan for California's Coastal Nonpoint-Source Pollution Control Program is implemented by the State Water Resources Control Board, the Regional Water Quality Control Boards, and CCC.

### State Water Resources Control Board General Stormwater Permits

The State Water Resources Control Board has issued and periodically renews a statewide General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. The permit was adopted in 2009 and further revised in 2012 (Order No. 2012-0006-DWQ). All construction activities that disturb 1 acre or more must prepare and implement a construction SWPPP that specifies BMPs to prevent pollutants from contacting stormwater. BMPs are effective, practical, structural, or nonstructural methods used to prevent or reduce the movement of sediments, nutrients, and pollutants from land to surface waters. The intent of the SWPPP and BMPs is to keep all products of erosion from moving off site into receiving waters, eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States, and perform sampling and analysis to determine the effectiveness of BMPs in reducing or preventing pollutants (even if not visually detectable) in stormwater discharges from causing or contributing to violations of water quality objectives.

### Oil Spill Prevention and Response

The OSPR is a multi-agency effort including USCG, the California State Lands Commission, and the California Department of Fish and Wildlife's Marine Safety Branch. The OSPR requires all marine facilities and tank vessels carrying petroleum products as cargo, and all non-tank vessels over 300 gross tons, to have a California-approved OSCP.

### Would the project:

- a. **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Less-than-Significant Impact.** Removal of the wharf as part of the proposed Project under Phase 1 could result in sediment resuspension during sub-seafloor removal of the wharf and pilings. The construction contractor would adhere to water quality requirements issued by LARWQCB (waste discharge requirements/Section 401 water quality certification). This would limit the potential for violations of water quality standards to below a level of significance. Removal of the piles would suspend some bottom

sediments known to contain contaminants at levels that could affect marine species and create localized and temporary turbidity plumes and associated water quality issues. However, currents in Fish Harbor are slow, and suspended sediments are expected to settle nearby in Fish Harbor where sediment characteristics, including contaminant levels, will be similar to those found in the suspended sediments. Such impacts would occur over a relatively small, localized area.

In addition to water quality effects related to suspended sediments, accidents could result in spills of fuel, lubricants, or hydraulic fluid from equipment used during pile removal. However, large volumes of these materials typically are not used or stored at landside construction sites, and BMPs outlined in the SWPPP would include standard conditions, such as the required use of secondary spill containment. Potential impacts associated with in-water construction activities are analyzed below.

Prior to all in-water construction under Phase 1, an SPCC plan and OSCP detailing spill prevention and control measures and implementation procedures would be developed and would receive approval. While the probability of an accidental spill from a construction vessel is small, accidental spills could affect water quality in the construction area. If an accidental spill were to occur, the response and notification actions required by SPCC regulations would immediately be implemented. These would include efforts to contain and neutralize the spill, such as deploying floating booms to contain and absorb the spill and using pumps to assist the cleanup. Such measures would likely prevent the accidental spill from causing any persistent degradation of water quality. Therefore, significant water quality impacts are not expected to occur as a result of accidental spills of pollutants during in-water construction. Impacts would be less than significant.

Construction activities, including demolition of the buildings under both phases, would be regulated under the NPDES Construction General Permit, which requires a site-specific SWPPP that defines actions to minimize potential for spills, manage runoff, and prevent impacts on water quality that could result in the introduction of structural material or dust into Fish Harbor, potentially resulting in reduced water quality. BMPs would be implemented during all Project construction in accordance with the SWPPP as well as the Clean Water Act Section 401 water quality certification issued by LARWQCB. As a consequence, accidents that result in spills of contaminants during Project construction during both phases are not expected to adversely affect beneficial uses of harbor waters or result in violations of water quality standards.

Stormwater from the existing facility flows directly into the Los Angeles Harbor. Once all properties are demolished under both phases, the sites would be graded, and newly exposed dirt would be covered with compacted and bound CMB, resulting in an impermeable ground surface. Consequently, the proposed Project would require LID compliance (Los Angeles County Code Title 12, Chapter 84, requires the use of LID principles in all development projects, except road and flood infrastructure projects), which would be implemented as a Project design feature under both phases. The installation of LID BMPs under both phases would include an infiltration basin along the entire demolition perimeter. It would potentially have the dimensions of 6 feet wide by 3 feet deep and would be filled with clean fill ballast rock.

As previously noted, the ultimate future use of the site is unknown. For the purposes of this analysis, however, it is assumed that the site would be developed with a chassis repair and maintenance depot(s). The maintenance area would likely be paved and would include appropriate BMPs to prevent any spills from reaching the harbor. Some stormwater flow is expected to continue to flow into adjacent waters with future cargo-related activities at the Project site; however, the future uses as part of Phase 2 would be required to comply with all BMPs and NPDES stormwater rules and regulations. Therefore, potential impacts on water quality due to potential future construction and operational activities related to future industrial development at the site would be less than significant, and no mitigation is required.

**b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**No Impact.** Groundwater at the Project site is affected by saltwater intrusion (high salinity) and therefore unsuitable for use as drinking water. The proposed Project's construction activities under both phases would occur primarily adjacent to, in, and over harbor waters. Landside activities would not adversely affect groundwater recharge because the Project area is not used as a recharge site and would not adversely affect drinking water supplies because there are none on or near the site. The proposed demolition and subsequent covering of the site with compacted bound CMB under both phases would increase the amount of impervious surface and improve surface water infiltration locally at the site. Although future uses at the Project site are unknown, it is not expected that the site would be developed with any new groundwater wells or include any type of groundwater extraction activities (due to the aforementioned saltwater intrusion). Therefore, the proposed Project, and the reasonably foreseeable future use of the site, would not affect existing groundwater supplies, drinking water supplies, groundwater recharge facilities, or aquifers. The proposed Project would have no impact with respect to groundwater, and no mitigation is required.

**c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:**

**1. Result in substantial erosion or siltation on-site or off-site?**

**Less-than-Significant Impact.** The Project site is currently developed and composed of structures and paved roads, with some soft-packed, landscaped dirt frontage strips adjacent to the existing buildings. Most of the area is currently impermeable. During demolition-related construction under both phases, surfaces would be temporarily permeable until the surface is covered with bound and compacted CMB. As discussed above, it is anticipated that future development of the Project site would include use of impermeable surfaces, which would be paved and include appropriate BMPs to prevent any spills from reaching the harbor, and the site would be bound by a permeable infiltration basin along the Project's demolition perimeter to comply with LID requirements under both phases. Some stormwater flow is expected to continue to flow into adjacent waters; however, as discussed below, site drainage would improve compared to current conditions. The proposed construction activities and the potential future construction and uses of the site would be required to comply with all BMPs and rules and regulations pertaining to water quality standards and waste discharges. Therefore, a less-than-significant impact related to alteration of drainage patterns resulting in erosion or siltation would occur, and no mitigation is required.

**2. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site?**

**No Impact.** Due to the implementation of LID BMPs under both phases, the proposed Project would result in an improvement in the site drainage patterns compared to current conditions, as LID features would increase permeability and stormwater capture and infiltration. Therefore, no impacts related to alteration of drainage patterns resulting in flooding would occur, and no mitigation is required.

**3. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less-than-Significant Impact.** The Project site is currently composed of mostly impervious surfaces that drain to harbor waters. During demolition-related construction activities under both phases, surfaces would be temporarily permeable until the surface is covered with bound and compacted CMB. It is anticipated that future development of the Project site would include areas with impermeable surfaces; therefore, the site would feature a permeable infiltration basin (LID features are a part of both phases) that runs along the Project's demolition perimeter to increase permeability and infiltration of stormwater. Some stormwater flow can reasonably be expected to continue to flow into adjacent waters. However, site drainage would improve compared to current conditions, as LID BMPs would increase permeability and infiltration of onsite stormwater. The proposed Project would have a less-than-significant impact with respect to exceeding capacity of the stormwater drainage system or providing substantial sources of polluted runoff, and no mitigation is required.

**4. Impede or redirect floodflows?**

**No Impact.** The Project site is currently composed of mostly impervious surfaces that drain to harbor waters. As discussed above, removal of impervious structures and development of the site with LID BMPs would improve site drainage and reduce potential for local flooding at the Project site. No mitigation is required.

**d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**Less-than-Significant Impact.** According to Flood Hazard Map FM06037C2032F, the western portion of the Project site (Plant No. 4) is in Zone X, which is not identified as a 100-year or 500-year flood zone. The eastern portion of the Project site, including the northern portion of the East Plant as well as the waterside dock, are in Zone AE, which is identified as a Special Flood Hazard Area that is subject to inundation by the 1 percent-annual-chance flood, also known as the base flood, which has a 1 percent chance of being equaled or exceeded in any given year (Federal Emergency Management Agency 2008). However, the proposed Project does not involve the construction of habitable structures; and it is not reasonably anticipated that the site would be developed with habitable structures in the future. Rather, the proposed Project would remove safety hazards at the site and improve site drainage. The proposed Project would not increase risks associated with tsunami or seiche. Seiches are seismically induced water waves that surge back and forth in an enclosed basin. Seiches could occur in the harbor as a result of earthquakes. A Port Complex model that assessed tsunami and seiche scenarios determined that impacts from a tsunami were equal to or more severe than those from a seiche in each case modeled

(Moffatt and Nichol 2007). Therefore, the discussion below refers to tsunami as the worst-case scenario for potential impacts. Potential impacts related to seiche would be the same as or less than those identified below.

According to the General Plan Safety Element, the Project site is in an area identified as a potential tsunami inundation area (City of Los Angeles 1996). However, due to the nature of future potential uses, it is anticipated that future Project development of the Project site would not include construction of any habitable structures or increase the potential for tsunami damage to occur. All facilities on the Project site would be demolished, and no new habitable structures would be constructed that would be subject to damage, including inundation, by tsunami. Therefore, there would be a less-than-significant impact associated with the risk release of pollutants from Project inundation due to a flood hazard, tsunami, or seiche. No mitigation is required.

**e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**No Impact.** The Project site currently complies with water quality requirements. During demolition-related construction activities under both phases, surfaces would be temporarily permeable until the surface is covered with bound and compacted CMB. Future construction and operation at the site could include areas with impermeable surfaces, but the site would be bounded by a permeable infiltration basin along the Project's demolition perimeter to increase permeability. Infiltration of stormwater would improve site drainage and reduce the potential for water quality impacts at the Project site (increased permeability and infiltration of stormwater would occur under both phases). No groundwater management plans are in place for the Project site because of saltwater intrusion at the site. No mitigation is required.

## **6.11 LAND USE AND PLANNING**

### **Would the project:**

**a. Physically divide an established community?**

**No Impact.** The proposed Project would be on Terminal Island, a heavy industrial area of the Port that does not include established communities. The nearest residential areas to the Project site are the single-family and multi-family residences along South Beacon Street, across the Main Channel in San Pedro (approximately 1 mile to the west). Therefore, no impacts associated with physical division of an established community would occur, and no mitigation is required.

**b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less-than-Significant Impact.** The proposed Project would be at the Port, within the area covered by the General Plan, Port of Los Angeles Plan (1982), and the Transportation Element (1999). The Project site has a General Plan designation of General/Bulk Cargo for Hazardous Industrial and Commercial and Commercial Fishing (City of Los Angeles 2001). The Project site is zoned for heavy industrial uses ([Q] M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles 2019a). The Port of Los Angeles Plan is one of 35 community plans that make up the General Plan of the City of Los Angeles (City of Los Angeles 1982). This plan provides a 20-year guide to continued development and operation of the Port.



The PMP (Port of Los Angeles 2018) establishes policies and guidelines to direct future development of the Port. The proposed Project is in Planning Area 3, Terminal Island, and Planning Area 4, Fish Harbor. Planning Area 3 focuses on container operations, while Planning Area 4 focuses on commercial fishing and maritime support uses. The PMP land use designation for the eastern portion of the Project site is “Container,” while the western portion of the Project site is “Commercial Fishing” or “Maritime Support.” Although the ultimate future use of the site is unknown, the analysis in this Final IS/MND assumes that the site would be developed with the potential future use of the site as cargo support, which can vary from container or chassis storage to chassis repair and maintenance, and is representative of the types of industrial uses allowed in this location according to the applicable zoning and the PMP. Therefore, it is expected that the Project would not conflict with the applicable zoning or PMP policies for Planning Areas 3 and 4.

The Port of Los Angeles Plan is designed to be consistent with the PMP discussed above. The proposed Project would be consistent with allowable land uses and the goals and policies of the City of Los Angeles General Plan, the Port of Los Angeles Plan, as well as ongoing implementation of other key Port plans and policies, including the Terminal Island Land Use Plan Summary (Port of Los Angeles 2012), which describes land use and management priorities. As mentioned in Section 2.0, *Project Description*, LAHD has solicited multiple requests for proposals for the proposed Project site but has received no viable responses and has had no success in finding a feasible future use due to the complex’s incurable functional obsolescence as well as irreparable infrastructure. Although the ultimate future use of the site is unknown, the potential future use of the site as cargo support, which can vary from container or chassis storage to chassis repair and maintenance, is a reasonably likely future use and representative of the types of industrial uses allowed in this location according to the applicable zoning and the PMP. The site is designated as “Container” and “Commercial Fishing” or “Maritime Support,” which support the use of container handling, chassis storage, commercial fishing and processing operations, and water-dependent and non-water-dependent operations that support cargo handling and other maritime activities. Therefore, it is not anticipated that future development of the proposed site made possible by the proposed Project would conflict with any applicable land use plan, policy, or regulation. Impacts would be less than significant, and no mitigation is required.

## 6.12 MINERAL RESOURCES

### Would the project:

- a. **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** The proposed Project would be on Terminal Island, which is composed mostly of artificial fill material. The Wilmington Oil Field, the third-largest oil field in the United States based on cumulative production, extends from Torrance to the Harbor District of Long Beach, approximately 13 miles (Otott and Clarke 1996). This is the closest oil field to the proposed Project. According to the General Plan’s Safety Element and the California Department of Conservation, Geologic Energy Management Division, the Project site would be outside the boundary of the Wilmington Oil Field. There are no active oil wells on the Project site for Phase 1 or Phase 2 (California Department of Conservation 2021). Therefore, no impacts related to the loss of availability of known valued mineral resources would occur with implementation of the proposed Project. No impact would occur, and no mitigation is required.

**b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**No Impact.** As described under question 4.12a, above, there are no active oil wells on the Project site. The proposed Project would not result in the loss of availability of a mineral resource recovery site, as described under question 4.12a. Therefore, no impact with respect to the availability of a mineral resource would result from construction of Phase 1 and Phase 2 of the proposed Project. No impact would occur, and no mitigation is required.

## **6.13 NOISE**

### **Would the project:**

**a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?**

**Less-than-Significant Impact.** The *L.A. CEQA Thresholds Guide* (City of Los Angeles 2006) states that a project would normally have a significant impact on noise levels if construction activities would exceed existing ambient exterior noise levels by 10 A-weighted decibels (dBA) at a noise-sensitive use for construction activities lasting more than one day. A significant impact on noise levels would also normally occur if construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use. Chapter XI of the City of Los Angeles Municipal Code provides noise standards that would apply to future onsite operations at the Project site. Based on the code, onsite operational activities (including motor driven vehicles operating on the site) may not generate noise that would exceed the ambient noise level at any noise-sensitive property by more than 5 dBA.

The nearest noise-sensitive receptors to the Project site are all located to the south and west. The closest residences are liveaboard vessels at the Al Larson Marina approximately 965 feet southwest of the Project site. Additional noise-sensitive land uses include residences (staff housing) on Reservation Point, approximately 3,850 feet south of the Project site, and various noise-sensitive land uses (single- and multi-family homes, Bloch Field, Gibson Park, and the Gibson Senior Citizen Community Garden), approximately 4,800 feet west of the Project site on South Beacon Street and South Harbor Boulevard.

Construction-related noise was analyzed using data and modeling methodologies from the Federal Highway Administration's Roadway Construction Noise Model (Federal Highway Administration 2006, 2008) and from other published sources. The Roadway Construction Noise Model predicts noise levels at nearby receptors by analyzing the type of equipment scheduled during each construction phase, the distance from source to receptor, and the presence or absence of intervening shielding between source and receptor. The construction noise analysis was based on the equipment list and construction schedule developed for the air quality analysis (refer to Section 4.3). Phase 1 and Phase 2 construction would each involve different elements (refer to Section 2.3, *Project Description*) and would require various construction activities. Noise levels for each construction activity were analyzed for both Phase 1 and Phase 2 construction. The two construction activities with the noisiest combination of equipment in each phase were then chosen to represent the worst-case noise levels.

### ***Phase 1 Construction***

Worst-case noise levels for Phase 1 construction would occur during the Wharf Demolition and Building Demolition activities. Wharf Demolition includes the demolition of the small waterside dock using a vibratory pile extractor, a crane, a barge, a tugboat, and an excavator. Building Demolition includes the demolition of structures on Plant No. 4 using excavators, loaders, and forklifts. Construction activities could result in a temporary increase in ambient noise levels at the closest noise-sensitive receptor. The closest noise-sensitive receptor is the Al Larson Marina, which is zoned [Q]M3-1 (Qualified Heavy Industrial) (City of Los Angeles 2020) with presumed ambient noise levels (day/night) of 65 dBA (City of Los Angeles Municipal Code, Section 111.03). Referring to Appendix F, the construction noise levels at the Al Larson Marina due to Phase 1 Wharf Demolition and Building Demolition are estimated to be 64 dBA and 59 dBA, respectively, which would not exceed the presumed ambient noise level of 65 dBA. Because all other Phase 1 construction activities would generate the same, or lower, noise levels than Wharf Demolition and Building Demolition, those activities would also not exceed ambient noise levels at the Al Larson Marina. Phase 1 construction noise levels would not exceed the ambient noise levels at any other noise-sensitive receptors because they are all substantially farther away from the Project site. As such, construction-related noise impacts resulting from implementation of Phase 1 would be less than significant, and no mitigation is required.

### ***Phase 2 Construction***

Worst-case noise levels for Phase 2 construction would occur during the Mobilization and Building Demolition activities, both of which would use excavators, loaders, and forklifts. Construction activities could result in a temporary increase in ambient noise levels at the closest noise-sensitive receptor. The closest noise-sensitive receptor is the Al Larson Marina, which is zoned [Q]M3-1 (Qualified Heavy Industrial) (City of Los Angeles 2020) with presumed ambient noise levels (day/night) of 65 dBA (City of Los Angeles Municipal Code, Section 111.03). Referring to Appendix F, the construction noise levels at the Al Larson Marina due to Phase 2 Mobilization and Building Demolition are both estimated to be 57 dBA, which would not exceed the presumed ambient noise level of 65 dBA. Because all other Phase 2 construction activities would generate lower noise levels than Mobilization and Building Demolition, those activities would also not exceed ambient noise levels at the Al Larson Marina. Phase 2 construction noise levels would not exceed the ambient noise levels at any other noise-sensitive receptors because they are all substantially farther away from the Project site. As such, construction-related noise impacts resulting from implementation of Phase 2 would be less than significant, and no mitigation is required.

### ***Potential Future Onsite Operations***

As described in Section 2.0, *Project Description*, although the ultimate future use of the site is unknown, this analysis considers the impacts from development and operation of a chassis repair and maintenance depot(s) for purposes of analyzing the impacts of potential future development of the site. Such chassis operations are anticipated to occur Monday through Friday from 7:00 a.m. to 3:00 a.m. Yard equipment to support operations would likely include two 30,000-pound forklifts and two 10,000-pound forklifts, a top pick, and one utility tractor rig. A mobile fuel service truck would likely deliver diesel and propane for

onsite equipment. Noise levels produced by this mix of equipment would be lower than estimated construction noise levels, which were found not to exceed ambient levels at noise-sensitive receivers. Therefore, it can be concluded that operational noise also would not exceed ambient noise levels. Additionally, truck trips to and from the Project site would be trips already traveling to the Harbor District and are considered minor diversions from their existing trips. Furthermore, truck trips would follow the same or similar route through the Harbor District, which would not pass by any residential land uses. As a result, an increase in ambient noise levels at the nearest noise-sensitive receptors would not occur due to potential future onsite operations or potential future traffic generated at the Project site. Therefore, potential future operational noise impacts would be less than significant, and no mitigation is required.

**b. Generate excessive ground-borne vibration or ground-borne noise levels?**

**Less-than-Significant Impact.** The air quality analysis included in Section 4.3, *Air Quality*, lists the pieces of heavy construction equipment expected to be used for the proposed demolition and related construction activities under both phases. The equipment list includes a vibratory pile extractor, derrick barge, material barge, tug boat, RC boat, excavators, loaders, forklifts, and vibratory soil compactors. Ground vibration levels would vary, depending on which piece of equipment is used. Vibration from construction equipment would spread through the ground, diminishing rapidly in strength with distance. While ground-borne vibration from construction activities does not often reach levels that can damage structures, fragile buildings must receive special consideration (Federal Transit Administration 2018). The closest offsite structures to the Project site are all industrial buildings that would not be susceptible to damage from Project construction. The highest levels of ground-borne vibration would be associated with the vibratory pile extractor. Using the reference data and calculation methodology provided in the *Transportation and Construction Vibration Guidance Manual* (California Department of Transportation 2020), it was predicted that the vibratory pile extractor could generate barely perceptible ground-borne vibration at a distance of approximately 1,100 feet, increasing to distinctly perceptible at approximately 320 feet. Vibratory soil compactors could generate barely perceptible ground-borne vibration at a distance of approximately 400 feet, increasing to distinctly perceptible at approximately 110 feet. Vibration levels from the remaining (non-vibratory) construction equipment would be lower. Because the closest residential buildings are approximately 3,500 feet from the Project site, ground-borne vibration levels would be imperceptible. No ground-borne vibration impacts would occur at the Al Larson Marina because the residences there are boats that are separated from the ground by water. Therefore, ground-borne vibration impacts resulting from Project construction would be less than significant, and no mitigation is required.

As mentioned above, the heaviest pieces of equipment used for potential future operational activities would be two 30,000-pound forklifts and two 10,000-pound forklifts, a top pick, and one utility tractor rig. Vibration levels from this mix of equipment would be far lower than what was analyzed for construction. The closest offsite structures to the Project site are all industrial buildings that would not be susceptible to damage from Project operation and ground-borne vibration levels would be imperceptible at the closest homes, which are approximately 3,500 feet from the Project site. Therefore, there would be no operational impact due to vibration, and no mitigation is required.

- c. Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?**

**No Impact.** Based on the potential future use of the site, which is zoned for and surrounded by heavy industrial uses, no homes or other noise-sensitive structures are proposed as part of the Project, and the Project would not alter the existing operations at any private airstrip, public airport, or public use airport. The closest airport to the Project site is Torrance Municipal Airport – Zamperini Field, a municipal airport approximately 5.4 miles northwest of the Project site. Long Beach Airport is approximately 8 miles northeast of the Project site. The Los Angeles County Airport Land Use Plan (Los Angeles County Airport Land Use Commission 2004) contains maps outlining the influence area for each airport within the county. The Project site is well outside the influence area and the established noise contours for both airports previously mentioned. The next-closest air facilities are the base for the Goodyear blimp (approximately 8 miles to the north) and Compton – Woodley Airport (approximately 10.5 miles north). As a result, the proposed Project would not expose people residing or working in the Project area to excessive noise levels from any private airstrip, public airport, or public use airport; therefore, there would be no impact and no mitigation is required.

## **6.14 POPULATION AND HOUSING**

### **Would the project:**

- a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?**

**No Impact.** The proposed Project would not establish new residential uses within the Port, require the extension of roads or other growth-accommodating infrastructure, or result in the relocation of substantial numbers of people from outside of the region. Given the temporary nature of construction, it is unlikely that any construction workers would relocate to the area. There is an adequate supply of construction workers in the Project vicinity given the developed urban nature of the surroundings. Operation of Phase 1 and Phase 2 would result in an increase of approximately 20 employees. Given the proposed Project's location within a well-established urban community with a large population base and existing housing stock and established infrastructure, it would not induce substantial population growth in the area. Therefore, the proposed Project would not directly or indirectly induce substantial population growth through the extension of roads or other infrastructure. No impacts associated with population growth would occur, and no mitigation is required.

- b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** There is no housing within the boundaries of the Project site that would be displaced as a result of the proposed Project. The proposed Project would not result in the displacement of any persons or the need for replacement housing. No impact would occur, and no mitigation is required.

## 6.15 PUBLIC SERVICES

### Would the project:

- a. **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:**

1. **Fire protection?**

**Less-than-Significant Impact.** The Los Angeles Fire Department (LAFD) currently provides fire protection and emergency services to the Project site and surrounding area. LAFD facilities in the Port include land-based fire stations and fireboat companies. The nearest station with direct fireboat access is Fire Station No. 112 in the Main Channel at 444 South Harbor Boulevard, about 0.9 mile west of the Project site. The approximate travel distance to the Project site is about 3.7 miles. The closest station with land access is Fire Station No. 40 to the north at 330 Ferry Street. The approximate travel distance to the Project site is approximately 1 mile. This station is on Terminal Island and equipped with a single engine company, an assessment engine, rescue ambulance, and rehab air tender. This station would provide fire service by land.

The Project site is already within the service area of LAFD. During demolition-related construction under both phases, emergency access to the Project vicinity would be maintained for emergency service vehicles. The proposed Project demolition activities would not increase the need for fire protection and emergency services. Furthermore, Phase 1 and Phase 2 construction would occur within the Project site and harbor and would not affect service ratios, response times, or other performance objectives of LAFD. Moreover, implementation of the proposed Project would remove safety and fire hazards from the site. Potential future operational activities under Phase 2 would include implementation of standard safety requirements, including preparation of an emergency response plan and coordination with emergency service providers, including LAFD.

Future potential use of the Project site would continue to be served by LAFD. Additionally, as discussed under Section 4.14, *Population and Housing*, above, the proposed Project would not directly or indirectly induce substantial population growth in the city. It is anticipated that the potential future development of the site would be adequately served by existing LAFD facilities, equipment, and personnel. The proposed Project's temporary construction activities under both phases and the addition of 20 employees over two work shifts (both day and night shift) at the Project site (under Phase 2) would not result in the need for new or physically altered governmental facilities that would cause significant environmental impacts. Therefore, impacts associated with the construction or expansion of LAFD facilities would be less than significant, and no mitigation is required.

## 2. Police protection?

**Less-than-Significant Impact.** LAPD and Port Police provide police services at the Port, with the latter being the primary law enforcement agency within the Port. Specifically, Port Police officers are responsible for patrol and surveillance within the Port's boundaries, including Port-owned properties in the communities of Wilmington, San Pedro, and Harbor City. Port Police officers maintain 24-hour land and water patrols and enforce federal, state, and local public safety statutes, Port tariff regulations, and environmental and maritime safety regulations. Port Police headquarters is at 330 Centre Street in San Pedro approximately 1.15 miles west of the Project site.

Although Port Police are the first responders in an emergency, LAPD is also responsible for police services in the Project vicinity because the Port is part of the city of Los Angeles. LAPD Harbor Division is at 2175 John S. Gibson Boulevard in San Pedro, which is approximately 2.1 miles northwest of the Project site. The Harbor Division is responsible for patrols throughout San Pedro, Harbor City, and Wilmington.

The proposed Project's demolition activities under both phases would occur within the Project site (Phase 1 would also include the demolition of a small waterside dock). Street closures would not be required. During future potential operations, the site would be the same distance from service providers as the existing facilities and, therefore, would not increase emergency response times. Potential future operations under Phase 2 are reasonably anticipated to require approximately 20 employees over two work shifts (both day and night shift). The proposed Project under both phases would not substantively alter terminal activities or result in indirect growth such that additional police protection would be necessary. In addition, implementation of the proposed Project (as a result of demolition activities to be conducted under both phases) would remove safety and attractive nuisance hazards from the site that could attract unlawful activity.

Therefore, Project construction and reasonably foreseeable future uses of the site would not affect the demand for law enforcement such that new facilities would be required. As such, impacts related to police protection would be less than significant, and no mitigation is required.

## 3. Schools?

**No Impact.** The proposed Project would not result in population growth that would increase student enrollment or have other impacts on schools. Therefore, no impacts on existing schools would occur, and no mitigation is required.

## 4. Parks?

**No Impact.** As further discussed in Section 4.16, *Recreation*, no residential uses or other land uses that are typically associated with directly inducing population growth are included as part of the proposed Project. An increase in patronage at park facilities is not expected. Therefore, no impacts associated with the construction or expansion of park facilities would occur, and no mitigation is required.

## 5. Other Public Facilities?

**Less-than-Significant Impact.** USCG is a federal agency and responsible for a broad range of regulatory, law-enforcement, humanitarian, and emergency-response duties. The USCG mission includes maritime safety, maritime law enforcement, protection of natural resources, maritime mobility, national defense, and homeland security. USCG's primary responsibility is to ensure the safety of vessel traffic in the channels of the Port and in coastal waters. The proposed Project would not result in impacts on USCG facilities or operations. As potential future uses would occur landside and within the Project site, no expansion of the Vessel Traffic Information System would be needed with the proposed Project. Therefore, the proposed Project is not expected to result in an increase in demand for other public facilities, including USCG facilities, that could lead to a substantial adverse physical impact. Impacts would be less than significant, and no mitigation is required.

## 6.16 RECREATION

### Would the project:

- a. **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

**No Impact.** The proposed Project would not directly or indirectly result in physical deterioration of parks or other recreational facilities. Therefore, impacts associated with parks or other recreational facilities would not occur, and no mitigation is required.

- b. **Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

**No Impact.** The proposed Project would not include recreational facilities or new residential development that would require construction or expansion of recreational facilities. Therefore, no new or expanded recreational facilities would be constructed, and no impact would occur. No mitigation is required.

## 6.17 TRANSPORTATION

### Would the project:

- a. **Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**No Impact.** The 2020 Los Angeles Department of Transportation (LADOT) guidelines state that a project that "generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent" and not in conflict. The 2020 LADOT guidelines include three screening criteria questions that are answered in order to help guide whether the project conflicts with City circulation system policies.



1. Does the project require a discretionary action that requires the decision maker to find that the project would substantially conform to the purpose, intent, and provisions of the general plan?
2. Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?
3. Is the project required to or proposing to make any voluntary modifications to the public right-of-way (e.g., dedications and/or improvements in the right-of-way, reconfigurations of curb line)?

All responses to the screening criteria questions are “no,” both with respect to the proposed Project and reasonably probable future uses for the Project site. Proposed future development of the site would also be subject to its own CEQA review and planning process. Therefore, it is not anticipated that the project would cause a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No impact would occur and no mitigation is required.

**b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**No Impact.** The intent of State CEQA Guidelines Section 15064.3, subdivision (b)(1) and Threshold T-2.1 in the 2020 LADOT guidelines is to assess whether a land use or office project would have a potential impact. The guidelines include two screening criteria questions that must be answered in order to determine consistency with State CEQA Guidelines Section 15063.3, subdivision (b)(1); the 2020 LADOT guidelines state that if the answer is “no” to *either* question, then further analysis will not be required for this threshold, and a “no impact” determination can be made.

1. Would the land use project generate a net increase of 250 or more daily vehicle trips?

Based on Technical Guidance from the Office of Planning and Research, VMT and vehicle trips used in the transportation section will be for passenger vehicles and light-duty trucks only (California Governor’s Office of Planning and Research 2018). The proposed Project is anticipated to require 20 employees on site and two light-duty truck fuel deliveries per day, which would result in a total of 44 one-way trips per day. Therefore, the proposed Project would generate fewer than 250 trips per day. Furthermore, although drayage and other heavy-duty trucks are excluded from consideration in this criterion, it is important to note that the drayage truck trips to and from the site are diverted trips by trucks that are already in the Harbor District, and therefore do not represent an increase in truck trips.

2. Would the project generate a net increase in daily VMT?

The proposed project anticipates that employee and delivery vehicles would generate approximately 692 VMT per day.

Because the response to the first screening question under this threshold is “no,” this Project maintains consistency with State CEQA Guidelines Section 15063.3, subdivision (b)(1). No impact would occur and no mitigation is required.

**c. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**No Impact.** The 2020 LADOT guidelines provide two screening criteria questions that must be answered in order to determine assess whether the Project would result in impacts due to geometric design hazards or incompatible uses.

1. Is the Project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?

As noted, a key objective the proposed Project is to make the site more marketable for future development and to reuse the site. Future development of the Project site could introduce new vehicle access to the property. However, it is probable that access to the proposed Project site would be from a private Port road, which has limited public traffic. Additionally, the proposed site is on Terminal Island, which is a heavily industrialized area. Therefore, even with the addition of a new access point to the site, there would be a negligible impact on flow of traffic near the access points for the Project site to the public right-of-way.

2. Is the Project proposing to make any voluntary or required modifications to the public right-of-way (e.g., street dedications, reconfigurations of curb line)?

The proposed Project does not include any street modifications to the public right-of-way.

Based on the above screening criteria questions, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. No impact would occur and no mitigations is required.

**d. Result in inadequate emergency access?**

**No Impact.** The Project (both Phase 1 and Phase 2) would not close or alter existing emergency access routes. No impact would occur and no mitigation is required.

## **6.18 TRIBAL CULTURAL RESOURCES**

**Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, that is:**

- a. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k)?**

**No Impact.** A request for a check of the Sacred Lands File (SLF) was made to the California Native American Heritage Commission (NAHC). A response from NAHC was received on May 8, 2019. The results of the SLF check conducted through the NAHC was negative, and no tribal cultural resources are known from the Project site.

On May 10, 2019, LAHD provided notification of the Project, pursuant to the provisions of AB 52 and PRC Section 21080.3.1(d). On May 17, 2019, the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe) formally requested AB 52 consultation with LAHD, based on the Project site's location within the Tribe's ancestral territory.

On June 10, 2019, LAHD initiated consultation with the Tribe through certified mail. The letter included a Project description and information indicating that past identification efforts did not identify the presence of archaeological materials in the Project area and an NAHC SLF search prepared for the Project was negative. LAHD included maps of the Port from 1915 and 2018, showing that the Project is occurring on nonnative sediments. In addition, LAHD provided three dates (June 17, 18, and 19, 2019) for a consultation meeting and requested a response from the Tribe.

On June 24, 2019, LAHD sent a follow-up email to the Tribe, stating that the proposed consultation meeting dates had passed and requesting a response regarding the availability of the Tribe to participate in consultation. LAHD did not receive a response from the Tribe. In light of the foregoing, and in accordance with PRC Section 21080.3.2(b)(2), LAHD, acting in good faith and after reasonable effort, respectfully concluded consultation through certified mail.

The Project site is on a modern artificial landform that was constructed with dredged material, which was used as fill. There is limited to no potential for intact tribal cultural resources given the inaccessibility of the current Project area landform prior to its construction in the early twentieth century. No impacts on tribal cultural resources, as defined in PRC Section 21074, are anticipated as a result of proposed Project activities. Therefore, the proposed Project would not cause a change in the significance of a tribal cultural resource listed or eligible for listing in the CRHR or in a local register of historical resources, as defined in PRC Section 5020.1(k). No impact would occur, and no mitigation is required.

**b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?**

**No Impact.** No tribal cultural resources have been identified in or within a 0.25-mile radius of the Project site. A request for a check of the SLF was made to the California NAHC. A response from NAHC was received on May 8, 2019. The results of the SLF check conducted through NAHC was negative. Therefore, there would be no impacts on tribal cultural resources determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 as a result of proposed Project activities. No impact would occur, and no mitigation is required.

## 6.19 UTILITIES AND SERVICE SYSTEMS

### Would the project:

- a. **Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less-than-Significant Impact.** The proposed Project would not increase the demand for potable water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities such that development of new or expansion of existing facilities would be required. The Project site is in a developed area that is served by existing utilities. No disruption to existing utility lines is expected.

During construction of both phases, no potable water, wastewater, electric power, or natural gas would be generated or used in quantities requiring development of new or expansion of existing facilities. No telecommunications facilities would be used during construction. Stormwater from the existing facility flows directly into the Los Angeles Harbor. Once all properties are demolished under Phases 1 and 2, the sites would be graded, and newly exposed dirt would be covered with compacted and bound CMB, resulting in an impermeable ground surface. Therefore, the proposed Project would require LID compliance, per Los Angeles County Code Title 12, Chapter 84, which requires the use of LID principles in all development projects, except road and flood infrastructure projects. The installation of LID BMPs in Phases 1 and 2 would include an infiltration basin along the entire demolition perimeter. The dimensions could be 6 feet wide by 3 feet deep. The basin would be filled with clean rock or gravel. Along with the BMPs installed to prevent operational impacts, the basin would capture stormwater flow and inclusion of porous material would increase permeability and infiltration of stormwater.

Although the ultimate future use of the site is unknown, for purposes of analysis, it is assumed that the site would be used for cargo support under Phase 2. It is anticipated that cargo support activities would occur on the compacted and bound CMB area, and that a canopy would be constructed on site, under which chassis repair and related activities would occur. As discussed in Section 4.10, *Hydrology and Water Quality*, the use of the site for this or a similar purpose would not substantially increase the rate or volume of stormwater runoff that could adversely affect the storm flow system, as the Project site is close to discharge points. As such, no new or expanded stormwater runoff systems would be necessary.

Future use of the Project site for cargo-related uses, such as long-term chassis storage, would not generate potable water, wastewater, or natural gas. No telecommunications facilities would be used. As part of the proposed Project under both phases, new exterior perimeter lighting would be installed around the perimeter of the Project site and would result in new operational electricity consumption. As discussed above in Section 4.5, *Energy*, during probable future operations, approximately 211,919 kilowatt-hours of electricity would be generated annually. As mentioned in Section 4.6, *Energy*, light-emitting diode light fixtures would be used at the Project site and would meet the latest efficiency standards. The proposed Project's energy uses would not constitute wasteful, inefficient, or unnecessary consumption or impacts that would result in the relocation or construction of new or expanded facilities. Impacts would be less than significant.

Future cargo-related use of the proposed Project site under Phase 2 would not substantially increase the rate or volume of stormwater runoff that could adversely affect the storm flow system. It is anticipated that a chassis repair and maintenance depot(s), or similar use, would be supported by an additional approximately 20 employees over two work shifts (both day and night shift). Existing utilities would be adequate to serve such proposed uses and nominal increase in employees. Therefore, the proposed Project would not directly or indirectly result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant, and no mitigation is required.

**b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

**Less-than-Significant.** Water lines would be capped at the street and the proposed Project under both phases is not anticipated to generate substantial water demand. Should a prospective tenant need water under Phase 2, a connection could be viable with trenching for the supply pipe. A small amount of water would be used temporarily only during construction for compaction, grading, and dust suppression. Potential future operations activities under Phase 2 would consist of cargo support; therefore, the proposed Project would not involve the development of any habitable structures or other uses that would result in an increase in the consumption of potable water. Additionally, as previously discussed in Section 4.14, *Population and Housing*, the proposed Project would not directly or indirectly induce substantial population growth. Therefore, impacts on water supplies would be less than significant.

**c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**No Impact.** No wastewater would be generated during construction or operation under Phases 1 and 2. The Project site is serviced by the City of Los Angeles Bureau of Sanitation's Terminal Island Water Reclamation Plant. The proposed Project does not involve any industrial process that may require an Industrial Waste Permit from the Bureau of Sanitation. The proposed Project would not substantially alter the current discharge from the Terminal Island Water Reclamation Plant and would not exceed wastewater treatment requirements. Therefore, the proposed Project would not exceed or substantially alter wastewater treatment requirements of LARWQCB.

During probable future operations under Phase 2, it is anticipated that 20 employees per day (both day and night shift) would be required and portable restrooms would be provided with a catch basin to minimize spills or waste to be pumped from tank storage by a waste disposal company. The proposed Project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the proposed Project's projected demand. Impacts would be less than significant, and no mitigation is required.

**d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less-than-Significant Impact.** Demolition-related construction activities for the proposed Project under both phases would generate a moderate amount of construction debris from demolition and grading activities. The generation of landfill waste would be reduced by recycling demolition debris to the extent

feasible. LAHD maintains an asphalt/concrete recycling facility at the intersection of East Grant Street and Foote Avenue in Wilmington. Any asphalt/concrete debris from construction activities would be crushed at the facility or elsewhere in the Port for reuse within the Port.

The majority of solid waste that would be generated during Phase 1 and Phase 2 of construction would be from the demolition of the two main buildings (Plant No. 4 and the northern portion of the East Plant), the waterside dock, and bridge, which would result in approximately 92,755 cubic yards or 46,378 tons of debris. Solid waste from demolition and construction that requires disposal at a landfill is not expected to be substantial relative to the permitted capacity at the local or regional disposal facilities (e.g., Chiquita Canyon Landfill, Sunshine Canyon Landfill) that could accept such waste from the proposed Project. The Chiquita Canyon Landfill has a maximum permitted capacity of 110,366,000 cubic yards, with 55 percent remaining capacity (60,408,000 cubic yards), and the Sunshine Canyon Landfill has a maximum permitted capacity of 140,900,000 cubic yards, with 55 percent remaining capacity (77,900,000 cubic yards) (CalRecycle 2019a, 2019b). There is also currently adequate inert waste disposal capacity available in Los Angeles County and there is no anticipated shortfall in permitted solid waste disposal capacity to occur within the next 15 years under current conditions (County of Los Angeles Public Works 2020). Furthermore, a number of operations within Los Angeles County recycle construction and demolition material, and the Port, as a standard condition of permit approval, requires recycling of construction materials and the use of materials with recycled content where feasible to minimize impacts related to solid waste. Therefore, demolition debris would not exceed landfill capacity.

During potential future cargo-related operations at the Project site under Phase 2, substantial amounts of solid waste are not anticipated to be generated and generation of waste would be similar to that of other chassis maintenance and repair depots with a stop/start function within the Port, such as the Pacific Crane Maintenance Company Chassis Repair and Storage Facility Project, Innovative Dock Chassis Depot, and Innovative Barracuda Chassis Depot. Therefore, the proposed Project would not generate or lead to generation of solid waste in excess of state or local standards or impair solid waste reduction goals.

In summary, near-term construction of the proposed Project and future construction and operational activities are anticipated to generate a moderate amount of waste that would require disposal in a landfill. The proposed Project would be served by landfills with adequate permitted capacity and, therefore, able to accommodate the Project's solid waste disposal needs. This impact would be less than significant, and no mitigation is required.

**e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less-than-Significant Impact.** The proposed Project would be required to conform to the policies and programs of the Solid Waste Integrated Resource Plan. Compliance with the Solid Waste Integrated Resource Plan would ensure sufficient permitted capacity to service the proposed Project. As such, the impact would be less than significant. As mentioned above, the proposed Project would generate approximately 92,755 cubic yards or 46,378 tons of construction debris from demolition and grading activities. However, the generation of landfill waste would be reduced by recycling demolition debris to the extent feasible. LAHD maintains an asphalt/concrete recycling facility at the intersection of East Grant

Street and Foote Avenue in Wilmington. Any asphalt/concrete debris from construction activities would be crushed at the facility or elsewhere in the Port for reuse within the Port. No mitigation measures are required.

During probable future operations under Phase 2, substantial amounts of solid waste would not be generated and generation of waste would be similar to that of other chassis maintenance and repair depots with a stop/start function within the Port, such as the Pacific Crane Maintenance Company Chassis Repair and Storage Facility Project, Innovative Dock Chassis Depot, and Innovative Barracuda Chassis Depot. The proposed Project would comply with federal, state, and local statutes and regulations related to solid waste. More specifically, the future use would comply with all applicable codes pertaining to solid waste disposal. These codes include Chapter VI, Article 6, Garbage, Refuse Collection, of the City of Los Angeles Municipal Code; Part 13, Title 42, Public Health and Welfare, of the California Health and Safety Code; and Chapter 39, Solid Waste Disposal, of the United States Code. The proposed Project would also be compliant with AB 939, the California Solid Waste Management Act, which requires each city in the state to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. AB 341 builds upon AB 939 and requires jurisdictions to implement mandatory commercial recycling with a statewide 75 percent diversion rate (from landfill disposal) by 2020. Therefore, the proposed Project would implement and be consistent with the procedures and policies detailed in these codes, the City's recycling and solid waste diversion efforts, and related laws pertaining to solid waste disposal. The impact would be less than significant, and no mitigation is required.

## 6.20 WILDFIRE

### Would the project:

#### a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

**Less-than-Significant Impact.** Disaster and tsunami evacuation routes are identified within the Port (City of Los Angeles Emergency Management Department 2019; City of Los Angeles 2008). However, the Project site would be fully within a previously developed site without public roadways. Furthermore, as discussed in Section 4.9, *Hazards and Hazardous Materials*, the Project site is not within a Very High Fire Hazard Severity Zone within its Local Responsibility Area (California Department of Forestry and Fire Protection 2021). The nearest boundary of a Very High Fire Hazard Severity Zone is in the city of Rancho Palos Verdes, approximately 3 miles west of the Project site. Construction and operation activities are not anticipated to result in delays for emergency vehicles or law enforcement. Impacts associated with an emergency response plan would be less than significant, and no mitigation is required.

#### b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

**No Impact.** The Project site is not in or near a fire hazard severity zone. The closest fire hazard severity zone is 3 miles west of the Project site, in the city of Rancho Palos Verdes (California Department of Forestry and Fire Protection 2021). The Project site is within a fully developed portion of Terminal Island, and no wildlands occur within or adjacent to the Project site. Therefore, no impacts associated with pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur, and no mitigation is required.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?**

**No Impact.** The Project is in an already developed industrial area. Implementation of the proposed Project would not require the installation or maintenance of additional infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that would exacerbate fire risk or result in temporary or ongoing impacts on the environment. Therefore, no impacts associated with the installation or maintenance of associated infrastructure would occur, and no mitigation is required.

- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact.** The Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes due to wildfires. As discussed in the analyses above, the Project site is flat and has no substantial natural or graded slopes. The Project is not within a California Geological Survey–designated landslide zone or a Very High Fire Hazard Severity Zone. The proposed Project and future potential uses of the site would not change drainage patterns that would increase flood risks. It would, however, involve complete demolition and removal of Plant No. 4, a small waterside dock, and the can manufacturing plant in the northern portion of the East Plant. The bridge that connects Plant No. 4 to the East Plant would also be demolished. Under both phases, once all properties are demolished, the sites would be graded, and newly exposed dirt would be covered with compacted and bound CMB. CMB would be bound and compacted and would therefore be impermeable and require LID compliance. The maintenance area would be paved and include appropriate BMPs to prevent any spills from reaching the harbor. For the purposes of this analysis, it is assumed that, in the future, within the Project footprint, a canopy (approximately 400 feet in length by 170 feet in width by 40 feet in height) would be constructed on site, under which chassis repair and related activities would occur. Therefore, no impacts associated with exposing people or structures to significant risks associated with downslope or downstream flooding or landslides would occur, and no mitigation is required.

## **6.21 MANDATORY FINDINGS OF SIGNIFICANCE**

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

**Less-than-Significant Impact.** As discussed in Section 4.4, *Biological Resources*, and Section 4.5, *Cultural Resources*, impacts on biological and cultural resources would be less than significant, and no mitigation is required.



- b. Does the project have impacts that are individually limited but cumulatively considerable?**  
(“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

**Less-than-Significant Impact.** The proposed Project, in combination with reasonably foreseeable probable future projects, would not result in significant cumulative impacts, the Project’s contribution of which would be cumulatively considerable. Projects in the Port in the vicinity of the Project area are identified in the cumulative project list below. See Appendix G. The proposed Project would not combine with reasonably probable future projects to result in cumulatively significant impacts, the Project’s contribution to which would be cumulatively considerable. As shown in Appendix G, other development projects are currently under construction or planned or have recently been completed within the Port. These projects include roadway and wharf improvements as well as container terminal, industrial, and other waterfront developments. Future projects would be evaluated in separate future environmental documents. These projects and other present and/or probable future projects would be required to comply with CEQA requirements, including mitigation measures to reduce or avoid environmental impacts, as well as applicable laws and regulations at the federal, state, and local level, including, but not limited to, the Los Angeles Municipal Code and local ordinances governing land use and development.

As discussed under each issue area in Sections 4.1 through 4.19 of this Final IS/MND, the proposed Project would not result in significant impacts related to aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, utilities and services systems, or wildfire. No mitigation would be required. In the absence of significant project-level impacts, the incremental contribution of the proposed Project would not be cumulatively considerable. Impacts would be less than significant, and no mitigation is required.

- c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less-than-Significant Impact.** Based on the analysis in this IS/MND, substantial adverse impacts on human beings would not occur as a result of the proposed Project. All impacts related to the proposed Project would be less than significant.

## **7.0 PROPOSED FINDING**

LAHD has prepared this Final IS/MND to address the environmental effects of the proposed Project. Based on the analysis provided in this Final IS/MND, LAHD finds that the proposed Project would not have a significant effect on the environment with incorporation of the mitigation measure described in this document.

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## 9.0 ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACBMs	asbestos-containing building materials
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMP	best management practice
CAA	Clean Air Act
CAAP	Clean Air Action Plan
CAAQS	California Ambient Air Quality Standard
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCC	California Coastal Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CERP	Community Emissions Reduction Plan
CHE	cargo-handling equipment
City	City of Los Angeles
Club	Dalmatian-American Club
CMB	crushed miscellaneous base
CO	carbon monoxide
CO <sub>2</sub> e	carbon dioxide equivalent
Conservancy	Los Angeles Conservancy
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DPM	diesel particulate matter

Acronym/Abbreviation	Definition
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
General Plan	City of Los Angeles General Plan
GHG	greenhouse gas
HCM	Historic-Cultural Monument
HPOZ	Historic Preservation Overlay Zone
HVAC	heating, ventilating, and air-conditioning
I	Interstate
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
LACM	Los Angeles County Natural History Museum
LADOT	Los Angeles Department of Transportation
LAFD	Los Angeles Fire Department
LAHD	Los Angeles Harbor Department
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	lead-based paint
LID	low-impact development
LST	Localized Significance Threshold
MBTA	Migratory Bird Treaty Act
MND	Mitigated Negative Declaration
MTCO <sub>2</sub> e/year	metric tons of carbon dioxide equivalent per year
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides

Acronym/Abbreviation	Definition
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OSCP	oil spill contingency plan
OSPR	California Office of Spill Prevention and Response
PCBs	polychlorinated biphenyls
Plant	Star-Kist Plant No. 4
PM10	coarse particulate matter
PM2.5	fine particulate matter
PMP	Port Master Plan
Port	Port of Los Angeles
Port Police	Los Angeles Harbor Department Port Police
PRC	Public Resources Code
Project	Star-Kist Cannery Facility Project
RGP 65	Regional General Permit No. 65
SCAQMD	South Coast Air Quality Management District
SLF	Sacred Lands File
SPCC	spill prevention, control, and countermeasure
SR	State Route
SVOC	semi-volatile organic compound
SWPPP	Stormwater Pollution Prevention Plan
TPH	total petroleum hydrocarbons
Tribe	Gabrieleño Band of Mission Indians-Kizh Nation
USCG	U.S. Coast Guard
VMT	vehicle miles traveled
VOC	volatile organic compound
WCWLB	Wilmington, Carson, West Long Beach
XRF	X-ray fluorescence

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**APPENDIX A**  
**2021 Recirculated Draft IS/MND Public Comments**

## **AGENCIES**

**From:** [Lin, Alan S@DOT](mailto:Lin, Alan S@DOT)  
**To:** [OPR State Clearinghouse](#); [Ceqacomment](#)s  
**Subject:** SCH # 2019129042-Star-Kist Cannery Facility Project  
**Date:** Thursday, December 2, 2021 11:46:07 AM  
**Attachments:** [LA-2019-03756 Star-Kist Canery Facility Project-RMND-Final.pdf](#)

---

**CAUTION:** External email.

---

Attached, please find Caltrans comment letter!

Happy Holidays!

Alan Lin, P.E.  
Transportation Engineer, Civil  
IGR, Division of Planning  
State of California  
Department of Transportation  
Mail Station 16  
100 South Main Street  
Los Angeles, CA 90012  
213-269-1124 Mobile



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life*

December 2, 2021

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

RE: Star-Kist Cannery Facility Project  
SCH # 2019129042  
Vic. LA-47/PM 2.206  
GTS # LA-2019-03756-RMND

Dear Mr. Cannon:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated MND. The project includes involves construction of a three-story, multi-family, residential development consisting of 149-units reserved for low-income residents and two market rate Manager's units. This document is a Recirculated Draft IS/MND because mitigation measures are required to reduce potential impacts to below significance thresholds.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources at the following links:

A1-2  
cont.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

A1-3

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for all projects in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The nearest State facilities to the proposed project are State Route 47 (SR-47), about 1 mile away, and Interstate 710 (I-710), about 2.5 miles away. The proposed Project is anticipated to require 20 employees on site and two light-duty truck fuel deliveries per day, which would result in a total of 44 one-way trips per day. Therefore, the proposed Project would generate fewer than 250 trips per day. After reviewing the Recirculated Negative Declaration (RMND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

A1-4

Again, as a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2019-03756AL-RMND.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
IGR/CEQA Branch Chief

email: State Clearinghouse



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

Comment Letter A2

SENT VIA E-MAIL:

[ceqacomment@portla.org](mailto:ceqacomment@portla.org)

[CCannon@portla.org](mailto:CCannon@portla.org)

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

December 7, 2021

## **Recirculated Mitigated Negative Declaration (MND) for the Proposed Star-Kist Cannery Facility Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles Harbor Department is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include information on the Community Emissions Reduction Plan (CERP) for the designated AB 617 Wilmington, Carson, West Long Beach (WCWLB) community in which the Proposed Project is located and recommended use of zero-emissions cargo handling equipment that the Lead Agency should include in the Final MND.

A2-1

### **South Coast AQMD Staff's Summary of Project Description**

Based on the Recirculated MND, the Proposed Project would involve demolition of an existing 2,254-square-foot building for development of a future cargo support facility. Because the future use of the Proposed Project is not known at the time of the release of the Recirculated MND, the environmental analysis in the Recirculated MND assumed the future use of the Proposed Project as a chassis repair and maintenance depot<sup>1</sup>. Assuming chassis are stacked to a maximum of five-chassis high when stored, the Proposed Project can store a total of 5,600 chassis<sup>2</sup>. Yard equipment to support operations would include two 30,000-pound forklifts, two 10,000-pound forklifts, one top pick, one utility tractor rig, and a mobile fuel service truck would provide diesel and propane for on-site equipment<sup>3</sup>. Truck trips from drayage trucks traveling to and from the Proposed Project would be those already existing and traveling to the Harbor District<sup>4</sup>.

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<sup>1</sup> Recirculated MND. Page 2-1.

<sup>2</sup> *Ibid.* Page 2-6.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.*

South Coast AQMD Staff's Comments*Community Emissions Reduction Plan for the Designated AB 617 WCWLB Community*

A2-2

The Proposed Project is located in the designated AB 617 WCWLB community. Through the AB 617 program, the community and South Coast AQMD staff have developed a CERP<sup>5</sup> that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the CERP for the designated AB 617 WCWLB community in September 2019. Since the adopted CERP existed at the time of the release of the Recirculated MND in November 2021, the Final MND should include a discussion of the CERP. Additionally, South Coast AQMD staff recommends that the Lead Agency review the actions included in Chapter 5, *Actions to Reduce Air Pollution Emissions or Exposures*, of the adopted CERP to explore whether additional air quality lease measures and mitigation measures can be identified and implemented at the Proposed Project.

*Zero-Emissions Cargo Handling Equipment*

A2-3

Based on the Recirculated MND, the Lead Agency assumed that the cargo handling equipment for operations at the Proposed Project would involve the use of two propane-fueled 10,000-pound forklifts, two diesel-fueled 30,000-pound forklifts, one top pick, and one utility tractor rig<sup>6</sup>. The Lead Agency did not include a lease measure, project design feature, or mitigation measure for air quality in the Recirculated MND.

Technology is transforming the freight and transportation sectors at a rapid speed. Based on the California Air Resources Board's Advanced Clean Fleet Truck Rulemaking<sup>7</sup>, zero-emissions drayage trucks, cargo handling equipment (including yard tractors) are already technically feasible and commercially available. Therefore, South Coast AQMD staff recommends that the Lead Agency require 100 percent of cargo handling equipment use zero-emissions technologies such as electric cargo handling equipment by the Proposed Project's opening day and include this requirement as a lease measure or a project design feature for future development. This recommendation supports the CERP implementation.

Conclusion

A2-4

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Final MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

<sup>5</sup>The WCWLB Community Emissions Reduction Plan is available at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf>.

<sup>6</sup> Recirculated MND. Page 4-9

<sup>7</sup> CARB. Advanced Clean Fleets. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC211104-04

Control Number



December 17, 2021

Mr. Chris Cannon, Director  
Los Angeles Harbor Department  
Environmental Management Division  
425 Palos Verdes Street  
San Pedro, California 90731  
[ceqacomment@portla.org](mailto:ceqacomment@portla.org)

**Star-Kist Cannery Facility (Project), Recirculated Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND), SCH# 2019129042**

Dear Mr. Cannon:

The California Department of Fish and Wildlife (Department) received a Notice of Intent to Adopt a Recirculated Initial Study/Mitigated Negative Declaration from the City of Los Angeles Harbor Department (City) for the Star-Kist Cannery Facility Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments on biological impacts and mitigation regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**DEPARTMENT ROLE**

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, Section 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines Section 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, Section 1802.) Similarly for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. The Department is also responsible for

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California, and ensuring fisheries are sustainably managed under the Marine Life Management Act. Pursuant to our jurisdiction, the Department has the following comments and recommendations regarding the Project.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** Port of Los Angeles, City of Los Angeles Harbor Department

**Objective:** The objective of the Project is to prepare the subject land parcel for future development and reuse. The land was historically used by Star-Kist as a seafood cannery. Based on comments received, the City determined to recirculate the initial IS/MND pursuant to section 15073.5 of the State CEQA Guidelines (14 CCR15000 et seq.) to include an updated, revised analysis, and to include analysis of reasonably foreseeable future uses of the Project site. For the purposes of this evaluation, it is assumed that the site will be developed with an automotive and heavy equipment chassis repair and maintenance depot. The Project objectives also include two construction phases. Phase 1 construction will include demolition of Main Plant No. 4, a small wharf structure, and a bridge connecting Main Plant No. 4 to the northern portion of the East Plant. After demolition, the Main Plant No. 4 land will be compacted with crushed miscellaneous base (CMB), and then perimeter lighting, fencing, and low-impact development (LID) best management practices (BMPs) (e.g., filtration trough) will be installed. Once funding is available, Phase 2 would involve installation of a concrete pad and canopy structure at the Phase 1 site and demolition of structures on East Plant. East Plant demolition and grading will be conducted like Phase 1, but no water side construction is proposed.

A3-1  
cont.

Construction elements potentially impacting marine life, water and habitats would include:

- Demolition of a 2,221 square foot wooden wharf and 20 timber pile structures.
- A vibratory pile extractor for pulling out 20 timber piles will be used wherever possible. Pile cutting will be done if necessary.
- Work vessels would include a derrick barge with a crane for the pile removal and a material barge to haul wharf debris to another area of the Port for disposal.
- Once all structures are demolished, the Phase 1 site would be graded and covered with CMB. Finally, perimeter fencing, filtration trough, and exterior perimeter lighting would be installed.

**Location:** Terminal Island within the Port of Los Angeles (Port), Los Angeles County, California. Cross Streets: Earle Street/Bass Street and Marina Street/Ways Street

**Timeframe:** Phase 1: August 2022 through May 2023, Phase 2: To be determined.

## Marine Biological Significance

The Los Angeles Harbor (Harbor) waters support many resident and migratory fish and special status wildlife such as seabirds, marine mammals, and sea turtles. Important marine plants and algae habitats such as eelgrass (*Zostera marina*) and Giant kelp (*Macrocystis pyrifera*) support those fish and wildlife species and are common throughout shallow areas and along shorelines of the harbor. Eelgrass is important as

A3-2



A3-2  
cont.

fish nursery habitat throughout the harbor and supports juvenile and adult fish. Harbor waters also support commercially and recreationally important fish and invertebrate species such as California halibut (*Paralichthys californicus*), California spiny lobster (*Panulirus interruptus*), and the important forage fish Northern anchovy (*Engraulis mordax*).

## COMMENTS AND RECOMMENDATIONS

The Department offers comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

### I. Project Level Impacts and Other Considerations

#### Comment #1 Pile Pulling Impacts and Sound Criteria

Underwater pile pulling generate sound pressure waves causing temporary or permanent impacts to fish and invertebrates. Impacts may include a startled response in fish resulting in fish temporarily leaving the safety of their normal essential habitats to avoid the construction noise. In some situations, pile driving sound pressure waves can cause fish barotrauma injury or mortality if not mitigated to tolerable noise levels. The Department relies on guidance from the Fisheries Hydroacoustic Working Group for setting sound pressure level safety criteria for fish resources, and for pile driving projects. The agreed upon criteria consists of sound pressure levels (SPL) of 206 decibels (dB) peak and 187 dB (or 183 dB for fish less than 2 grams body weight) accumulated sound exposure level (SEL) for all listed fish within a project area. Impacts to marine organisms from underwater sound are influenced by the SELs, SPLs, sound frequency, and depth and distance from the sound output source. Additional information on in water sound level criteria can be found at:

<https://dot.ca.gov/programs/environmental-analysis/biology/hydroacoustics>

Pile pulling commonly generates significant temporary impacts such as water turbidity plumes that may reduce or block out essential underwater light for primary producers (marine plant organisms) that use photosynthesis for growth and survival. Turbidity can cause permanent impacts by clogging fish and invertebrate gills causing reduced respiration, and/or may cause reduced ability to forage and avoid predators. Temporary periods of turbidity may cause lower marine life productivity in the marine ecosystem trophic levels, lower marine biodiversity, and can contribute to marine habitat degradation and/or losses if not mitigated.

Pile pulling may cause adverse impacts to habitat forming plant and algae species. This may include degradation and losses due to a buildup of sedimentation (silt) on top of sensitive marine plants and algae including, but not limited to, eelgrass and Giant kelp. Sedimentation may also cause burial of benthic or epibenthic marine organisms.

Incomplete removal of creosote timber piles may result in broken piles, pile stub, at or above the mud line. A pile stub that is left at the mudline may potentially remain in

A3-3



eelgrass habitat, prevent eelgrass expansion within the footprint of each cut pile, and potentially continue to leach creosote contaminants into the environment.

**Recommendation:** The Department recommends that the Final IS/MND include an analysis of anticipated in water SPLs and SELs. The maximum sound levels generated should not exceed the Interim Criteria for Injury to Fish (peak Sound Exposure Level (SEL) of 206 decibels (dB) and accumulated SEL of 187 dB SEL threshold for fish over 2 grams, and 183 dB for fish under 2 grams), (Interim Criteria 2008).

**Mitigation Measures:** Should anticipated SPLs and SELs exceed the agreed Interim Criteria, the Department recommends including the following fish impact mitigation measures:

- In water sound level monitoring should be conducted if anticipated SPLs and SELs exceed acceptable levels as per the Interim Criteria for Injury to Fish.
- To reduce in water sound levels, extractions of all timber piles should be conducted by direct pull or by vibratory methods.
- Include soft starts and safety buffer zones for fish.

**Mitigation Measure:** Extractions of all timber piles should be conducted by direct pull or by vibratory methods. Should a pile break or cannot be removed, the pile should be cut, at a minimum, 2 feet below the mud line.

**Mitigation Measures:** To reduce turbidity impacts to eelgrass if present:

- Install silt turbidity curtains around piles to contain turbidity and sedimentation to the smallest area.
- If an eelgrass or Giant kelp bed is present, an additional turbidity curtain should be placed in such a way to protect the bed from turbidity and sedimentation effects.

## **Comment #2 Native Eelgrass Impacts**

Eelgrass habitat has been identified as a special aquatic site and given protections by the Clean Water Act. The Magnuson–Stevens Fishery Conservation and Management Act (MSA) identifies it as a Habitat Area of Special Concern. Additionally, the importance of eelgrass protection and restoration, as well as the ecological benefits of eelgrass, is identified in the California Public Resources Code (PRC §35630).

Therefore, eelgrass impacts should be avoided, impacts minimized, and if any significant eelgrass impacts occur due to the project construction phases, these impacts should be compensated using guidance for adverse eelgrass impacts and mitigation as provided by the California Eelgrass Mitigation Policy (CEMP), (NOAA 2014).

The City's Draft IS/MND relies on the 2018 Biological Surveys of the Los Angeles and Long Beach Harbors that indicate the nearest eelgrass patch was observed about 540 feet west of the wharf edge. The 2018 survey is outdated for determining the extent of eelgrass at the site, additional eelgrass beds may currently exist in or adjacent to the area of potential Project effects and may be damaged or degraded by Project activities.

Additional new eelgrass habitat may be impacted if it has expanded and grown closer to the wharf within the last three years. Eelgrass impacts from sedimentation may include eelgrass bed degradation resulting in reduced density and areal extent.

Wharf and pile demolition and Phase 1 of construction will likely generate significant eelgrass habitat impacts if eelgrass exists in the area of potential effects. Potential eelgrass impacts may be permanent and/or temporary. Permanent impacts may include direct damage to eelgrass habitat from pile pulling, barge propellor wash and cuts, burial, barge shading, and damage from barge anchor and chains. Temporary impacts may include falling debris/dust, rocks or dirt, stormwater runoff, turbidity, and sedimentation.

**Mitigation Measures:** The proposed Project should avoid and minimize disturbance and damage or losses to eelgrass beds from pile pulling and associated barges/vessels to the maximum extent feasible. Impacts to avoid and minimize may include, at a minimum, barge shading and anchoring within eelgrass habitat, pile pulling bottom disturbances, and demolition and construction turbidity, sedimentation, and falling debris. The Final MND should include, at a minimum, the following eelgrass mitigation measures:

- Locate pile driver barges and vessels and all barge anchoring outside of eelgrass habitat if feasible. Barge and vessel mooring anchor designs and installation should include methods to avoid anchor chain scouring of the soft bottom and eelgrass during the proposed in water Project.
- To avoid and minimize demolition and construction debris impacts to eelgrass and marine habitats use BMPs such as perimeter debris booms and other feasible methods. If debris is observed falling into Harbor water, retrieve debris as soon as possible from Harbor water and bottom.
- To reduce water turbidity and sedimentation impacts to eelgrass, install silt curtains around piles, wharf, and eelgrass beds as feasible prior to, and during demolition and construction. Restrict the turbidity plumes to the smallest possible area during all phases of demolition and construction; and

**Mitigation Measure:** If unavoidable eelgrass losses or degradation impacts occur then these impacts should be compensated in-kind and on site. Actual eelgrass losses should be determined and compensated after construction is complete using guidance from the CEMP.

**Recommendation:** Should the updated eelgrass survey indicate eelgrass has expanded, an Eelgrass Mitigation and Monitoring Plan (Plan) should be developed in consultation with the Department and other permitting and resources agencies. The finalized Plan should include:

- A comprehensive analysis of all impacts to native eelgrass and other native marine habitats based on updated pre-construction marine life and habitat surveys.
- A native marine habitat gain/loss analysis summary table for the proposed

A3-4  
cont.

Project should be included in the Plan.

- The Plan should also include a summary table of eelgrass habitat impact avoidance and minimization mitigation measures.
- If compensatory mitigation is required for eelgrass impacts, mitigation should be conducted in accordance with the CEMP.
- The Plan should identify the Department as one of the agencies to receive and review draft and final eelgrass and marine habitat mitigation and monitoring reports, surveys, and plans.
- Eelgrass donor sites should be identified and surveyed during pre- or post-construction eelgrass surveys.

**Recommendation:** If transplanting of eelgrass is required for mitigation, a Scientific Collecting Permit (SCP) from the Department will be required prior to harvest and transplanting activities. The SCP may include conditions such as donor bed surveys, limits on number of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit the Department's SCP webpage for more information: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>.

### Comment #3 Invasive Species Impacts

A3-5

Disturbance of the bottom sediments from dredging and pile construction may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to eelgrass and the marine ecology. The invasive algae *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act and while deemed eradicated in 2006 is monitored for potential future emergence. Another invasive algae species found recently in Newport Bay is *Caulerpa prolifera*, which is also a potential threat to growth and expansion of native eelgrass beds and other native alga.

**Mitigation Measure:** The Department recommends including a mitigation measure detailing a pre-construction *Caulerpa spp.* survey to identify potential existence of invasive *Caulerpa spp.* as described in the Caulerpa Control Protocol <https://www.fisheries.noaa.gov/west-coast/habitat-conservation/aquatic-invasive-species-west-coast>. If *Caulerpa spp.* are found, do not disturb the species, and contact the Department and National Marine Fisheries Service within 24 hours as described in the Caulerpa Control Protocol.

### ENVIRONMENTAL DATA

A3-6

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information on submitting data to the CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

## FILING FEES

A3-7 | The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by Department. Payment of the fee is required for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## Conclusion

A3-8 | The Department appreciates the opportunity to comment on the Draft IS/MND for the Star-Kist Cannery Facility. If you have any questions or comments, please contact Loni Adams, Environmental Scientist, at 858-204-1051 or [loni.adams@wildlife.ca.gov](mailto:loni.adams@wildlife.ca.gov).

Sincerely,



Craig Shuman, D. Env  
Marine Regional Manager

ec: Becky Ota, Environmental Program Manager  
Department of Fish and Wildlife  
[Becky.Ota@wildlife.ca.gov](mailto:Becky.Ota@wildlife.ca.gov)

Eric Wilkins, Senior Environmental Scientist Supervisor  
Department of Fish and Wildlife  
[Eric.Wilkins@wildlife.ca.gov](mailto:Eric.Wilkins@wildlife.ca.gov)

Loni Adams, Environmental Scientist  
Department of Fish and Wildlife  
[Loni.Adams@wildlife.ca.gov](mailto:Loni.Adams@wildlife.ca.gov)

Vanessa Navarro, Project Manager  
Los Angeles District, U.S. Army Corps of Engineers  
[Vanessa.Navarro@usace.army.mil](mailto:Vanessa.Navarro@usace.army.mil)

Fernie Sy, Senior Coastal Analyst  
California Coastal Commission  
[Fernie.Sy@coastal.ca.gov](mailto:Fernie.Sy@coastal.ca.gov)

Celine Gallon, Senior Environmental Scientist Supervisor  
Los Angeles Regional Water Quality Control Board  
[Celine.Gallon@waterboards.ca.gov](mailto:Celine.Gallon@waterboards.ca.gov)

Habitat Conservation Program Branch CEQA Program Coordinator  
California Department of Fish and Wildlife  
[ceqacommentletters@wildlife.ca.gov](mailto:ceqacommentletters@wildlife.ca.gov)

Office of Planning and Research, State Clearinghouse  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

## **References**

NOAA (National Oceanic and Atmospheric Administration) Fisheries, West Coast Region. 2014. California Eelgrass Mitigation Policy and Implementing Guidelines.

Fisheries Hydroacoustic Working Group. 2008. Interim Criteria for Injury of Fish Exposed to Pile Driving Operations: Memorandum. Washington: Federal Highway Administration.



## BOARD OF SUPERVISORS COUNTY OF LOS ANGELES

822 KENNETH HAHN HALL OF ADMINISTRATION/ LOS ANGELES, CALIFORNIA 90012  
Telephone (213) 974-4444 / FAX (213) 229-3676

**JANICE HAHN**

Supervisor, Fourth District

December 21, 2021

Los Angeles Board of Harbor Commissioners  
425 S. Palos Verdes Street  
San Pedro, CA 90731

Dear Board of Harbor Commissioners,

I am writing to urge you not to demolish the historic Star-Kist Cannery on Terminal Island.

I understand the rationale behind this proposal. The back-up of containers at our ports has caused a scramble to find underutilized port property and make more space to stack cargo. But we should be wary of destroying historic buildings as short-term solutions to this crisis.

The Star-Kist cannery may be empty, but it shouldn't be considered wasted space.

The building is a testament to our community's history and the cannery industry's role in making the harbor area what it is today. There are so many residents that have ties to this historic building, whether they can remember their parents or grandparents working there, or they themselves had jobs in the cannery.

In fact, just recently, I was with Rudy Svorinich as he was showing Croatia's Ambassador around the Dalmatian American Club and he pointed to the portrait of Martin Bogdanovich and, with great Croatian pride, relayed the story of the founding of Star-Kist cannery.

Our port is full of history. Even as we work to modernize it and make sure it can meet the demands of the 21<sup>st</sup> century, we need to balance that with the importance of preserving historic aspects of the harbor area that are part of our community's shared history.

The Star-Kist cannery is a building that should be preserved. I urge you to spare the historic Star-Kist cannery from demolition and put out a request for proposal for a new use for the building that will preserve its historic integrity.

Sincerely,

JANICE HAHN

Supervisor, Fourth District  
County of Los Angeles

A4-1

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

**DATE:** January 10, 2022

**TO:** Christopher Cannon, Director of Environmental Management  
The Port of Los Angeles

**FROM:** Lenise Marrero, Acting Division Manager  
Wastewater Engineering Services Division  
LA Sanitation and Environment



**SUBJECT: STAR-KIST CANNERY FACILITY PROJECT - NOTICE OF INTENT TO  
ADOPT A RECIRCULATED INITIAL STUDY/NEGATIVE  
DECLARATION**

---

A5-1

This is in response to your November 4, 2021 Notice of Intent to Adopt an Initial Study/Negative Declaration that was received on January 5, 2022 for the proposed project located within Terminal Island at Wilmington, CA 90731. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined the project is unrelated to sewers and does not require any hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org)

LM/CD: sa

c: Shahram Kharaghani, LASAN  
Michael Scaduto, LASAN  
Wing Tam, LASAN  
Christopher DeMonbrun, LASAN

## **ORGANIZATIONS**



November 19, 2021

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

RE: Star-Kist Cannery Facility Project Draft Initial Study/Mitigated Negative Declaration APP No. 190311-032

Dear Mr. Cannon:

On behalf of FuturePorts, I am pleased to submit this letter of support for the Port of Los Angeles Star-Kist Cannery Facility Project. FuturePorts supports the primary objectives of the proposed project to create a parcel of land that is more marketable for future development, to reuse and capitalize the site more efficiently.

FuturePorts is a 501(c)(6) nonprofit advocacy coalition founded in 2005 to help coalesce the Southern California supply chain around the need to both grow the ports and to address the environmental, air quality, and quality of life issues that come with that growth. FuturePorts believes that a vibrant and healthy economic and environmental future for the ports is vital to us all.

FuturePorts supports this Recirculated IS/MND for potential future use of the project site for cargo support. This could include container or chassis storage, or chassis repair and maintenance, consistent with the Port Master Plan (PMP), or other related maritime uses, as appropriate considering the current logistics and space crunch the POLA is currently experiencing.

For these reasons and more, FuturePorts is proud to support this project and the Port of Los Angeles.

Thank you,



Marnie Primmer  
Executive Director  
FuturePorts

O1-1

**From:** [simie seaman](#)  
**To:** [Ceqacomment](#)  
**Subject:** Star Kist Cannery (OPPOSE Demolish)  
**Date:** Sunday, December 5, 2021 10:30:51 PM

---

**CAUTION:** External email.

---

Chris Cannon  
Director LA Harbor  
Dept. Environmental Management Division

RE: Star Kist Cannery

Dear Mr. Cannon,

O2-1

The Wilmington Historical Society opposes the demolition of the historic Star Kist plant #4 on Terminal Island. This facility was the key for the worldwide tuna canning industry and made San Pedro and Wilmington the epicenter of the tuna industry.

Simie Seaman  
President  
Wilmington Historical Society

**From:** [Gabrieleno Administration](#)  
**To:** [Enciso, Nicole](#)  
**Subject:** Re: star-kist cannery facility project port of los angeles  
**Date:** Tuesday, December 7, 2021 2:14:00 PM

---

**CAUTION:** External email.

---

Hello Nicole

Thank you  
Admin Specialist  
Gabrieleno Band of Mission Indians - Kizh Nation  
PO Box 393  
Covina, CA 91723  
Office: 844-390-0787  
website: [www.gabrielenoindians.org](http://www.gabrielenoindians.org)



*The region where Gabrieleno culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleno who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. "The Gabrieleno are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area ". "That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleno, the community simply would not have survived."*

On Tue, Dec 7, 2021 at 1:41 PM Enciso, Nicole <[NEnciso@portla.org](mailto:NEnciso@portla.org)> wrote:

Good Afternoon,

Figure 2-3 provides a site map of the proposed project.

Regards,

Nicole Enciso

Acting Marine Environmental Supervisor - CEQA

Port of Los Angeles

Environmental Management Division

**\*Please note that response to telephone messages may be delayed and that e-mail is the preferred mode of communication at this time.**

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**From:** Gabrieleno Administration <[admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org)>

**Sent:** Tuesday, December 7, 2021 11:59 AM

**To:** Ceqacomments <[Ceqacomments@portla.org](mailto:Ceqacomments@portla.org)>

**Subject:** star-kist cannery facility project port of los angeles

Hello Christopher Cannon

O3-1

Thank you for your letter regarding the above project. Can you please provide a diagram of the project?

Thank you

Brandy Salas

Admin Specialist  
Gabrieleno Band of Mission Indians - Kizh Nation  
PO Box 393  
Covina, CA 91723

Office: 844-390-0787

website: [www.gabrielenoindians.org](http://www.gabrielenoindians.org)



*The region where Gabrieleno culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleno who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. "The Gabrieleno are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area ". "That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleno, the community simply would not have survived."*

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Christian Guzman, President  
Chris Valle, Vice President  
Melanie Labrecque, Treasurer  
Victor Christensen, Secretary



## Comment Letter O4

Certified Neighborhood Council  
Certification Date 02-12-02  
NW San Pedro Neighborhood Council  
638 S. Beacon Street, Box 688  
San Pedro, CA 90731

TELEPHONE: (310) 918-8650 • WEBSITE: NWSanPedro.org • E-MAIL: BOARD@NWSanPedro.org

December 14, 2021

Chris Cannon  
Director of Environmental Management  
City of Los Angeles Harbor Department  
425 S. Palos Verdes St.  
San Pedro, CA. 90731  
ceqacomment@portla.org

Re: Star-Kist Terminal Facility Project

Dear Mr. Cannon,

Thank you for the opportunity to comment on the Star-Kist Terminal Facility Project MND.

O4-1

Section 2.2, Project Objectives, specifically identifies the Terminal Island Land Use Plan Summary [2012] as a way to implement the goals stated in the first paragraph of the Section. However, Transmittal No. 1, and to some extent Transmittal No. 2 accompanying the Board Report approving the Plan Summary, show what appear to be other uses for the parcels, such as fish-processing uses and perhaps containers.

We suggest the evaluation include a discussion of how your proposed use conforms to the adopted Plan, including its priorities. We note that these parcels have water frontage, which is not only a rare and valuable asset, but is also one of the usage considerations discussed in the development of the Plan. Chassis operations can go anywhere— they don't need to be on the waterfront.

O4-2

We are also concerned about the impact of your proposed uses on other possible uses of Terminal Island and have the following questions:

O4-3

- It appears that the proposal may be a consolidation of project numbers 14 and 15 on the Appendix G "Cumulative Projects" list, if so, what is going to happen to those projects?
- Are the proposed chassis repair and storage uses transfers of existing facilities elsewhere on the Island, which appears to be the case in the traffic analysis?
- If so, what will be the uses planned for the approximately 14 acres that would be cleared by such a move? It is a large parcel, equal to 14 floors of the Harbor Department Administration Building, or 10.5 football fields.
- Is the Port planning to expand other terminals, make way for rail expansion, container storage, installation of new equipment, sustainable industries (e.g., Blue Economy) or other operations?

O4-4

O4-5

Continued on Page Two

- O4-6 | We suggest there are growth inducing aspects to the proposed project that have not been evaluated. It also appears that the Port may be “piecemealing” developments on Terminal Island by effectively clearing other parcels for future development without initially evaluating the impacts. We believe these concerns require a more complete CEQA analysis.
- O4-7 | In addition, any use of the property should incorporate solar panels and any activity related to its use should be zero emission.
- O4-8 | Lastly, there appears to be some community sentiment for preserving the fishing industry history of the site. The Port should find a way to preserve the history as a public exhibition in an appropriate manner.

Thank you for your consideration and your cooperation in providing us with requested documents.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Christian L. Guzman', with a stylized flourish at the end.

Christian L. Guzman, President  
On Behalf of the Northwest San Pedro Neighborhood Council

CC: Nicole Enciso, Lisa Wunder

*Approved by the Northwest San Pedro Council Board at the December 13, 2021 Monthly Meeting.*



# Dalmatian-American Club of San Pedro, Inc.

*Preserving our Croatian Ethnic & Cultural Heritage as a California 501c4 Non-Profit, Social Benefit Corporation*

Club Founded: May 6, 1926 – Clubhouse Grand Opening: August 31, 1935

1639 So. Palos Verdes Street, San Pedro, CA 90731

Tel: (310) 831-2629 – Email: [info@dacsp.com](mailto:info@dacsp.com)

December 17, 2021

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

Dear Mr. Cannon:

On behalf of our board of directors, our organization would like to encourage the Los Angeles Harbor Department not to demolish the former Star Kist Cannery Plant 4 located on Terminal Island but find an alternative use for this historic edifice.

Our organization and former Star Kist have quite a common history as Star Kist's co-founder – Martin J. Bogdanovich - was one of the original twenty-five (25) founding members of our organization in 1926, was chairman of our Club's building committee and was our president for a decade.

Moreover, many of our early members were fishermen and their spouses and many family members cannery workers as well.

While we understand acreage at the port is a precious commodity and that re-use of properties makes financial sense, we believe there may still be usage that would warrant building retention rather than demolition. There are pitifully few reminders of the significant contribution of the Croatian pioneers of our community. To erase one of last remaining vestiges of this history would be a shame.

Thank you for your serious consideration of the re-use of Plant 4 rather than demolition. Please keep us informed of any issues/actions regarding Plant 4. Thank you very much. As I remain,

Very Truly Yours,

HONORABLE RUDY SVORINICH, JR.,  
President, Dalmatian-American Club of San Pedro, Inc.





523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

December 21, 2021

Mr. Chris Cannon  
Los Angeles Harbor Department  
Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, CA 90731

Email: [ceqacomments@portla.org](mailto:ceqacomments@portla.org)

**RE: Recirculation of the Star-Kist Cannery Facility Project, Draft Initial Study and Mitigated Negative Declaration**

Dear Mr. Cannon:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Initial Study/Negative Declaration (Draft IS/ND) for the proposed Star-Kist Cannery Facility Project (Project). We continue to be very disappointed in the Port's current and previous actions related to this site. As stated during the last comment period in 2019, we believe it represents a clear violation of the California Environmental Quality Act (CEQA) and the need for an Environmental Impact Report (EIR). We recognize the Port's updated 2021 Historic Resource Assessment (HRA) conducted by ICF; however, we continue to believe the Star-Kist Cannery is a historic resource and shall be assessed as such and alternatives evaluated through an EIR process, rather than a Mitigated Negative Declaration (MND).

The Conservancy has long advocated for preservation to be a priority in planning at the Port and in particular, at Terminal Island. Despite the Port's past stewardship and investments in heritage tourism as a component of its waterfront revitalization efforts, the continued threat to historic resources on Terminal Island from lease changes, proposed projects, intentional neglect, long-term infrastructure plans, and most recently, a series of demolitions, has prompted renewed concern by the Conservancy. These are the reasons why the National Trust for Historic Preservation included Terminal Island on their 2012 list of *America's 11 Most Endangered Historic Places*.

In August 2013, the Port of Los Angeles' Board of Harbor Commissioners approved a 2030 Master Plan Update. The Conservancy worked in good faith to advocate for preservation at the Port while being pragmatic and prioritizing specific issues alongside Port staff and leadership. While the adopted Master Plan Update does



not address all of our concerns, we saw it as a potential win-win as it was a great improvement that offered a framework for preservation going forward.

O6-2  
cont'd.

We believed there was a path for preservation in the Master Plan Update as this occurred after working collaboratively with the Port to consider various priorities. The plan included policies and procedures that identify and protect historic resources throughout the Port while offering clarity for future development. For instance, the inclusion of preservation as one of the five goals in the Master Plan Update was strengthened to make it equal with the other goals. Further, the Port adopted a Built Environment Historic, Architectural, and Cultural Resource Policy in May 2013.

O6-3

At the time of the Master Plan Update in 2013, the Star-Kist facility was identified as a historic resource, eligible for local, state, and listing on the National Register of Historic Places. At the time it was one of three former cannery facilities that remained in 2013, in addition to Pan Pacific and Chicken of the Sea. Shortly after the adoption of the plan, the Port demolished Pan Pacific due to its deteriorated condition and the Port's insistence regarding life/safety concerns.

Given there are now only two canneries remaining at the Port's Terminal Island, we strongly believe they both have now have attained greater significance due to their rarity. Based on this current undertaking and recent action by the Port, these are imminently at risk through the Port's targeted demolition.

#### **I. The Port is in violation of the "Fair Argument" standard as part of CEQA and must prepare an Environmental Impact Report (EIR)**

O6-4

The Conservancy strongly disagrees with the findings in the 2021 ICF Final Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities and the previous 2018 ICF Star-Kist Re-Evaluation Memo. We believe the Star-Kist facility continues to retain substantial integrity as well as its ability to convey significance as an example of Terminal Island's canning heritage. Therefore, the Port, as the Lead Agency, should not allow the demolition of the project site without first preparing an EIR and the preparation of project alternatives. We are increasingly concerned by the steps taken by the Port to diminish the little-remaining historic resources on Terminal Island, especially given the adoption of the Master Plan Update and its Cultural Resource Policy.

O6-5

Not only has ICF reversed the 2008 Jones & Stokes evaluation of the Star-Kist Canning Facility, but it has also reversed the evaluation of the Fisherman's Pride Processing Facility (Chicken of the Sea). In both evaluations, ICF concluded that neither property retains substantial integrity. It is unclear in either re-evaluation what has changed in the last ten years to warrant this change of opinion. Up until 2018, the Port was operating as if these two facilities were historic resources. For instance, in 2015, a Port spreadsheet of its cultural resources identified both facilities as being individually eligible for the National Register of Historic Places (attached).



O6-6 What took place between 2008, 2015, 2018, or 2021 to materially change and affect the eligibility status of both Star-Kist and Chicken of the Sea? Both facilities are primarily significant for their historical and cultural associations rather than architectural. Since integrity is cited by ICF, please explain what material circumstances have substantially changed, and how was this evaluated for a resource that is primarily conveying its significance through historic and cultural associations? Per the alteration summary in the HRA, little to no details are provided regarding alterations after 2008 aside from “vandalism” and the removal of roof access points. As per the Port’s own Cultural Resource Policy, was the City’s Office of Historic Resources and SurveyLA consulted at all during this re-evaluation process, and did they concur?

O6-7 In our view, this wrongful determination and re-evaluation of clear historic resources by the Port is an attempt to circumvent CEQA and the EIR process, in an effort to erase the last remaining examples of Fish Harbor’s significant canning heritage.

**A. The Project site is significant as representative of cultural and industrial heritage**

O6-8 Fish Harbor on Terminal Island was once home to the largest tuna canning industry in the United States. At its height, Terminal Island canneries produced eighty percent of canned tuna packed in the country. Canning on Terminal Island began during the late 1910s and grew until its peak in the 1950s. In 1912 Wilbur F. Wood opened the California Tuna Canning Company. Two years later, Wood sold the company to Frank Van Camp, who renamed it Van Camp Sea Food Company, producers of “Chicken of the Sea.” In the following years, the Los Angeles Harbor Department built Fish Harbor as a protected anchorage to foster the canning industry’s growth.

O6-9 In the years leading up to World War II, Terminal Island canneries relied on exclusive contracts with Japanese fishermen. The industry brought hundreds of fishermen from the Wakayama Prefecture in Japan to Terminal Island for their expertise. The community of fishermen grew into Furusato, a village of over 3,000 residents. Husbands and sons went to sea while wives and daughters worked the canning facilities. Following the internment of Japanese residents in 1942 and razing of Furusato by the Navy, the canneries began to employ primarily Mexican and Filipino labor.

By 1946, Terminal Island produced more canned tuna than anywhere in the world. In the same year, Pan-Pacific Fisheries opened the world’s most modern cannery, and in 1952, Star-Kist opened its new Main Plant (Plant 4), the single largest cannery in the world. Terminal Island’s tuna industry grew so prominent in the 1950s that the County of Los Angeles added the tuna fish to the official insignia.

O6-10 Star-Kist and Fisherman’s Pride (Chicken of the Sea) represent the two remaining historic canning facilities in Fish Harbor. The sites are layered with history meeting multiple criteria for eligibility at the local, state, and national levels as determined by Jones & Stokes and in concurrence by SurveyLA. Together these sites hold cultural significance for their association with Japanese American heritage on Terminal Island and are representative of the companies that fostered a major U.S. industry. The Star-Kist Cannery Main Plant is also significant for its design. John K. Minasian designed the facility, and when built, it was the single largest



O6-10  
cont'd.

example of tilt-up construction built by private industry on the West Coast. Minasian later engineered the famed Seattle Space Needle for the 1962 World’s Fair.

**B. The Project site has gained importance following the demolition of the adjacent Pan-Pacific Fisheries Cannery**

O6-11

Following the demolition of the Pan-Pacific Fisheries Cannery Building at 350 Sardine and 991 Barracuda Streets, the remaining buildings associated with the canning industry have gained importance as this history is erased. In 2008, Jones & Stokes identified the Star-Kist Main Plant as “the most complete and operative cannery facility in the Port of Los Angeles. Although nearly all of the original equipment has been removed from the Main Plant, the canning process itself is still well represented.”<sup>1</sup> Furthermore, Jones & Stokes found the cannery facility to hold a high degree of integrity despite several 1970s and 1980s alterations. Even with those alterations, the facility was determined to have a strong ability to convey the 1952 significance as a “Factory Complex” whereby raw materials enter and finished products leave. Again, what has changed that ICF would now determine this facility holds no significance at either the local, state and national levels?

**C. The project site continues to convey significance. Therefore the Port and lead agency is required to produce alternatives to complete demolition.**

O6-12

After reviewing the Draft IS/MND, it is unclear what changed at the Project site other than a stronger desire by the Port to demolish the Star-Kist cannery. With ICF’s 2018 and 2021 re-evaluations and reversal of the Jones & Stokes determination, the Port stands to demolish the entire complex without presenting alternatives or a replacement project.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.” <sup>2</sup> To this end, CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>3</sup>

O6-13

CEQA has a special standard of review applicable to whether an EIR or a Negative Declaration must be prepared for a project. The unique “fair argument” standard gives no deference to the agency and instead mandates the preparation of an EIR if there is any substantial evidence in the “whole record” of proceedings that supports a “fair argument” that a project “may” have a significant effect on the environment.<sup>4</sup> In this case, there is a clear record and fair argument established that there is an historic

<sup>1</sup> Jones and Stokes, *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, prepared for the Los Angeles Harbor Department (January 2008), 40  
<sup>2</sup> Public Resource Code, Sec. 21001 (b), (c).  
<sup>3</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.  
<sup>4</sup> Guideline §15064(f)(1); *No Oil, Inc., v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.





O6-13  
cont'd.

resource involved and impacted as part of this proposed undertaking. A low-threshold fair argument is achieved if the record contains facts or fact-based assumptions or expert opinions of any potentially significant environmental impact, regardless of substantial evidence to the contrary.<sup>5</sup>

O6-14

Courts often refer to the environmental impact process as “the heart” of CEQA because it provides decision-makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.<sup>6</sup> The Conservancy believes Terminal Island’s canning facilities to be eligible resources, and therefore, agencies “shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”<sup>7</sup> As an eligible resource, the Port cannot merely skip the EIR process or subsequently adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>8</sup>

O6-15

The Conservancy is concerned by the Port’s choice not to consult further with our organization since our initial meeting in 2019, given collaboration in 2012 and 2013 when the National Trust placed these exact canneries on their “11 Most Endangered List.” Following the Trust’s listing, the Conservancy aided the Port in crafting a cultural resource policy. The policy’s goal is to retain and reuse the industrial heritage of the Port, such as the canneries in Fish Harbor. There appears to be a pattern emerging now by the Port to re-evaluate previously-determined historic resources and deem them ineligible without substantial evidence and justification. This all goes against our collaborative, good-faith efforts to work together as outlined within the Port’s Master Plan Update, the Cultural Resource Policy, and one of the plan’s stated goals of preservation.

#### **D. Potential Historic District Analysis sets a dangerous precedent for future demolition of the last remaining historic resources.**

O6-16

In Chapter 10 of the HRA, ICF evaluated potential historic districts. We believe the findings in this section set a dangerous precedent for future demolitions of the limited historic resources in Fish Harbor. In their analysis, ICF evaluated four historic district themes, 1) Fish Harbor: Post-World War II History, 2) The United States and Fish Harbor Canning Industry, 3) Star-Kist at Fish Harbor, and 4) Property Type/Architectural Style. Within each theme, a total of nine properties were identified as potential contributors to the potential historic districts. ICF determined nearly all of the properties lack sufficient integrity to contribute to a historic district, such an analysis sets a dangerous precedent for the future demolition of all Fish Harbor properties connected to the canning heritage, Japanese and Japanese American heritage of the harbor. As stated previously, many of these historic are not significant for their

<sup>5</sup> *League for Protection v. City of Oakland* (1997) 52 Cal.App.4th 896, 905; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310.

<sup>6</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

<sup>7</sup> Public Resource Code, Sec. 21002.1.

<sup>8</sup> Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



O6-16  
cont'd.

architecture and should not be held to the same standards as architecturally significant properties such as single-family residences. Fish Harbor's historic resources are nearly entirely manufacturing properties that have sustained minor alterations as a means to stay commercially viable. Despite their alterations, many of these buildings retain a significant amount of integrity and continue to convey their significance connected to the area's heritage. The collection of properties at Fish Harbor tells a uniquely layered history that cannot be found in other areas within the Port.

O6-17

In conclusion, the Conservancy strongly disagrees with the re-evaluation of the Star-Kist and Fisherman's Pride Processors (Chicken of the Sea), and Historic District analysis. We believe that both facilities retain the ability to convey significance as historic resources and as determined in the 2008 Jones & Stokes evaluations as well as many of the historic resources evaluated in ICF's district analysis. Additionally, we

O6-18

strongly disagree with the findings of the historic district analysis and are extremely concerned that such findings will lead to the demolition of all properties in Fish Harbor. As industrial buildings, these resources should not be evaluated to the same degree as properties such as residential. This property type must adapt over time to meet manufacturing and commercial needs. Despite expansions at the Star-Kist Canning Facility, the majority of the original 1952 structure still stands. We believe that this portion of the "Factory Complex" retains enough integrity to convey its significance under multiple criteria at the local, state, and national levels.

**About the Los Angeles Conservancy:**

O6-19

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Given the current circumstances and significance of affected historic resources, we believe a meeting is in necessary to discuss. I will be reaching out to set something up soon but please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,

*Adrian Scott Fine*  
Adrian Scott Fine  
Senior Director of Advocacy

cc:

Mr. Gene Seroka, Port of Los Angeles  
Mr. Ken Bernstein, Office of Historic Resources  
Ms. Chris Morris, National Trust for Historic Preservation  
Councilmember Joe Buscaino



**INDIVIDUALS**

**From:** [pat.nave](#)  
**To:** [Enciso, Nicole](#)  
**Cc:** [Jason Herring](#); [Thomas Norman](#); [Christian Guzman](#)  
**Subject:** Extension of time for comment  
**Date:** Tuesday, November 9, 2021 9:08:14 AM

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**CAUTION:** External email.

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Thank you for sending the notice of your Star-Kist project.

As you can imagine, a December 6th close of the comment period makes it impossible for our Northwest San Pedro Neighborhood council to comment on the project.

May we have a 90 day extension on the comment period? I have a call in to you and would be happy to discuss my concerns. I think that will save a lot of time for both of us.

Thanks!

310-831-1975, 310-505-7660.

I1-1



**From:** [Mary Bumbak](#)  
**To:** [Ceqacomment](#)  
**Subject:** Star Kist Cannery Facility Project  
**Date:** Wednesday, December 1, 2021 10:47:51 PM

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**CAUTION:** External email.

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To Whom it May Concern,

I was informed that there is a potential of the old Star Kist plant to be demolished. I am very sadden to hear this because I had hopes this would one day perhaps open into a museum of some sort. The plant has so much history and the reason many including myself not only live in this town but exist. My grandparents immigrated from a small island in Croatia to work for Star Kist. Funny story is a few years ago I was on a ferry heading to the island of Vis when a foreigner showed me a tourist book and asked me if I knew where San Pedro California was. The reason San Pedro is in the book because of the great migration of Croatians to work in the factory especially from the island of Vis whish Mr. Bogandovich was from.

Please reconsider what this factory means to us local and especially the grand history of San Pedro.

Sincerely,  
Mary Bumbak

I2-1

**From:** [Darleen Davis](#)  
**To:** [Ceqacommments](#)  
**Subject:** Star Kist Cannery Facility Project  
**Date:** Wednesday, December 1, 2021 4:08:56 PM

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**CAUTION:** External email.

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I3-1 | Please keep this Historical Building. It is what San Pedro is all about. Lots of history here.

**From:** [Olivia Fernandez](#)  
**To:** [Ceqacomment](#)  
**Subject:** Star Kist Cannery Facility Project  
**Date:** Saturday, December 4, 2021 3:30:44 PM

**CAUTION:** External email.

Dear Chris Cannon, Director, and others,

It saddens me to hear that plans are being considered to demolish the Star Kist Cannery facility. I **strongly oppose** such action.

Years ago when Coast Fishing Co. in Wilmington was demolished, it led to the beginning of the destruction of Wilmington's historic waterfront. I grew up taking lunch with my great grandfather to my grandmother and mother who along with many others worked at the local facility. I realize that the fishing industry has changed but the community's and greater Los Angeles' tie to the past with the loss of Wilmington's cannery, its overhead conveyor, the Catalina Terminal, Matson Terminal, seaport, sky diving school and other sites is gone forever. Don't let it happen again.

Thousands of residents from the harbor and inland, including my relatives, worked at the canneries. When there was no work in Wilmington, Star Kist was a mecca for earnings to support families. Terminal Island's history should be preserved for its important historical significance.

Again, please **do not demolish the Star Kist Cannery facility**. Too much has already been lost.

Olivia Cueva-Fernandez  
 1657 N. Marine Avenue  
 Wilmington, CA 90744

**From:** [Maria Enriquez](#)  
**To:** [Ceqacommments](#)  
**Subject:** Star Kist Cannery Facility Project  
**Date:** Sunday, December 5, 2021 10:06:01 PM

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**CAUTION:** External email.

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Chris Cannon

Please do not allow demolition of the Star Kist cannery. We have already lost historical sites in the Harbor Area to demolition or remodeling and do not need another building demolished.

Star Kist tuna became known worldwide. There are families in the Harbor Area that had generations of family members that worked for the cannery. It is not clear to me as to why the cannery needs to be demolished. It would be a great loss to the history of our area to lose the cannery.

Thank you.

Maria Elena Enriquez

I5-1

**From:** [anthony.sujak@gmail.com](mailto:anthony.sujak@gmail.com)  
**To:** [Ceqacomment](#)  
**Subject:** Star Kist Cannery Facility Project  
**Date:** Monday, December 6, 2021 10:29:37 AM

**CAUTION:** External email.

Dear Mr. Cannon,

I am writing this letter in opposition to the proposed demolition of the Star Kist Cannery Plant # 4 located at 1050-1054 Ways Street on Terminal Island. I am requesting that the Los Angeles Harbor Department find an alternative use for this historic building.

The facility traces its origins to the French Sardine Co. founded on Terminal Island in 1918 by my grand uncle Martin J. Bogdanovich. While Star Kist closed its facilities on Terminal Island in 1984, the building continues to represent a significant link to Los Angeles' once mighty tuna industry. The plant is also significant for its design by John K. Minasian, a prominent engineer who worked on projects at Cape Canaveral and Edwards Air Force Base and served as the chief engineer for the Space Needle at the Seattle world fair. It was the single largest example of tilt-up construction built by private industry on the West Coast and boasts an unusual level of architectural detailing on its fish harbor facing façade. It also was the workplace of tens of thousands of San Pedrans who made their living working at the facility. Star Kist Plant #4 was literally the economic engine for San Pedro for decades.

It is for these reasons the facility should be preserved under the Port of Los Angeles Cultural Resource Policy of May 28, 2013. This policy assures that buildings such as plant #4 are identified early in the planning process for proposed projects or potential leasing of vacant properties.

Numerous individuals and organizations including the Central San Pedro Neighborhood Council, the Los Angeles Conservancy, the Dalmatian American Club of San Pedro all advocate for the preservation of the facility.

Since the plant was used in tuna canning, it can be repurposed for canning any type of food products. Another RFP ( nationwide) should be released in 2022 targeting those companies in the food industry, especially in California's central valley to gauge their interest. Since the facility is located in the middle of export facilities, I am sure that a suitable suitor for the facility can be found, in line with the goals outlined in the Port's Master Plan.

Sincerely,

Honorable Anthony Misetich  
 Former Honorary Mayor of San Pedro  
 Former Mayor of the city of Rancho Palos Verdes

December 12, 2021

From: Stephanie Mardesich

2205 W. 25<sup>th</sup> Street, Unit 3

San Pedro, California 9732

Tel. 310/519-0756

To: Board of Harbor Commissioners, Port of Los Angeles

Re:

Star Kist Cannery Facility Project

Draft Initial Study/Mitigated Negative Declaration

APP No. 190311-032

For Public Comment:

My name is Stephanie Mardesich, granddaughter of Joseph M. Mardesich, Sr. acknowledged as a “pioneer” of the California tuna canning industry who was a full founding partner of French Sardine Company in c. 1917-18, located in Fish Harbor on Terminal Island, California. The company was re-named Star Kist in the early 1950s. In c.1924 Mr. Mardesich sold out his interest to the other partner(s) and founded his own Franco Italian Packing Company that thrived as a “private label packer” for decades.

Our family has a vested interest in the history of the fishing industry and the area known as “Fish Harbor”; and is a sponsor of the permanent exhibition “Caught, Canned and Eater: The History of San Pedro’s Tune & Canning Industry” in the Los Angeles Maritime Museum, where Grandfather’s bronze bust likeness, photographs and story are on view.

For many years we have had concern about the disposition of the remaining buildings in Fish Harbor and spoken up previously.

In May 2013 a policy regarding historic preservation was adopted and press release distributed by the Port of Los Angeles (POLA) on May 28 stating: “Groundbreaking Document Provides Framework for Preservation,”

It included three important statements about the POLA commitment:

- Preparing and maintaining an inventory of historical, cultural and architectural resources of the Port;
- Completing a comprehensive survey to evaluate Port historical resources within two years of adoption of the policy and every five years thereafter. Buildings, objects, districts and sites within the Port that are at least 50 years old will be evaluated; resources less than 50 years old that have exceptional importance may also be reviewed;
- Establishing priorities for preservation and adaptive reuse, where possible, of historical buildings, structures, districts and other sites owned by or located on property owned by the Harbor Department. Staff will consider historical resources at the earliest stages of planning, adaptive reuse in leasing transactions will be encouraged.

It seems these items, and the third in particular, have been overlooked with respect to the recent proposal to raze the historic Star Kist cannery building “Draft Initial Study”... APP No. 190311-032 cited above. An excerpt from document “Introduction” contradicts the concept of preservation and adaptive use:

“The primary objectives of the proposed Project are to create a parcel of land that is more marketable for future development, to reuse and capitalize the site more efficiently, and to alleviate public nuisance.”

If indeed there is indeed an element of “public nuisance” at the Star Kist property and docks, then who created and caused it since the Harbor Department is the ostensible owner/manager of said property ergo it is their neglect that is at the root and why hasn’t the property been safely maintained?

We among many in San Pedro and harbor communities believe in preservation in the concept of “repurpose.” The Star Kist edifice could function as a cannery for products other than fish shipped in from agrarian communities, and/or other commerce affiliations and use for the building, this should be intensely investigated and explored.

The POLA needs to stop the pattern of needlessly demolishing and consider more restoration and preservation. If we do not save our history today, it’s lost for tomorrow and future generations.

## **2019 Draft IS/ND Public Comments**

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

**DATE:** December 18, 2019

**TO:** Christopher Cannon, Director of Environmental Management  
The Port of Los Angeles

**Attn:** Nicole Enciso, Environmental Specialist  
The Port of Los Angeles

**FROM:** *For* Ali Poosti, Division Manager  
Wastewater Engineering Services Division  
LA Sanitation and Environment



**SUBJECT: STAR-KIST CANNERY FACILITY PROJECT - NOTICE OF INTENT TO ADOPT A RECIRCULATED INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

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This is in response to your December 12, 2019 Notice of Intent to Adopt an Initial Study/Negative Declaration for the proposed project located within Terminal Island at Wilmington, CA 90731. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review it has been determined that the project is unrelated to sewers and does not require any hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org)

CD/AP: sa

c: Kosta Kaporis, LASAN  
Cyrus Gilani, LASAN  
Christopher DeMonbrun, LASAN



**CALIFORNIA COASTAL COMMISSION**

South Coast District Office  
301 E Ocean Blvd, Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



December 31, 2019

Nicole Enciso  
Environmental Specialist  
Los Angeles Harbor Department  
Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, CA 90731

**RE: Star-Kist Cannery Facility Project  
Coastal Commission Comments on Proposed Draft IS/ND (SCH # 2019129042)**

Ms. Enciso:

Thank you for your invitation to comment on the proposed Initial Study/Negative Declaration for the Star-Kist Cannery Facility Project, at the site on Terminal Island within the Port of Los Angeles. Coastal Commission staff appreciates the opportunity to review initial drafts of the environmental review process and offer comment. The project includes demolition of the former Star-Kist cannery facilities, removal of the associated wharf, and subsequent installation of crushed miscellaneous base within fencing. As acknowledged in the Initial Study, the project is located within Planning Areas 3 and 4 of the Port's permitting jurisdiction. The Coastal Commission certified a Port Master Plan (PMP) for the Port of Los Angeles in 1980, outlining a standard of review for development within the port and harbor areas. While the Port of Los Angeles may process a coastal development permit for site changes within its PMP jurisdiction, the project is appealable to the Coastal Commission based on its location and scope. In the event of an appeal to the Coastal Commission, the standard of review is primarily the aforementioned PMP.

The Port of Los Angeles PMP emphasizes preservation of existing biological resources, requiring minimization of introduced pollutants and habitat disturbance; if significant environmental impacts are unavoidable, commensurate mitigation is necessary. The PMP also recognizes the economic and cultural importance of commercial fishing, specifically in Planning Area 4 of Terminal Island. This should inform the future use of the project site.

**Impacts to Eelgrass**

Section 9.3 *Biological Resources* of the PMP states, in relevant part, that eelgrass beds are "a habitat area of particular concern" necessitating a high level of caution in nearby development. The analysis of potential impacts to nearby eelgrass beds in the Initial Study Section 4.4 *Biological Resources* is problematic in its failure to fully consider the effects of vibratory driving and pile removal. As acknowledged in the aforementioned section, eelgrass beds are known to occur within at least 200 feet of the project wharf. While the positive impacts of wharf and pile removal (such as increase in available soft-bottom habitat, decrease in hard-bottom habitat, reduction of shading) are substantial, these may be negated by damage from removal equipment and operations. The project proposes to use a vibratory pile

Star-Kist Cannery Facility Project  
Coastal Commission Comments on Proposed Draft IS/ND  
Page 2 of 3

driver to dislodge piles, derrick barge for crane extraction, and material barge for subsequent disposal of piles. Results of this equipment could include pile fragmentation, release of unnecessarily high concentrations of wood-treated compounds, introduction of sediment to surface water from improper barge drainage, and other significant changes. The assertion that these tools will produce impacts "short-term...and [within] a relatively small, localized area" disregards the potential for construction mismanagement and substantial damage.

Commission staff recommends firstly that *Caulerpa* surveys be submitted in the final environmental document, as this invasive species constitutes a significant threat to eelgrass beds and there is potential for *Caulerpa* to be spread through project activities. The subsequent pre- and post-construction eelgrass surveys proposed in Initial Study Section 4.4 *Biological Resources* should be accompanied by analysis of construction impacts to any nearby beds. This analysis should acknowledge with some specificity the increase in turbidity, potential for pile breakage, and release of harmful wood-treated compounds. It should include possible minimization of these factors, as well as mitigation measures if necessary. In addition to a more detailed analysis of equipment impacts to eelgrass beds, best management practices (BMPs) for pile removal and disposal should be included in the final environmental document. Examples may include, but are not limited to: a water quality monitoring program; drainage control within the material barge to avoid unnecessary release of sediment to surface water; minimization of turbidity through a slowed crane extraction; initial brief vibration of pile (referred to in BMPs as a "wake-up") to decrease likelihood of breakage; and a damage control plan in the event of pile fragmentation. Using BMPs to guide the use of removal tools will ensure compliance with Section 9.3 of the PMP and demonstrate commitment to impact minimization.

### Site Plans

As mentioned in the Initial Study Section 4.4 *Biological Resources*, there exist "several state or federally listed species and other sensitive species potential[ly] occurring in the Project area". The Initial Study acknowledges bird foraging in vegetation surrounding project site but describes native species nesting as unlikely. As acknowledged in the Initial Study, the PMP protects native bird species through compliance with the Migratory Bird Protection Act (MBPA) and Fish and Game Code 3513 prohibiting accidental or purposeful killing of migratory birds. The PMP cites laws and regulations of authorities including U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, and California Department of Fish and Game in order to sufficiently protect important species. Commission staff recognizes the project's initial compliance with these policies through surveys of bird activity within the site, but comment that fencing and exterior lighting around the compound could constitute a serious disruption. The project should involve a site plan delineating the fencing perimeter, as well as placement and direction of exterior lighting. The site plan should be guided by findings in the final environmental document. Light sources directed downward and mounted at lesser heights may be less likely to expel surrounding avian communities. Fencing may attract some bird species and pose a risk to other species. The final environmental document should include an analysis of light pollution impacts and minimization measures in compliance with the PMP and MBPA.

### Future Use

As previously referenced, the PMP places a high level of importance on commercial fishing within the Port of Los Angeles. Section 5.6.1 *General Overview* states that Planning Area 4 of Terminal Island will "focus...on commercial fishing and maritime support uses" with "commercial fishing uses maintain[ing]

Star-Kist Cannery Facility Project  
Coastal Commission Comments on Proposed Draft IS/ND  
Page 3 of 3

priority". The PMP valuation of commercial fishing also extends beyond Planning Area 4—Section 7.2.4 instructs those pursuing projects within all sections of the port not to "eliminate or reduce existing commercial fishing harbor space, unless the demand...no longer exists or adequate alternative space has been provided (California Coastal Act Section 30703)".

As a project site occurring both within Planning Area 4 and the greater PMP jurisdiction, the Star-Kist Cannery Facility Project may comply with the aforementioned policies by not foreclosing the potential for the site's continued and future use in commercial fishing activities. The Initial Study description reports attempting to find a use for the space with "no viable options found"; Commission staff encourages the Port and future lessees/applicants to identify a viable commercial fishing or maritime support use through any future development of the site. The final environmental document should make clear that neither demolition of the existing facility nor the interim treatment (fencing, security lighting, and a miscellaneous crushed base) effectively change the priority use of the site or prepares the site for a specific future use.

Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the project develops. Coastal Commission staff requests notification of any future activity associated with this project or related projects. Thank you for the opportunity to comment on the proposed Initial Study/ Negative Declaration. You may contact me at 562-590-5071 with any questions.

Sincerely,

  
Chloe Seifert  
Coastal Program Analyst

CC: Zach Rehm, District Supervisor, CCC



January 13, 2019

Mr. Chris Cannon  
Los Angeles Harbor Department  
Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, CA 90731

523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
laconservancy.org

Email: [cegacomments@portla.org](mailto:cegacomments@portla.org)

**RE: Star-Kist Cannery Facility Project, Draft Initial Study/Negative Declaration App No. 190311-032**

Dear Mr. Cannon:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Initial Study/Negative Declaration (Draft IS/ND) for the proposed Star-Kist Cannery Facility Project (Project). We are very disappointed in **the Port's current action, and** strongly disagree with your direction for this project and undertaking. We believe it represents a clear violation of the California Environmental Quality Act (CEQA) and the need for an Environmental Impact Report (EIR). The Star-Kist Cannery is a historic resource and shall be assessed as such and alternatives evaluated through an EIR process, rather than a Negative Declaration.

The Conservancy has long advocated for preservation to be a priority in planning at the Port and in particular, **at Terminal Island. Despite the Port's past** stewardship and investments in heritage tourism as a component of its waterfront revitalization efforts, the continued threat to historic resources on Terminal Island from lease changes, proposed projects, intentional neglect, long-term infrastructure plans, and most recently, a series of demolitions, has prompted renewed concern by the Conservancy. These are the reasons why the National Trust for Historic Preservation included Terminal Island on their 2012 list of *America's 11 Most Endangered Historic Places*.

**In August 2013, the Port of Los Angeles' Board of Harbor Commissioners approved** a 2030 Master Plan Update. The Conservancy worked in good faith to advocate for preservation at the Port while being pragmatic and prioritizing specific issues alongside Port staff and leadership. While the adopted Master Plan Update does not address all of our concerns, we saw as a potential win-win as it was a great improvement that offered a framework for preservation going forward.



We believed there was a path for preservation in the Master Plan Update as this occurred after working collaboratively with the Port to consider various priorities. The plan included policies and procedures that identify and protect historic resources throughout the Port while offering clarity for future development. For instance, the inclusion of preservation as one of the five goals in the Master Plan Update was strengthened to make it equal with the other goals. Further, the Port adopted a Built Environment Historic, Architectural and Cultural Resource Policy in May 2013.

At the time of the Master Plan Update in 2013, the Star-Kist facility was identified as a historic resource, eligible for local, state and listing on the National Register of Historic Places. At the time it was one of three former cannery facilities that remained in 2013, in addition to Pan Pacific and Chicken of the Sea. Shortly after the adoption of the plan, the Port demolished Pan Pacific due to its deteriorated condition **and the Port's** insistence regarding life/safety concerns.

**Given there are now only two canneries remaining at the Port's Terminal Island, we strongly believe they** both have now have attained greater significance due to their rarity. Based on this current undertaking and recent action by the Port, these are imminently at risk through **the Port's** targeted demolition.

## **I. The Port is in violation of the "Fair Argument" standard as part of CEQA, and must prepare an Environmental Impact Report (EIR)**

The Conservancy strongly disagrees with the findings in the 2018 ICF Star-Kist Re-Evaluation Memo. We believe the Star-Kist facility continues to retain substantial integrity as well as its ability to convey significance **as an example of Terminal Island's canning heritage**. Therefore, the Port, as the Lead Agency, should not allow the demolition of the project site without first preparing an EIR, and the preparation of project alternatives. We are increasingly concerned by the steps taken by the Port to diminish the little-remaining historic resources on Terminal Island, especially given the adoption of the Master Plan Update and its Cultural Resource Policy.

Not only has ICF reversed the 2008 Jones & Stokes evaluation of the Star-Kist Canning Facility, but it has also reversed the evaluation of the **Fisherman's Pride Processing Facility** (Chicken of the Sea). In both evaluations, ICF concluded that neither property retains substantial integrity. It is unclear in either re-evaluation what has changed in the last ten years to warrant this change of opinion. Up until 2018, the Port was operating as if these two facilities were historic resources. For instance, in 2015, a Port spreadsheet of its cultural resources identified both facilities as being individually eligible for the National Register of Historic Places (attached).

What took place between 2008, 2015 or 2018 to materially change and affect the eligibility status of both Star-Kist and Chicken of the Sea? Both facilities are primarily significant for their historical and cultural associations rather than architectural. Since integrity is cited by ICF, please explain what material circumstances have substantially changed, and how was this evaluated for a resource that is primarily conveying its significance through historic and cultural associations? **As per the Port's own Cultural**



**Resource Policy, was the City’s Office of Historic Resources and SurveyLA consulted** at all during this re-evaluation process and did they concur?

In our view, this wrongful determination and re-evaluation of clear historic resources by the Port is an attempt to circumvent CEQA and the EIR process, in an effort to erase the last remaining examples of **Fish Harbor’s significant canning heritage.**

#### **A. The Project site is significant as representative of cultural and industrial heritage**

Fish Harbor on Terminal Island was once home to the largest tuna canning industry in the United States. At its height, Terminal Island canneries produced eighty percent of canned tuna packed in the country. Canning on Terminal Island began during the late 1910s and grew until its peak in the 1950s. In 1912 Wilbur F. Wood opened the California Tuna Canning Company. Two years later, Wood sold the company to Frank Van Camp, who renamed it Van Camp **Sea Food Company, producers of “Chicken of the Sea.”** In the following years, the Los Angeles Harbor Department built Fish Harbor as a protected anchorage to foster the canning industry’s growth.

In the years leading up to World War II, Terminal Island canneries relied on exclusive contracts with Japanese fishermen. The industry brought hundreds of fishermen from the Wakayama Prefecture in Japan to Terminal Island for their expertise. The community of fishermen grew into Furusato, a village of over 3,000 residents. Husbands and sons went to sea while wives and daughters worked the canning facilities. Following the internment of Japanese residents in 1942 and razing of Furusato by the Navy, the canneries began to employ primarily Mexican and Filipino labor.

By 1946, Terminal Island produced more canned tuna than anywhere in the world. In the same year, **Pan-Pacific Fisheries opened the world’s most modern cannery**, and in 1952, Star-Kist opened its new Main Plant (Plant 4), the single largest cannery in the world. **Terminal Island’s** tuna industry grew so prominent in the 1950s that the County of Los Angeles added the tuna fish to the official insignia.

**Star-Kist and Fisherman’s Pride** (Chicken of the Sea) represent the two remaining historic canning facilities in Fish Harbor. The sites are layered with history meeting multiple criteria for eligibility at the local, state and national levels as determined by Jones & Stokes and in concurrence by SurveyLA. Together these sites hold cultural significance for their association with Japanese American heritage on Terminal Island and are representative of the companies that fostered a major U.S. industry. The Star-Kist Cannery Main Plant is also significant for its design. John K. Minasian designed the facility, and when built, it was the single largest example of tilt-up construction built by private industry on the West Coast. Minasian later engineered **the famed Seattle Space Needle for the 1962 World’s Fair.**





## **B. The Project site has gained importance following the demolition of the adjacent Pan-Pacific Fisheries Cannery**

Following the demolition of the Pan-Pacific Fisheries Cannery Building at 350 Sardine and 991 Barracuda Streets, the remaining buildings associated with the canning industry have gained importance as this history is erased. In 2008, Jones & Stokes identified the Star-Kist Main Plant as “the most complete and operative cannery facility in the Port of Los Angeles. Although nearly all of the original equipment has been removed from the Main Plant, the canning process itself is still well represented.”<sup>1</sup> Furthermore, Jones & Stokes found the cannery facility to hold a high degree of integrity despite several 1970s and 1980s alterations. Even with those alterations, the facility was determined to have a strong ability to convey the 1952 significance as a “Factory Complex” whereby raw materials enter and finished products leave. Again, what has changed that ICF would now determine this facility holds no significance at either the local, state and national levels?

## **C. The project site continues to convey significance. Therefore the Port and lead agency is required to produce alternatives to complete demolition.**

After review of the Draft IS/NG, it is unclear what changed at the Project site other than a stronger desire by the Port to demolish the Star-Kist cannery. With ICF’s 2018 re-evaluation and reversal of the Jones & Stokes determination, the Port stands to demolish the entire complex without presenting alternatives or a replacement project.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”<sup>2</sup> To this end, CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>3</sup>

CEQA has a special standard of review applicable to whether an EIR or a Negative Declaration must be prepared for a project. The unique “fair argument” standard gives no deference to the agency and instead mandates the preparation of an EIR if there is any substantial evidence in the “whole record” of proceedings that supports a “fair argument” that a project “may” have a significant effect on the environment.<sup>4</sup> In this case, there is a clear record and fair argument established that there is an historic resource involved and impacted as part of this proposed undertaking. A low-threshold fair argument is

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<sup>1</sup> Jones and Stokes, *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, prepared for the Los Angeles Harbor Department (January 2008), 40

<sup>2</sup> Public Resource Code, Sec. 21001 (b), (c).

<sup>3</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.

<sup>4</sup> Guideline §15064(f)(1); *No Oil, Inc., v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.



achieved if the record contains facts or fact-based assumptions or expert opinions of any potentially significant environmental impact, regardless of substantial evidence to the contrary.<sup>5</sup>

Courts often refer to the environmental impact process as **“the heart” of CEQA because it provides** decision-makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.<sup>6</sup> The Conservancy believes Terminal Island’s canning facilities to be eligible resources, and therefore, agencies **“shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”**<sup>7</sup> As an eligible resource, the Port cannot merely skip the EIR process or subsequently adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>8</sup>

The Conservancy is concerned by the Port’s **choice not to** consult with our organization, given collaboration in 2012 and 2013 when the National Trust placed these exact **canneries on their “11 Most Endangered List.”** Following **the Trust’s listing**, the Conservancy aided the Port in crafting a cultural resource policy. **The policy’s goal is** to retain and reuse the industrial heritage of the Port, such as the canneries in Fish Harbor. There appears to be a pattern emerging now by the Port to re-evaluate previously-determined historic resources and deem them ineligible without substantial evidence and justification. This all goes against our collaborative, good-faith efforts to work together as outlined within **the Port’s Master Plan Update, the Cultural Resource Policy, and one of the plan’s stated goals of** preservation.

In conclusion, the Conservancy strongly disagrees with the re-evaluation of the Star-Kist and Fisherman’s Pride Processors (Chicken of the Sea). We believe that both facilities retain the ability to convey significance as historic resources and as determined in the 2008 Jones & Stokes evaluations. As industrial buildings, these resources should not be evaluated to the same degree as properties such as residential. This property type must adapt over time to meet manufacturing needs. Despite expansions at the Star-Kist Canning Facility, the majority of the original 1952 structure still stands. We believe that this portion **of the “Factory Complex” retains enough integrity to convey** its significance under multiple criteria at the local, state and national levels.

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<sup>5</sup> *League for Protection v. City of Oakland* (1997) 52 Cal.App.4th 896, 905; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310.

<sup>6</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

<sup>7</sup> Public Resource Code, Sec. 21002.1.

<sup>8</sup> Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



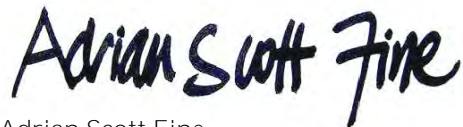


**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Given the current circumstances and significance of affected historic resources, we believe a meeting is in necessary to discuss. I will be reaching out to set something up soon but please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

cc:

Mr. Gene Seroke, Port of Los Angeles

Mr. Ken Bernstein, Office of Historic Resources

Mr. Brian Turner and Ms. Chris Morris, National Trust for Historic Preservation

Councilmember Joe Buscaino



**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*



January 16, 2020

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

RE: Star-Kist Cannery Facility Project  
Negative Declaration (ND)  
SCH# 2019129042  
GTS# 07-LA-2019-03002  
Vic. LA – 47/ PM 2.206

Dear Mr. Cannon:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project involves demolition of the former Star-Kist cannery facilities on an approximately 16.5-acre site within Terminal Island at the Port of Los Angeles. Construction activities would involve demolition of all facilities within the project footprint including a small wooden dock; grading; covering newly exposed dirt with crushed miscellaneous base; and installation of perimeter fencing and lighting.

The nearest State facilities to the proposed project are State Route 47 (SR-47), about 1 mile away, and Interstate 710 (I-710), about 2.5 miles away. After reviewing the Negative Declaration (ND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov or (213) 897-4230 and refer to GTS# 07-LA-2019-03002.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Miya Edmonson'.

MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse



## GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

### **Adopt Mitigative Declaration Study / Mitigated Negative Declaration**

The Port of Los Angeles  
425 S. Palos Verdes Street  
San Pedro, CA 90733

Good Afternoon Christopher Cannon,

We have received your Notice of the Adopt Mitigative Negative Declaration for the STAR-KIST Cannery Facility Project the Port of Los Angeles CA. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

Sincerely,  
Gabrieleno Band of Mission Indians/Kizh Nation  
(1844) 390-0787 Office

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians@yahoo.com](http://www.gabrielenoindians@yahoo.com)

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)

**APPENDIX B**  
**Air Quality and Greenhouse Gas Supporting Documentation**

## **B-1: Construction AQ & GHG Emissions**

## Regional Emissions Summary (Onsite + Offsite)

Emissions by Phase	Daily Emissions (lb/day)						Daily Emissions (lb/day)			Total MT			
Phase Name	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Phase 1-Mobilize	0.26	5.22	8.91	0.01	1.01	0.15	1431.10	0.33	0.09	3.25	0.001	0.000	3.33
Phase 1-Lead and Asbestos Removal	0.22	2.64	2.68	0.02	1.71	0.34	2030.44	0.02	0.25	69.07	0.001	0.009	71.66
Phase 1-Wharf Demolition	2.07	40.07	35.62	0.06	2.64	1.47	5608.57	0.58	0.31	12.72	0.001	0.001	12.96
Phase 1-Building Demolition	1.52	44.47	53.03	0.15	24.07	3.67	15469.79	1.99	1.70	421.02	0.054	0.046	436.15
Phase 1-Grading/Compaction	0.51	15.38	16.10	0.07	6.98	1.03	6929.65	0.55	0.87	62.86	0.005	0.008	65.35
Phase 1-Install Crushed Misc Base	0.51	15.38	16.10	0.07	6.92	1.02	6929.65	0.55	0.87	62.86	0.005	0.008	65.35
Phase 1-Perimeter Lighting and Fencing	0.15	2.52	5.03	0.01	0.59	0.11	850.91	0.17	0.05	11.58	0.002	0.001	11.83
Phase 1-Clean Up	0.09	0.36	1.22	0.00	0.74	0.12	404.61	0.01	0.03	0.92	0.000	0.000	0.94
Phase 1-Demobilize	0.25	5.12	8.85	0.01	1.01	0.15	1426.29	0.33	0.09	3.23	0.001	0.000	3.31
Phase 2-Concrete Pad at Phase 1 Site	0.72	11.87	18.43	0.04	0.51	0.20	3514.52	0.27	0.24	15.94	0.001	0.001	16.30
Phase 2-Install Canopy at Phase 1 Site	1.42	18.33	31.33	0.05	0.75	0.36	4684.82	0.86	0.22	42.50	0.008	0.002	43.30
Phase 2-Mobilize	0.16	2.82	4.88	0.01	1.00	0.14	920.45	0.17	0.07	2.09	0.000	0.000	2.14
Phase 2-Lead and Asbestos Removal	0.18	0.88	2.42	0.01	1.38	0.25	992.34	0.02	0.09	13.50	0.000	0.001	13.87
Phase 2-Building Demolition	0.69	19.63	26.18	0.07	10.34	1.57	7058.74	0.99	0.74	160.09	0.022	0.017	165.67
Phase 2-Grading/Compaction	0.63	16.64	20.70	0.06	5.63	0.85	6494.94	0.76	0.73	29.46	0.003	0.003	30.54
Phase 2-Install Crushed Misc Base	0.48	13.76	15.72	0.06	5.57	0.83	5866.92	0.55	0.71	26.61	0.003	0.003	27.63
Phase 2-Perimeter Lighting and Fencing	0.15	2.52	5.03	0.01	0.59	0.11	850.91	0.17	0.05	3.86	0.001	0.000	3.94
Phase 2-Clean Up	0.09	0.35	1.14	0.00	0.74	0.12	400.53	0.01	0.03	0.91	0.000	0.000	0.93
Phase 2-Demobilize	0.16	2.81	4.82	0.01	1.00	0.14	916.44	0.17	0.07	2.08	0.000	0.000	2.13
<b>Maximum Daily Emissions</b>	<b>2.07</b>	<b>44.47</b>	<b>53.03</b>	<b>0.15</b>	<b>24.07</b>	<b>3.67</b>	<b>Total 977.33</b>						
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55	20 -Year Amortization 48.87						
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>							

## Localized Emissions Summary (Onsite)

Emissions by Phase	Daily Emissions (lb/day)			
Phase Name	NO <sub>x</sub>	CO	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total
Phase 1-Mobilize	4.75	8.02	0.78	0.09
Phase 1-Lead and Asbestos Removal	0.13	0.06	0.81	0.09
Phase 1-Wharf Demolition	39.26	34.71	2.36	1.40
Phase 1-Building Demolition	29.93	48.70	21.31	2.84
Phase 1-Grading/Compaction	8.99	13.97	5.45	0.57
Phase 1-Install Crushed Misc Base	8.99	13.97	5.39	0.57
Phase 1-Perimeter Lighting and Fencing	2.28	3.85	0.31	0.04
Phase 1-Clean Up	0.08	0.04	0.46	0.05
Phase 1-Demobilize	4.74	8.02	0.78	0.09
Phase 2-Concrete Pad at Phase 1 Site	10.71	17.13	0.08	0.08
Phase 2-Install Canopy at Phase 1 Site	17.97	29.01	0.22	0.22
Phase 2-Mobilize	2.44	4.04	0.77	0.08
Phase 2-Lead and Asbestos Removal	0.12	0.06	0.76	0.08
Phase 2-Building Demolition	14.77	24.28	9.12	1.21
Phase 2-Grading/Compaction	11.59	18.78	4.38	0.48
Phase 2-Install Crushed Misc Base	8.71	13.80	4.32	0.46
Phase 2-Perimeter Lighting and Fencing	2.28	3.85	0.31	0.04
Phase 2-Clean Up	0.08	0.04	0.46	0.05
Phase 2-Demobilize	2.44	4.04	0.77	0.08
<b>Maximum Daily Emissions</b>	<b>39.26</b>	<b>48.70</b>	<b>21.31</b>	<b>2.84</b>
SCAQMD Regional Construction Thresholds	118	1,982	42	10
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

## Regional Emissions Summary (Onsite + Offsite) - Overlapping Construction and Operations

Emissions by Phase	Daily Emissions (lb/day)									
Phase Name	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total
Phase 2-Mobilize	0.16	2.82	4.88	0.01	0.99	0.01	1.00	0.13	0.01	0.14
Phase 2-Lead and Asbestos Removal	0.18	0.88	2.42	0.01	1.37	0.01	1.38	0.24	0.01	0.25
Phase 2-Building Demolition	0.69	19.63	26.18	0.07	10.23	0.11	10.34	1.46	0.11	1.57
Phase 2-Grading/Compaction	0.63	16.64	20.70	0.06	5.53	0.10	5.63	0.75	0.10	0.85
Phase 2-Install Crushed Misc Base	0.48	13.76	15.72	0.06	5.48	0.09	5.57	0.74	0.09	0.83
Phase 2-Perimeter Lighting and Fencing	0.15	2.52	5.03	0.01	0.58	0.01	0.59	0.10	0.01	0.11
Phase 2-Clean Up	0.09	0.35	1.14	0.00	0.74	0.00	0.74	0.12	0.00	0.12
Phase 2-Demobilize	0.16	2.81	4.82	0.01	0.99	0.01	1.00	0.13	0.01	0.14
<b>Max Daily Phase 2 Construction Emissions</b>	<b>0.69</b>	<b>19.63</b>	<b>26.18</b>	<b>0.07</b>	<b>10.23</b>	<b>0.11</b>	<b>10.34</b>	<b>1.46</b>	<b>0.11</b>	<b>1.57</b>
Max Daily Phase 1 Operations Emissions	3.50	31.43	25.61	0.12	2.12	0.29	2.42	0.57	0.27	0.84
<b>Max Daily Emissions</b>	<b>4.19</b>	<b>51.06</b>	<b>51.78</b>	<b>0.19</b>	<b>12.35</b>	<b>0.41</b>	<b>12.76</b>	<b>2.03</b>	<b>0.38</b>	<b>2.42</b>
SCAQMD Regional Operations Thresholds	55	55	550	150	--	--	150	--	--	55
Exceeds Threshold?	No	No	No	No	--	--	No	--	--	No



Offroad Equipment											Emission Factor (g/bhp-hr) <sup>1</sup>												
Phase Name	Start	End	# of Workdays	First Year of CSTN	EF Year	Equipment Type	# of Equipment	Usage (Hours per day)	HP	LF	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	2022	Excavators	8	1	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.19	0.15	0.02
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	2022	Rubber Tired Loaders	6	1	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.49	0.15	0.02
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	2022	Forklifts	2	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 1-Lead and Asbestos Removal	8/10/2022	11/22/2022	75	2022	2022	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Cranes	1	8	231	0.29	0.08	1.29	2.60	0.01	-	0.01	0.01	-	0.01	0.01	472.98	0.15	0.02
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Generator Sets	1	8	150	0.74	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	568.30	0.02	0.03
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Other General Industrial Equipment	1	8	175	0.34	0.08	1.29	2.60	0.01	-	0.01	0.01	-	0.01	0.01	471.85	0.15	0.02
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Excavators	1	8	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.19	0.15	0.02
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	2022	Excavators	8	8	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.19	0.15	0.02
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	2022	Rubber Tired Loaders	6	8	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.49	0.15	0.02
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	2022	Forklifts	2	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	2023	Rubber Tired Loaders	2	8	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	2023	Other Construction Equipment	2	8	157	0.42	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	469.56	0.15	0.02
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	2023	Other Construction Equipment	2	8	157	0.42	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	469.56	0.15	0.02
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	2023	Rubber Tired Loaders	2	8	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 1-Perimeter Lighting and Fencing	4/19/2023	5/30/2023	30	2023	2023	Tractors/Loaders/Backhoes	2	4	158	0.37	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	468.82	0.15	0.02
Phase 1-Clean Up	5/31/2023	6/6/2023	5	2023	2023	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	2023	Excavators	8	1	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.28	0.15	0.02
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	2023	Rubber Tired Loaders	6	1	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	2023	Forklifts	2	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	2023	Excavators	4	1	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.28	0.15	0.02
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	2023	Rubber Tired Loaders	3	1	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	2023	Forklifts	1	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 2-Lead and Asbestos Removal	8/3/2023	9/13/2023	30	2023	2023	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	2023	Excavators	4	8	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.28	0.15	0.02
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	2023	Rubber Tired Loaders	3	8	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	2023	Forklifts	1	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	2023	Rubber Tired Loaders	2	8	203	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	2023	Other Construction Equipment	2	8	157	0.42	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	469.56	0.15	0.02
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	2023	Other Construction Equipment	2	8	157	0.42	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	469.56	0.15	0.02
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	2023	Rubber Tired Loaders	2	8	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.56	0.15	0.02
Phase 2-Perimeter Lighting and Fencing	12/21/2023	1/3/2024	10	2023	2023	Tractors/Loaders/Backhoes	2	4	158	0.37	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	468.82	0.15	0.02
Phase 2-Clean Up	1/4/2024	1/10/2024	5	2024	2024	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	2024	Excavators	4	1	158	0.38	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.43	0.15	0.02
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	2024	Rubber Tired Loaders	3	1	97	0.36	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	466.81	0.15	0.02
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	2024	Forklifts	1	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	2023	Cement and Mortar Mixers	3	8	9	0.56	0.66	4.14	3.47	0.01	-	0.16	0.16	-	0.16	0.16	568.30	0.06	0.03
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	2023	Pumps	3	8	84	0.74	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	568.30	0.03	0.03
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	2023	Tractors/Loaders/Backhoes	1	8	158	0.37	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	468.82	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Cranes	1	8	231	0.29	0.08	1.29	2.60	0.01	-	0.01	0.01	-	0.01	0.01	472.97	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Forklifts	1	8	89	0.2	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	471.53	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Generator Sets	1	8	150	0.74	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	568.30	0.02	0.03
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Tractors/Loaders/Backhoes	1	8	158	0.37	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	468.82	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Welders	3	8	46	0.45	0.70	3.89	4.60	0.01	-	0.15	0.15	-	0.15	0.15	568.30	0.06	0.03
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Pavers	1	8	130	0.42	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	472.72	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Paving Equipment	1	8	132	0.36	0.06	2.15	3.70	0.01	-	0.01	0.01	-	0.01	0.01	470.66	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Rollers	1	8	80	0.38	0.11	2.14	3.70	0.01	-	0.01	0.01	-	0.01	0.01	473.94	0.15	0.02

Notes:  
1. Emission factors based on CalEEMod default values

Offroad Equipment											Daily Emissions (lb/day)												
Phase Name	Start	End	# of Workdays	First Year of CSTN	EF Year	Equipment Type	# of Equipment	Usage (Hours per day)	HP	LF	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	2022	Excavators	8	1	158	0.38	0.06	2.28	3.92	0.01	-	0.01	0.01	-	0.01	0.01	500.02	0.16	0.02
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	2022	Rubber Tired Loaders	6	1	97	0.36	0.05	0.99	1.71	0.00	-	0.00	0.00	-	0.00	0.00	215.48	0.07	0.01
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	2022	Forklifts	2	8	89	0.2	0.07	1.34	2.32	0.00	-	0.01	0.01	-	0.01	0.01	296.06	0.10	0.01
Phase 1-Lead and Asbestos Removal	8/10/2022	11/22/2022	75	2022	2022	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Cranes	1	8	231	0.29	0.09	1.52	3.07	0.01	-	0.01	0.01	-	0.01	0.01	558.83	0.18	0.03
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Generator Sets	1	8	150	0.74	0.12	4.21	7.24	0.01	-	0.02	0.02	-	0.02	0.02	1112.57	0.04	0.05
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Other General Industrial Equipment	1	8	175	0.34	0.08	1.35	2.73	0.01	-	0.01	0.01	-	0.01	0.01	495.16	0.16	0.02
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	2022	Excavators	1	8	158	0.38	0.06	2.28	3.92	0.01	-	0.01	0.01	-	0.01	0.01	500.02	0.16	0.02
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	2022	Excavators	8	8	158	0.38	0.51	18.21	31.34	0.04	-	0.07	0.07	-	0.07	0.07	4000.14	1.30	0.18
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	2022	Rubber Tired Loaders	6	8	97	0.36	0.41	7.91	13.67	0.02	-	0.03	0.03	-	0.03	0.03	1723.84	0.56	0.08
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	2022	Forklifts	2	8	89	0.2	0.07	1.34	2.32	0.00	-	0.01	0.01	-	0.01	0.01	296.06	0.10	0.01
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	2023	Rubber Tired Loaders	2	8	97	0.36	0.14	2.64	4.56	0.01	-	0.01	0.01	-	0.01	0.01	574.69	0.19	0.03
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	2023	Other Construction Equipment	2	8	157	0.42	0.14	5.00	8.61	0.01	-	0.02	0.02	-	0.02	0.02	1092.18	0.35	0.05
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	2023	Other Construction Equipment	2	8	157	0.42	0.14	5.00	8.61	0.01	-	0.02	0.02	-	0.02	0.02	1092.18	0.35	0.05
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	2023	Rubber Tired Loaders	2	8	97	0.36	0.14	2.64	4.56	0.01	-	0.01	0.01	-	0.01	0.01	574.69	0.19	0.03
Phase 1-Perimeter Lighting and Fencing	4/19/2023	5/30/2023	30	2023	2023	Tractors/Loaders/Backhoes	2	4	158	0.37	0.06	2.22	3.81	0.01	-	0.01	0.01	-	0.01	0.01	483.38	0.16	0.02
Phase 1-Clean Up	5/31/2023	6/6/2023	5	2023	2023	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	2023	Excavators	8	1	158	0.38	0.06	2.28	3.92	0.01	-	0.01	0.01	-	0.01	0.01	500.11	0.16	0.02
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	2023	Rubber Tired Loaders	6	1	97	0.36	0.05	0.99	1.71	0.00	-	0.00	0.00	-	0.00	0.00	215.51	0.07	0.01
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	2023	Forklifts	2	8	89	0.2	0.07	1.34	2.32	0.00	-	0.01	0.01	-	0.01	0.01	296.06	0.10	0.01
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	2023	Excavators	4	1	158	0.38	0.03	1.14	1.96	0.00	-	0.00	0.00	-	0.00	0.00	250.05	0.08	0.01
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	2023	Rubber Tired Loaders	3	1	97	0.36	0.03	0.49	0.85	0.00	-	0.00	0.00	-	0.00	0.00	107.76	0.03	0.00
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	2023	Forklifts	1	8	89	0.2	0.03	0.67	1.16	0.00	-	0.00	0.00	-	0.00	0.00	148.03	0.05	0.01
Phase 2-Lead and Asbestos Removal	8/3/2023	9/13/2023	30	2023	2023	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	2023	Excavators	4	8	158	0.38	0.25	9.11	15.67	0.02	-	0.03	0.03	-	0.03	0.03	2000.43	0.65	0.09
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	2023	Rubber Tired Loaders	3	8	97	0.36	0.20	3.95	6.84	0.01	-	0.01	0.01	-	0.01	0.01	862.04	0.28	0.04
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	2023	Forklifts	1	8	89	0.2	0.03	0.67	1.16	0.00	-	0.00	0.00	-	0.00	0.00	148.03	0.05	0.01
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	2023	Rubber Tired Loaders	2	8	203	0.36	0.28	5.52	9.54	0.01	-	0.02	0.02	-	0.02	0.02	1202.71	0.39	0.06
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	2023	Other Construction Equipment	2	8	157	0.42	0.14	5.00	8.61	0.01	-	0.02	0.02	-	0.02	0.02	1092.18	0.35	0.05
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	2023	Other Construction Equipment	2	8	157	0.42	0.14	5.00	8.61	0.01	-	0.02	0.02	-	0.02	0.02	1092.18	0.35	0.05
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	2023	Rubber Tired Loaders	2	8	97	0.36	0.14	2.64	4.56	0.01	-	0.01	0.01	-	0.01	0.01	574.69	0.19	0.03
Phase 2-Perimeter Lighting and Fencing	12/21/2023	1/3/2024	10	2023	2023	Tractors/Loaders/Backhoes	2	4	158	0.37	0.06	2.22	3.81	0.01	-	0.01	0.01	-	0.01	0.01	483.38	0.16	0.02
Phase 2-Clean Up	1/4/2024	1/10/2024	5	2024	2024	No Equipment	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	2024	Excavators	4	1	158	0.38	0.03	1.14	1.96	0.00	-	0.00	0.00	-	0.00	0.00	250.13	0.08	0.01
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	2024	Rubber Tired Loaders	3	1	97	0.36	0.03	0.49	0.85	0.00	-	0.00	0.00	-	0.00	0.00	107.81	0.03	0.00
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	2024	Forklifts	1	8	89	0.2	0.03	0.67	1.16	0.00	-	0.00	0.00	-	0.00	0.00	148.03	0.05	0.01
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	2023	Cement and Mortar Mixers	3	8	9	0.56	0.18	1.10	0.93	0.00	-	0.04	0.04	-	0.04	0.04	151.55	0.02	0.01
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	2023	Pumps	3	8	84	0.74	0.36	7.04	12.17	0.02	-	0.03	0.03	-	0.03	0.03	1869.11	0.09	0.09
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	2023	Tractors/Loaders/Backhoes	1	8	158	0.37	0.06	2.22	3.81	0.01	-	0.01	0.01	-	0.01	0.01	483.38	0.16	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Cranes	1	8	231	0.29	0.09	1.52	3.07	0.01	-	0.01	0.01	-	0.01	0.01	558.82	0.18	0.03
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Forklifts	1	8	89	0.2	0.03	0.67	1.16	0.00	-	0.00	0.00	-	0.00	0.00	148.03	0.05	0.01
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Generator Sets	1	8	150	0.74	0.12	4.21	7.24	0.01	-	0.02	0.02	-	0.02	0.02	1112.57	0.04	0.05
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Tractors/Loaders/Backhoes	1	8	158	0.37	0.06	2.22	3.81	0.01	-	0.01	0.01	-	0.01	0.01	483.38	0.16	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Welders	3	8	46	0.45	0.76	4.26	5.03	0.01	-	0.17	0.17	-	0.17	0.17	622.44	0.07	0.03
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Pavers	1	8	130	0.42	0.06	2.07	3.56	0.00	-	0.01	0.01	-	0.01	0.01	455.22	0.15	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Paving Equipment	1	8	132	0.36	0.05	1.80	3.10	0.00	-	0.01	0.01	-	0.01	0.01	394.47	0.13	0.02
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	2023	Rollers	1	8	80	0.38	0.06	1.15	1.98	0.00	-	0.00	0.00	-	0.00	0.00	254.11	0.08	0.01

Notes:  
1. Emission factors based on CalEEMod default values

Marine Vessel (Tug Boat) Engines

Marine Vessel (Tug Boat) Engines												Emission Factors (g/kW-hr) <sup>1</sup>												
Phase Name	Start Date	End Date	# of Workdays	Engine Type	Engine Year	Engine Tier	Quantity	Hours per day	Engine Size (HP)	Engine Size (kW)	LF <sup>1</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	Propulsion	2010	Tier 2	1	8	788	580	0.31	0.47	8.57	5.00	0.01	-	0.41	0.41	-	0.36	0.36	652.00	0.01	0.03
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	Auxiliary	2012	Tier 3	1	8	62	48	0.43	0.39	7.13	5.00	0.01	-	0.30	0.30	-	0.27	0.27	652.00	0.01	0.03

Notes:  
1. Source: Kinder Morgan Wharf Repair Project, Table C-2

Marine Vessel (Tug Boat) Engines

Marine Vessel (Tug Boat) Engines												Emissions (lb/day)												
Phase Name	Start Date	End Date	# of Workdays	Engine Type	Engine Year	Engine Tier	Quantity	Hours per day	Engine Size (HP)	Engine Size (kW)	LF <sup>1</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	Propulsion	2010	Tier 2	1	8	788	580	0.31	1.49	27.18	15.86	0.02	-	1.30	1.30	-	1.14	1.14	2067.59	0.03	0.10
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	Auxiliary	2012	Tier 3	1	8	62	48	0.43	0.14	2.60	1.82	0.00	-	0.11	0.11	-	0.10	0.10	237.35	0.00	0.01

Notes:  
1. Source: Kinder Morgan Wharf Repair Project, Table C-2

Demolition Fugitive Dust Emissions						Demo Dust EF (lb/ton)						Emissions (lb/day)					
Phase Name	Start Date	End Date	Total Days	Year	Demo Debris Weight (tons)	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	695	0.021		0.021	0.003		0.003	0.20		0.20	0.03		0.03
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	104	0.021		0.021	0.003		0.003	0.45		0.45	0.07		0.07
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	33,796	0.021		0.021	0.003		0.003	12.05		12.05	1.83		1.83
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	208	0.021		0.021	0.003		0.003	0.15		0.15	0.02		0.02
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	11,574	0.021		0.021	0.003		0.003	4.95		4.95	0.75		0.75
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	0.021		0.021	0.003		0.003	-		-	-		-
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	0.021		0.021	0.003		0.003	-		-	-		-

Truck Loading Fugitive Dust Emissions

								Truck Loading EF (lb/ton throughput)						Emissions (lb/day) <sup>1</sup>					
Phase Name	Start Date	End Date	Total Days	Year	Total CY	Tons/CY	Throughput (tons)	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total
Phase 1-Mobilize	8/3/22	8/9/22	5	2022		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	38,298	1.2642	48,415.2	8.93E-05		8.93E-05	1.35E-05		1.35E-05	0.08		0.08	0.01		0.01
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	10,000	1.2642	12,641.7	8.93E-05		8.93E-05	1.35E-05		1.35E-05	0.02		0.02	0.00		0.00
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 1-Clean Up	5/31/23	6/6/23	5	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 1-Demobilize	6/7/23	6/13/23	5	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Mobilize	7/27/23	8/2/23	5	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	15,111	1.2642	19,103.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	0.07		0.07	0.01		0.01
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	4,000	1.2642	5,056.7	8.93E-05		8.93E-05	1.35E-05		1.35E-05	0.02		0.02	0.00		0.00
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Clean Up	1/4/24	1/10/24	5	2024		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-
Phase 2-Demobilize	1/4/24	1/10/24	5	2024		1.2642	0.0	8.93E-05		8.93E-05	1.35E-05		1.35E-05	-		-	-		-

Notes:  
1. Includes dust control measure of watering exposed area 3 times per day.



Worker Offsite							Running Exhaust Emission Factor (g/mile) <sup>2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Worker Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	16	14.7	0.02	0.10	1.29	0.003	0.32	0.002	0.32	0.08	0.00	0.08	332.01	0.01	0.01
Phase 1-Lead and Asbestos Removal	8/10/2022	11/22/2022	75	2022	48	14.7	0.02	0.10	1.29	0.003	0.32	0.002	0.32	0.08	0.00	0.08	332.01	0.01	0.01
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	16	14.7	0.02	0.10	1.29	0.003	0.32	0.002	0.32	0.08	0.00	0.08	332.01	0.01	0.01
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	48	14.7	0.02	0.10	1.29	0.003	0.32	0.002	0.32	0.08	0.00	0.08	332.01	0.01	0.01
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 1-Perimeter Lighting and Fencing	4/19/2023	5/30/2023	30	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 1-Clean Up	5/31/2023	6/6/2023	5	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	16	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	22	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	48	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	16	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Lead and Asbestos Removal	8/3/2023	9/13/2023	30	2023	48	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Perimeter Lighting and Fencing	12/21/2023	1/3/2024	10	2023	24	14.7	0.02	0.09	1.19	0.003	0.32	0.002	0.32	0.08	0.00	0.08	328.42	0.01	0.01
Phase 2-Clean Up	1/4/2024	1/10/2024	5	2024	24	14.7	0.02	0.08	1.11	0.003	0.32	0.002	0.32	0.08	0.00	0.08	325.09	0.00	0.01
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	16	14.7	0.02	0.08	1.11	0.003	0.32	0.002	0.32	0.08	0.00	0.08	325.09	0.00	0.01

- Notes:
1. Accounts for all exhaust and evaporative processes.
  2. Emission factors from EMFAC2021 for LDA/LDT1/LDT2, SCAQMD, Aggregate Model Year, Aggregate Speed, GAS only.

Worker Offsite

							Non-Running Emission Factors (g/trip) <sup>1,2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Worker Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	16	14.7	1.38	0.37	4.25	0.001	-	0.003	0.003	-	0.002	0.002	82.43	0.09	0.04
Phase 1-Lead and Asbestos Removal	8/10/2022	11/22/2022	75	2022	48	14.7	1.38	0.37	4.25	0.001	-	0.003	0.003	-	0.002	0.002	82.43	0.09	0.04
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	16	14.7	1.38	0.37	4.25	0.001	-	0.003	0.003	-	0.002	0.002	82.43	0.09	0.04
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	48	14.7	1.38	0.37	4.25	0.001	-	0.003	0.003	-	0.002	0.002	82.43	0.09	0.04
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 1-Perimeter Lighting and Fencing	4/19/2023	5/30/2023	30	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 1-Clean Up	5/31/2023	6/6/2023	5	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	16	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	22	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	48	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	16	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Lead and Asbestos Removal	8/3/2023	9/13/2023	30	2023	48	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Perimeter Lighting and Fencing	12/21/2023	1/3/2024	10	2023	24	14.7	1.31	0.34	3.98	0.001	-	0.003	0.003	-	0.002	0.002	81.21	0.09	0.04
Phase 2-Clean Up	1/4/2024	1/10/2024	5	2024	24	14.7	1.25	0.32	3.74	0.001	-	0.002	0.002	-	0.002	0.002	80.18	0.08	0.04
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	16	14.7	1.25	0.32	3.74	0.001	-	0.002	0.002	-	0.002	0.002	80.18	0.08	0.04

- Notes:
- 1. Accounts for all exhaust and evaporative processes.
  - 2. Emission factors from EMFAC2021 for LDA/LDT1/LDT2, SCAQMD, Aggregate Model Year, Aggregate Speed, GAS only.



Worker Offsite							Daily Emissions (lb/day)												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Worker Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/2022	8/9/2022	5	2022	16	14.7	0.06	0.07	0.82	0.00	0.164	0.001	0.165	0.041	0.001	0.042	175.07	0.01	0.01
Phase 1-Lead and Asbestos Removal	8/10/2022	11/22/2022	75	2022	48	14.7	0.18	0.20	2.45	0.01	0.493	0.003	0.496	0.123	0.003	0.126	525.20	0.02	0.02
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	2022	16	14.7	0.06	0.07	0.82	0.00	0.164	0.001	0.165	0.041	0.001	0.042	175.07	0.01	0.01
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	2022	48	14.7	0.18	0.20	2.45	0.01	0.493	0.003	0.496	0.123	0.003	0.126	525.20	0.02	0.02
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 1-Perimeter Lighting and Fencing	4/19/2023	5/30/2023	30	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 1-Clean Up	5/31/2023	6/6/2023	5	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 1-Demobilize	6/7/2023	6/13/2023	5	2023	16	14.7	0.06	0.06	0.76	0.00	0.164	0.001	0.165	0.041	0.001	0.042	173.16	0.01	0.01
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	2023	22	14.7	0.08	0.08	1.04	0.00	0.226	0.001	0.227	0.056	0.001	0.057	238.09	0.01	0.01
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	2023	48	14.7	0.17	0.18	2.28	0.01	0.493	0.003	0.496	0.123	0.003	0.125	519.48	0.02	0.02
Phase 2-Mobilize	7/27/2023	8/2/2023	5	2023	16	14.7	0.06	0.06	0.76	0.00	0.164	0.001	0.165	0.041	0.001	0.042	173.16	0.01	0.01
Phase 2-Lead and Asbestos Removal	8/3/2023	9/13/2023	30	2023	48	14.7	0.17	0.18	2.28	0.01	0.493	0.003	0.496	0.123	0.003	0.125	519.48	0.02	0.02
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 2-Perimeter Lighting and Fencing	12/21/2023	1/3/2024	10	2023	24	14.7	0.09	0.09	1.14	0.00	0.247	0.002	0.248	0.061	0.001	0.063	259.74	0.01	0.01
Phase 2-Clean Up	1/4/2024	1/10/2024	5	2024	24	14.7	0.08	0.08	1.06	0.00	0.247	0.001	0.248	0.061	0.001	0.063	257.09	0.01	0.01
Phase 2-Demobilize	1/4/2024	1/10/2024	5	2024	16	14.7	0.05	0.05	0.71	0.00	0.164	0.001	0.165	0.041	0.001	0.042	171.40	0.01	0.00

- Notes:
- 1. Accounts for all exhaust and evaporative processes.
  - 2. Emission factors from EMFAC2021 for LDA/LDT1/LDT2, SCAQMD, Aggregate Model Year, Aggregate Speed, GAS only.

Vendor Onsite

							Running Exhaust Emission Factor (g/mile) <sup>3</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Vendor Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	10	0.27	0.25	6.37	0.86	0.02	333.81	0.04	333.85	33.27	0.03	33.30	2497.70	0.01	0.39
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	6	0.27	0.25	6.37	0.86	0.02	333.81	0.04	333.85	33.27	0.03	33.30	2497.70	0.01	0.39
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	0	0.27	0.25	6.37	0.86	0.02	333.81	0.04	333.85	33.27	0.03	33.30	2497.70	0.01	0.39
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	6	0.27	0.25	6.37	0.86	0.02	333.81	0.04	333.85	33.27	0.03	33.30	2497.70	0.01	0.39
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	10	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	34	0.00	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	6	0.00	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	10	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	6	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	0.27	0.13	5.57	0.58	0.02	333.81	0.03	333.84	33.27	0.03	33.29	2436.61	0.01	0.38
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	6	0.27	0.12	5.44	0.55	0.02	333.81	0.02	333.83	33.27	0.02	33.29	2399.45	0.01	0.38
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	10	0.27	0.12	5.44	0.55	0.02	333.81	0.02	333.83	33.27	0.02	33.29	2399.45	0.01	0.38

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Includes dust control measure of watering exposed areas 3 times per day
  - 3. Emission factors from EMFAC2021 for MHDT/HHDT, SCAQMD, Aggregate Model Year, DSL only

Vendor Onsite

							Non-Running Emission Factors (g/trip) <sup>1,3</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Vendor Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	10	0.27	0.19	4.82	2.76	0.005	-	0.003	0.003	-	0.003	0.003	539.42	0.01	0.08
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	6	0.27	0.19	4.82	2.76	0.005	-	0.003	0.003	-	0.003	0.003	539.42	0.01	0.08
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	0	0.27	0.19	4.82	2.76	0.005	-	0.003	0.003	-	0.003	0.003	539.42	0.01	0.08
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	6	0.27	0.19	4.82	2.76	0.005	-	0.003	0.003	-	0.003	0.003	539.42	0.01	0.08
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	10	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	34	0.00	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	6	0.00	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	10	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	6	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	0.27	0.19	4.67	2.90	0.005	-	0.002	0.002	-	0.002	0.002	516.93	0.01	0.08
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	6	0.27	0.19	4.87	2.89	0.005	-	0.002	0.002	-	0.002	0.002	506.64	0.01	0.08
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	10	0.27	0.19	4.87	2.89	0.005	-	0.002	0.002	-	0.002	0.002	506.64	0.01	0.08

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Includes dust control measure of watering exposed areas 3 times per day
  - 3. Emission factors from EMFAC2021 for MHDT/HHDT, SCAQMD, Aggregate Model Year, DSL only

Vendor Onsite

							Emissions (lb/day) <sup>2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Vendor Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	10	0.27	0.006	0.144	0.066	0.000	0.763	0.000	0.763	0.076	0.000	0.076	26.524	0.000	0.004
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	6	0.27	0.003	0.086	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.914	0.000	0.003
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	6	0.27	0.003	0.086	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.914	0.000	0.003
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	0.27	0.001	0.027	0.013	0.000	0.153	0.000	0.153	0.015	0.000	0.015	5.134	0.000	0.001
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	10	0.27	0.005	0.136	0.067	0.000	0.763	0.000	0.763	0.076	0.000	0.076	25.671	0.000	0.004
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	34	0.00	0.014	0.350	0.218	0.000	-	0.000	0.000	-	0.000	0.000	38.748	0.001	0.006
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	6	0.00	0.002	0.062	0.038	0.000	-	0.000	0.000	-	0.000	0.000	6.838	0.000	0.001
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	10	0.27	0.005	0.136	0.067	0.000	0.763	0.000	0.763	0.076	0.000	0.076	25.671	0.000	0.004
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	6	0.27	0.003	0.081	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.402	0.000	0.002
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	0.27	0.001	0.027	0.013	0.000	0.153	0.000	0.153	0.015	0.000	0.015	5.134	0.000	0.001
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	6	0.27	0.003	0.084	0.040	0.000	0.458	0.000	0.458	0.046	0.000	0.046	15.136	0.000	0.002
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	10	0.27	0.005	0.139	0.067	0.000	0.763	0.000	0.763	0.076	0.000	0.076	25.226	0.000	0.004

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Includes dust control measure of watering exposed areas 3 times per day
  - 3. Emission factors from EMFAC2021 for MHDT/HHDT, SCAQMD, Aggregate Model Year, DSL only

Vendor Offsite

Vendor Offsite							Running Exhaust Emission Factor (g/mile) <sup>2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Vendor		ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
					Trips/day (In/Out)	Trip Length (mi)													
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	10	6.9	0.030	1.912	0.112	0.013	0.385	0.022	0.407	0.101	0.021	0.122	1354.55	0.001	0.213
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	6	6.9	0.030	1.912	0.112	0.013	0.385	0.022	0.407	0.101	0.021	0.122	1354.55	0.001	0.213
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	0	6.9	0.030	1.912	0.112	0.013	0.385	0.022	0.407	0.101	0.021	0.122	1354.55	0.001	0.213
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	6	6.9	0.030	1.912	0.112	0.013	0.385	0.022	0.407	0.101	0.021	0.122	1354.55	0.001	0.213
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	10	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	34	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	10	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	6	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	6.9	0.017	1.416	0.080	0.013	0.384	0.020	0.404	0.101	0.019	0.120	1343.54	0.001	0.212
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	6	6.9	0.016	1.338	0.074	0.013	0.384	0.019	0.403	0.101	0.018	0.119	1332.28	0.001	0.210
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	10	6.9	0.016	1.338	0.074	0.013	0.384	0.019	0.403	0.101	0.018	0.119	1332.28	0.001	0.210

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Emission factors from EMFAC2021 for MHDT/HHDT, SCAQMD, Aggregate Model Year, Aggregate Speed, DSL only

Vendor Offsite

							Non-Running Emission Factors (g/trip) <sup>1,2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Vendor Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	10	6.9	0.190	4.819	2.758	0.005	-	0.003	0.003	-	0.003	0.003	539.415	0.009	0.085
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	6	6.9	0.190	4.819	2.758	0.005	-	0.003	0.003	-	0.003	0.003	539.415	0.009	0.085
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	0	6.9	0.190	4.819	2.758	0.005	-	0.003	0.003	-	0.003	0.003	539.415	0.009	0.085
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	6	6.9	0.190	4.819	2.758	0.005	-	0.003	0.003	-	0.003	0.003	539.415	0.009	0.085
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	10	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	34	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	10	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	6	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	6.9	0.188	4.668	2.904	0.005	-	0.002	0.002	-	0.002	0.002	516.933	0.009	0.081
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	6	6.9	0.187	4.869	2.892	0.005	-	0.002	0.002	-	0.002	0.002	506.641	0.009	0.080
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	10	6.9	0.187	4.869	2.892	0.005	-	0.002	0.002	-	0.002	0.002	506.641	0.009	0.080

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Emission factors from EMFAC2021 for MHDT/HHDT, SCAQMD, Aggregate Model Year, Aggregate Speed, DSL only

Vendor Offsite

Vendor Offsite							Emissions (lb/day)												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Vendor	Trip Length (mi)													
					Trips/day (In/Out)		ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	10	6.9	0.009	0.397	0.078	0.002	0.059	0.003	0.062	0.015	0.003	0.019	217.947	0.000	0.034
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	6	6.9	0.005	0.238	0.047	0.001	0.035	0.002	0.037	0.009	0.002	0.011	130.768	0.000	0.021
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	0	6.9	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	6	6.9	0.005	0.238	0.047	0.001	0.035	0.002	0.037	0.009	0.002	0.011	130.768	0.000	0.021
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	6.9	0.001	0.064	0.015	0.000	0.012	0.001	0.012	0.003	0.001	0.004	43.155	0.000	0.007
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	10	6.9	0.007	0.318	0.076	0.002	0.058	0.003	0.061	0.015	0.003	0.018	215.775	0.000	0.034
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	34	6.9	0.023	1.082	0.259	0.007	0.199	0.010	0.209	0.052	0.010	0.062	733.636	0.001	0.116
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	10	6.9	0.007	0.318	0.076	0.002	0.058	0.003	0.061	0.015	0.003	0.018	215.775	0.000	0.034
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	6	6.9	0.004	0.191	0.046	0.001	0.035	0.002	0.037	0.009	0.002	0.011	129.465	0.000	0.020
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	6.9	0.001	0.064	0.015	0.000	0.012	0.001	0.012	0.003	0.001	0.004	43.155	0.000	0.007
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	6	6.9	0.004	0.186	0.045	0.001	0.035	0.002	0.037	0.009	0.002	0.011	128.301	0.000	0.020
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	10	6.9	0.007	0.311	0.075	0.002	0.058	0.003	0.061	0.015	0.003	0.018	213.835	0.000	0.034

- Notes:
- 1. Accounts for all exhaust and evaporative processes
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Haul Onsite

Haul Onsite							Running Exhaust Emission Factor (g/mile) <sup>3</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Haul	Trip Length (mi) <sup>1</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
					Trips/day (In/Out)						Fugitive	Exhaust	Total	Fugitive	Exhaust	Total			
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	0.27	0.25	9.19	1.19	0.03	333.86	0.02	333.88	33.29	0.02	33.30	2967.71	0.01	0.47
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	2	0.27	0.25	9.19	1.19	0.03	333.86	0.02	333.88	33.29	0.02	33.30	2967.71	0.01	0.47
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	6	0.27	0.25	9.19	1.19	0.03	333.86	0.02	333.88	33.29	0.02	33.30	2967.71	0.01	0.47
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	114	0.27	0.25	9.19	1.19	0.03	333.86	0.02	333.88	33.29	0.02	33.30	2967.71	0.01	0.47
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	64	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	64	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	0.00	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	0.00	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	2	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	48	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	50	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	50	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	0.27	0.08	8.23	0.76	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2859.45	0.00	0.45
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	0.27	0.08	8.14	0.73	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2795.48	0.00	0.44
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	0.27	0.08	8.14	0.73	0.03	333.86	0.01	333.87	33.28	0.01	33.30	2795.48	0.00	0.44

- Notes:
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  - 2. Includes dust control measure of watering exposed areas
  - 3. Emission factors from EMFAC2021 for HHDT, SCAQMD, Aggregate Model Year, Aggregate Speed, DSL only



Haul Onsite

							Non-Running Emission Factors (g/trip) <sup>1,3</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Haul Trips/day (In/Out)	Trip Length (mi) <sup>1</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	0.27	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	2	0.27	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	6	0.27	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	114	0.27	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	64	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	64	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	0.00	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	0.00	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	2	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	48	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	50	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	50	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	0.27	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	0.27	0.36	7.10	5.18	0.01	-	0.002	0.002	-	0.002	0.002	834.07	0.02	0.13
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	0.27	0.36	7.10	5.18	0.01	-	0.002	0.002	-	0.002	0.002	834.07	0.02	0.13

- Notes:
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  - 3. Emission factors from EMFAC2021 for HHDT, SCAQMD, Aggregate Model Year, Aggregate Speed, DSL only

Haul Onsite

							Emissions (lb/day) <sup>2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Haul Trips/day (In/Out)	Trip Length (mi) <sup>1</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	2	0.27	0.00	0.04	0.02	0.00	0.153	0.000	0.153	0.015	0.000	0.015	7.41	0.00	0.00
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	6	0.27	0.01	0.13	0.07	0.00	0.458	0.000	0.458	0.046	0.000	0.046	22.24	0.00	0.00
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	114	0.27	0.11	2.38	1.32	0.00	8.696	0.002	8.698	0.867	0.002	0.869	422.57	0.00	0.07
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	64	0.27	0.05	1.27	0.76	0.00	4.882	0.001	4.883	0.487	0.001	0.487	227.59	0.00	0.04
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	64	0.27	0.05	1.27	0.76	0.00	4.882	0.001	4.883	0.487	0.001	0.487	227.59	0.00	0.04
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	0.27	0.00	0.04	0.02	0.00	0.153	0.000	0.153	0.015	0.000	0.015	7.11	0.00	0.00
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	2	0.27	0.00	0.04	0.02	0.00	0.153	0.000	0.153	0.015	0.000	0.015	7.11	0.00	0.00
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	48	0.27	0.04	0.95	0.57	0.00	3.661	0.001	3.662	0.365	0.001	0.366	170.69	0.00	0.03
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	50	0.27	0.04	0.99	0.60	0.00	3.814	0.001	3.814	0.380	0.001	0.381	177.81	0.00	0.03
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	50	0.27	0.04	0.99	0.60	0.00	3.814	0.001	3.814	0.380	0.001	0.381	177.81	0.00	0.03
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	0.27	0.00	0.04	0.02	0.00	0.153	0.000	0.153	0.015	0.000	0.015	7.11	0.00	0.00
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Includes dust control measure of watering exposed areas
  - 3. Emission factors from EMFAC2021 for HHDT, SCAQMD, Aggregate Model Year, Aggregate Speed, DSL only

Haul Offsite

Haul Offsite							Running Exhaust Emission Factor (g/mile) <sup>2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Haul	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
					Trips/day (In/Out)						Fugitive	Exhaust	Total	Fugitive	Exhaust	Total			
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	20.0	0.03	2.46	0.12	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1617.59	0.00	0.25
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	2	188.9	0.03	2.46	0.12	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1617.59	0.00	0.25
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	6	20.0	0.03	2.46	0.12	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1617.59	0.00	0.25
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	114	20.0	0.03	2.46	0.12	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1617.59	0.00	0.25
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	64	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	64	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	6.9	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	2	45.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	48	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	50	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	50	20.0	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	6.9	0.01	1.83	0.08	0.02	0.41	0.03	0.44	0.11	0.03	0.14	1598.26	0.00	0.25
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	20.0	0.01	1.75	0.07	0.01	0.41	0.03	0.44	0.11	0.03	0.14	1577.91	0.00	0.25
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	20.0	0.01	1.75	0.07	0.01	0.41	0.03	0.44	0.11	0.03	0.14	1577.91	0.00	0.25

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Emission factors from EMFAC2021 for HHDT, SCAQMD, Aggregate Model Year, DSL only

Haul Offsite

							Non-Running Emission Factors (g/trip) <sup>1,2</sup>												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Haul Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	20.0	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	2	188.9	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	6	20.0	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	114	20.0	0.36	7.01	4.94	0.01	-	0.003	0.003	-	0.002	0.002	892.75	0.02	0.14
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	64	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	64	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	6.9	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	2	45.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	48	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	50	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	50	20.0	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	6.9	0.36	6.80	5.20	0.01	-	0.002	0.002	-	0.002	0.002	853.21	0.02	0.13
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	20.0	0.36	7.10	5.18	0.01	-	0.002	0.002	-	0.002	0.002	834.07	0.02	0.13
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	20.0	0.36	7.10	5.18	0.01	-	0.002	0.002	-	0.002	0.002	834.07	0.02	0.13

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Emission factors from EMFAC2021 for HHDT, SCAQMD, Aggregate Model Year, DSL only

Haul Offsite

							Emissions (lb/day)												
Phase Name	Start Date	End Date	Total Days	Year	# of One-way Haul Trips/day (In/Out)	Trip Length (mi)	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1-Mobilize	8/3/22	8/9/22	5	2022	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Lead and Asbestos Removal	8/10/22	11/22/22	75	2022	2	188.9	0.03	2.08	0.12	0.01	0.35	0.02	0.37	0.09	0.02	0.11	1351.15	0.00	0.21
Phase 1-Wharf Demolition	11/23/22	11/29/22	5	2022	6	20.0	0.01	0.74	0.10	0.00	0.11	0.01	0.12	0.03	0.01	0.04	439.75	0.00	0.07
Phase 1-Building Demolition	11/30/22	2/21/23	60	2022	114	20.0	0.24	14.11	1.83	0.08	2.08	0.14	2.23	0.55	0.14	0.69	8355.30	0.01	1.32
Phase 1-Grading/Compaction	2/22/23	3/21/23	20	2023	64	20.0	0.09	6.11	0.95	0.04	1.16	0.08	1.24	0.31	0.07	0.38	4630.57	0.00	0.73
Phase 1-Install Crushed Misc Base	3/22/23	4/18/23	20	2023	64	20.0	0.09	6.11	0.95	0.04	1.16	0.08	1.24	0.31	0.07	0.38	4630.57	0.00	0.73
Phase 1-Perimeter Lighting and Fencing	4/19/23	5/30/23	30	2023	2	6.9	0.00	0.09	0.03	0.00	0.01	0.00	0.01	0.00	0.00	0.00	52.39	0.00	0.01
Phase 1-Clean Up	5/31/23	6/6/23	5	2023	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 1-Demobilize	6/7/23	6/13/23	5	2023	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Concrete Pad at Phase 1 Site	6/15/23	6/28/23	10	2023	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Install Canopy at Phase 1 Site	6/29/23	7/26/23	20	2023	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Mobilize	7/27/23	8/2/23	5	2023	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Lead and Asbestos Removal	8/3/23	9/13/23	30	2023	2	45.0	0.00	0.39	0.04	0.00	0.08	0.01	0.09	0.02	0.01	0.03	320.88	0.00	0.05
Phase 2-Building Demolition	9/14/23	11/22/23	50	2023	48	20.0	0.07	4.58	0.71	0.03	0.87	0.06	0.93	0.23	0.05	0.29	3472.93	0.00	0.55
Phase 2-Grading/Compaction	11/23/23	12/6/23	10	2023	50	20.0	0.07	4.77	0.74	0.03	0.91	0.06	0.97	0.24	0.06	0.30	3617.64	0.00	0.57
Phase 2-Install Crushed Misc Base	12/7/23	12/20/23	10	2023	50	20.0	0.07	4.77	0.74	0.03	0.91	0.06	0.97	0.24	0.06	0.30	3617.64	0.00	0.57
Phase 2-Perimeter Lighting and Fencing	12/21/23	1/3/24	10	2023	2	6.9	0.00	0.09	0.03	0.00	0.01	0.00	0.01	0.00	0.00	0.00	52.39	0.00	0.01
Phase 2-Clean Up	1/4/24	1/10/24	5	2024	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-
Phase 2-Demobilize	1/4/24	1/10/24	5	2024	0	20.0	-	-	-	-	-	-	-	-	-	-	-	-	-

- Notes:
- 1. Accounts for all exhaust and evaporative processes
  - 2. Emission factors from EMFAC2021 for HHDT, SCAQMD, Aggregate Model Year, DSL only

Project Name: POLA Star-Kist  
Project Size: 13 acres  
-Construction Days per week5

Dust Control

Water Exposed Area	Reduction (%)	Truck Trips
Dust Control Reduction (Water 3x per day: 3.2-hr interval)	61%	6
Dust Control Reduction (Water 4x per day: 2.1-hr interval)	74%	8
Valued used in analysis	61%	

Construction Schedule<sup>2</sup>

								Offsite Trip Length (mi) <sup>1</sup>			Onsite Trip Length (mi)	Vehicle Class		
Phase Name	Start Date	End Date	# of Workdays	# of Worker Trips/day <sup>2</sup>	# of Vendor Trips/day	Total # of One-Way Haul Trucks	One-Way Haul Trips/day	Worker	Vendor	Haul	ONSITE (Vendor & Haul)	Worker	Vendor	Haul
Phase 1-Mobilize	8/3/2022	8/9/2022	5	16	10	0	0	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Lead and Asbestos Removal	8/10/2022	11/22/2022	75	48	6	140	2	14.7	6.9	189	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Wharf Demolition	11/23/2022	11/29/2022	5	16	0	22	6	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Building Demolition	11/30/2022	2/21/2023	60	48	6	6,760	114	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Grading/Compaction	2/22/2023	3/21/2023	20	24	6	1,270	64	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Install Crushed Misc Base	3/22/2023	4/18/2023	20	24	6	1,250	64	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Perimeter Lighting and Fencing	4/19/2023	5/30/2023	30	24	2	14	2	14.7	6.9	6.9	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Clean Up	5/31/2023	6/6/2023	5	24	6	0	0	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 1-Demobilize	6/7/2023	6/13/2023	5	16	10	0	0	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	22	34	0	0	14.7	6.9	20	0.00	LD_Mix	HDT_Mix	HHDT
Phase 2-Install Canopy at Phase 1 Site	6/29/2023	7/26/2023	20	48	6	0	0	14.7	6.9	20	0.00	LD_Mix	HDT_Mix	HHDT
Phase 2-Mobilize	7/27/2023	8/2/2023	5	16	10	0	0	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Lead and Asbestos Removal	8/3/2023	9/13/2023	30	48	6	42	2	14.7	6.9	45	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Building Demolition	9/14/2023	11/22/2023	50	24	6	2,316	48	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Grading/Compaction	11/23/2023	12/6/2023	10	24	6	500	50	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Install Crushed Misc Base	12/7/2023	12/20/2023	10	24	6	500	50	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Perimeter Lighting and Fencing	12/21/2023	1/3/2024	10	24	2	14	2	14.7	6.9	6.9	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Clean Up	1/4/2024	1/10/2024	5	24	6	0	0	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
Phase 2-Demobilize	1/4/2024	1/10/2024	5	16	10	0	0	14.7	6.9	20	0.27	LD_Mix	HDT_Mix	HHDT
												LD_Mix	LDA, LDT1, LDT2	
												HDT_Mix	MHDT/HHDT	
												HHDT	HHDT	

Concrete Amounts

Parameter	Value
Total Volume (ft <sup>3</sup> ) <sup>2</sup>	3,000
Total Volume (CY)	112
Concrete Truck Capacity (CY/truck)	8
# of Trucks Required	14
# Truck Truck Trips (In/Out)	28

Notes:

- 1 Trip lengths based on CalEEMod default values for SCAQMD
- 2 Based on information provided by applicant
- 3 Distributed concrete needs evenly among Phase 1 and Phase 2

**Construction Workers**

Phase Name	# of Workdays	Duration
Phase 2-Concrete Pad at Phase 1 Site	10	2 weeks
Phase 2-Install Canopy at Phase 1 Site	20	4 weeks

Equipment	Equipment Type	Quantity	Hours per Day	Workers per Equipment	# of Workers	# of One-Way Worker Trips per Day (In/Out)
Phase 2-Concrete Pad at Phase 1 Site	Cement and Mortar Mixers	3	8	1.25	3.75	8
Phase 2-Concrete Pad at Phase 1 Site	Pumps	3	8	1.25	3.75	8
Phase 2-Concrete Pad at Phase 1 Site	Tractors/Loaders/Backhoes	1	8	2.25	2.25	6
Phase 2-Install Canopy at Phase 1 Site	Cranes	1	8	1.25	1.25	4
Phase 2-Install Canopy at Phase 1 Site	Forklifts	1	8	1.25	1.25	4
Phase 2-Install Canopy at Phase 1 Site	Generator Sets	1	8	1.25	1.25	4
Phase 2-Install Canopy at Phase 1 Site	Tractors/Loaders/Backhoes	1	8	1.25	1.25	4
Phase 2-Install Canopy at Phase 1 Site	Welders	3	8	1.25	3.75	8
Phase 2-Install Canopy at Phase 1 Site	Pavers	1	8	2.25	2.25	6
Phase 2-Install Canopy at Phase 1 Site	Paving Equipment	1	8	3.25	3.25	8
Phase 2-Install Canopy at Phase 1 Site	Rollers	1	8	4.25	4.25	10
Phase Name	# of One-Way Worker Trips per Day (In/Out)					
Phase 2-Concrete Pad at Phase 1 Site	22					
Phase 2-Install Canopy at Phase 1 Site	48					

Construction Assumptions for Concrete Pad and Canopy at Phase 1 Site

Note: This construction would occur prior to any construction activites at Phase 2 site

Schedule

Phase Name	# of Workdays	Duration
Phase 2-Concrete Pad at Phase 1 Site	10	2 weeks
Phase 2-Install Canopy at Phase 1 Site	20	4 weeks

Equipment

Phase Name	Equipment Type	Quantity	Hours per Day
Phase 2-Concrete Pad at Phase 1 Site	Cement and Mortar Mixers	3	8
Phase 2-Concrete Pad at Phase 1 Site	Pumps	3	8
Phase 2-Concrete Pad at Phase 1 Site	Tractors/Loaders/Backhoes	1	8
Phase 2-Install Canopy at Phase 1 Site	Cranes	1	8
Phase 2-Install Canopy at Phase 1 Site	Forklifts	1	8
Phase 2-Install Canopy at Phase 1 Site	Generator Sets	1	8
Phase 2-Install Canopy at Phase 1 Site	Tractors/Loaders/Backhoes	1	8
Phase 2-Install Canopy at Phase 1 Site	Welders	3	8
Phase 2-Install Canopy at Phase 1 Site	Pavers	1	8
Phase 2-Install Canopy at Phase 1 Site	Paving Equipment	1	8
Phase 2-Install Canopy at Phase 1 Site	Rollers	1	8

Concrete Pad Dimensions for Canopy

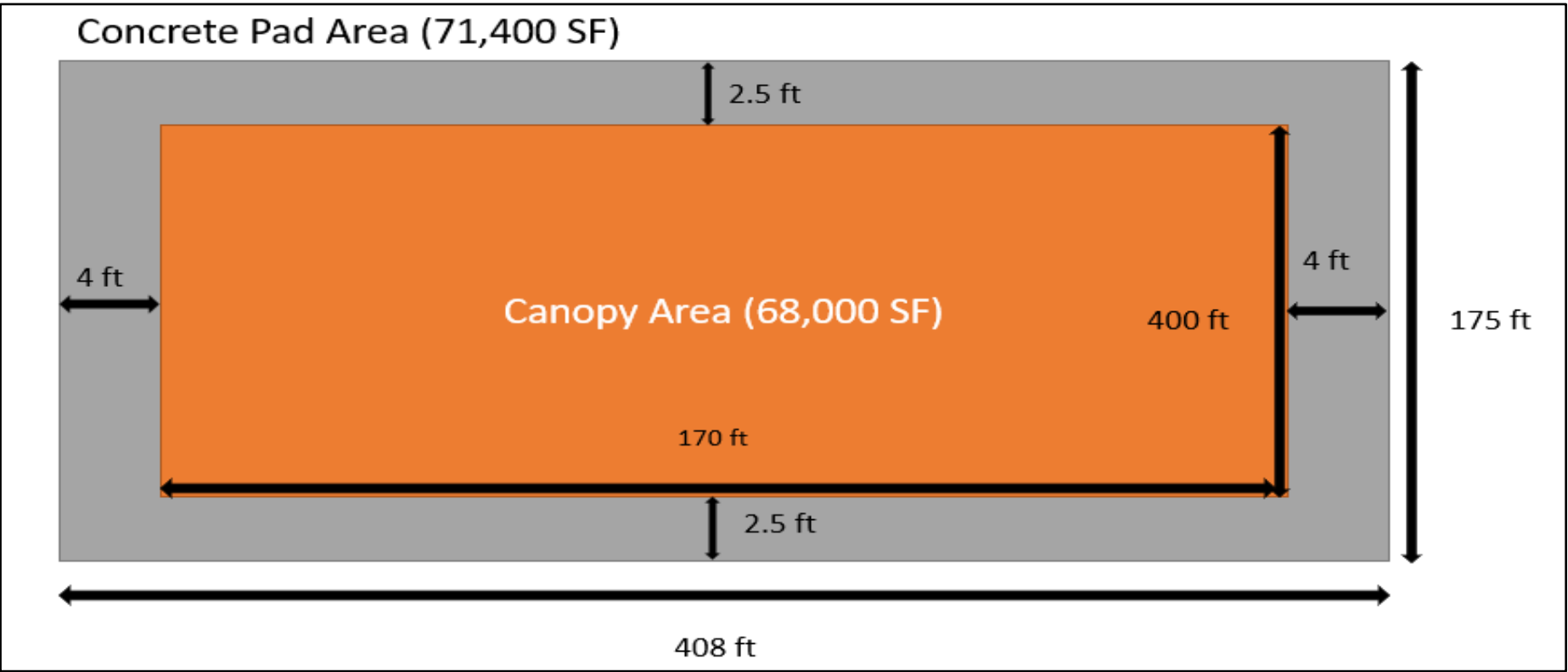
Phase Name	Start Date	End Date	# of Workdays	Canopy Length (ft) <sup>1</sup>	Canopy Width (ft) <sup>1</sup>	Canopy Area (ft <sup>2</sup> )	Contingency (%) <sup>2</sup>	Total Concrete Pad Area (ft <sup>2</sup> )	Depth of Pad (ft)	Volume (ft <sup>3</sup> )	Volume (CY)	Concrete Truck Capacity (CY/Truck)	# of Concrete Trucks	# of Trucks per Day	# of Trucks One-Way Trips per Day (In/Out)
Phase 2-Concrete Pad at Phase 1 Site	6/15/2023	6/28/2023	10	400	170	68,000	5%	71,400	0.50	35,700	1,322	8	166	17	34

Notes:

Concrete Pad Area with Contingency

Parameter	Length (ft)	Width (ft)	Area (ft <sup>2</sup> )
Actual Concrete Pad Dimensions	408	175	71400
Additional footage beyond canopy area	8	5	
Additional footage on each side	4	2.5	

1. Canopy dimensions provided by applicant.
2. Although the canopy has a dimension of 68,000 SF, the concrete pad may extend beyond the perimeter of canopy area. Conservatively added 5 percent contingency to account for any extra concrete needed beyond canopy dimensions.





<b>STRUCTURE DEMOLITION QUANTITIES<sup>2</sup></b>	<b>Phase 1-Lead and Asbestos Removal</b>	<b>Phase 1-Wharf Demolition</b>	<b>Phase 1-Building Demolition</b>	<b>Phase 2-Lead and Asbestos Removal</b>	<b>Phase 2-Building Demolition</b>
<b>Parameter</b>	<b>Value</b>	<b>Value</b>	<b>Value</b>	<b>Value</b>	<b>Value</b>
Existing Building Area (ft <sup>2</sup> ) <sup>1</sup>		2,254	365,000		125,000
Building Height (ft) <sup>3</sup>	10	10	20	10	20
Building Volume (ft <sup>3</sup> )	0	22,540	7,300,000	0	2,500,000
Building Waste Conversion (1 ft <sup>3</sup> building volume/0.25 ft <sup>3</sup> waste volume) <sup>2</sup>	0.25	0.25	0.25	0.25	0.25
Building Waste Volume (ft <sup>3</sup> )	0	5,635	1,825,000	0	625,000
Building Waste Volume (CY)	1,391	209	67,593	415	23,148
Haul Truck Capacity (CY) <sup>1</sup>	20	20	20	20	20
# of Trucks Required	70	10	3,380	21	1,157
<b>Total One-Way Truck Trips</b>	<b>140</b>	<b>22</b>	<b>6,760</b>	<b>42</b>	<b>2,316</b>
Debris Density (ton/CY) <sup>2</sup>	0.50	0.50	0.50	0.50	0.50
<b>Debris Weight (tons)</b>	<b>695</b>	<b>104</b>	<b>33,796</b>	<b>208</b>	<b>11,574</b>

#### Demolition Weight

<b>Phase</b>	<b>Tons</b>
Phase 1-Lead and Asbestos Removal	695.41
Phase 1-Wharf Demolition	104.35
Phase 1-Building Demolition	33,796.30
Phase 2-Lead and Asbestos Removal	207.53
Phase 2-Building Demolition	11,574.07

#### Notes

- 1 [Client Provided Information](#)
- 2 CalEEMod User's Guide, Appendix A, p.13
- 3 Accounted for two story building heights

**Import/Export Quantities**

<b>Phase Name</b>	<b>Import (CY)</b>	<b>Export (CY)</b>	<b>Truck Capacity (CY/truck)</b>	<b># of Trucks Required</b>	<b># of Trucks Trips (In/Out)</b>
Phase 1-Mobilize			16	0	0
Phase 1-Lead and Asbestos Removal			16	0	0
Phase 1-Wharf Demolition			16	0	0
Phase 1-Building Demolition			16	0	0
Phase 1-Grading/Compaction		10,150	16	635	1,270
Phase 1-Install Crushed Misc Base	10,000		16	625	1,250
Phase 1-Perimeter Lighting and Fencing			16	0	0
Phase 1-Clean Up			16	0	0
Phase 1-Demobilize			16	0	0
Phase 2-Mobilize			16	0	0
Phase 2-Lead and Asbestos Removal			16	0	0
Phase 2-Building Demolition			16	0	0
Phase 2-Grading/Compaction		4,000	16	250	500
Phase 2-Install Crushed Misc Base	4,000		16	250	500
Phase 2-Perimeter Lighting and Fencing			16	0	0
Phase 2-Clean Up			16	0	0
Phase 2-Demobilize			16	0	0

Grading Quantities

Construction Phase	Total Area (ft <sup>2</sup> )	Depth (ft)	Total Volume (ft <sup>3</sup> )	Total Volume (CY)
Phase 1-Grading/Compaction	380,000	2	760,000	28,148
Phase 2-Grading/Compaction	150,000	2	300,000	11,111

## **B-2: Operations AQ & GHG Emissions**

**Regional Emissions Summary**

	Daily Emissions (lb/day)					
Source	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total
Employees	0.13	0.14	1.86	0.00	0.47	0.12
Fuel Trucks	0.003	0.15	0.04	0.00	0.03	0.01
Drayage Trucks-Onsite	0.19	6.13	2.76	0.01	0.11	0.03
Drayage Trucks-Offsite	0.23	14.92	3.38	0.09	2.30	0.66
Cargo Handling Equipment	3.08	16.45	19.48	0.05	0.27	0.24
<b>Project Total</b>	<b>3.63</b>	<b>37.79</b>	<b>27.52</b>	<b>0.15</b>	<b>3.17</b>	<b>1.06</b>
SCAQMD Regional Thresholds	55	55	550	150	150	55
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Phase 1 Regional Emissions**

	Daily Emissions (lb/day)					
Source	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total
Employees	0.13	0.14	1.86	0.00	0.47	0.12
Fuel Trucks	0.00	0.15	0.04	0.00	0.03	0.01
Drayage Trucks-Onsite	0.13	4.53	1.93	0.01	0.09	0.03
Drayage Trucks-Offsite	0.16	10.16	2.30	0.06	1.57	0.45
Cargo Handling Equipment	3.08	16.45	19.48	0.05	0.27	0.24
<b>Phase 1 Operations Total</b>	<b>3.50</b>	<b>31.43</b>	<b>25.61</b>	<b>0.12</b>	<b>2.42</b>	<b>0.84</b>

**Localized Emissions Summary**

Source	Daily Emissions (lb/day)			
	NOX	CO	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total
Employees	0.01	0.19	0.05	0.01
Fuel Trucks	0.02	0.00	0.00	0.00
Drayage Trucks-Onsite	6.13	2.76	0.11	0.03
Drayage Trucks-Offsite	0.00	0.00	0.00	0.00
Cargo Handling Equipment	16.45	19.48	0.27	0.24
<b>Total</b>	<b>22.61</b>	<b>22.43</b>	<b>0.42</b>	<b>0.29</b>
SCAQMD Localized Thresholds	118	1,982	10	3
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Localized Thresholds based on a 5-acre site with a receptor distance of 50 meters in  
SRA 4: South Coastal LA County

GHG Emissions Summary

Source	MTCO <sub>2</sub> e
Employees	83.25
Fuel Trucks	16.63
Drayage Trucks-Onsite	207.90
Drayage Trucks-Offsite	1,563.21
Cargo Handling Equipment	749.22
Electricity	63.87
Construction	48.87
<b>Total Emissions</b>	<b>2,732.95</b>
GHG Significance Threshold	10,000
<b>Exceeds Threshold?</b>	<b>No</b>

Employees					Running Exhaust Emission Factor (g/mile) <sup>5</sup>												
Annual Days of Operation	Year	Daily Employees <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
365	2023	20	40	16.6	0.021	0.077	1.057	0.003	0.317	0.002	0.318	0.079	0.001	0.080	335.681	0.005	0.007

Notes:

1) Daily employees based on information in Project Description

2) Trip length based on CalEEMod default value for Commercial-Work trip

3) Accounts for all exhaust (idling/starting) and evaporative processes

4) Global Warming Potentials based on IPCC AR4

5) Emission factors based on EMFAC2021, LDA, LDT1, LDT2, MCY, & MDV vehicle categories, gasoline only



Employees					Non-Running Emission Factors (g/trip) <sup>3,5</sup>												
Annual Days of Operation	Year	Daily Employees <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>					PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>			
					ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	Fugitive	Exhaust	Total	Fugitive	Exhaust	Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
365	2023	20	40	16.6	1.145	0.317	3.544	0.001	0.000	0.002	0.002	0.000	0.002	0.002	82.267	0.083	0.036

Notes:

1) Daily employees based on information in Project Description

2) Trip length based on CalEEMod default value for Commercial-Work trip

3) Accounts for all exhaust (idling/starting) and evaporative processes

4) Global Warming Potentials based on IPCC AR4

5) Emission factors based on EMFAC2021, LDA, LDT1, LDT2, MCY, & MDV vehicle categories, gasoline only

Employees					Daily Emissions (lb/day)												
Annual Days of Operation	Year	Daily Employees <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
365	2023	20	40	16.6	0.13	0.14	1.86	0.00	0.46	0.00	0.47	0.11	0.00	0.12	498.65	0.01	0.01

Notes:

1) Daily employees based on information in Project Description

2) Trip length based on CalEEMod default value for Commercial-Work trip

3) Accounts for all exhaust (idling/starting) and evaporative processes

4) Global Warming Potentials based on IPCC AR4

5) Emission factors based on EMFAC2021, LDA, LDT1, LDT2, MCY, & MDV vehicle categories, gasoline only

Employees					Annual Emissions (MT) <sup>4</sup>			
Annual Days of Operation	Year	Daily Employees <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
365	2023	20	40	16.6	82.56	0.00	0.00	83.25

Notes:

1) Daily employees based on information in Project Description

2) Trip length based on CalEEMod default value for Commercial-Work trip

3) Accounts for all exhaust (idling/starting) and evaporative processes

4) Global Warming Potentials based on IPCC AR4

5) Emission factors based on EMFAC2021, LDA, LDT1, LDT2, MCY, & MDV vehicle categories, gasoline only

Fuel Trucks					Running Exhaust Emission Factor (g/mile) <sup>5</sup>												
Annual Days of Operations	Year	Daily Fuel Trucks <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
365	2023	2	4	7	0.016	1.601	0.078	0.014	0.397	0.023	0.420	0.110	0.026	0.135	1458.750	0.001	0.230

- Notes:
- 1) Assumes 1 diesel fuel truck and 1 propane fuel truck per day
  - 2) Trip length provided by applicant.
  - 3) Accounts for all exhaust (idling/starting) and evaporative processes
  - 4) Global Warming Potentials based on IPCC AR4
  - 5) Emission factors based on EMFAC2021, HHDT/MHDT vehicle categories, diesel only

Fuel Trucks					Non-Running Emission Factors (g/trip) <sup>3,5</sup>												
Annual Days of Operations	Year	Daily Fuel Trucks <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
365	2023	2	4	7	0.265	5.919	3.945	0.006	0.000	0.002	0.002	0.000	0.002	0.002	669.032	0.012	0.105

- Notes:
- 1) Assumes 1 diesel fuel truck and 1 propane fuel truck per day
  - 2) Trip length provided by applicant.
  - 3) Accounts for all exhaust (idling/starting) and evaporative processes
  - 4) Global Warming Potentials based on IPCC AR4
  - 5) Emission factors based on EMFAC2021, HHDT/MHDT vehicle categories, diesel only

Fuel Trucks					Daily Emissions (lb/day)												
Annual Days of Operations	Year	Daily Fuel Trucks <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
365	2023	2	4	7	0.00	0.15	0.04	0.00	0.02	0.00	0.03	0.01	0.00	0.01	95.95	0.00	0.02

- Notes:
- 1) Assumes 1 diesel fuel truck and 1 propane fuel truck per day
  - 2) Trip length provided by applicant.
  - 3) Accounts for all exhaust (idling/starting) and evaporative processes
  - 4) Global Warming Potentials based on IPCC AR4
  - 5) Emission factors based on EMFAC2021, HHDT/MHDT vehicle categories, diesel only

Fuel Trucks					Annual Emissions (MT) <sup>4</sup>			
Annual Days of Operations	Year	Daily Fuel Trucks <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
365	2023	2	4	7	15.89	0.00	0.00	16.63

- Notes:
- 1) Assumes 1 diesel fuel truck and 1 propane fuel truck per day
  - 2) Trip length provided by applicant.
  - 3) Accounts for all exhaust (idling/starting) and evaporative processes
  - 4) Global Warming Potentials based on IPCC AR4
  - 5) Emission factors based on EMFAC2021, HHDT/MHDT vehicle categories, diesel only

Onsite Drayage Trucks

							Running Exhaust Emission Factor (g/mile) <sup>3,4</sup>												
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1	383,064	2023	5	365	490	86	0.11	10.40	1.37	0.03	0.47	0.01	0.48	0.13	0.01	0.14	3464.11	0.01	0.55
Phase 2	179,466	2023	5	365	230	17	0.11	10.40	1.37	0.03	0.47	0.01	0.48	0.13	0.01	0.14	3464.11	0.01	0.55
Total	562,530				720	103													

Notes:

- 1) Information based on Project Description
- 2) Onsite speed, trips, and VMT information provided from applicant
- 3) Emission factors from EMFAC2021
- 4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel only
- 5) Accounts for all exhaust (idling/starting) and evaporative processes
- 6) Daily emissions account for 1 idling event and 1 engine start onsite
- 7) Global Warming Potentials based on IPCC AR4

VMT = vehicle miles traveled



Onsite Drayage Trucks

							Non-Running Emission Factors (g/trip) <sup>3,4,5</sup>												
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1	383,064	2023	5	365	490	86	0.21	4.75	3.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	520.23	0.01	0.08
Phase 2	179,466	2023	5	365	230	17	0.21	4.75	3.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	520.23	0.01	0.08
Total	562,530				720	103													

Notes:

1) Information based on Project Description

2) Onsite speed, trips, and VMT information provided from applicant

3) Emission factors from EMFAC2021

4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel onl

5) Accounts for all exhaust (idling/starting) and evaporative processes

6) Daily emissions account for 1 idling event and 1 engine start onsite

7) Global Warming Potentials based on IPCC AR4

VMT = vehicle miles traveled

Onsite Drayage Trucks

							Daily Emissions (lb/day) <sup>6</sup>												
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1	383,064	2023	5	365	490	86	0.13	4.53	1.93	0.01	0.09	0.00	0.09	0.02	0.00	0.03	935.88	0.01	0.15
Phase 2	179,466	2023	5	365	230	17	0.06	1.60	0.83	0.00	0.02	0.00	0.02	0.00	0.00	0.01	263.33	0.00	0.04
Total	562,530				720	103	0.19	6.13	2.76	0.01	0.11	0.00	0.11	0.03	0.00	0.03	1,199.20	0.01	0.19

Notes:

1) Information based on Project Description

2) Onsite speed, trips, and VMT information provided from applicant

3) Emission factors from EMFAC2021

4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel onl

5) Accounts for all exhaust (idling/starting) and evaporative processes

6) Daily emissions account for 1 idling event and 1 engine start onsite

7) Global Warming Potentials based on IPCC AR4

VMT = vehicle miles traveled

Onsite Drayage Trucks

							Annual Emissions (MT) <sup>7</sup>			
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Phase 1	383,064	2023	5	365	490	86	154.94	0.00	0.02	162.25
Phase 2	179,466	2023	5	365	230	17	43.60	0.00	0.01	45.65
Total	562,530				720	103	198.54	0.00	0.03	207.90

Notes:

- 1) Information based on Project Description
- 2) Onsite speed, trips, and VMT information provided from applicant
- 3) Emission factors from EMFAC2021
- 4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel onl
- 5) Accounts for all exhaust (idling/starting) and evaporative processes
- 6) Daily emissions account for 1 idling event and 1 engine start onsite
- 7) Global Warming Potentials based on IPCC AR4

VMT = vehicle miles traveled

Offsite Drayage Trucks

							Running Exhaust Emission Factor (g/mile) <sup>3,4</sup>												
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1	383,064	2023	30	365	490	1512	0.01	2.28	0.19	0.02	0.46	0.01	0.47	0.13	0.01	0.13	1757.73	0.00	0.28
Phase 2	179,466	2023	30	365	230	709	0.01	2.28	0.19	0.02	0.46	0.01	0.47	0.13	0.01	0.13	1757.73	0.00	0.28
Total	562,530				720	2221													

- Notes:
- 1) Information based on Project Description
  - 2) Onsite speed, trips, and VMT information provided from applicant
  - 3) Emission factors from EMFAC2021
  - 4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel only
  - 5) Accounts for all exhaust (idling/starting) and evaporative processes
  - 6) Daily emissions account for 1 idling event and 1 engine start offsite
  - 7) Global Warming Potentials based on IPCC AR4
  - 8) VMT represents total VMT from inbound and outbound trips
- VMT = vehicle miles traveled

Offsite Drayage Trucks

							Non-Running Emission Factors (g/trip) <sup>3,4,5</sup>												
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1	383,064	2023	30	365	490	1512	0.21	4.75	3.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	520.23	0.01	0.08
Phase 2	179,466	2023	30	365	230	709	0.21	4.75	3.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	520.23	0.01	0.08
Total	562,530				720	2221													

- Notes:
- 1) Information based on Project Description
  - 2) Onsite speed, trips, and VMT information provided from applicant
  - 3) Emission factors from EMFAC2021
  - 4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel onl
  - 5) Accounts for all exhaust (idling/starting) and evaporative processes
  - 6) Daily emissions account for 1 idling event and 1 engine start offsite
  - 7) Global Warming Potentials based on IPCC AR4
  - 8) VMT represents total VMT from inbound and outbound trips
- VMT = vehicle miles traveled

Offsite Drayage Trucks

							Daily Emissions (lb/day) <sup>6</sup>												
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Phase 1	383,064	2023	30	365	490	1512	0.16	10.16	2.30	0.06	1.54	0.02	1.57	0.42	0.02	0.45	6,140.23	0.01	0.97
Phase 2	179,466	2023	30	365	230	709	0.07	4.76	1.08	0.03	0.72	0.01	0.73	0.20	0.01	0.21	2,877.96	0.00	0.45
Total	562,530				720	2221	0.23	14.92	3.38	0.09	2.27	0.03	2.30	0.62	0.03	0.66	9,018.19	0.01	1.42

Notes:

1) Information based on Project Description

2) Onsite speed, trips, and VMT information provided from applicant

3) Emission factors from EMFAC2021

4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel onl

5) Accounts for all exhaust (idling/starting) and evaporative processes

6) Daily emissions account for 1 idling event and 1 engine start offsite

7) Global Warming Potentials based on IPCC AR4

8) VMT represents total VMT from inbound and outbound trips

VMT = vehicle miles traveled

Offsite Drayage Trucks

							Annual Emissions (MT) <sup>7</sup>			
Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Phase 1	383,064	2023	30	365	490	1512	1,016.59	0.00	0.16	1,064.34
Phase 2	179,466	2023	30	365	230	709	476.48	0.00	0.08	498.86
Total	562,530				720	2221	1,493.06	0.00	0.24	1,563.21

- Notes:
- 1) Information based on Project Description
  - 2) Onsite speed, trips, and VMT information provided from applicant
  - 3) Emission factors from EMFAC2021
  - 4) Emission factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel onl
  - 5) Accounts for all exhaust (idling/starting) and evaporative processes
  - 6) Daily emissions account for 1 idling event and 1 engine start offsite
  - 7) Global Warming Potentials based on IPCC AR4
  - 8) VMT represents total VMT from inbound and outbound trips
- VMT = vehicle miles traveled

Cargo Handling Equipment<sup>9</sup>

Cargo Handling Equipment <sup>9</sup>										Fuel Correction Factor <sup>6</sup>												
Equipment Type <sup>1</sup>	POLA EI Equipment Type	# of Equipment <sup>1</sup>	Fuel Type <sup>2,3</sup>	Avg. Model Year <sup>4</sup>	Avg. HP <sup>4</sup>	Avg. kW <sup>4</sup>	Avg. Annual Hours <sup>4</sup>	Load Factor <sup>5</sup>	Max Daily Usage (hours per day)	HC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
10,000 lb Forklift	Forklift	2	Propane	2000	73	54	396	0.30	6	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30,000 lb Forklift	Forklift	2	Diesel	2010	177	132	538	0.30	11	0.72	0.95	1.00	0.11	-	0.80	0.80	-	0.80	0.80	1.00	0.72	0.95
Top Pick	Top Handler	1	Diesel	2012	338	252	2,177	0.59	8	0.72	0.95	1.00	0.11	-	0.85	0.85	-	0.85	0.85	1.00	0.72	0.95
Utility Tractor Rig	Yard Tractor	1	Diesel	2011	228	170	1,910	0.39	14	0.72	0.95	1.00	0.11	-	0.85	0.85	-	0.85	0.85	1.00	0.72	0.95

Daily Operations

Hours of operation are from 7am to 3am.

Days per Year: 365

Notes:

- 1) Equipment information provided by applicant
- 2) Based on POLA 2019 Emission Inventory, majority of 10,000 lb Forklifts are propane-powered
- 3) Based on POLA 2019 Emission Inventory, majority of 30,000 lb Forklifts are diesel-powered
- 4) Average values from Table 5.1 of POLA 2019 Emission Inventory
- 5) Load factor based on Table 4.1 Cargo Handling Equipment Engine Load Factors from San Pedro Bay Emissions Inventory Methodology
- 6) Fuel correction factors based on Table 4.2 Fuel Correction Factors for ULSD from San Pedro Bay Emissions Inventory Methodology
- 7) Assuming no control devices
- 8) Emission factors based on information from Appendix B of San Pedro Bay Emissions Inventory Methodology
- 9) Quantity of CHE equipment fleet is for full buildout conditions.



Cargo Handling Equipment<sup>9</sup>

Cargo Handling Equipment <sup>9</sup>										Control Factor <sup>7</sup>												
Equipment Type <sup>1</sup>	POLA EI Equipment Type	# of Equipment <sup>1</sup>	Fuel Type <sup>2,3</sup>	Avg. Model Year <sup>4</sup>	Avg. HP <sup>4</sup>	Avg. kW <sup>4</sup>	Avg. Annual Hours <sup>4</sup>	Load Factor <sup>5</sup>	Max Daily Usage (hours per day)	HC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
10,000 lb Forklift	Forklift	2	Propane	2000	73	54	396	0.30	6	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
30,000 lb Forklift	Forklift	2	Diesel	2010	177	132	538	0.30	11	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Top Pick	Top Handler	1	Diesel	2012	338	252	2,177	0.59	8	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Utility Tractor Rig	Yard Tractor	1	Diesel	2011	228	170	1,910	0.39	14	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Daily Operations

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Cargo Handling Equipment<sup>9</sup>

Cargo Handling Equipment <sup>9</sup>										Emission Factor (g/kW-hr) <sup>8</sup>												
Equipment Type <sup>1</sup>	POLA EI Equipment Type	# of Equipment <sup>1</sup>	Fuel Type <sup>2,3</sup>	Avg. Model Year <sup>4</sup>	Avg. HP <sup>4</sup>	Avg. kW <sup>4</sup>	Avg. Annual Hours <sup>4</sup>	Load Factor <sup>5</sup>	Max Daily Usage (hours per day)	HC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
10,000 lb Forklift	Forklift	2	Propane	2000	73	54	396	0.30	6	3.48	13.35	44.23	-	-	0.08	0.08	-	0.08	0.08	904.00	-	-
30,000 lb Forklift	Forklift	2	Diesel	2010	177	132	538	0.30	11	0.35	3.56	1.44	0.08	-	0.20	0.20	-	0.18	0.18	762.00	0.05	0.02
Top Pick	Top Handler	1	Diesel	2012	338	252	2,177	0.59	8	0.63	2.34	1.76	0.07	-	0.02	0.02	-	0.02	0.02	762.00	0.05	0.02
Utility Tractor Rig	Yard Tractor	1	Diesel	2011	228	170	1,910	0.39	14	0.61	2.32	1.91	0.08	-	0.02	0.02	-	0.02	0.02	762.00	0.05	0.02

Daily Operations

Hours of operation are from 7am to 3am.

Days per Year: 365

Notes:

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- 7) Assuming no control devices
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- 9) Quantity of CHE equipment fleet is for full buildout conditions.

Cargo Handling Equipment<sup>9</sup>

Cargo Handling Equipment <sup>9</sup>										Daily Emissions (lbs/day)												
Equipment Type <sup>1</sup>	POLA EI Equipment Type	# of Equipment <sup>1</sup>	Fuel Type <sup>2,3</sup>	Avg. Model Year <sup>4</sup>	Avg. HP <sup>4</sup>	Avg. kW <sup>4</sup>	Avg. Annual Hours <sup>4</sup>	Load Factor <sup>5</sup>	Max Daily Usage (hours per day)	HC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Fugitive	PM <sub>10</sub> Exhaust	PM <sub>10</sub> Total	PM <sub>2.5</sub> Fugitive	PM <sub>2.5</sub> Exhaust	PM <sub>2.5</sub> Total	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
10,000 lb Forklift	Forklift	2	Propane	2000	73	54	396	0.30	6	0.75	2.88	9.56	-	-	0.02	0.02	-	0.02	0.02	195.28	-	-
30,000 lb Forklift	Forklift	2	Diesel	2010	177	132	538	0.30	11	0.24	3.24	1.38	0.01	-	0.15	0.15	-	0.14	0.14	731.72	0.04	0.02
Top Pick	Top Handler	1	Diesel	2012	338	252	2,177	0.59	8	1.19	5.82	4.62	0.02	-	0.05	0.05	-	0.05	0.05	1998.55	0.09	0.05
Utility Tractor Rig	Yard Tractor	1	Diesel	2011	228	170	1,910	0.39	14	0.90	4.51	3.92	0.02	-	0.04	0.04	-	0.04	0.04	1559.49	0.08	0.05
										3.08	16.45	19.48	0.05	0.00	0.27	0.27	0.00	0.24	0.24	4485.04	0.20	0.12

Daily Operations

Hours of operation are from 7am to 3am.

Days per Year: 365

Notes:

- 1) Equipment information provided by applicant
- 2) Based on POLA 2019 Emission Inventory, majority of 10,000 lb Forklifts are propane-powered
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- 4) Average values from Table 5.1 of POLA 2019 Emission Inventory
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- 8) Emission factors based on information from Appendix B of San Pedro Bay Emissions Inventory Methodology
- 9) Quantity of CHE equipment fleet is for full buildout conditions.

Cargo Handling Equipment<sup>9</sup>

										Annual Emissions (MT)			
Equipment Type <sup>1</sup>	POLA EI Equipment Type	# of Equipment <sup>1</sup>	Fuel Type <sup>2,3</sup>	Avg. Model Year <sup>4</sup>	Avg. HP <sup>4</sup>	Avg. kW <sup>4</sup>	Avg. Annual Hours <sup>4</sup>	Load Factor <sup>5</sup>	Max Daily Usage (hours per day)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
10,000 lb Forklift	Forklift	2	Propane	2000	73	54	396	0.30	6	32.33	-	-	32.33
30,000 lb Forklift	Forklift	2	Diesel	2010	177	132	538	0.30	11	121.14	0.01	0.00	122.37
Top Pick	Top Handler	1	Diesel	2012	338	252	2,177	0.59	8	330.88	0.01	0.01	333.70
Utility Tractor Rig	Yard Tractor	1	Diesel	2011	228	170	1,910	0.39	14	258.19	0.01	0.01	260.81
										742.55	0.03	0.02	749.22

Daily Operations

Hours of operation are from 7am to 3am.

Days per Year: 365

Notes:

- 1) Equipment information provided by applicant
- 2) Based on POLA 2019 Emission Inventory, majority of 10,000 lb Forklifts are propane-powered
- 3) Based on POLA 2019 Emission Inventory, majority of 30,000 lb Forklifts are diesel-powered
- 4) Average values from Table 5.1 of POLA 2019 Emission Inventory
- 5) Load factor based on Table 4.1 Cargo Handling Equipment Engine Load Factors from San Pedro Bay Emissions Inventory Methodology
- 6) Fuel correction factors based on Table 4.2 Fuel Correction Factors for ULSD from San Pedro Bay Emissions Inventory Methodology
- 7) Assuming no control devices
- 8) Emission factors based on information from Appendix B of San Pedro Bay Emissions Inventory Methodology
- 9) Quantity of CHE equipment fleet is for full buildout conditions.

## POLA Star-Kist Operations-Lighting - South Coast AQMD Air District, Annual

**POLA Star-Kist Operations-Lighting**  
**South Coast AQMD Air District, Annual**

**1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Parking Lot	9.20	Acre	9.20	400,752.00	0
Parking Lot	4.70	Acre	4.70	204,732.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	31
<b>Climate Zone</b>	11			<b>Operational Year</b>	2023
<b>Utility Company</b>	Los Angeles Department of Water & Power				
<b>CO2 Intensity (lb/MW hr)</b>	662.95	<b>CH4 Intensity (lb/MW hr)</b>	0.026	<b>N2O Intensity (lb/MW hr)</b>	0.003

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics - GHG Intensity Factors based on LADWP power mix for for 2023.

Land Use -

Energy Use -

Table Name	Column Name	Default Value	New Value
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.026
tblProjectCharacteristics	CO2IntensityFactor	1227.89	662.95
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.003

### Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	63.7261	63.7261	2.5000e-003	2.9000e-004	63.8745
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0476	0.0000	1.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	63.7264	63.7264	2.5000e-003	2.9000e-004	63.8749

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	63.7261	63.7261	2.5000e-003	2.9000e-004	63.8745
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0476	0.0000	1.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	63.7264	63.7264	2.5000e-003	2.9000e-004	63.8749

[illegible]

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.550151	0.042593	0.202457	0.116946	0.015037	0.005825	0.021699	0.034933	0.002123	0.001780	0.004876	0.000710	0.000868





5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	140263	42.1784	1.6500e-003	1.9000e-004	42.2767
Parking Lot	71656.2	21.5477	8.5000e-004	1.0000e-004	21.5979
Total		63.7261	2.5000e-003	2.9000e-004	63.8745

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	140263	42.1784	1.6500e-003	1.9000e-004	42.2767
Parking Lot	71656.2	21.5477	8.5000e-004	1.0000e-004	21.5979
Total		63.7261	2.5000e-003	2.9000e-004	63.8745

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Unmitigated	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	8.4200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Total	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	8.4200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Total	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

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Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

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## B-3: Construction Energy Analysis

**Fuel Consumption per Construction Phase**

Phase Name	Diesel (gal)			Gasoline (gal)
	Offroad Equipment	Vendor Trucks	Haul Trucks	Worker Vehicles
Phase 1-Mobilize	266	58	0	45
Phase 1-Lead and Asbestos Removal	0	520	4,495	2,036
Phase 1-Wharf Demolition	614	0	77	45
Phase 1-Building Demolition	18,655	416	23,578	1,629
Phase 1-Grading/Compaction	1,731	139	4,430	271
Phase 1-Install Crushed Misc Base	1,731	139	4,360	271
Phase 1-Perimeter Lighting and Fencing	724	69	18	407
Phase 1-Clean Up	0	35	0	68
Phase 1-Demobilize	266	58	0	45
Phase 2-Concrete Pad at Phase 1 Site	1,167	379	0	124
Phase 2-Install Canopy at Phase 1 Site	3,809	134	0	543
Phase 2-Mobilize	133	58	0	45
Phase 2-Lead and Asbestos Removal	0	208	324	814
Phase 2-Building Demolition	7,773	347	8,078	679
Phase 2-Grading/Compaction	1,148	69	1,744	136
Phase 2-Install Crushed Misc Base	865	69	1,744	136
Phase 2-Perimeter Lighting and Fencing	241	23	18	136
Phase 2-Clean Up	0	35	0	68
Phase 2-Demobilize	133	58	0	45
<b>Subtotal</b>	<b>39,257</b>	<b>2,812</b>	<b>48,866</b>	<b>7,545</b>
<b>Total Fuel Consumption</b>		<b>90,935</b>		<b>7,545</b>

**PROJECT Fuel Consumption Summary**

Source Category	Fuel Consumption (gal)	
	Diesel	Gasoline
Offroad Equipment	39,257	--
Haul Trucks	48,866	--
Vendor Trucks	2,812	--
Workers	--	7,545
<b>Total Fuel Consumption</b>	<b>90,935</b>	<b>7,545</b>

**Construction Duration (years):** 1.4  
**Average Annual Diesel (gal):** 63,221  
**Average Annual Gasoline (gal):** 5,245

**County Fuel Consumption (2019) <sup>1</sup>**

**County:** Los Angeles

Source	Fuel Type	Gallons (Retail + Non-Retail)	Percent of Project Compared to County
Workers	Gas	3,559,000,000	0.0001%
Off-Road/Haul & Vendor Trucks	Diesel	575,000,000	0.011%

**Notes:**

- California Energy Commission, California Annual Retail Fuel Outlet Report Results (CEC-A15), 2010-2019  
<https://www.energy.ca.gov/sites/default/files/2020-10/2010-2019%20CEC-A15%20Results%20and%20Analysis.xlsx>  
 Accessed November 2020. Diesel is adjusted to account for retail (48%) and non-retail (52%) diesel sales



## Off-Road Equipment

Fuel Consumption: Equipment ≤ 100HP	Value
Brake Specific Fuel Consumption Factor (lb/hp-hr) <sup>1</sup>	0.408
Fuel Density (lb/gal) <sup>1</sup>	7.11
Consumption Factor (gal/hp-hr)	0.0574
Total HP-HR <100	235,808
<b>Total Diesel Fuel (gal)</b>	<b>13,534</b>

Fuel Consumption: Equipment > 100HP	Value
Brake Specific Fuel Consumption Factor (lb/hp-hr) <sup>1</sup>	0.367
Fuel Density (lb/gal) <sup>1</sup>	7.11
Consumption Factor (gal/hp-hr)	0.0516
Total HP-HR >100	498,274
<b>Total Diesel Fuel (gal)</b>	<b>25,723</b>

**Total diesel gallons (off-road equipment): 39,257**

Phase Name	Equipment	# of Equipment	Hours/Day	HP	Load Factor	Days	Total HP-HR
Phase 1-Mobilize	Excavators	8	1	158	0.38	5	2,401.60
Phase 1-Mobilize	Rubber Tired Loaders	6	1	97	0.36	5	1,047.60
Phase 1-Mobilize	Forklifts	2	8	89	0.2	5	1,424.00
Phase 1-Lead and Asbestos Removal	No Equipment	0	0	0	0	75	0.00
Phase 1-Wharf Demolition	Cranes	1	8	231	0.29	5	2,679.60
Phase 1-Wharf Demolition	Generator Sets	1	8	150	0.74	5	4,440.00
Phase 1-Wharf Demolition	Other General Industrial Equipment	1	8	175	0.34	5	2,380.00
Phase 1-Wharf Demolition	Excavators	1	8	158	0.38	5	2,401.60
Phase 1-Building Demolition	Excavators	8	8	158	0.38	60	230,553.60
Phase 1-Building Demolition	Rubber Tired Loaders	6	8	97	0.36	60	100,569.60
Phase 1-Building Demolition	Forklifts	2	8	89	0.2	60	17,088.00
Phase 1-Grading/Compaction	Rubber Tired Loaders	2	8	97	0.36	20	11,174.40
Phase 1-Grading/Compaction	Other Construction Equipment	2	8	157	0.42	20	21,100.80
Phase 1-Install Crushed Misc Base	Other Construction Equipment	2	8	157	0.42	20	21,100.80
Phase 1-Install Crushed Misc Base	Rubber Tired Loaders	2	8	97	0.36	20	11,174.40
Phase 1-Perimeter Lighting and Fencing	Tractors/Loaders/Backhoes	2	4	158	0.37	30	14,030.40
Phase 1-Clean Up	No Equipment	0	0	0	0	5	0.00

Phase Name	Equipment	# of Equipment	Hours/Day	HP	Load Factor	Days	Total HP-HR
Phase 1-Demobilize	Excavators	8	1	158	0.38	5	2,401.60
Phase 1-Demobilize	Rubber Tired Loaders	6	1	97	0.36	5	1,047.60
Phase 1-Demobilize	Forklifts	2	8	89	0.2	5	1,424.00
Phase 2-Mobilize	Excavators	4	1	158	0.38	5	1,200.80
Phase 2-Mobilize	Rubber Tired Loaders	3	1	97	0.36	5	523.80
Phase 2-Mobilize	Forklifts	1	8	89	0.2	5	712.00
Phase 2-Lead and Asbestos Removal	No Equipment	0	0	0	0	30	0.00
Phase 2-Building Demolition	Excavators	4	8	158	0.38	50	96,064.00
Phase 2-Building Demolition	Rubber Tired Loaders	3	8	97	0.36	50	41,904.00
Phase 2-Building Demolition	Forklifts	1	8	89	0.2	50	7,120.00
Phase 2-Grading/Compaction	Rubber Tired Loaders	2	8	203	0.36	10	11,692.80
Phase 2-Grading/Compaction	Other Construction Equipment	2	8	157	0.42	10	10,550.40
Phase 2-Install Crushed Misc Base	Other Construction Equipment	2	8	157	0.42	10	10,550.40
Phase 2-Install Crushed Misc Base	Rubber Tired Loaders	2	8	97	0.36	10	5,587.20
Phase 2-Perimeter Lighting and Fencing	Tractors/Loaders/Backhoes	2	4	158	0.37	10	4,676.80
Phase 2-Clean Up	No Equipment	0	0	0	0	5	0.00
Phase 2-Demobilize	Excavators	4	1	158	0.38	5	1,200.80
Phase 2-Demobilize	Rubber Tired Loaders	3	1	97	0.36	5	523.80
Phase 2-Demobilize	Forklifts	1	8	89	0.2	5	712.00
Phase 2-Concrete Pad at Phase 1 Site	Cement and Mortar Mixers	3	8	9	0.56	10	1,209.60
Phase 2-Concrete Pad at Phase 1 Site	Pumps	3	8	84	0.74	10	14,918.40
Phase 2-Concrete Pad at Phase 1 Site	Tractors/Loaders/Backhoes	1	8	158	0.37	10	4,676.80
Phase 2-Install Canopy at Phase 1 Site	Cranes	1	8	231	0.29	20	10,718.40
Phase 2-Install Canopy at Phase 1 Site	Forklifts	1	8	89	0.2	20	2,848.00
Phase 2-Install Canopy at Phase 1 Site	Generator Sets	1	8	150	0.74	20	17,760.00
Phase 2-Install Canopy at Phase 1 Site	Tractors/Loaders/Backhoes	1	8	158	0.37	20	9,353.60
Phase 2-Install Canopy at Phase 1 Site	Welders	3	8	46	0.45	20	9,936.00
Phase 2-Install Canopy at Phase 1 Site	Pavers	1	8	130	0.42	20	8,736.00
Phase 2-Install Canopy at Phase 1 Site	Paving Equipment	1	8	132	0.36	20	7,603.20
Phase 2-Install Canopy at Phase 1 Site	Rollers	1	8	80	0.38	20	4,864.00
<b>Total &gt;100HP</b>							498,274.00
<b>Total &lt;100HP</b>							235,808.40

## Notes:

1. CARB, 2017 Off-road Diesel Emission Factors

[https://ww3.arb.ca.gov/msei/ordiesel/ordas\\_ef\\_fcf\\_2017\\_v7.xlsx](https://ww3.arb.ca.gov/msei/ordiesel/ordas_ef_fcf_2017_v7.xlsx)

**Offroad Equipment Fuel Consumption Summary**

Phase Name	Total HP-HR	Gallons	Total HP-HR	Gallons	Total Fuel
	>100		<100		Consumption (gal)
Phase 1-Mobilize	2401.60	123.98	2471.60	141.85	265.83
Phase 1-Lead and Asbestos Removal	-	-	-	-	-
Phase 1-Wharf Demolition	11901.20	614.40	-	-	614.40
Phase 1-Building Demolition	230553.60	11902.26	117657.60	6752.61	18654.87
Phase 1-Grading/Compaction	21100.80	1089.32	11174.40	641.32	1730.64
Phase 1-Install Crushed Misc Base	21100.80	1089.32	11174.40	641.32	1730.64
Phase 1-Perimeter Lighting and Fencing	14030.40	724.32	-	-	724.32
Phase 1-Clean Up	-	-	-	-	-
Phase 1-Demobilize	2401.60	123.98	2471.60	141.85	265.83
Phase 2-Concrete Pad at Phase 1 Site	4676.80	241.44	16128.00	925.62	1167.06
Phase 2-Install Canopy at Phase 1 Site	54171.20	2796.57	17648.00	1012.85	3809.43
Phase 2-Mobilize	1200.80	61.99	1235.80	70.93	132.92
Phase 2-Lead and Asbestos Removal	-	-	-	-	-
Phase 2-Building Demolition	96064.00	4959.28	49024.00	2813.59	7772.86
Phase 2-Grading/Compaction	22243.20	1148.30	-	-	1148.30
Phase 2-Install Crushed Misc Base	10550.40	544.66	5587.20	320.66	865.32
Phase 2-Perimeter Lighting and Fencing	4676.80	241.44	-	-	241.44
Phase 2-Clean Up	-	-	-	-	-
Phase 2-Demobilize	1200.80	61.99	1235.80	70.93	132.92
<b>Totals</b>	<b>--</b>	<b>25723.25</b>	<b>--</b>	<b>13533.52</b>	<b>39256.77</b>

## Haul Trucks

Onroad Travel Consumption	Value
EMFAC2021 Diesel Fuel Consumption Factor (gal/mi): <sup>1</sup>	0.169
Total VMT (mi):	284,296
<b>Total diesel gallons</b>	<b>48,182</b>
Idling Consumption	Value
Idling Fuel Consumption Factor (gal/hr): <sup>2</sup>	0.6400
Total Idle-Hours per Year:	1,069
<b>Total diesel gallons</b>	<b>684</b>

**Total diesel gallons: 48,866**

Phase	Total Truck Trips (In/Out)	Trip Length (miles)	Vehicle Category	VMT	Idle Hours	Onroad Travel Consumption (gal)	Idling Consumption (gal)	Total Fuel Consumption (gal)
Phase 1-Mobilize	0	20.27	HHDT	-	-	-	-	-
Phase 1-Lead and Asbestos Removal	140	189.15	HHDT	26481.32	11.67	4487.97	7.47	4495.43
Phase 1-Wharf Demolition	22	20.27	HHDT	445.85	1.83	75.56	1.17	76.73
Phase 1-Building Demolition	6760	20.27	HHDT	136996.27	563.33	23217.68	360.53	23578.21
Phase 1-Grading/Compaction	1270	20.27	HHDT	25737.46	105.83	4361.90	67.73	4429.64
Phase 1-Install Crushed Misc Base	1250	20.27	HHDT	25332.15	104.17	4293.21	66.67	4359.88
Phase 1-Perimeter Lighting and Fencing	14	7.17	HHDT	100.32	1.17	17.00	0.75	17.75
Phase 1-Clean Up	0	20.27	HHDT	-	-	-	-	-
Phase 1-Demobilize	0	20.27	HHDT	-	-	-	-	-
Phase 2-Concrete Pad at Phase 1 Site	0	20.00	HHDT	-	-	-	-	-
Phase 2-Install Canopy at Phase 1 Site	0	20.00	HHDT	-	-	-	-	-
Phase 2-Mobilize	0	20.27	HHDT	-	-	-	-	-
Phase 2-Lead and Asbestos Removal	42	45.27	HHDT	1901.16	3.50	322.20	2.24	324.44
Phase 2-Building Demolition	2316	20.27	HHDT	46935.41	193.00	7954.46	123.52	8077.98
Phase 2-Grading/Compaction	500	20.27	HHDT	10132.86	41.67	1717.28	26.67	1743.95
Phase 2-Install Crushed Misc Base	500	20.27	HHDT	10132.86	41.67	1717.28	26.67	1743.95
Phase 2-Perimeter Lighting and Fencing	14	7.17	HHDT	100.32	1.17	17.00	0.75	17.75
Phase 2-Clean Up	0	20.27	HHDT	-	-	-	-	-
Phase 2-Demobilize	0	20.27	HHDT	-	-	-	-	-
<b>Total VMT:</b>				<b>284,296</b>		<b>48181.56</b>	<b>684.16</b>	<b>48,865.72</b>
<b>Total Idle-Hours:</b>					<b>1,069</b>			

1. CARB, EMFAC2021 (SCAQMD; HHDT; Annual; CY 2022; Aggregate MY; Aggregate Speed,DSL)

2. Department of Energy, Fact #861, 2015 Idle Fuel Consumption for Selected Gasoline and Diesel Vehicles, February 23, 2015.

<https://www.energy.gov/eere/vehicles/fact-861-february-23-2015-idle-fuel-consumption-selected-gasoline-and-diesel-vehicles>

## Vendor Trucks

Onroad Travel Consumption		Value
EMFAC2021 Diesel Fuel Consumption Factor (gal/mi): <sup>1</sup>		0.154
Total VMT (mi):		17,434
<b>Total diesel gallons</b>		<b>2,681</b>
Idling Consumption		Value
Idling Fuel Consumption Factor (gal/hr): <sup>2</sup>		0.6400
Total Idle-Hours per Year:		204
<b>Total diesel gallons</b>		<b>131</b>

**Total diesel gallons: 2,812**

Phase	Days/year	Truck Trips per Day (In/Out)	Trip Length (miles)	Vehicle Category	VMT	Idle Hours	Onroad Travel Consumption (gal)	Idling Consumption (gal)	Total Fuel Consumption (gal)
Phase 1-Mobilize	5	10	7.17	HHDT/MHDT	358	4	55.11	2.67	57.77
Phase 1-Lead and Asbestos Removal	75	6	7.17	HHDT/MHDT	3,225	38	495.97	24.00	519.97
Phase 1-Wharf Demolition	5	0	7.17	HHDT/MHDT	0	0	-	-	-
Phase 1-Building Demolition	60	6	7.17	HHDT/MHDT	2,580	30	396.77	19.20	415.97
Phase 1-Grading/Compaction	20	6	7.17	HHDT/MHDT	860	10	132.26	6.40	138.66
Phase 1-Install Crushed Misc Base	20	6	7.17	HHDT/MHDT	860	10	132.26	6.40	138.66
Phase 1-Perimeter Lighting and Fencing	30	2	7.17	HHDT/MHDT	430	5	66.13	3.20	69.33
Phase 1-Clean Up	5	6	7.17	HHDT/MHDT	215	3	33.06	1.60	34.66
Phase 1-Demobilize	5	10	7.17	HHDT/MHDT	358	4	55.11	2.67	57.77
Phase 2-Concrete Pad at Phase 1 Site	10	34	6.90	HHDT/MHDT	2,346	28	360.84	18.13	378.97
Phase 2-Install Canopy at Phase 1 Site	20	6	6.90	HHDT/MHDT	828	10	127.35	6.40	133.75
Phase 2-Mobilize	5	10	7.17	HHDT/MHDT	358	4	55.11	2.67	57.77
Phase 2-Lead and Asbestos Removal	30	6	7.17	HHDT/MHDT	1,290	15	198.39	9.60	207.99
Phase 2-Building Demolition	50	6	7.17	HHDT/MHDT	2,150	25	330.64	16.00	346.64
Phase 2-Grading/Compaction	10	6	7.17	HHDT/MHDT	430	5	66.13	3.20	69.33
Phase 2-Install Crushed Misc Base	10	6	7.17	HHDT/MHDT	430	5	66.13	3.20	69.33
Phase 2-Perimeter Lighting and Fencing	10	2	7.17	HHDT/MHDT	143	2	22.04	1.07	23.11
Phase 2-Clean Up	5	6	7.17	HHDT/MHDT	215	3	33.06	1.60	34.66
Phase 2-Demobilize	5	10	7.17	HHDT/MHDT	358	4	55.11	2.67	57.77
<b>Total VMT:</b>					<b>17,434</b>		<b>2,681.47</b>	<b>130.67</b>	<b>2,812.13</b>
<b>Total Idle-Hours:</b>						<b>204</b>			

1. CARB, EMFAC2021 (SCAQMD; HHDT/MHDT; Annual; CY 2022; Aggregate MY; Aggregate Speed,DSL)

2. Department of Energy, Fact #861, 2015 Idle Fuel Consumption for Selected Gasoline and Diesel Vehicles, February 23, 2015.  
<https://www.energy.gov/eere/vehicles/fact-861-february-23-2015-idle-fuel-consumption-selected-gasoline-and-diesel-vehicles>

**Worker Vehicles**

<b>Onroad Travel Consumption</b>	<b>Value</b>
EMFAC2021 Gasoline Fuel Consumption Factor (gal/mi): <sup>1</sup>	0.038
Total VMT (mi):	196,098
<b>Total gasoline gallons</b>	<b>7,545</b>

<b>Phase</b>	<b>Days/year</b>	<b>Vehicle Trips per day (In/Out)</b>	<b>Trip Length (miles)</b>	<b>Vehicle Category</b>	<b>VMT</b>	<b>Onroad Travel Consumption (gal)</b>
Phase 1-Mobilize	5	16	14.7	LD Fleet Mix	1,176	45
Phase 1-Lead and Asbestos Removal	75	48	14.7	LD Fleet Mix	52,920	2,036
Phase 1-Wharf Demolition	5	16	14.7	LD Fleet Mix	1,176	45
Phase 1-Building Demolition	60	48	14.7	LD Fleet Mix	42,336	1,629
Phase 1-Grading/Compaction	20	24	14.7	LD Fleet Mix	7,056	271
Phase 1-Install Crushed Misc Base	20	24	14.7	LD Fleet Mix	7,056	271
Phase 1-Perimeter Lighting and Fencing	30	24	14.7	LD Fleet Mix	10,584	407
Phase 1-Clean Up	5	24	14.7	LD Fleet Mix	1,764	68
Phase 1-Demobilize	5	16	14.7	LD Fleet Mix	1,176	45
Phase 2-Concrete Pad at Phase 1 Site	10	22	14.7	LD Fleet Mix	3,234	124
Phase 2-Install Canopy at Phase 1 Site	20	48	14.7	LD Fleet Mix	14,112	543
Phase 2-Mobilize	5	16	14.7	LD Fleet Mix	1,176	45
Phase 2-Lead and Asbestos Removal	30	48	14.7	LD Fleet Mix	21,168	814
Phase 2-Building Demolition	50	24	14.7	LD Fleet Mix	17,640	679
Phase 2-Grading/Compaction	10	24	14.7	LD Fleet Mix	3,528	136
Phase 2-Install Crushed Misc Base	10	24	14.7	LD Fleet Mix	3,528	136
Phase 2-Perimeter Lighting and Fencing	10	24	14.7	LD Fleet Mix	3,528	136
Phase 2-Clean Up	5	24	14.7	LD Fleet Mix	1,764	68
Phase 2-Demobilize	5	16	14.7	LD Fleet Mix	1,176	45
<b>Total VMT:</b>					<b>196,098</b>	<b>7,545</b>

1. CARB, EMFAC2021 (SCAQMD; LDA/LDT1/LDT2; Annual; CY 2022; Aggregate MY; Aggregate Speed,GAS)

2. Department of Energy, Fact #861, 2015 Idle Fuel Consumption for Selected Gasoline and Diesel Vehicles, February 23, 2015.

<https://www.energy.gov/eere/vehicles/fact-861-february-23-2015-idle-fuel-consumption-selected-gasoline-and-diesel-vehicles>

**Idling Fuel Consumption Factors**

VEHICLE TYPE	FUEL TYPE	ENGINE SIZE (LITER)	GROSS VEHICLE WEIGHT (GVW) (LBS)	IDLING FUEL USE (GAL/HR WITH NO LOAD)
Compact Sedan	Gas	2	-	0.16
Large Sedan	Gas	4.6	-	0.39
Compact Sedan	Diesel	2	-	0.17
Medium Heavy Truck	Gas	7-May	19,700-26,000	0.84
Delivery Truck	Diesel	-	19,500	0.84
Tow Truck	Diesel	-	26,000	0.59
Medium Heavy Truck	Diesel	10-Jun	23,000-33,000	0.44
Transit Bus	Diesel	-	30,000	0.97
Combination Truck	Diesel	-	32,000	0.49
Bucket Truck	Diesel	-	37,000	0.9
Tractor-Semitrailer	Diesel	-	80,000	0.64

Department of Energy, Fact #861, 2015 Idle Fuel Consumption for Selected Gasoline and Diesel Vehicles, February 23, 2015.

<https://www.energy.gov/eere/vehicles/fact-861-february-23-2015-idle-fuel-consumption-selected-gasoline-and-diesel-vehicles>

**Worker Fuel Consumption Factor****Year: 2022**

<b>Vehicle Category</b>	<b>VMT (mi/day)</b>	<b>Fuel Consumption (1000gal/day)</b>	<b>Fuel Consumption Factor (gal/mi)</b>	<b>Fuel Economy (mi/gal)</b>	<b>Fleet Mix</b>	<b>Fuel Consumption Factor (gal/mi)</b>
LDA	222935825.2	7924.34	0.036	28.13	65%	0.038
LDT1	18702393.24	795.45	0.043	23.51	5%	
LDT2	100022729.2	4425.21	0.044	22.60	29%	

Source: EMFAC2021, **Output:** Onroad Emissions, **Model Version:** EMFAC2021 v1.0.0, **Air District:** South Coast AQMD, **Vehicle Categories:** EMFAC2007, **Model Year:** Aggregate, **Speed:** Aggregate, **Fuel:** All, **Output Unit:** tons/operation day



Truck Fuel Consumption Factor

Year: 2022

Vehicle Category	VMT (miles/day)	Fuel Consumption (1000 gal/day)	Fuel Consumption Factor (gal/mi)	Fuel Economy (mi/gal)	Fleet Mix	Fuel Consumption Factor (gal/mi)
HHDT	12818542.36	2172.4	0.169	5.90	72%	0.154
MHDT	4886151.151	550.7	0.113	8.87	28%	

Source: EMFAC2021, **Output:** Onroad Emissions, **Model Version:** EMFAC2021 v1.0.0, **Air District:** South Coast AQMD, **Vehicle Categories:** EFMAC2007, **Model Year:** Aggregate, **Speed:** Aggregate, **Fuel:** All, **Output Unit:** tons/operation day

## B-4: Operations Energy Analysis

Project Annual Energy Consumption

Source	Gallons		
	Diesel	Gasoline	Propane
Employees		9,728	
Fuel Trucks	1,555		
Drayage Trucks-Onsite	6,273		
Drayage Trucks-Offsite	135,263		
Cargo Handling Equipment	75,531		5,652
Project Total	218,622	9,728	5,652

Project Site Lighting

Annual Electricity Consumption (kWh):	211,919
---------------------------------------	---------

Employees

					Gasoline		
Annual Days of Operation	Year	Daily Employees <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	Total VMT	Consumption Factor (gal/mi) <sup>3</sup>	Annual Gasoline Consumption (gal)
365	2023	20	40	16.6	242,360	0.040	9,728

Notes:

- 1) Daily employees based on information in Project Description
- 2) Trip length based on CalEEMod default value for Commercial-Work trip
- 3) Fuel consumption factors based on EMFAC2021, LDA, LDT1, LDT2, MCY, & MDV vehicle categories, gasoline only

Fuel Trucks

Annual Days of Operations	Year	Daily Fuel Trucks <sup>1</sup>	# of One-way Employee Trips/day (In/Out)	Trip Length (mi) <sup>2</sup>	Diesel		
					Total VMT	Consumption Factor (gal/mi) <sup>3</sup>	Annual Diesel Consumption (gal)
365	2023	2	4	7	10,220	0.15	1,555

Notes:

- 1) Assumes 1 diesel fuel truck and 1 propane fuel truck per day
- 2) Trip length provided by applicant.
- 3) Fuel consumption factors based on EMFAC2021, HHDT/MHDT vehicle categories, diesel only

Onsite Drayage Trucks

Phase	Area	EF Year	Speed (mph) <sup>2</sup>	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	Total VMT	Diesel Consumption Factor (gal/mi) <sup>3</sup>	Annual Diesel Fuel Consumption (gal)
Phase 1	383,064	2023	5	365	490	86	31,299	0.167	5,223
Phase 2	179,466	2023	5	365	230	17	6,289	0.167	1,049
Total	562,530				720	103	37,588		6,273

Notes:

1) Information based on Project Description

2) Onsite speed, trips, and VMT information provided from applicant

3) Fuel consumption factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel only

VMT = vehicle miles traveled

Offsite Drayage Trucks

Phase	Area	EF Year	Speed (mph)	Days per year <sup>1</sup>	Trips <sup>2</sup>	VMT <sup>2</sup>	Total VMT	Diesel Consumption Factor (gal/mi) <sup>3</sup>	Annual Diesel Fuel Consumption (gal)
Phase 1	383,064	2023	30	365	490	1512	551,880	0.167	92,097
Phase 2	179,466	2023	30	365	230	709	258,665	0.167	43,166
Total	562,530				720	2221	810,545		135,263

Notes:

1) Information based on Project Description

2) Onsite speed, trips, and VMT information provided from applicant

3) Fuel consumption factors based on aggregate model year and T7 POLA Class 8 vehicle category, diesel only

VMT = vehicle miles traveled

## Cargo Handling Equipment

Fuel Consumption: Equipment ≤ 100HP	Value
Brake Specific Fuel Consumption Factor (lb/hp-hr) <sup>1</sup>	0.408
Fuel Density (lb/gal) <sup>1</sup>	7.11
Consumption Factor (gal/hp-hr)	0.0574
Total HP-HR <100	-
<b>Total Diesel Fuel (gal)</b>	<b>-</b>

Fuel Consumption: Equipment > 100HP	Value
Brake Specific Fuel Consumption Factor (lb/hp-hr) <sup>1</sup>	0.367
Fuel Density (lb/gal) <sup>1</sup>	7.11
Consumption Factor (gal/hp-hr)	0.0516
Total HP-HR >100	1,463,081
<b>Total Diesel Fuel (gal)</b>	<b>75,531</b>

**Total diesel gallons (off-road equipment): 75,531**

## Diesel

Equipment	# of Equipment	Hours/Day	HP	Load Factor	Days	Total HP-HR
Forklift	2	11	177	0.30	365	426,393.00
Top Handler	1	8	338	0.59	365	582,306.40
Yard Tractor	1	14	228	0.39	365	454,381.20

**Total >100HP 1,463,080.60**

**Total <100HP 0.00**

## Propane

Equipment	Total MTCO <sub>2</sub>	Total kg CO <sub>2</sub>	kg CO <sub>2</sub> /gal <sup>2</sup>	Total Gallons
Forklift	32.33	32331	5.72	5652.33

## Notes:

1. CARB, 2017 Off-road Diesel Emission Factors

[https://ww3.arb.ca.gov/msei/ordiesel/ordas\\_ef\\_fcf\\_2017\\_v7.xlsx](https://ww3.arb.ca.gov/msei/ordiesel/ordas_ef_fcf_2017_v7.xlsx)

2. Table 1.1: US Default Factors for Calculating CO<sub>2</sub> Emissions from Combustion of Fossil Fuel and Biomass, The Climate Registry, 2019.

<https://www.theclimateregistry.org/wp-content/uploads/2019/05/The-Climate-Registry-2019-Default-Emission-Factor-Document.pdf>



## POLA Star-Kist Operations-Lighting - South Coast AQMD Air District, Annual

**POLA Star-Kist Operations-Lighting**  
**South Coast AQMD Air District, Annual**

**1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Parking Lot	9.20	Acre	9.20	400,752.00	0
Parking Lot	4.70	Acre	4.70	204,732.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	31
<b>Climate Zone</b>	11			<b>Operational Year</b>	2023
<b>Utility Company</b>	Los Angeles Department of Water & Power				
<b>CO2 Intensity (lb/MW hr)</b>	662.95	<b>CH4 Intensity (lb/MW hr)</b>	0.026	<b>N2O Intensity (lb/MW hr)</b>	0.003

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics - GHG Intensity Factors based on LADWP power mix for for 2023.

Land Use -

Energy Use -

Table Name	Column Name	Default Value	New Value
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.026
tblProjectCharacteristics	CO2IntensityFactor	1227.89	662.95
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.003

### Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	63.7261	63.7261	2.5000e-003	2.9000e-004	63.8745
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0476	0.0000	1.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	63.7264	63.7264	2.5000e-003	2.9000e-004	63.8749

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	63.7261	63.7261	2.5000e-003	2.9000e-004	63.8745
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0476	0.0000	1.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	63.7264	63.7264	2.5000e-003	2.9000e-004	63.8749

[illegible]

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.550151	0.042593	0.202457	0.116946	0.015037	0.005825	0.021699	0.034933	0.002123	0.001780	0.004876	0.000710	0.000868



5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	140263	42.1784	1.6500e-003	1.9000e-004	42.2767
Parking Lot	71656.2	21.5477	8.5000e-004	1.0000e-004	21.5979
Total		63.7261	2.5000e-003	2.9000e-004	63.8745

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	140263	42.1784	1.6500e-003	1.9000e-004	42.2767
Parking Lot	71656.2	21.5477	8.5000e-004	1.0000e-004	21.5979
Total		63.7261	2.5000e-003	2.9000e-004	63.8745

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Unmitigated	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	8.4200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Total	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	8.4200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004
Total	0.0476	0.0000	1.8000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.4000e-004	3.4000e-004	0.0000	0.0000	3.7000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000



9.0 Operational Offroad

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment

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Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

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**APPENDIX C**  
**Historic Resource Assessment for Star-Kist Plant No. 4 and**  
**Associated Star-Kist Facilities**

# **Final Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities Port of Los Angeles, Los Angeles, California**

**APP No. 190311-032**

**PREPARED FOR:**

Los Angeles Harbor Department, Environmental Management Division  
425 South Palos Verdes Street  
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**PREPARED BY:**

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**August 2021**



ICF. *Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California.* (ICF 643.18 and 656.19). Prepared for: Los Angeles Harbor Department, Environmental Management Division, Los Angeles, CA. August 2021.

## Executive Summary

ICF prepared this historic resource assessment at the request of the Los Angeles Harbor Department (Harbor Department), Environmental Management Division (EMD) in accordance with its *Built Environment Historic Architecture and Cultural Resources Policy* (Cultural Policy). The Cultural Policy requires the Harbor Department to maintain an inventory of its cultural resources, which includes resources 50 years of age or older. The Harbor Department is also tasked with updating the inventory every 5 years. The Cultural Policy (Appendix C) provides guidance on preservation and documentation of historical resources.

In 2008, the Harbor Department hired Jones & Stokes to evaluate Star-Kist Plant No. 4 (Plant) and its associated Star-Kist Company (Star-Kist) facilities. That evaluation is memorialized in a report titled *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California* (2008 evaluation). The 2008 evaluation considered all extant Star-Kist facilities at Fish Harbor, Terminal Island, Port of Los Angeles (Port), and determined that only the Plant appeared eligible for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and as a Los Angeles Historic-Cultural Monument (HCM) under all criteria. The report identified that all other Star-Kist buildings were not eligible.

In 2019, in accordance with the Cultural Policy, the Harbor Department engaged ICF to re-evaluate the Plant and associated facilities. ICF memorialized its findings in a technical memorandum titled *Star-Kist Re-evaluation Memo* (2019 evaluation). ICF's examination of the 2008 evaluation revealed deficiencies related to its analysis of integrity and significance evaluation.

ICF's 2019 evaluation considered the eligibility of the Plant and all extant Star-Kist facilities. ICF concluded that although Star-Kist played an important role in the tuna industry at the Port, the Plant is individually **ineligible** for the NRHP, CRHR, or as an HCM due to a substantial loss of integrity. The findings for the Empty Can Warehouse and East Plant remained the same as in the 2008 evaluation: individually ineligible. All other Star-Kist facilities evaluated in 2008 at Fish Harbor, Terminal Island have been demolished. Table ES-1, below, provides a summary of the 2019 individual evaluations.

**Table ES-1. Summary of Findings of Eligibility**

Building Name in Current (2021) Evaluation	Address	Year Built	Current Status
Net Shed	250 Terminal Way	1947 and 1948	Demolished
Star-Kist Plant No. 4	1050 Ways Street	1952	Ineligible
Laboratory	212–214 Terminal Way	1950, 1961–1969	Demolished
Empty Can Warehouse	926 Barracuda Street	1970	Ineligible
East Plant	936–950 Barracuda Street	1971–1972; 1974–1977	Ineligible
Food Testing and Animal Nutrition	919 Earle Street	1972	Demolished
Pet Food Plant	642 Tuna Street	1979	Demolished

In 2021, the Harbor Department requested that ICF supplement the 2019 evaluation. The current analysis restates the conclusions of the 2019 evaluation and supplements it in two primary ways.

First, this analysis provides a detailed discussion of the 2008 evaluation's deficiencies in Chapter 2. Secondly, it analyzes whether extant Star-Kist facilities form a historic district and if any of these facilities had the potential to be a contributor to an industry-related or architectural historic district at Fish Harbor. The current analysis concludes that no historic district that includes Star-Kist facilities is present at Fish Harbor.

In summary, no Star-Kist facility, including the Plant, is individually eligible or a district contributor under the NRHP, CRHR, HCM, or Historic Preservation Overlay Zone (HPOZ) designation criteria.

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## Acronyms and Abbreviations

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2008 evaluation	<i>Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California</i>
2019 evaluation	<i>Star-Kist Re-evaluation Memo</i>
CRHR	California Register of Historical Resources
Cultural Policy	<i>Built Environment Historic Architecture and Cultural Resources Policy</i>
DPR	Department of Parks and Recreation
EMD	Environmental Management Division
French Sardine	French Sardine Company
Harbor Department	Los Angeles Harbor Department
HCM	Historic-Cultural Monument
HPOZ	Historic Preservation Overlay Zone
NRHP	National Register of Historic Places
Plant	Star-Kist Plant No. 4
Port	Port of Los Angeles
Sanborn maps	Sanborn Fire Insurance Company maps
SHPO	State Historic Preservation Officer
Star-Kist	Star-Kist Company
TEU	20-foot-equivalent unit
USC	University of Southern California
USITC	U.S. International Trade Commission
Van Camp	Van Camp Sea Food Company

# Chapter 1

## Introduction

ICF prepared this historic resource assessment at the request of the Los Angeles Harbor Department (Harbor Department), Environmental Management Division (EMD) in accordance with its *Built Environment Historic Architecture and Cultural Resources Policy* (Cultural Policy). The Cultural Policy requires the Harbor Department to maintain an inventory of its cultural resources, which includes resources 50 years of age or older. The Harbor Department is also tasked with updating the inventory every 5 years. The Cultural Policy (Appendix C) provides guidance on preservation and documentation of historical resources.

In 2008, the Harbor Department hired Jones & Stokes to evaluate Star-Kist Plant No. 4 (Plant) and its associated Star-Kist Company (Star-Kist) facilities. That evaluation is memorialized in a report titled *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California* (2008 evaluation). The 2008 evaluation considered all extant Star-Kist facilities at Fish Harbor, Terminal Island, Port of Los Angeles (Port), and determined that only the Plant appeared eligible for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and as a Los Angeles Historic-Cultural Monument (HCM) under all criteria. The report identified that all other Star-Kist buildings were not eligible.

In 2019, in accordance with the Cultural Policy, the Harbor Department engaged ICF to re-evaluate the Plant and associated facilities. ICF memorialized its findings in a technical memorandum titled *Star-Kist Re-evaluation Memo* (2019 evaluation). ICF's examination of the 2008 evaluation revealed deficiencies related to its integrity and significance evaluation.

ICF's 2019 evaluation considered the eligibility of the Plant and all extant Star-Kist facilities. ICF completed a site visit of all Star-Kist facilities, reviewed the 2008 evaluation and noted its deficiencies, conducted research that found sources not available in 2008, and prepared new context in support of re-evaluation.

ICF concluded that although Star-Kist played an important role in the tuna industry at the Port, the Plant is individually **ineligible** for the NRHP, CRHR, or as an HCM due to a substantial loss of integrity. The findings for the Empty Can Warehouse and East Plant remain the same as in the 2008 evaluation: individually ineligible. The other four Star-Kist facilities evaluated in 2008 (Net Shed Storage; Laboratory; Food Testing and Animal Nutrition; and the Pet Food Plant) have been demolished. Table 1-1, below, summarizes this information.

**Table 1-1. Building Status**

Building Name in Current (2021) Evaluation	Building Name in 2008 Evaluation	Address	Year Built	Status
Net Shed Storage	Net Shed Storage	250 Terminal Way	1947 and 1948	Demolished
Plant No. 4	Main	1050 Ways Street	1952	Ineligible
Laboratory	Pet Products	212-214 Terminal Way	1950, 1961-1969	Demolished
Empty Can Warehouse	Green	926 Barracuda Street	1970	Ineligible

Building Name in Current (2021) Evaluation	Building Name in 2008 Evaluation	Address	Year Built	Status
East Plant	Cold Storage; Impress Plant; Distribution	950 Barracuda Street; 936 Barracuda Street; 938 Barracuda Street	1971; 1974–1977	Ineligible
Food Testing and Animal Nutrition	Animal Care	919 Earle Street	1972	Demolished
Pet Food Plant	Pilot Plant	642 Tuna Street	1979	Demolished

ICF prepared Department of Parks and Recreation (DPR) 523 series Update forms for all Star-Kist facilities evaluated in 2008, including demolished facilities. See Appendix A.

In 2021, the Harbor Department requested that ICF supplement the 2019 evaluation. The current analysis restates the conclusions of the 2019 evaluation and supplements it in two primary ways. First, this analysis provides a detailed discussion of the 2008 evaluation’s deficiencies in Chapter 2. Secondly, it analyzes whether extant Star-Kist facilities form a historic district and if any of these facilities had the potential to be a contributor to an industry-related or architectural historic district at Fish Harbor. ICF completed a site visit of nine additional resources at Fish Harbor, reviewed previous evaluations, conducted research, and prepared site histories in support of the evaluation. The current analysis concludes that no district that includes Star-Kist facilities is present at Fish Harbor.

In summary, no Star-Kist facility, including the Plant, is individually eligible or a district contributor under the NRHP, CRHR, HCM, or Historic Preservation Overlay Zone (HPOZ) designation criteria.

## 1.1 Location

The Port is in the San Pedro and Wilmington neighborhoods, the southernmost area of the city of Los Angeles. Terminal Island, originally known as Rattlesnake Island, comprises 2,854 acres of land. The Ports of Los Angeles and Long Beach created most of Terminal Island using reclaimed land dredged from the San Pedro Harbor. The Port of Los Angeles maintains the western half of Terminal Island while the Port of Long Beach administers the eastern half. The Ports of Los Angeles and Long Beach use Terminal Island for industrial purposes, which primarily include container shipping activities. Fish Harbor is in the southwestern portion of Terminal Island, just east of the Port’s Main Channel, and consists of an inner and outer harbor. Figure 1-1, below, provides the location of Terminal Island and Fish Harbor.





Extant Star-Kist facilities are on the east side of Fish Harbor, with the Plant facing west onto the harbor and the Empty Can Warehouse and East Plant situated east of the Plant. Ways Street fronts the Plant to the west and separates it from the harbor. Bass Street forms the Plant's northern boundary, Barracuda Street forms the eastern boundary, and outer Fish Harbor forms the southern boundary. The Empty Can Warehouse is at the northeast corner of the intersection of Bass and Barracuda Streets. The East Plant is bound by Barracuda Street to the west, Bass Street to the north, Earle Street to the east, and Marina Street to the south. Bass Street is gated off and inaccessible to the public. Likewise, Barracuda Street at and south of Bass Street is also gated. Table 1-2, below, provides additional locational data for each extant Star-Kist Facility. Figure 1-2 depicts the location of these three Star-Kist facilities.

**Table 1-2. Locational Data for Extant Star-Kist Facilities**

Name	Address	Year Built	UTM	Notes
Plant	1050 Ways Street	1952	11S; 382896.98 mE/ 3733600.92 mN	Block bound by Ways, Bass, and Barracuda Streets, and outer Fish Harbor to the south
Empty Can Warehouse	926 Barracuda Street	1970	11S; 382953.42 mE/ 3733808.66 mN	Northeast corner of Bass and Barracuda Streets
East Plant	936-950 Barracuda Street	1971-1977	11S; 383045.53 mE/ 3733609.65 mN	Block bound by Barracuda, Bass, and Earle Streets, and Marine Way to the south

UTM = Universal Transverse Mercator

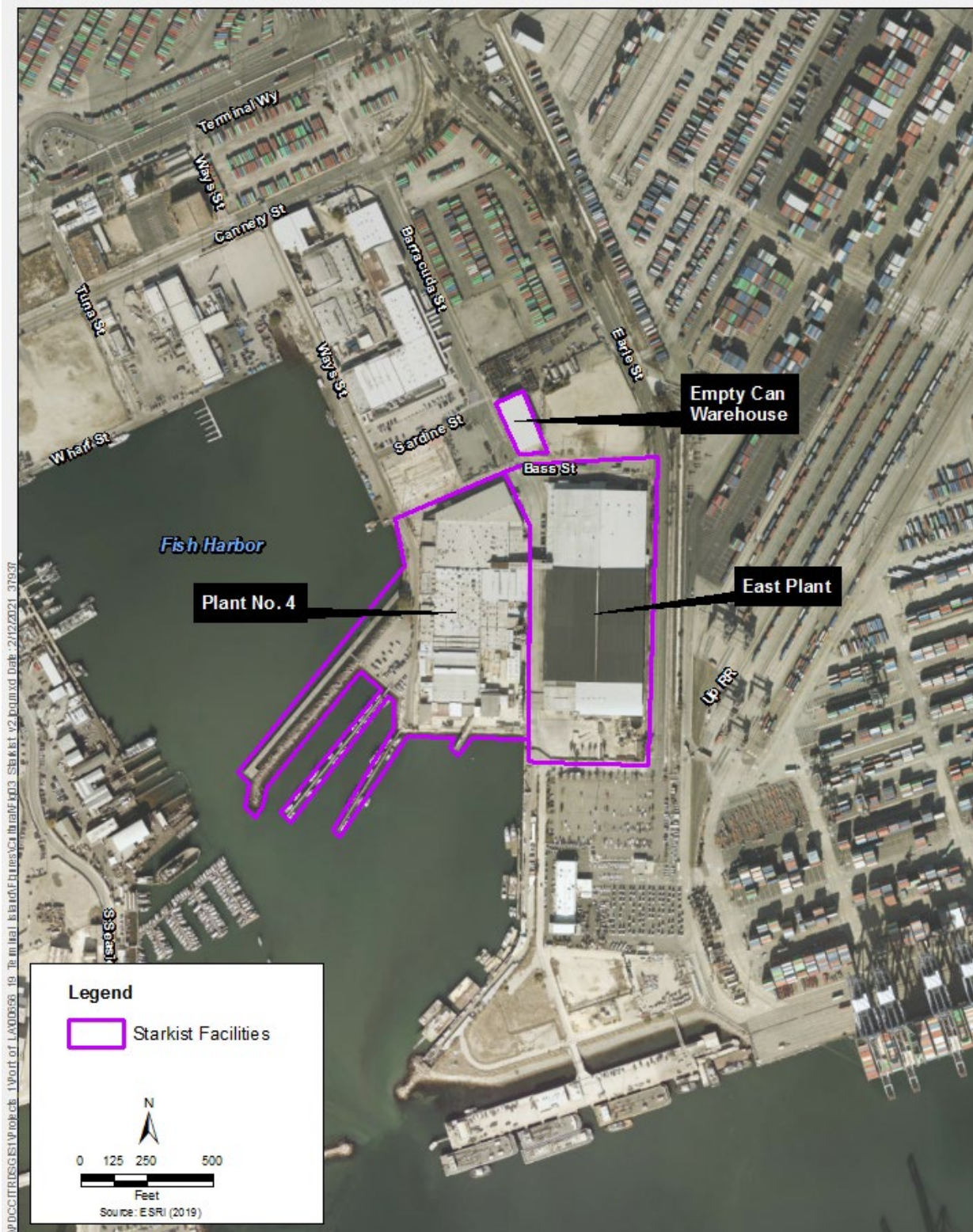


Figure 1-2. Star-Kist Facilities

## Chapter 2

# 2008 Evaluation: Summary of Deficiencies

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The Harbor Department evaluated the Plant and its associated Star-Kist buildings in 2008 in the context of the 2008 evaluation. Jones & Stokes, ICF's predecessor organization, prepared the 2008 evaluation, which argued that the Plant appeared eligible for the NRHP, the CRHR, and as a local HCM under all criteria: events or patterns of events, important persons, architecture, and information potential.

The 2008 evaluation stated that the Plant appeared eligible under NRHP/CRHR A/1 because it was important in the fishing and canning industry at the Port and that the Plant was the largest example of its type when it opened in 1952; under NRHP/CRHR B/2 because Star-Kist president Joseph J. Bogdanovich was an important person in Port history and Plant architect John K. Minasian was an important person in architectural history; under NRHP/CRHR C/3 because the Plant's tilt-up concrete construction was significant as the largest example built by a private company on the west coast, and its Moderne style façade featured key aspects of its era and was sited to impress persons from the harbor; and under NRHP/CRHR D/4 because the Plant had the potential to yield important information because it was "the most complete and operative cannery facility in the Port."<sup>1</sup>

The Harbor Department initiated re-evaluation of the resources in accordance with its Cultural Policy. The Harbor Department requested ICF's support with this re-evaluation. As a first step, ICF reviewed the 2008 evaluation. Based upon its review and additional research, ICF noted inaccuracies and deficiencies in the 2008 evaluation according to the standards set for the NRHP, CRHR, HCM, and HPOZs.

The sections below explain why the findings are incorrect or deficient. The change in finding between the 2008 evaluation and this re-evaluation is not the result of changes to the property since 2008, but rather a revised analysis of integrity and a new evaluation based on an appropriate understanding of the criteria that corrects the 2008 evaluation. Newly available sources discussed in Chapter 4 support the current evaluation.

## 2.1 2008 Evaluation Findings

The 2008 evaluation analyzed the Plant and eight additional resources associated with the company's production facilities on Terminal Island.<sup>2</sup> The 2008 evaluation found eight of nine buildings to be ineligible (Table 2-1). The 2008 evaluation stated that the Plant (formerly the main building) appeared to be eligible for the NRHP, the CRHR, and as an HCM under all four criteria.

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<sup>1</sup> *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, prepared for the Los Angeles Harbor Department (January 2008), 38–40; 40 quoted. As with its reference in text, "2008 evaluation" will be used to identify this reference hereafter.

<sup>2</sup> The current evaluation considers three of the 2008 buildings as one building: Cold Storage, Can Manufacturing (formerly Impress Plant), and Warehouse (formerly Distribution) form the East Plant.

**Table 2-1. Resources Evaluated in 2008**

Building Name in 2008 Evaluation	Address	Year Built*	NRHP, CRHR, and HCM Eligible per 2008 Evaluation?
Net Shed	250 Terminal Way	1947 and 1948	No
<b>Main Plant</b>	<b>1050 Ways Street</b>	<b>1952</b>	<b>Yes</b>
Pet Products	212–214 Terminal Way	1950, 1961–1969	No
Green	926 Barracuda Street	1970	No
Cold Storage	950 Barracuda Street	1971; 1974–1977	No
Impress Plant	936 Barracuda Street	1972	No
Animal Care	919 Earle Street	1972	No
Distribution	938 Barracuda Street	1974	No
Pilot Plant	642 Tuna Street	1979	No

\*These dates reflect updated construction dates, based on research completed for this technical report.

## 2.2 Deficiencies of the 2008 Evaluation

Review of the 2008 evaluation noted deficiencies in the previous research and inaccuracies in the application of NRHP, CRHR, and local criteria that prevented the authors of that report from accurately assessing the eligibility of the Plant. The 2008 evaluation provided insufficient consideration of the period of significance, alterations, and integrity; and the analysis under three of the significance criteria. ICF identified eight topics that represent these deficiencies identified in Table 2-2, below.

**Table 2-2. Summary of Deficiencies Identified in the 2008 Evaluation**

Topic	Inaccuracy or deficiency	Section
Period of Significance	<ul style="list-style-type: none"> <li>Did not establish a clearly stated period of significance</li> </ul>	2.3.1
Construction History and Alterations	<ul style="list-style-type: none"> <li>Did not provide a construction history or clearly identify alterations</li> </ul>	2.3.2
Integrity	<ul style="list-style-type: none"> <li>Did not analyze the seven aspects of integrity</li> </ul>	2.3.3
Joseph Bogdanovich	<ul style="list-style-type: none"> <li>Did not support claims regarding significant association with Joseph Bogdanovich, president of Star-Kist at the time of the Plant's construction</li> </ul>	2.3.4
John K. Minasian/ Work of a Master	<ul style="list-style-type: none"> <li>Did not support claims regarding significant association with John K. Minasian, architect of the Plant</li> <li>Erroneously included discussion of Minasian as a master architect under Criteria B/2</li> <li>Did not establish Minasian as a master architect or that the Plant is a significant example of his work under Criteria C/3</li> </ul>	2.3.5

Topic	Inaccuracy or deficiency	Section
Architecture: Distinctive Characteristics	<ul style="list-style-type: none"> <li>Did not provide architectural context or thresholds of significance on either the building type or style, but indicated that the Plant was significant for exhibiting several elements of late-1940s and/or 1950s design and as an industrial complex</li> <li>Did not support claim that the Plant's large-scale, tilt-up concrete construction is significant</li> </ul>	2.3.6, Distinctive Characteristics
Architecture: High Artistic Value	<ul style="list-style-type: none"> <li>Did not support the claim that the Plant's design was significant for impressing viewers from the harbor and did not provide evidence to support the claim that this was uncommon at the Port</li> </ul>	2.3.6, High Artistic Value
Information Potential	<ul style="list-style-type: none"> <li>Did not substantiate the statements that despite the removal of process engineering/canning equipment, the Plant stands "as the most complete and operative cannery in the Port of Los Angeles" and the "canning process...is still well represented"<sup>3</sup></li> </ul>	2.3.7

## 2.3 Analysis of the 2008 Evaluation's Deficiencies

This section reviews the 2008 evaluation's deficiencies.

### 2.3.1 Period of Significance

*The 2008 evaluation lacked a clearly stated period of significance.* Clearly establishing a period of significance provides the framework for analyzing integrity of eligible resources. Although it implies that the Plant's period of significance is 1952, its date of construction, the 2008 evaluation does not explicitly state a period of significance. Without knowing *when* a property is significant, it is impossible to assess whether it *retains sufficient integrity to convey that significance*. In the case of the Plant, this omission is particularly problematic because Star-Kist extensively altered the building during the 1970s and 1980s such that it no longer looks like or reflects its operations as it did in 1952 or during any period related to a significant historic context.

### 2.3.2 Construction History and Alterations

*The 2008 evaluation included neither a detailed construction history nor a thorough discussion of alterations.* Based on a visual comparison of historic photographs and current conditions, supplemented by review of building permits on file with the Los Angeles Department of Building and Safety, architectural historians developed a comprehensive understanding of the Plant's physical development over time. A detailed list of alterations is provided in Chapter 7, below. This evaluation also summarizes the alterations on Figure 2-1, which compares a 1952 bird's-eye photograph to a recent image taken from the same angle and identifies areas of major alteration. Star-Kist also completed minor exterior alterations and numerous interior alterations, which are not represented on Figure 2-1. In addition, its process engineering equipment has been removed.

<sup>3</sup> 2008 evaluation 43, quoted.





**Figure 2-1. Birds-eye view of Star-Kist Plant No. 4 in 2018, with green overlay denoting extant portions of the 1952 building and red noting additions since 1952, camera facing northeast.**

*Google and ICF, 2018.*

### 2.3.3 Integrity

*The 2008 evaluation lacked a detailed analysis of integrity.* Integrity is the cornerstone of the significance edifice. A property must retain sufficient integrity to convey its significance. Moreover, an analysis of integrity “must always be grounded in an understanding of a property’s physical features and how they relate to its significance.”<sup>4</sup> Using construction history as evidence, this evaluation’s detailed integrity analysis is provided below in Chapter 8. Because of extensive alterations performed in the 1970s and 1980s, the Plant lacks sufficient integrity to convey significance with a 1952 period of significance, the period of significance implied in the 2008 evaluation.

### 2.3.4 Joseph Bogdanovich

The 2008 evaluation identified Joseph Bogdanovich as a significant person in the history of Star-Kist and the canning industry. It did not, however, establish a factual basis for this claim.

Significance under this criterion refers to “individuals whose activities are demonstrably important within local, state, or national historic context.”<sup>5</sup> Before a property can be considered eligible under this criterion, a researcher must identify and document *specific contributions* to history made by individuals associated with that property. Moreover, the researcher must establish the nature and duration of the association between the property and person. That association must reflect the person’s “*productive life*.”<sup>6</sup> For example, the headquarters of an important mogul’s business empire, wherein he or she kept an office from which he or she directed the business during its important period, could be eligible under this criterion. A significant architect’s studio, wherein the architect

<sup>4</sup> National Park Service (NPS), “How to Apply the National Register Criteria for Evaluation (National Register Bulletin 15),” *National Register Bulletin* (Washington D.C.: NPS, 1995), 44, quoted, accessed 10/7/2020, [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf).

<sup>5</sup> “National Register Bulletin 15,” 14.

<sup>6</sup> “National Register Bulletin 15,” 15.

designed his or her body of work, or the home in which he or she lived during the productive period of his or her career, could also be eligible under this criterion. A representative example of an architect's work, however, should be assessed under design/construction Criterion C: the work of a master.<sup>7</sup>

In 1917, Martin Bogdanovich and partners established the French Sardine Company (French Sardine; later renamed Star-Kist). After Bogdanovich died in 1944, Joseph Bogdanovich became the company's president. Although undoubtedly a successful businessperson, neither the 2008 evaluation nor current research established the younger Bogdanovich as having "gained importance within his profession" consistent with this criterion. Moreover, Star-Kist located its administrative headquarters elsewhere—specifically, within an office in San Pedro and not at the Plant. As such, research indicates that, as president, Bogdanovich would have held an office at the company's administrative office in San Pedro. Although Bogdanovich was involved in the fishing and canning activities at French Sardine locations in the 1930s, no evidence emerged to physically place him in the Plant during its operation.

Because Bogdanovich has not been established as a significant person or as someone who possesses a demonstrable association with the Plant, the 2008 evaluation was incorrect in asserting eligibility under this criterion.

### 2.3.5 John K. Minasian/Work of a Master

The 2008 evaluation identified John K. Minasian as a significant person in the history of Star-Kist and its construction but did not provide a factual basis for this assertion. As noted above in Section 2.3.4, Criteria B/2 must represent the productive life of an individual. Therefore, Minasian would have had to work or live in the Plant for it be eligible under this criterion, and he did not. The 2008 evaluation erroneously details Minasian's career achievements as part of the Criteria B/2 discussion.

After designing the Plant, Minasian became known for his tower-related engineering projects, which led him to work as chief consulting engineer on the construction of the 1962 Space Needle in Seattle, Washington. Although he was certainly a competent architect in 1952, the 2008 evaluation fails to explain how the Plant is a good or representative example of his work illustrative of his achievements.

Because Minasian has not been established as a significant person or as someone who possesses a demonstrable association with the Plant, the 2008 evaluation was incorrect in asserting eligibility under Criteria B/2. In addition, the 2008 evaluation did not argue that the Plant was the work of a master under Criteria C/3—the appropriate criteria for evaluating Minasian as a master architect.

### 2.3.6 Architecture

A property may be eligible for its architecture, design, engineering, or construction if it meets one or more of the following aspects of significance under Criteria C/3:

- Embodies the distinctive characteristics of a type, period, or method of construction;
- Represents the work of a master;
- Possesses high artistic value; or

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<sup>7</sup> "National Register Bulletin 15," 16.

- Represents a significant and distinguishable entity whose components may lack individual distinction.<sup>8</sup>

## Distinctive Characteristics

The 2008 evaluation failed to establish that the Plant embodies the distinctive characteristics of a type or style, period, or method of construction.

### Type

The 2008 evaluation lacks context on the light industrial building type in support of an eligible finding under this criterion. It did not identify the history or character-defining features of the type or provide significance thresholds. The 2008 evaluation noted that the primary elevation defined the office portion of the building and that its distinctive entrance was important in contrast to the otherwise industrial and unembellished design.<sup>9</sup> Although light industrial design was common in industrial buildings of the 1950s, the 2008 evaluation failed to explain how the Plant's design met this criterion for its type as a light industrial building.

### Style

The 2008 evaluation lacks context on Moderne architecture in support of an eligible finding under this criterion. It did not identify the history or character-defining features of the style or provide significance thresholds. The Plant's primary (west) elevation includes some elements of the Late Moderne style such as a stack-bond brick cladding and bezeled windows but is missing other elements such as a pylon-like entrance or built-in planters.<sup>10</sup>

The 2008 evaluation fails to address the entryway's second-story addition, which altered the original Moderne appearance of the entryway and the primary elevation's overall design. This omission contributes to its elision of this major 1980 alteration, which radically changed the Plant's appearance. As detailed in Chapters 7 and 8, this 1980 alteration, along with other alterations completed in the 1970s and 1980s, has not accrued significance in its own right because it is not associated with an important historic context.

## Construction

The 2008 evaluation stated that the Plant was eligible as the largest example of tilt-up concrete construction built by a private company on the West Coast, as identified in a 1952 newspaper article. The 2008 evaluation, however, fails to explain how or why this distinction, even if true, would establish significance under this criterion.

## High Artistic Values

The 2008 evaluation indicated that the Plant was sited and designed in order to "impress" viewers from the harbor. The 2008 evaluation also states that this was unusual, and therefore significant. These points are not sufficient to establish eligibility under this criterion.

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<sup>8</sup> "National Register Bulletin 15," 17, quoted. The final bullet is typically cited to support a district evaluation.

<sup>9</sup> 2008 evaluation 42–43.

<sup>10</sup> It originally had such an entrance, but a 1980 second-story addition modified the appearance of the entrance.



By their very nature, buildings, structures, and objects at the Port depend on its harbors and channels; outwardly displaying entrances or architectural detailing along those waterways is commonplace. The Harbor Department architecturally designed its transit sheds, passenger-cargo terminals, and public buildings, often hiring well-known local architects, although sometimes drafting plans in-house. Extant examples are abundant and often include architectural elements on all elevations of a building, including elevations seen from the harbor, to express to all viewers that the Port and its tenants were world-class.<sup>11</sup>

## 2.3.7 Information Potential

The 2008 evaluation's discussion regarding its information potential suggests that, although all equipment has been removed, the Plant stands "as the most complete and operative cannery in the Port of Los Angeles."<sup>12</sup>

Information potential corresponds primarily to archaeological resources but can apply to buildings, structures, or objects. A property must "have the potential to answer...research questions" about important human history that "can only be answered by the actual physical material" of a place.<sup>13</sup> Furthermore, the property "must be, or have been, the principal source of the important information."<sup>14</sup>

The 2008 evaluation fails to establish the importance of research questions regarding fish processing and canning that are reflected in this Plant alone. The Plant retains one original Fish Import Dock and its interior drainage system, but all other process engineering equipment, some of which was specially designed for the Plant, such as butchering and cleaning tables, a pre-cooker system, multi-level conveyers, automatic can machines, and sanitizing machines, had been removed by 2008. Without this equipment, the Plant, as it stands today, cannot yield significant information regarding Star-Kist production. Moreover, literature and historic photographs detailing the tuna canning process generally and at the Plant are widely available such that inspection of the Plant, as it stands today, contributes little information to our understanding of this history.

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<sup>11</sup> Extant examples of architecturally distinctive Port-designed buildings include but are not limited to the 1921 Mission Revival transit shed at Berth 151A (formerly at Berth 151); the 1927 classically inspired Fireboat House No. 1 (now the Port Police Dive Team Building) on Seaside Avenue across the harbor from Star-Kist Plant No. 4; the 1930s Beaux-Arts transit shed at Berths 180–181; the 1937/1950 Moderne and International Style passenger-cargo terminal at Berths 154–155; the 1953 Mission Revival-inspired Moderne transit shed at Berth 153; and the 1963 International Style passenger-cargo terminal at Berth 93 (cruise terminal). Each of these buildings feature a distinct architectural style and architecturally designed elements on all elevations, not just the harborside elevation or main entrance.

Additionally, private companies designed buildings with architectural distinction along waterfronts such as the 1920s–1930s classically inspired Mission Revival Standard Oil property on Seaside Avenue across the harbor from the Plant. In addition, although substantially altered today, the entrance and office of the early 1930s California Marine Packing and Curing Company facilities at the Cannery Block (north of the Plant) were designed with Moderne elements facing Fish Harbor.

<sup>12</sup> 2008 evaluation 43, quoted.

<sup>13</sup> "National Register Bulletin 15," 21, quoted.

<sup>14</sup> "National Register Bulletin 15," 21, quoted.

## Chapter 3

# Registration Programs

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Federal, state, and local jurisdictions recognize the public's interest in historic resources as well as the public benefit from preserving them. The following sections describe registration programs' eligibility requirements. Each program has criteria for eligibility coupled with integrity thresholds.

### 3.1 Federal

#### 3.1.1 National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the NRHP was established by the National Historic Preservation Act of 1966 as “an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The NRHP recognizes properties that are significant at the national, state, and local levels. Ordinarily, birthplaces, cemeteries, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties that are primarily commemorative in nature; and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP, unless they satisfy certain conditions.

According to NRHP guidelines, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess and meet the established criteria:

**Criterion A.** A property that is associated with events that have made a significant contribution to the broad patterns of our history.

**Criterion B.** A property that is associated with the lives of persons who were significant in our past.

**Criterion C.** A property that embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.

**Criterion D.** A property that yields, or may be likely to yield, information important in prehistory or history.

## 3.2 State

### 3.2.1 California Register of Historical Resources

The National Historic Preservation Act mandated the selection and appointment of a State Historic Preservation Officer (SHPO) in each state. Each SHPO is tasked with, among other duties, maintaining an inventory of historic properties. In California, the state legislature established additional duties for the SHPO. These duties include maintenance of the CRHR. Established by California Public Resources Code Section 5024.1(a) in 1992, the CRHR serves as “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent feasible, from substantial adverse change.” According to California Public Resources Code Section 5024.1(c), the CRHR criteria broadly mirror those of the NRHP. The CRHR criteria, found in California Public Resources Code Section 5024.1(c), are as follows:

“A historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, region, or method or construction; represents the work of a master; or possesses high artistic values.
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.”

The general rule is that a resource must be at least 45 years old to qualify for the CRHR. Inclusion in the CRHR can be based on a nomination and public consideration process. In addition, a resource that is subject to a discretionary action by a governmental agency is evaluated for eligibility for the CRHR. As previously stated, properties listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

## 3.3 Local

The City of Los Angeles formally recognizes important cultural resources, including buildings, sites, objects, and districts, through two programs administered by the Los Angeles Department of City Planning. The City designates local landmarks, which it calls HCMs, according to Chapter 9, Section 22 (Cultural Heritage Ordinance), of the Los Angeles Municipal Code. It also recognizes local historic districts, which are referred to as HPOZs and codified in Section 12.20.3 of the Los Angeles Municipal Code.

### 3.3.1 Historic-Cultural Monuments

The criteria for designation as an HCM are codified in Chapter 9, Section 22, of the Los Angeles Municipal Code. An HCM is any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to Los Angeles. Designated resources may include historic structures or sites:

- In which the broad cultural, political, economic, or social history of the nation, state, or community is reflected or exemplified
- That are identified with historic personages or with important events in the main currents of national, state, or local history
- That embody the distinguishing characteristics or an architectural-type specimen, inherently valuable for a study or a period style or method of construction
- That represent notable work of a master builder, designer, or architect whose individual genius influenced his age

### 3.3.2 Historic Preservation Overlay Zones

A City of Los Angeles historic district is identified as an HPOZ. An HPOZ defines “an area of the city which is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural or aesthetic significance.”<sup>15</sup> Likewise, it must meet at least one of the criteria listed above under the HCM criteria. The procedures for designating an HPOZ are found in Section 12.20.3 of the Los Angeles Municipal Code.

## 3.4 Los Angeles Harbor Department

The Harbor Department adopted the Cultural Policy (Resolution No. 13-7479) on April 24, 2013. This policy includes the identification of historic resources early in the planning process, provides a framework for the identification of historic resources, and supports preservation and re-use of historic resources. Four sections make up the policy: Inventory, Evaluation, Preservation, and Documentation of Historic Resources. For detailed regulatory information on the Cultural Policy, see Appendix C.

## 3.5 Integrity

Integrity is the ability of a property to convey its historic significance. The evaluation of a resource’s integrity must be grounded in an understanding of that resource’s physical characteristics and how those characteristics relate to and reflect its significance.

The seven aspects of integrity are:

1. **Location:** the place where a historic event occurred or the place where a property was constructed
2. **Design:** “the combination of elements that create form, plan, space, structure, and style of a property”<sup>16</sup>
3. **Setting:** the physical environment of and surrounding a property
4. **Materials:** the physical elements and patterns in which they were arranged

<sup>15</sup> Office of Historic Resources, “HPOZ FAQs” (Los Angeles, CA: Department of City Planning, Office of Historic Resources, n.d.), 1, accessed 7/27/2020, <https://planning.lacity.org/odocument/1a885676-568b-40fb-b174-00730dd249bf/Info%20Brief%20HPOZ%20FAQs.pdf>.

<sup>16</sup> “National Register Bulletin 15,” 44, quoted.

5. **Workmanship:** the physical evidence of craft or manufacture used during a particular era or culture
6. **Feeling:** the “property’s expression of the aesthetic or historic sense of a particular period of time”<sup>17</sup>
7. **Association:** “the direct link between an important historic event or person and a historic property”<sup>18</sup>

In order to identify a property’s integrity, it is essential to establish a period of significance, or a time in which the property’s physical features expressed its significant historic context.

The NRHP requires a resource to not only meet one of the criteria listed above, but also to possess integrity. The NRHP requires a high level of integrity.

The CRHR requires a resource to not only meet one of the criteria listed above, but also to possess integrity. The CRHR defines integrity as “the authenticity of a historical resource’s physical identity, evidenced by the survival of characteristics that existed during the resource’s period of significance.” The CRHR’s threshold level of integrity is lower than that of the NRHP, but the resource must still retain sufficient integrity to convey significance. In addition, a resource that has lost its historic character may retain eligibility if it can yield or has the potential to yield significant information.<sup>19</sup>

The Los Angeles HCM and HPOZ also require integrity for a property to be listed or eligible for listing. Integrity is defined as the “ability of a historic building to its historical, architectural and cultural significance with consideration” of the seven aspects listed above.<sup>20</sup> The HCM and HPOZ thresholds may also be lower than those of the NRHP and CRHR, provided it retains links to its significance.

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<sup>17</sup> “National Register Bulletin 15,” 45, quoted.

<sup>18</sup> “National Register Bulletin 15,” 45, quoted.

<sup>19</sup> Office of Historic Preservation, “How to Nominate a Resource to the California Register of Historical Resources,” *Preservation Technical Assistance Series* (Sacramento, CA: OHP, August 1997), Appendix A, 2, accessed 10/9/2020, [https://ohp.parks.ca.gov/pages/1056/files/07\\_TAB%207%20How%20To%20Nominate%20A%20Property%20to%20California%20Register.pdf](https://ohp.parks.ca.gov/pages/1056/files/07_TAB%207%20How%20To%20Nominate%20A%20Property%20to%20California%20Register.pdf).

<sup>20</sup> Los Angeles Conservancy, “Landmark This! Guide to Local Landmark Designation” (Los Angeles, CA: Los Angeles Conservancy, 2015), 6, accessed 2/15/2021, <https://www.laconservancy.org/sites/default/files/files/resources/Landmark%20This%21%20Cultural%20Edition%20FINAL.pdf>.

## Chapter 4

# Methodology for Star-Kist Facilities

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This chapter provides the methodology for researching, surveying, and evaluating the Star-Kist facilities.

### 4.1 Research Sources Consulted

Architectural historians researched Star-Kist, its facilities on Terminal Island, the canning industry at Fish Harbor, and the history of Fish Harbor to evaluate extant Star-Kist facilities for NRHP, CRHR, and local and district eligibility. They consulted the following sources:

- 2008 evaluation (Appendix B)
- Calisphere: University of California Digital Archives
- Historicaerials.com
- Los Angeles Department of Building and Safety online permit archives
- Harbor Department Annual Reports
- Harbor Department Photograph archive
- Los Angeles Public Library primary and secondary sources
- *Los Angeles Times* Historical Archives (ProQuest)
- Newspapers.com database
- Sanborn Fire Insurance Company maps (Sanborn maps)
- San Pedro Historical Society collections:
  - Star-Kist
  - Canning
- Tessa: Digital Collection of the Los Angeles Public Library

A records search from the South Central Coastal Information Center was not completed for the purposes of this evaluation.

### 4.2 Survey

Daniel Paul and Margaret Roderick, architectural historians meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, completed a field survey of all extant Star-Kist buildings previously recorded in the 2008 Evaluation on October 29, 2018. The Harbor Department's EMD and Real Estate Division staff members accompanied Mr. Paul and Ms. Roderick. The purpose of the survey was to inspect and digitally photograph all buildings, structures, and objects within the boundaries of the Plant as well as other buildings associated with Star-Kist that

were subject to evaluation for historic significance. The visual inspection noted alterations, integrity considerations, architectural details, and potential character-defining features.

## 4.3 Historic Context Statements

From the sources listed above and review of the 2008 evaluation, ICF determined that the 2008 evaluation had gaps in its historic context. ICF developed historic contexts related to Star-Kist and its extant associated facilities, which build upon the *Area History* and *Historic Context* sections in the 2008 evaluation.<sup>21</sup> Information on the Port, Fish Harbor, and closure of the Plant presented in this report provides more detail than found in the 2008 evaluation. Building type and architectural style context introduces new context for evaluation. ICF prepared the following contexts for the purpose of the current evaluation:

- The Port of Los Angeles and the Rise of Containerization (1945–1989)
- History of the Cannery (1915–1985)
- The Post-World War II Rise and Fall of Fish Harbor (1945–1985)
- The End of Star-Kist’s U.S. Production (1980–1984)
- Architecture
  - Industrial (1945–1985)
  - Moderne Architecture (1925–1959)

## 4.4 Potentially Important Dates

Based on the historic context presented in the 2008 evaluation and that prepared for the current evaluation, this report identifies potentially important dates associated with each context and the Plant. Table 4-1 below summarizes this information.

**Table 4-1. Potentially Important Dates Associated with Star-Kist History**

Theme	Potentially Important Dates	Justification of Potentially Important Dates	Significant Historical Context?	Retains Sufficient Integrity?
United States Tuna Canning Industry	1952–1969	Beginning with the construction of Plant No. 4 and including the period of the industry’s prominence in the United States and at the Port of Los Angeles. By 1969, approximately half of canned tuna was prepared overseas, denoting a shift the United States industry. <sup>22</sup>	Yes	No

<sup>21</sup> This report incorporates by reference the following historic context statements included in the 2008 evaluation: French Sardine Company/Star-Kist History; Founder of French Sardine Company/Star-Kist: Martin Bogdanovich; Star-Kist Advertising/Marketing; The “Tuna Nurses” – Women Cannery Workers of Star-Kist; and Star-Kist Plant Architect: John K. Minasian. See Appendix B, 11–20.

<sup>22</sup> David F. Belnap, “U.S.-Latin Tuna Talks Bring No Firm Results,” *Los Angeles Times* (August 18, 1969), 4.

Theme	Potentially Important Dates	Justification of Potentially Important Dates	Significant Historical Context?	Retains Sufficient Integrity?
Star-Kist Company: Establishment in Industry	1952–1959	Beginning with the construction of Plant No. 4 and extending through the company's construction of a new plant overseas, denoting a shift in company production. <sup>23</sup>	Yes	No
Star-Kist Company: Globalization	1960–1979	Initial decline at the Port of Los Angeles beginning with the construction of a Star-Kist plant overseas and including challenges posed by foreign competition, local overfishing, pollution from the canning process, and the passing of the Marine Mammal Protection Act of 1972 that directly affected common tuna fishing practices. <sup>24</sup> The company retained high production, but this period illustrates instability that led to decline and closure of Plant No. 4 at the Port of Los Angeles.	No	N/A
Star-Kist Company: End of United States Manufacturing	1980–1984	Rapid decline in the company's Port of Los Angeles-based operations due to ongoing competition from foreign canneries including lack of adequate tuna supply and increased canning wages that resulted in consolidation of company headquarters and large-scale layoffs. When Congress declined to increase tariffs on imported tuna, Star-Kist closed the Plant on October 1, 1984. <sup>25</sup>	No	N/A
Joseph Bogdanovich	1952–1988	Beginning with the construction of Plant No. 4 through the company's acquisition by Heinz, where Bogdanovich remained chief executive officer until 1988.	No	N/A
John Minasian	1952	Minasian is not associated with the Plant after construction.	No	N/A
Industrial Architecture	1952	The Plant's design supported state-of-the-art, specially designed canning equipment for efficient and sterile production that is no longer extant.	No	N/A
Moderne Architecture	1952	Plant featured a modest Late Moderne primary elevation and entry program.	No	N/A
Moderne Addition	1980	Star-Kist completed a major Late Moderne-inspired second-story addition to the Plant's primary elevation in 1980.	No	N/A

<sup>23</sup> John Rogers, "Boomy '60 Foreseen, with 22% Auto Rise," *New York Daily News* (December 7, 1959), 129; Howard Morin, "Russ Move into New Fishing Area Found by U.S. Clipper," *San Pedro News-Pilot* (September 23, 1959), 1.

<sup>24</sup> Mark Schoell, "The Marine Mammal Protection Act and Its Role in the Decline of San Diego's Tuna Fishing Industry," *The Journal of San Diego History* Vol. 45, No. 1 (Winter 1999), np, accessed March 30, 2021, <https://sandiegohistory.org/journal/1999/january/tuna-2/>.

<sup>25</sup> For information on the end of the company's U.S. Production see historic context statement in Section 6.3, *The End of Star-Kist's U.S. Tuna Production (1980–1984)*, below.



## 4.5 Consensus

On December 5, 2018, Mr. Paul, Ms. Roderick, Andrew Bursan, and Colleen Davis, professionally qualified architectural historians, reviewed the research to establish this report's findings regarding Star-Kist facilities' individual eligibility.

## Chapter 5

# Architectural Descriptions for Star-Kist Facilities

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Architectural descriptions of the Plant, Empty Can Warehouse, and East Plant are provided below. The descriptions identify alterations.

### 5.1 Plant

The Plant at 1050 Ways Street faces west toward Ways Street and Fish Harbor (Figure 5-1 and Figure 5-2). The primary elevation spans over 400 feet and displays Late Moderne and utilitarian features. Ways Street separates the property from Fish Harbor as well as a circa 1963 surface parking lot, which leads to the inner Fish Harbor breakwater and three piers. The parking lot, docks, Fish Import Dock (located at the south elevation), and infrastructure elements are considered part of the Plant. The primary (west) elevation is a low-rise, horizontally oriented, nine-volume configuration with a mixture of unfenestrated walls and contrasting stack-bond brick cladding. As a whole, the building rises approximately 20 feet with a flat roof, although a few volumes feature gabled roofs. The office portion of the Plant has two stories, while the light industrial spaces typically have one tall story.



**Figure 5-1. Aerial map showing Plant No. 4 boundary.**

*Google and ICF, 2018.*



**Figure 5-2. Star-Kist Plant No. 4, primary (west) elevation, camera facing northeast.**

*ICF, 2018.*

### **5.1.1 Primary (West) Elevation**

The primary elevation is divided into nine distinct volumes. The central portion, or the third volume from the north, includes the building's altered main entrance, flanked by altered two-story wings designed with Late Moderne attributes (Figure 5-3). Three pairs of metal-framed glass doors, with each pair topped by a large steel transom, make up the tall, deeply recessed concrete entrance (Figure 5-4 and Figure 5-5). A non-original hood surmounts the pylon's original squat-fluted cornice line. The entrance's flanking wings rise two stories and project slightly above the entrance's porch hood. Concrete, brick, and smooth stucco clad the wings.



**Figure 5-3. Star-Kist Plant No. 4, primary (west) elevation showing entrance, camera facing northeast.**  
*ICF, 2018.*



**Figure 5-4. Star-Kist Plant No. 4, primary (west) elevation, detail of third volume from the north, entrance pylon, camera facing east.**  
*ICF, 2018.*





**Figure 5-5. Star-Kist Plant No. 4, primary (west) elevation, detail of third volume from the north, detail of entrance, camera facing east.**

*ICF, 2018.*

At the first story, stack-bond brick cladding above a concrete water table wraps around each wing of the entrance (Figure 5-6 and Figure 5-7). At the north wing, a centered, white, concrete bezel surrounds the window and door openings. A solid-slab, double-door configuration is adjacent to large industrial-style rolled-steel windows (with both fixed sashes and awning sashes) arranged to the north. A single solid-slab door is adjacent to a single-light, fixed-sash horizontally orientated window arranged to the south (Figure 5-6). A portion of the north wing's wall is framed by the concrete bezel features' non-original stucco cladding. Approximately half of this stucco cladding features inscribed lines that have been arranged to replicate the muntin pattern of the large rolled-steel window. Directly above the south door and its adjacent single-light window, the stucco cladding lacks inscribed lines. A brick sill runs across the bezel beneath the windows. At the south wing, a bezel surrounds a long, centered ribbon window configuration (Figure 5-7). Each individual window contains one operable metal, two-light awning sash set above a non-operable single-light sash. A brick sill ornaments the base of the bezel surround, which is otherwise formed by white concrete. Slightly north of center, a double solid-slab pedestrian door punctuates the wall. The non-original 1980 second story of each wing exhibits stucco cladding, with an alternating band of windows and stack-bond brick panels surrounded by a bezel. Each individual window is a two-light aluminum slider.



**Figure 5-6. Star-Kist Plant No. 4, primary (west) elevation, detail of third volume from the north, north wing, camera facing east.**

*ICF, 2018.*



**Figure 5-7. Star-Kist Plant No. 4, primary (west) elevation, detail of third volume from the north, south wing, camera facing east.**

*ICF, 2018.*

The northernmost volume of the primary elevation forms a one-story utilitarian volume, punched with three regularly spaced garage door openings. Two openings retain metal roll-up doors, while non-original concrete blocks, a large industrial rolled-steel window, and a single pedestrian door

infill southernmost of the three openings (Figure 5-8). A corrugated metal strip caps the concrete building. Two metal boxes with mechanical equipment hover over the central garage door.



**Figure 5-8. Star-Kist Plant No. 4, primary (west) elevation, detail of northern volume, camera facing northeast.**

*ICF, 2018.*

The second volume from the north rises two stories (Figure 5-9). Its scored concrete construction contains two doors south of center: a metal roll-up door fronted by a sliding chain-link gate and a solid-slab pedestrian door. A non-original infilled window penetrates the wall south of the door. Both the pedestrian door and window punctuation appear to be non-original.



**Figure 5-9. Star-Kist Plant No. 4, primary (west) elevation, detail of second volume from the north, camera facing east.**

*ICF, 2018.*

Described above, the third volume from the north features the main entrance and the majority of the building's surviving Late Moderne elements (Figure 5-3 through Figure 5-7 above).

The fourth volume from the north, like the centered third volume, reflects Late Moderne architectural elements (Figure 5-10). Like the third volume's wings, the fourth volume's first story contains stack-bond brick cladding set above a concrete watertable. The stack-bond cladding, however, is lower than the brick cladding on the main entrance (third volume). A door and two windows complete this volume's fenestration. A pair of half-glazed metal doors and a transom window marks an entrance. A blade sign above the entrance reads "FIRST AID." A centered two-light awning window forms one window, and a double window configuration with a pair of awning windows sandwiched vertically between one-light fixed sashes above and below to the north forms the second window. A brick sill runs below each window configuration. The non-original 1980 stucco-clad second story mirrors the non-original second stories of the third massing's wings. Stack-bond brick panels separate the three aluminum slider windows, all of which are framed by a bezel.





**Figure 5-10. Star-Kist Plant No. 4, primary (west) elevation, detail of fourth volume from the north, camera facing southeast.**

*ICF, 2018.*

The fifth volume from the north also reflects Late Moderne detailing and features additional office space for the Plant (Figure 5-11). An addition to the Plant, this non-original circa 1980 two-story volume features stucco cladding, aluminum sliders, and stack-bond brick. A bezel surrounds a central pair of metal-framed glass doors, which are capped by a single-light transom. A porch hood cantilevers over the entrance. At the first story, a stack-bond brick panel separates an aluminum slider. This configuration flanks the entrance on either side and is surrounded by a bezel. The second story features two bezeled window configurations; the northern one is longer than the southern, and they reflect the same arrangement as the windows on the first story below.



**Figure 5-11. Star-Kist Plant No. 4, primary (west) elevation, detail of fifth volume from the north, camera facing northeast.**

*ICF, 2018.*

The remaining four volumes of this elevation are to the south (Figure 5-12 through Figure 5-14). Set back approximately 50 feet from the entrance, the sixth volume's tilt-up concrete walls, which are divided into five bays, contain large multi-light industrial windows at the clerestory level in the three centered bays (Figure 5-12). A small one-story projection features a pedestrian door but otherwise lacks fenestration. In contrast, a metal roll-up door and a solid-slab pedestrian door fenestrate the southern portion of this volume. Three projecting volumes complete the primary elevation at its southern corner (Figure 5-13 and Figure 5-14). The northernmost (non-original) projection, constructed of concrete blocks, has a solid slab door. The center projecting volume lacks fenestration, although non-original concrete blocks infill a former window opening. At the southernmost volume, non-original plywood sheathes three windows and a pedestrian door. An electrical system, gated by chain-link fencing, fronts the two southernmost bays. A non-attached, non-original warehouse building, formed by vertical metal siding, rests on a concrete base. The building is capped by a low-pitched gabled roof at the southwestern-most portion of the Plant's block.



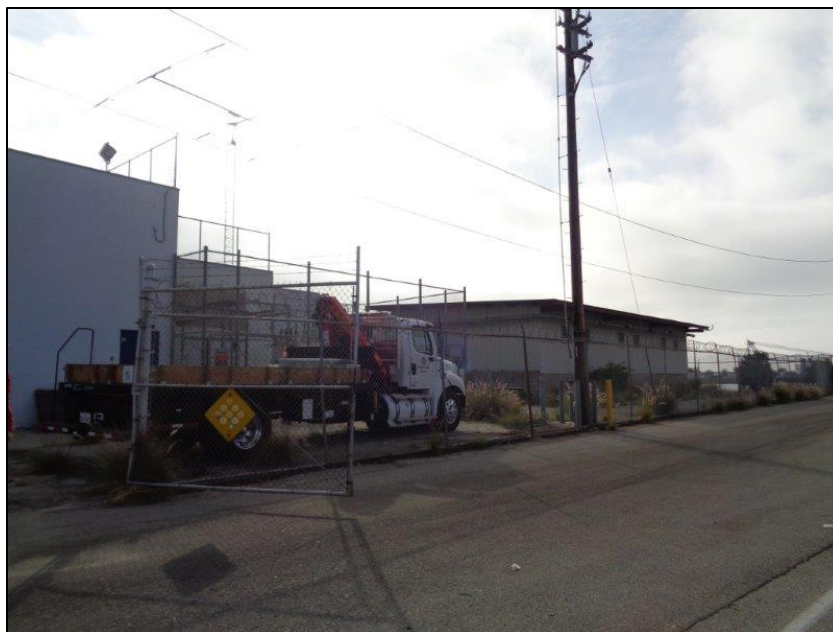
**Figure 5-12. Star-Kist Plant No. 4, primary (west) elevation, detail of lunch patio and recessed warehouse/manufacturing building, sixth volume from the north, camera facing northeast.**

*ICF, 2018.*



**Figure 5-13. Star-Kist Plant No. 4, primary (west) elevation, overview of southwest corner of Plant (including volumes 7-9), camera facing southeast.**

*ICF, 2018.*



**Figure 5-14. Star-Kist Plant No. 4, primary (west) elevation, detail of southwest corner of Plant, showing gated electrical area and detached building, camera facing southeast.**

*ICF, 2018.*

## 5.1.2 North Elevation

Seven asymmetrical bays characterize the north elevation (Figure 5-15). The first five bays from the east, which are non-original and date to 1974, form the bulk of the massing and rise approximately 20 feet. Stepped back from the eastern bays, the two westernmost bays, which are original, rise only approximately 10 feet. Clad with metal siding, a side-gabled roof caps the massing. The first bay from the east features a metal roll-up door at the ground level and two square louvered vents arranged just below the roofline. The second and third bays from the east maintain the same width as the first bay from the east but lack any doors. These two bays remain unpunctuated but for two square-like louvered vents below the roofline, with one in each bay. The fourth and fifth bays from the east are approximately one-half longer than the three bays to the east, and each one contains a metal roll-up door. Three square louvered vents just below the roofline embellish these two bays. A porch hood supported by two posts frames the fifth bay's roll-up door. The sixth bay features a squat, one-story massing with an off-center boarded-up window above a two-door pedestrian opening. Two louvered vents are at ground level. Finally, the westernmost bay corresponds to the primary elevation's northernmost massing and appears to contain a small, centered window.





**Figure 5-15. Star-Kist Plant No. 4, north elevation, camera facing south.**

*ICF, 2019.*

### 5.1.3 South Elevation

The south elevation includes several detached buildings and adjacent industrial elements (Figure 5-16 through Figure 5-22). The variegated five-volume façade reflects the function of the south elevation: tuna importation. A detached one-story warehouse building is at the southwestern corner of the Plant. Its south elevation features metal cladding set atop a concrete base, and corrugated metal infills a garage bay.

Three non-original variegated masses appended to the original south elevation of the Plant's 1952 tilt-up concrete-paneled south elevation (Figure 5-16). A non-original corrugated metal roof dating to the 1970s covers a large space where tuna was stored and processed upon arrival, which is appended to the western portion of the south elevation of the 1952 Plant. Visible through the non-original patio shed, the Plant's tilt-up concrete walls contain a pedestrian door, which is accessed from two steps; a metal roll-up door, which is accessed from a ramp; and at least two window openings that have been infilled with non-original concrete blocks. An approximately 3-foot-tall concrete wall minimally encloses a patio shed space with two crane-conveyor systems above, on the underside of the roof. non-original fiberglass or plastic panels clad the second from the west volume's metal-frame construction. A non-original stepped-back second story, of similar construction and cladding, caps this component. An open loading bay provides access to the center portion on either side. Many of its non-original panels are no longer extant. Non-original, clear plastic panels clad the non-original metal-frame construction of the third volume from the west, and a non-original corrugated metal roof caps this volume. The interior space shades infrastructure elements such as pipes and bulky, non-original bins. A non-original two-story massing rests atop the easternmost portion of this one-story massing and is associated with the remaining Fish Import Dock. A conveyor at the dock rises from sea level to the third-story level (Figure 5-16 and Figure 5-17). The west side of this non-original pop-up contains four aluminum sliding windows, with two in each story, while the east side contains six windows, with three in each story.



**Figure 5-16. Star-Kist Plant No. 4, south elevation, southwest corner of Plant, showing remaining tuna import bridge, camera facing northwest.**

*ICF, 2018.*



**Figure 5-17. Star-Kist Plant No. 4, south elevation's ancillary/related buildings/structures, showing the only remaining tuna import bridge and dock, camera facing south.**

*ICF, 2018.*

Two additions form the eastern side of the south elevation. Located east of the tuna import and processing section of the south elevation, one structure features a low-pitched gabled roof and rusting metal cladding set atop a concrete block foundation (Figure 5-18). Centered on the volume, a projecting gabled element includes a metal roll-up door. The remaining south elevation structure is non-original and now forms the southeast corner of the Plant. Set back from the previously described sections of the south elevation, the metal siding clads a boxy flat-roofed mass, which is

capped by a metal catwalk (Figure 5-19). Plywood partially covers sections of removed metal cladding. Separate outlying buildings and infrastructure adorns the southern portion of the Plant's land (Figure 5-20 through Figure 5-22).



**Figure 5-18. Star-Kist Plant No. 4, south elevation, southeast corner including tanks, camera facing east.**  
*ICF, 2018.*



**Figure 5-19. Star-Kist Plant No. 4, south and rear (east) elevations, southeast corner of Plant No. 4, camera facing north.**  
*ICF, 2018.*





**Figure 5-20. Star-Kist Plant No. 4, south elevation's ancillary/related buildings/structures, showing tuna import bridge in background, camera facing southeast.**

*ICF, 2018.*



**Figure 5-21. Star-Kist Plant No. 4, ancillary/related buildings/structures adjacent to south elevation, showing pipes, railings, fencing, and concrete pads, camera facing southeast.**

*ICF, 2018.*





**Figure 5-22. Star-Kist Plant No. 4, ancillary/related buildings/structures adjacent to south elevation, southeast corner of Plant No. 4, camera facing southeast.**

*ICF, 2018.*

### 5.1.4 Rear (East) Elevation

The variegated rear (east) elevation contains several detached original and non-original buildings and structures in the vicinity. Together, the buildings are a plethora of variegated elevations and mechanical elements, and provided storage and steam power processing for the cannery. Three sections form the rear elevation: a courtyard makes up the southern portion of the elevation, mechanical infrastructure forms the center portion, and the Plant's metal walls align the closed-off Barracuda Street to the east at the north. At the south, the courtyard's concrete flooring shows signs of previous tanks and buildings/structures. The Plant's 1952 tilt-up concrete wall, visible for approximately 150 feet along the west side of the courtyard, includes four non-original metal-clad additions (Figure 5-23). Two of these metal-clad additions rise approximately 20 feet and two of them rise approximately 10 feet. The first addition from the south lacks fenestration. The second addition from the south contains a solid-slab pedestrian door and a metal roll-up door. Boarded-up windows occupy the two lower-height additions. The courtyard's southern boundary is formed by a recessed portion and a projecting portion, both of which are clad in metal siding. Attached to the Plant to the north, a medium-pitch gabled building clad with metal extends along a north-south axis to form the eastern side of the courtyard (Figure 5-24). The northern side of the courtyard features an approximately 20-foot-tall warehouse (Figure 5-24). Corrugated metal cladding set upon a pedestrian-height concrete-block foundation forms this warehouse wall. Regularly placed windows punctuate the cladding at the clerestory level. A non-original 1970s two-story building, which contained employee restrooms and lockers, occupies the courtyard (Figure 5-24).



**Figure 5-23. Star-Kist Plant No. 4, rear (east) elevation, southeast corner of Plant, detail showing rear of warehouse/manufacturing building (left) and ancillary building/structure (right [with purple graffiti]), camera facing northwest.**

*ICF, 2018.*



**Figure 5-24. Star-Kist Plant No. 4, rear (east) elevation, detail of ancillary two buildings/structures (left, with staircase; right, with roll-up door) and warehouse/manufacturing building (center), camera facing north.**

*ICF, 2018.*

The center of the rear (east) elevation, as mentioned above, incorporates mechanical and infrastructure elements that appear to produce or distribute the Plant's steam/power/mechanical system. This area includes at least one tall, open shed and a non-original multi-story tower, the

purpose of which is unknown (Figure 5-25). In this area, a multitude of pipes and wires adorn the landscape.



**Figure 5-25. Star-Kist Plant No. 4, rear (east) elevation, multi-story tower at center of rear (east) elevation, camera facing north.**

*ICF, 2018.*

Volumes with metal cladding compose the north segment of the rear elevation. This portion, as stated above, abuts the now closed-off Barracuda Street. An enclosed metal skybridge built in the 1970s, noted in permits as a pipe bridge, over Barracuda Street connects the Plant with the East Plant.

## 5.1.5 Interior

Interior office space is arranged along the Plant's primary (west) elevation and large warehouse spaces characterize its canned tuna production area. The altered lobby contains a small area that is open to the second story. A painting of a lighthouse has been appended to a wall opposite the entrance (non-original feature of the entrance) (Figure 5-26). A pedestrian doorway to the south provides access to first-floor office space and the warehouse beyond, while a staircase to the north provides access to the upper floor's non-original office space. Original square, mint-green, metal panels clad the lobby walls (Figure 5-27). A simple balustrade of metal infilled with corrugated green fiberglass and a wood handrail are located along the staircase and second-floor walkway—an original feature forming a mezzanine. Metal roof support posts punctuate the large warehouse spaces (Figure 5-28 through Figure 5-30). Truss systems support wood and metal roofs. Flat truss systems are most common in the original 1952 portions of the Plant; two rooms contain non-original monitor roofs. Concrete and metal walls divide spaces; the division of spaces primarily

represents additions and alterations to the original 1952 plan (Figure 5-31 and Figure 5-32). Natural light also penetrates some of the interior spaces through original rolled-steel windows at the clerestory level. Drainage channels embedded in the floors note the Plant's need to remove viscera and other debris from the production process (Figure 5-28 and Figure 5-29).



**Figure 5-26. Star-Kist Plant No. 4, interior, entrance lobby, camera facing northeast.**

*ICF, 2018.*





**Figure 5-27. Star-Kist Plant No. 4, interior, entrance lobby shown from staircase landing, camera facing south.**

*ICF, 2018.*



**Figure 5-28. Star-Kist Plant No. 4, interior, warehouse/manufacturing area showing drains in floor, camera facing southeast.**

*ICF, 2018.*



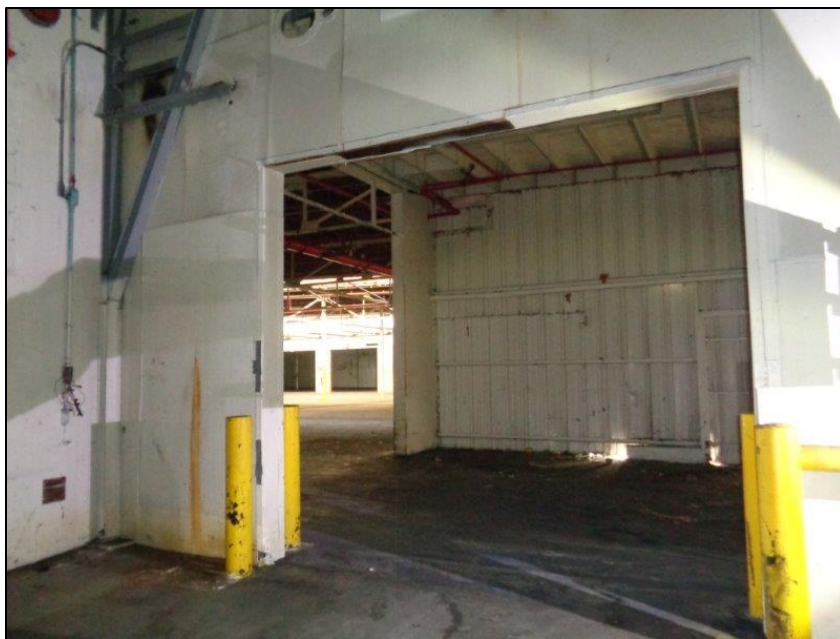
**Figure 5-29. Star-Kist Plant No. 4, interior, warehouse/manufacturing area showing drains in floor, camera facing east.**

*ICF, 2018.*



**Figure 5-30. Star-Kist Plant No. 4, interior, warehouse/manufacturing area at north portion of Plant, camera facing west.**

*ICF, 2018.*



**Figure 5-31. Star-Kist Plant No. 4, interior, warehouse/manufacturing area, camera facing east.**  
*ICF, 2018.*



**Figure 5-32. Star-Kist Plant No. 4, interior, warehouse/manufacturing area, camera facing southeast.**  
*ICF, 2018.*

## 5.2 Empty Can Warehouse

The Empty Can Warehouse is at the northeast corner of the intersection of Bass and Barracuda Streets. It faces north onto a surface parking lot/storage area accessed by a driveway from



Barracuda Street. This one-story warehouse building has an approximately 100-foot by 200-foot rectangular plan and is constructed of steel and clad in corrugated metal. A shallow-pitched gabled roof with no eaves caps the building.

The north (primary) elevation faces a parking lot and outdoor storage area. A centered door opening punctuates the north elevation (Figure 5-33). A partially enclosed shed projects from the north elevation east of the opening. A single light fixture is above and to the west of the centered opening.



**Figure 5-33. North and west elevations, camera facing south.**

*ICF, 2018.*

The west and east elevations are minimally elaborated, with only regularly placed vents arranged just below the roofline (Figure 5-39 and Figure 5-34). The west elevation abuts Barracuda Street. The east elevation fronts additional surface storage space.



**Figure 5-34. West elevation, camera facing southwest.**

*ICF, 2018.*



The south elevation contains a secondary large, centrally located loading door. Several vents punctuate the south elevation west of the door, while two light fixtures flank it.

The Empty Can Warehouse's steel frame construction is visible on the interior of the building. Asphalt covers the ground inside the warehouse. A small square office is at the northwest interior corner of the building atop a larger concrete platform. A mezzanine level with enclosed space below is at the southwest corner of the building. The office and mezzanine appear to be constructed of wood. Otherwise, the interior of the building remains an open space (Figure 5-35). The utilitarian design expresses common warehouse-type construction of the 1970s that relies on electrical systems rather than natural lighting.



**Figure 5-35. Interior, camera facing south.**

*ICF, 2018.*

## 5.3 East Plant

The East Plant contains three attached buildings built between 1971 and 1977: Can Manufacturing Plant, Warehouse, and Cold Storage. The Can Manufacturing Plant is in the northern portion of the East Plant, the Warehouse in the center, and Cold Storage to the south. These three functional components correspond to aspects of the Star-Kist operations in specific areas of the East Plant. The East Plant is approximately the same size as the Plant to the west. The East Plant lot is bound by Bass Street to the north, Earle Street to the east (formerly harbor bay), Marina Street to the south (formerly harbor bay), and Barracuda Street to the east. Concrete loading and storage areas are at the southernmost portion of the East Plant site. The buildings are primarily constructed of metal. Front gabled roofs cap the Can Manufacturing Plant and Warehouse portions, while side-gabled roofs cap the three Cold Storage units.

The East Plant's north elevation's metal warehouse (corresponding to the Can Manufacturing Plant portion of the East Plant) addresses Bass Street (Figure 5-36). A loading dock with loading doors and a metal canopy occupies the western half of the primary elevation. A rectangular storage or

office building original to the 1972 construction of the Can Manufacturing Plant occupies a portion of the east half of elevation, adjacent the loading dock. It projects from the north elevation's overall plane and contains a pedestrian door and a loading door to the east, and six irregularly placed windows to the west. Another loading door is along the primary elevation, east of the rectangular storage or office.



**Figure 5-36. North elevation, Can Manufacturing Plant portion of facility, camera facing south.**

*ICF, 2018.*

The west elevation features the East Plant's three functional components: the Can Manufacturing Plant to the north, the Warehouse in the center, and a Cold Storage to the south as mentioned above (Figure 5-37 and Figure 5-38). The Can Manufacturing Plant portion of the west elevation consists of a full-length (approximately 300-foot) raised concrete loading dock with a canopy, and at least two loading doors. Regularly spaced vents punctuate the wall just below the roofline and above the canopy. Clad in corrugated metal with a concrete block watertable, the Warehouse at the center of the west elevation contains multiple loading doors. A small porch, a pedestrian entrance, and four raised loading doors arranged at irregular intervals characterize the northern section. Regularly spaced vents below the roofline punctuate the Warehouse along its length. The southern section of the west elevation, corresponding to the Cold Storage portion of the East Plant, features 13 regularly spaced at-grade loading doors.



**Figure 5-37. West elevation, Can Manufacturing Plant portion of facility in distance (left), sky-bridge to Star-Kist Plant No. 4 Main Facility and Empty Can (center) and Warehouse portion of facility in foreground (right), camera facing north.**

*ICF, 2018.*



**Figure 5-38. West elevation, Warehouse portion of facility in foreground (left) and Cold Storage portion in the distance (right), camera facing south.**

*ICF, 2018.*

The south elevation is clad in corrugated white metal and features approximately four large door openings. Tanks, metal pipes, metal railings, concrete pads, concrete paving, small buildings, metal cabinets, and catwalks sit in front of the south elevation near the south loading area of the property (Figure 5-39 and Figure 5-40). Corrugated metal siding and concrete block clad the single-story south elevation. Cold Storage areas are to the west, accessed by large metal swinging doors (Figure 5-41), while a metal roll-up door accesses storage to the east (Figure 5-39). Two small rectangular volumes with tanks and catwalks form the elevation (Figure 5-40). The two small volumes appear to contain support facilities, such as restrooms, offices, or storage space. The western projection



contains two solid-core pedestrian doors separated by a window. The eastern projection also features fenestration: two four-light windows flank a double door.



**Figure 5-39. South elevation, Cold Storage portion of the facility, camera facing northeast.**  
*ICF, 2018.*



**Figure 5-40. South elevation, Cold Storage portion of the facility, camera facing northeast.**  
*ICF, 2018.*



**Figure 5-41. South elevation, Cold Storage portion of the facility, detail showing a cold storage door, camera facing northeast.**

*ICF, 2018.*

The east elevation originally overlooked water but now abuts Earle Street. In the mid- to late-1970s, Los Angeles Harbor Department filled this location to expand Terminal Island. Similar to the west elevation, the east elevation denotes the East Plant's three functional components: the Can Manufacturing Plant to the north, the Warehouse in the center, and a Cold Storage Room to the south. The Can Manufacturing Plant portion consists of a pedestrian door to the north and a loading door surmounted by a canopy to the south. The elevation also has irregularly placed vents of varying sizes. Some vents are louvered while others are covered. The center (Warehouse) portion of the elevation rises approximately 6 feet higher than the north and south portions that flank it. The elevation features two loading doors, one each within the north and south portions. Seven regularly placed louvered vents punctuate the elevation approximately 6 feet below the roofline. Several pipes and light fixtures are also attached to this portion of the east elevation. Finally, a solid metal wall forms the southern, Cold Storage portion of the east elevation.

Cement and blacktop parking and loading areas are arranged along the north, south, and west elevations. The southernmost portion of the grounds serves as outdoor storage for metal pipes, wood beams, and other equipment, and includes a stand-alone raised loading ramp and a collection of three tanks.

## Chapter 6

# Historic Context

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This report builds on the context presented in the 2008 evaluation and addresses gaps in the prior research (see Appendix B, pages 5 through 21 for previously established Port history and historic context statements). It incorporates new sources not previously considered that reveal how Star-Kist made changes to the Plant after construction, with a particular focus on changes completed within the past 50 years that are neither associated with a significant historic context nor have gained significance in their own right.

The following context statements support the re-evaluation of Star-Kist Plant No. 4 and its associated facilities on Terminal Island, Port of Los Angeles: *The Port of Los Angeles and the Rise of Containerization (1945–1989)*; *History of the Cannery (1915–1985)*; *The Post-World War II Rise and Fall of Fish Harbor (1945–1985)*; *The End of Star-Kist's U.S. Production (1980–1984)*; *Light Industrial Architecture (1945–1985)*; and *Moderne Architecture (1925–1959)*.

### 6.1 The Port of Los Angeles and the Rise of Containerization (1945–1989)

The Port experienced unparalleled growth after the U.S. Navy relinquished control of the Port in late 1945 following the conclusion of World War II.<sup>26</sup> The military had commissioned the Port for shipbuilding during the war.<sup>27</sup> During that time, the Harbor Department was unable to maintain and improve the Port. After Japan surrendered in 1945, the Harbor Department promptly started its deferred maintenance and improvement projects.<sup>28</sup> The Harbor Department arranged construction of 13,360 feet of detached breakwater, an essential component to the Port's success. Without breakwaters, waves and turbulent conditions would prevent the safe passage of seafaring vessels into the Port. In 1947, the Port operated 28 miles of waterfront, with approximately 70 percent used as wharves for every type of seafaring vessel, from large-scale cargo ships to fishing boats to pleasure craft.<sup>29</sup> Although 19 canneries and numerous other business operated at the Port in the late 1940s, lumber imports saw the sharpest increase in trade during the decade. From 1947 to 1948, lumber imports through the Port more than doubled in terms of board-feet of product, consistent with the postwar construction boom in Southern California and elsewhere in the United States.<sup>30</sup> A Foreign Trade Zone charter, bestowed upon the Port in 1949, supported exponential growth in the postwar era by lessening or lifting U.S. Customs duties, fees, and taxes on traded merchandise at this and other chartered locations.<sup>31</sup>

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<sup>26</sup> Michael D. White, *Images of America: The Port of Los Angeles* (Charleston, SC: Arcadia Publishing, 2008), 81.

<sup>27</sup> Port of Los Angeles, *History, Wartime Efforts*, accessed December 18, 2018, <https://www.portoflosangeles.org/about/history>.

<sup>28</sup> Charles F. Queenan, *Port of Los Angeles: From Wilderness to World Port* (Los Angeles, CA: Los Angeles Harbor Department, 1983), 93.

<sup>29</sup> *Ibid.*, 94.

<sup>30</sup> *Ibid.*, 94.

<sup>31</sup> "Foreign-Trade Zones in the United States," *Federal Register: The Daily Journal of the United States Government*. (February 28, 2012), np, accessed November 9, 2018, <https://www.federalregister.gov/documents/2012/02/28/2012-4249/foreign-trade-zones-in-the-united-states>; Michael D. White, *Images of America: The Port of Los Angeles* (Charleston, SC: Arcadia Publishing, 2008), 81.

The Harbor Department continued to expand its imports and exports through infrastructure projects in the 1950s. Port-related commerce increased by 6 percent, or approximately 3 million tons, from 1949 to 1950, which allowed the Port of Los Angeles to eclipse the Port of San Francisco's trade for the first time in history.<sup>32</sup> While the Harbor Department rectified deferred maintenance and installed new improvements at the Port throughout the decade, it also increased the size of Terminal Island's land mass to support expansion and built infrastructure at old berths. Star-Kist opened Plant No. 4 on a newly created section of Terminal Island at Fish Harbor in 1952.<sup>33</sup> A new passenger-cargo terminal opened in 1950 at Berth 154, with another under construction at Berths 195–199.<sup>34</sup> These passenger-cargo terminals allowed the Harbor Department to incorporate leisure travel services at the Port in the wake of World War II's lifted travel restrictions.<sup>35</sup> Furthermore, the Japanese Peace Pact of 1951 reopened avenues of international trade through specified provisions regarding trade and commerce.<sup>36</sup> The effect of the Japanese Peace Pact was immediate and profound. Imports and exports, recorded in tonnage, increased 163 percent between the Port and Japan from September 1951 to December 1952.<sup>37</sup> Trade with Japan continued to increase through the 1950s. Indeed, Japanese seafaring vessels exceeded all other foreign flag-flying vessels at the Port by 324 in 1956.<sup>38</sup> At the end of the 1950s, the Harbor Department opened two foreign offices, one in Oslo, Norway, and another in Tokyo, Japan, to support overseas clients. The Port quickly gained recognition as a global port during the 1950s. American wares exported from the Port were sold in 114 (out of 122) countries by the close of the decade.<sup>39</sup>

Malcom McLean developed the concept of containerized shipping in the late 1950s, which affected worldwide port development beginning in the 1960s.<sup>40</sup> Containerization, or intermodalization, standardized containers through multiple facets—ship, train, truck—from its originating location to its final location without the need to unload the items inside the container. Before the advent of containerization, cargo loading was labor intensive. A crew of longshoremen loaded individual pieces of cargo (as drums, boxes, bags, crates, or raw materials) onto ships after a repetitive process of unloading from a truck or train and reloading onto the ship at the wharf, then stowing the goods in ships' holds, all by cranes or by hand. Occasionally, nets or pallets were used to move a group of packages, but the process was still lengthy.<sup>41</sup> McLean realized that shipping by container could cut down on time and therefore cost. Modified trucking trailers were used as containers.<sup>42</sup> The use of containers, however, did not become the standard form of shipping overnight because the design of ships and infrastructure of ports supported existing shipping methods. With containerization, ships required a flatbed on which to stack containers, while ports required gantry cranes to move

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<sup>32</sup> Queenan, 96.

<sup>33</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1912), Sheet 1921; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1921; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1938.

<sup>34</sup> Queenan, 96.

<sup>35</sup> Ibid.

<sup>36</sup> *United States Senate, Committee on Foreign Relations, Japanese Peace Treaty and Other Treaties Relating to Security in the Pacific* (Washington DC: United States Government Printing Office, 1952), np, accessed November 9, 2018, <https://www.cia.gov/library/readingroom/docs/CIA-RDP58-00453R000100300001-1.pdf>.

<sup>37</sup> Queenan, 97.

<sup>38</sup> Queenan, 97; Michael D. White, 81.

<sup>39</sup> Queenan, 100; Michael D. White, 81.

<sup>40</sup> Edna Bonacich and Jake B. Wilson, *Getting the Goods: Ports, Labor, and the Logistic Revolution* (Ithaca, NY, and London: Cornell University Press, 2008), 51.

<sup>41</sup> Bonacich and Wilson, 50; White, 30, 32, 41, 55–56, 62, 65, and 68.

<sup>42</sup> Bill Sharpsteen, *The Docks* (Berkeley, Los Angeles, and London: University of California Press, 2011), 36; Bonacich and Wilson, 51.

containers on and off carrier ships. In addition, ports needed open space on which to stack containers as well as trucking and train hubs to move containers in and out of a port's boundaries. As such, ships required retrofits or entirely new construction, and ports required extensive new infrastructure to move and accommodate containers—both at the exporting and importing ports of a shipment.<sup>43</sup> Shippers, ship builders, ports, railroads, and trucking companies reached an agreement on the global standardization of container sizes approximately two decades after the advent of containerization. The standard measurement for containers today is the 20-foot-equivalent unit (TEU) (the container was originally 20 feet long).<sup>44</sup>

The advent of containerization dominated the Port's development beginning in the 1960s. A Los Angeles City Charter amendment, a development plan, and bond measures enacted in the late 1950s and early 1960s facilitated the Port's transition from old cargo methods to containerization by allowing for new container-related improvements.<sup>45</sup> Both new and improved berths, such as the Los Angeles Container Terminal at Berths 126–131 in the West Basin, which included a 40-ton crane to load or unload 80 containers per hour, dramatically changed the Port's landscape.<sup>46</sup> In 1960, the Port imported and exported 7,000 containers, while in 1968, the Port imported and exported 70,000 containers, evidencing the rapid transition to containerization worldwide.<sup>47</sup> Gantry cranes; new terminal construction, such as the Los Angeles Container Terminal; and other changes to the Port's design and infrastructure facilitated the tenfold increase in containers traveling through the Port between 1960 and 1968.

In addition to container-related improvements, the Harbor Department expanded other services at the Port. In 1963, the Harbor Department established a new passenger-cargo terminal at Berths 90–93, the Vincent Thomas Bridge opened, and Ports O' Call Village, a 24-acre commercial tourist complex, was developed.<sup>48</sup> The Harbor Department constructed the passenger-cargo terminal at Berths 90–93, designed by Kistner, Wright, & Wright (architects and engineers), Edward S. Fickett (architect), and S.B. Barnes & Associates (structural engineers) for the American President Lines.<sup>49</sup> The Vincent Thomas Bridge allowed direct automobile access to Terminal Island; previously, the Terminal Island ferryboat named the Islander transported passengers between San Pedro and Terminal Island (its last voyage was the day before the bridge opened).<sup>50</sup> The Harbor Department redeveloped wharves that had previously been used by the fishing industry for construction of the New England/Polynesian-themed Ports O' Call.<sup>51</sup>

The Harbor Department sought to expand the Port's containerization capabilities in the 1970s. As containerization became increasingly widespread, the Harbor Department realized that the 35-foot depth of the harbor was not enough for the new containerized vessels; the design of container

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<sup>43</sup> Bonacich and Wilson, 51.

<sup>44</sup> Ibid., 51–52.

<sup>45</sup> Queenan, 101–105; "Good Gains for Los Angeles Harbor: Shipping Facilities Expanded," *Long Beach Independent* (January 5, 1960), 42.

<sup>46</sup> Queenan, 109.

<sup>47</sup> Ibid., 105, 109.

<sup>48</sup> Queenan, 106–111; "Terminal Island Toll Bridge to Be Built," *Redlands Daily Facts* (January 4, 1960), 1; Lou Jobst, "Target Date 1968 for New Harbor Span," *Long Beach Independent* (May 18, 1965), 9; "Good Gains for Los Angeles Harbor: Shipping Facilities Expanded," *Long Beach Independent* (January 5 1960), 42.

<sup>49</sup> "\$4.3 Million Port Job: Terminal Contract Goes to L.A. Firm," *Long Beach Independent* (February 8, 1961), 11.

<sup>50</sup> Sam Gnerre, "The Vincent Thomas Bridge," *The Daily Breeze* (October 21, 2009), np, accessed December 19, 2018, <http://blogs.dailybreeze.com/history/2009/10/21/the-vincent-thomas-bridge/>.

<sup>51</sup> D.J. Waldie, "San Pedro's Ports O' Call: The Theme Ends, Then What?" *KCET* (May 16, 2014), np, accessed December 19, 2018, <https://www.kcet.org/socal-focus/san-pedros-ports-ocall-the-theme-ends-then-what>.



carriers necessitated deeper waters to accommodate their size.<sup>52</sup> Progress to deepen the Port's waterways to a 45-foot depth through dredging continued throughout the decade, until final approval by the Coastal Commission in 1980.<sup>53</sup> Yet, the Port's facilities underwent numerous other improvements to support container shipping. The Harbor Department increasingly cultivated relationships with Pacific Rim countries and welcomed Evergreen, a Taiwan-based shipping company, to a new 20-acre container terminal at Berths 233–235 in the mid-1970s.<sup>54</sup> In addition to the aforementioned 20-acre container site, the Harbor Department facilitated construction of a 50-acre container terminal for Matson on Terminal Island at Berths 206–209; expansion of the Los Angeles Container Terminal in the West Basin; and expansion of Terminal Island to support future and ongoing containerization-related terminals and infrastructure at the Port.<sup>55</sup> Wares imported and exported through the Port generated approximately \$500 million for Southern California during the early 1970s.<sup>56</sup> During the Port's 1976–1977 fiscal year, the Port had a net income of \$14.1 million, while the following fiscal year, it nearly doubled to \$25.7 million and became the “leading port in the United States in net income.”<sup>57</sup>

Large-scale infrastructure projects dominated the Port during the 1980s. Launched on March 16, 1981, dredging operations at the Port took 30 months to complete, giving the harbor a depth of 45 feet. Once completed, the Port accepted all container ships, including the approximately 35 percent that had previously been unable to navigate the harbor because of its shallowness.<sup>58</sup> Dredging supported Terminal Island infill; 14 million cubic yards of material removed from the harbor floor created 190 acres of useable land on Terminal Island.<sup>59</sup> To expedite the movement of containers in and out of the Port, the Harbor Department also facilitated construction of a 114-acre Intermodal Container Transfer Facility—where railroad, trucking, and shipping meet—2.5 miles north of the Port.<sup>60</sup> Through dredging and infrastructure projects in the mid-1980s, the combined Ports of Los Angeles and Long Beach became the leading port hub in the United States in 1986, importing and exporting 14 percent more TEUs than the New York and New Jersey Port hub.<sup>61</sup>

## 6.2 History of the Cannery (1915–1985)

The canning industry originated in the early nineteenth century. Initially a labor-intensive process, canning required handcrafted cans and demanded long cooking times making canned goods expensive to purchase. Driven by demand from militaries, which needed non-perishable food for troops, the canning industry grew during the late-nineteenth century. Companies met this demand, which skyrocketed during World War I, through increased mechanization. At this stage, ports throughout the United States became important hubs for canning salmon, sardines, and tuna.<sup>62</sup>

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<sup>52</sup> Queenan, 113.

<sup>53</sup> *Ibid.*, 113–119.

<sup>54</sup> Queenan, 114–115; Bonacich and Wilson, 59–60.

<sup>55</sup> Queenan, 113–115; Jack Baldwin, “Matson Dedicates Container Terminal on Terminal Island,” *Independent Press-Telegram* (March 13, 1971), 50.

<sup>56</sup> Queenan, 114.

<sup>57</sup> *Ibid.*, 118.

<sup>58</sup> *Ibid.*, 123.

<sup>59</sup> *Ibid.*, 123.

<sup>60</sup> *Ibid.*, 121–122, 126.

<sup>61</sup> Bonacich and Wilson, 58.

<sup>62</sup> Greg Steven Pearson, “The Democratization of Food: Tin Cans and the Growth of the American Food Processing Industry, 1810–1940” (Doctoral Dissertation, Lehigh University, 2016), 1–2.

The industry grew rapidly at the Port with the creation of Fish Harbor in 1915. Sanborn maps from 1921 depict small canneries at the Port, with many lined along a single block, whereas a 1951 Sanborn map shows larger canneries, designed with areas for processing fish, canning, net making and drying, and other related tasks.<sup>63</sup> These modern plants, such as Star-Kist Plant No. 4, could occupy one or more city blocks. Regardless of their size, canneries consistently included a wharf or dock to accept the arrival of fishing vessels, a canning area with an open space to butcher fish, and a boiler house for the cooking process, described below.<sup>64</sup>

The canning process relied on multiple steps, which created some of the important character-defining features of canneries. In the nineteenth century, workers cleaned fish and packed cans manually. Steam retorts would then cook the contents, after which the cans would seal as they cooled. Throughout the twentieth century, this process became increasingly mechanized. From the docks, conveyor systems lifted fish directly into the building, bypassing interruptions on the street level entirely. Machines cleaned fish rapidly and floor drains efficiently removed viscera and blood from buildings. Conveyors continued to move the fish through the complex, where workers would pack it into cans. Depending on the site and the overall design of the complex, workers may carry out all of these processes in one open space or move between ancillary buildings dedicated to a particular step.<sup>65</sup> Canning complexes included spaces for can manufacturing, net repair, boat repair, storage of excess cans, offices, mess halls, or bunkhouses, depending on how integrated the production process was.<sup>66</sup>

Technology influenced the industry. As early as the 1910s, light machinery was available to seal cans at a rate of 90 cans per minute and workers could load this equipment with sanitary cans produced either on site or purchased from other companies.<sup>67</sup> Other technologies, such as can-filling machines, fish-cleaning machines, and conveyor belts, worked to clean and cut fish or move items from one place to another. Companies incorporated mechanized production in varying stages, but by 1930 most canneries used machines to fill at least a portion of the cans.<sup>68</sup>

Cannery design changed throughout the twentieth century, as did its material composition. In the pre-World War II era, companies relied on wood for structure and cladding. Canneries had wood posts driven deep into the ground to provide a stable foundation for the structures on natural or reclaimed land. Floor systems consisted of wood planks set atop wood joists. Cannery buildings typically clad these buildings in wood board-and-batten siding. Following World War II, companies embraced new building technologies. Concrete construction became more common, as used at the Plant. Corrugated metal or stucco replaced wood as the preferred cladding. Concrete flooring replaced wood planks and joists. Postwar plants relied on electric light rather than daylight.<sup>69</sup> Although availability of electric light reduced reliance on daylight and resulted in fewer windows, skylights were still used, as demonstrated by the extant canning-related buildings at Fish Harbor.<sup>70</sup>

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<sup>63</sup> Sanborn Fire Insurance Map, "Los Angeles," Volume 19 (1948), Sheet 1912.

<sup>64</sup> Sarah Steen, "Expanding Context: A Look at the Industrial Landscapes of Astoria, Oregon, 1880–1933" (Master's Thesis, University of Oregon, 2009), 95–98.

<sup>65</sup> Margaret Roderick, Visual Inspection of Star-Kist Plant No. 4, October 29, 2018; Margaret Roderick, Visual Inspection of Cannery Block, April 10, 2019.

<sup>66</sup> Steen, 97–98.

<sup>67</sup> "Ad-'AMS' Four Spindle Double Steamer No. 49," *Pacific Fisherman* (Portland, Oregon: M. Freeman Publications, 1917), 10.

<sup>68</sup> Steen, 148.

<sup>69</sup> Steen, 98; Sanborn Fire Insurance Map, "Los Angeles," Volume 19 (1948), Sheet 1912.

<sup>70</sup> Roderick, October 29, 2018.

Under NRHP/CRHR Criteria A/1, an eligible example of a cannery would need to demonstrate the character-defining features of its process engineering, which are a combination of original process engineering canning equipment and its layout within its interior spaces. At the Plant, this layout relies on a linear production with raw goods (tuna) entering at the southern end and packaged goods (canned tuna) shipping from the northern portion, and its equipment in place to demonstrate this production process. Canning properties, especially those constructed before World War II, are frequently altered to accommodate new or different product manufacturing processes or updated technologies and methods, but these changes must be significant and present in order for a cannery to be eligible under this criterion.

## 6.2.1 The Post-World War II Rise and Fall of Fish Harbor (1945–1985)

Despite the federal government's detention and internment of the Japanese-American fishermen and cannery workers who had been the backbone of the Port's canning industry during the prewar era, the industry flourished after the war. By the 1950s, Los Angeles reigned as the world's leading tuna production location.<sup>71</sup> Sanborn maps of Fish Harbor show densely built fish processing plants surrounding Fish Harbor, with several belonging to companies dating to the 1910s and 1920s like Van Camp Sea Food Company (Van Camp), the Southern California Fish Company, and French Sardine (later renamed Star-Kist).<sup>72</sup> Additionally, in 1946, Pan-Pacific Fisheries opened a modern cannery on Sardine Street and in 1952, Star-Kist built the world's largest tuna cannery on Fish Harbor's eastern waterfront.<sup>73</sup> The 1950s marked the industry's peak; at that time these Fish Harbor canneries produced 80 percent of canned tuna in the United States.<sup>74</sup> In 1957, county authorities added the image of a tuna fish to the official County of Los Angeles seal—a testament to the role this industry had come to play in the regional economy.<sup>75</sup>

Simultaneously, trade passing through the Port increased, particularly with countries in the Pacific Rim region. The United States-Japan Security Treaty of 1951 allowed trade that had ceased during the war to resume. By 1956, Japan had become the Port's most significant trading partner.<sup>76</sup> The economic consequences of expanding trade between the United States and Japan proved consequential for the Fish Harbor canning industry. Japanese companies undercut American competitors by innovating packaging methods such as freezing goods. Freezing fish during times of prosperity compensated for times of decline, when fish were less abundant or required further travel to acquire. Moreover, Japanese products cost less than Star-Kist, Van Camp, and other American tuna and canned fish brands. While the development of new purse seiner boats supported American fishermen's ability to obtain sufficient stocks of fish, the method also killed numerous dolphins because they would get caught in the nets and drown, which led to the Marine Mammal Protection Act of 1972. The Marine Mammal Protection Act called for changes to the fishing industry.<sup>77</sup> By the 1970s Fish Harbor was in decline due to the combination of reasons mentioned

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<sup>71</sup> Grobaty, np.

<sup>72</sup> Sanborn Fire Insurance Map, "San Pedro," Volume 19 (1950), Sheet 1913.

<sup>73</sup> Los Angeles Conservancy, "Taking Tuna Mainstream," (Los Angeles, CA: Los Angeles Conservancy, n.d.), np, accessed July 9, 2020, <https://www.laconservancy.org/node/1076>.

<sup>74</sup> "Port Board Approves Permit for \$160,000 Fish Cannery," *San Pedro News-Pilot* (January 30, 1947), 1; Grobaty, np.

<sup>75</sup> Louis Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np, accessed August 5, 2020, <http://articles.latimes.com/2001/jun/03/local/me-6015>.

<sup>76</sup> White, 81.

<sup>77</sup> Schoell, np.

above.<sup>78</sup> Profits declined for Los Angeles' canneries, and their lobbying efforts pressuring Congress to implement new national tariffs against foreign competition failed in the mid-1980s.<sup>79</sup>

## 6.3 The End of Star-Kist's U.S. Production (1980–1984)

Star-Kist, like other companies in the tuna canning industry, sought to reconcile instability issues and other difficulties in the early 1980s at their United States-based facilities but ultimately laid off workers and closed. In September 1980, the cannery workers at Star-Kist and Pan-Pacific Fisheries, both on Terminal Island, obtained a wage increase, raising workers' incomes and benefits by approximately 15 percent over 3 years.<sup>80</sup> The pay increase was seen as a "major victory" for Terminal Island cannery workers.<sup>81</sup> However, less than 2 years after this victory, Star-Kist, which was under pressure from foreign canned tuna production and imports, discharged 2,600 workers because of "economic uncertainties in the tuna industry."<sup>82</sup> Star-Kist soon rehired the workers after an agreement was reached to delay that year's wage increase until the following year.<sup>83</sup> Plagued by globalization since the 1960s, tuna workers lost approximately 1 million work hours in 1982 compared with 1981.<sup>84</sup> Layoffs at Star-Kist also occurred in April and November 1983.<sup>85</sup> In April, Star-Kist reduced its night staff by 350; in November, Star-Kist discontinued its night shift entirely. It also reduced its day staff.<sup>86</sup> At that time, Star-Kist laid off 600 employees, including 340 fish cleaners.<sup>87</sup> Star-Kist was not the only U.S. cannery to lay off workers in the early 1980s. Star-Kist is but one example of instability in the canned tuna industry in the United States. Pan-Pacific Fisheries of San Pedro, Bumble Bee of San Diego, and Van Camp of San Diego laid off approximately 1,800 workers between 1982 and 1983.<sup>88</sup>

Two cannery labor groups picketed in front of the Plant on Terminal Island in the 1980s, the Fisherman's Cooperative Association in 1981 and Star-Kist cannery workers in 1984.<sup>89</sup> The Fisherman's Cooperative Association strike resulted from changes in the way Star-Kist solicited tuna fishermen. Instead of determining a tonnage-per-day allotment, which was then distributed to all available ships in the cooperative, Star-Kist sought contracts with individual fishermen, resulting in

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<sup>78</sup> "Tuna Industry Started Crudely, but Has Developed Ultra-Modern Ways," *San Pedro News-Pilot* (February 7, 1968), 16.

<sup>79</sup> Robert A. Rosenblatt, "Higher Tuna Tariffs Urged to Protect Jobs," *Los Angeles Times* (June 6, 1984), A1, 4; "Tuna Industry Started Crudely, but Has Developed Ultra-Modern Ways," *San Pedro News-Pilot* (February 7, 1968), 16.

<sup>80</sup> "The Southland," *Los Angeles Times* (September 26, 1980), 2.

<sup>81</sup> "New Contract," *Los Angeles Times* (September 28, 1980), 577.

<sup>82</sup> "Back on the Job," *Los Angeles Times* (December 26, 1982), 110.

<sup>83</sup> Ibid.

<sup>84</sup> Ibid.

<sup>85</sup> Tim Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canneries," *Los Angeles Times* (November 20, 1983), 618.

<sup>86</sup> "Star-Kist Now Says 600 Were Laid Off," *Los Angeles Times* (November 15, 1983), 54; Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canneries," *Los Angeles Times* (November 20, 1983), 618.

<sup>87</sup> *Los Angeles Times* (November 15, 1983), 54.

<sup>88</sup> Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canneries," *Los Angeles Times* (November 20, 1983), 618.

<sup>89</sup> Jerry Ruhlow, "Conflict Over Awarding Contracts: Fishermen's Groups Claims Cannery Plot," *Los Angeles Times* (November 1, 1981), 28; Julio Moran and Tim Waters, "300 Marchers Protest Tuna Cannery Layoffs," *Los Angeles Times* (July 12, 1984), A3.

fewer catches for fewer fishermen per day.<sup>90</sup> Picketing by Star-Kist employees in 1984 protested Star-Kist's job cuts.<sup>91</sup>

Star-Kist considered consolidating its administrative personnel headquarters in the early 1980s. Previously, administrative personnel held offices at multiple locations in San Pedro, including at the Pacific Trade Center in San Pedro.<sup>92</sup> In 1983, Star-Kist decided to expand its 75,000 square feet of office space at the Plant by approximately 35,000 square feet to accommodate its administrative personnel.<sup>93</sup> It appears that the Plant's 1980 second-story addition along Ways Street, which included office space and a staff breakroom, foreshadowed its 1983 announcement. However, Star-Kist scrapped the Terminal Island expansion in 1984 and announced the consolidation of administrative offices at Crocker Plaza in Long Beach.<sup>94</sup> Star-Kist cited Terminal Island traffic and immediate need as determining factors in the relocation of office staff.<sup>95</sup> Approximately 400 employees were affected by the move, although approximately 100 remained at the Plant.<sup>96</sup>

Uncertainties in tuna fishing, instability in the canning industry, and competition from foreign companies forced Star-Kist and other major U.S. canneries to seek a tariff increase on foreign canned tuna, from 6 percent to 35 percent, to remain competitive in the market in the 1980s.<sup>97</sup> In contrast, foreign canned tuna companies in Malaysia, Morocco, Mexico, and Ghana applied for tariff reductions on imports to the United States during that same time.<sup>98</sup> Foreign cannery goods sold in the U.S. were considerably cheaper than local products, necessitating Star-Kist's plea for government assistance in the form of tariffs. For example, Star-Kist's product sold wholesale for approximately \$40.60 per case under the Star-Kist brand and \$29.25 per case under a supermarket label; imported tuna from Thailand and the Philippines sold wholesale for approximately \$22 per case.<sup>99</sup> Foreign competition exported 51.7 million pounds of tuna to the U.S. in 1978; the number rose to 87.5 million pounds in 1982.<sup>100</sup>

Star-Kist, along with other tuna canneries, appealed to the U.S. International Trade Commission (USITC) for a tariff increase on imported tuna. Star-Kist stated that without a higher tariff on imports, the company would close its Terminal Island facility on October 1, 1984, and strictly produce canned tuna overseas.<sup>101</sup> Although it was no longer cost effective for Star-Kist to operate its Terminal Island facility, after being embroiled in the imported tuna tariff issue for several years,

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<sup>90</sup> Ruhlow, "Conflict Over Awarding Contracts: Fishermen's Groups Claims Cannery Plot," *Los Angeles Times* (November 1, 1981), 28.

<sup>91</sup> Moran and Waters, "300 Marchers Protest Tuna Cannery Layoffs," *Los Angeles Times* (July 12, 1984), A3.

<sup>92</sup> Mark Gladstone, "Star-Kist Foods Decides Against Move to Long Beach," *Los Angeles Times* (June 19, 1983), 526; Tim Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603.

<sup>93</sup> Gladstone, "Star-Kist Foods Decides Against Move to Long Beach," *Los Angeles Times* (June 19, 1983), 526.

<sup>94</sup> Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603; "Terminal Island," *Los Angeles Times* (December 6, 1984), 248.

<sup>95</sup> Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603.

<sup>96</sup> "Terminal Island," *Los Angeles Times* (December 6, 1984), 248.

<sup>97</sup> "New Contract," *Los Angeles Times* (September 28, 1980), 577; Rosenblatt, "Higher Tuna Tariffs Urged to Protect Jobs," *Los Angeles Times* (June 6, 1984), A1, 4.

<sup>98</sup> Ibid.

<sup>99</sup> Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canners," *Los Angeles Times* (November 20, 1983), 618.

<sup>100</sup> Ibid.

<sup>101</sup> Oswald Johnston and Cyndi Mitchell, "Commission Blocks Hike in Tariffs on Canned Tuna," *Los Angeles Times* (July 26, 1984), 32.

USITC decided not to support or recommend import limitations or increase tariffs on canned tuna. USITC concluded that imported tuna was “not the main source of injury to an industry saddled with debts and declining markets.”<sup>102</sup>

A final plea to Congress was also unsuccessful; Congress did not take measures to impose a tariff on imported tuna. Star-Kist’s tuna processing division closed on October 1, 1984.<sup>103</sup> Star-Kist laid off 1,150 cannery workers but retained its pet food, research and development, and can production operations on Terminal Island.<sup>104</sup>

Research presented in the 2008 evaluation’s historic context statements and above do not evidence a significant context associated with Star-Kist’s U.S. decline or the Plant’s closure. (See Appendix B, pages 5 through 21 for previously established historic context statements.)

## 6.4 Architecture

### 6.4.1 Light Industrial Architecture (1945–1985)

The “light industrial” property type is a version of industrial architecture that focuses on the production process for smaller-scale items, which are often consumer and business oriented, or “manufacturing activity that uses moderate amounts of partially processed materials to produce items of relatively high value per unit weight.”<sup>105</sup> The term “light industrial” gained popularity during the postwar era as city planners increasingly zoned for this property type. Postwar light industrial architecture throughout the United States shares a consistent set of design features.

Light industrial architecture in the postwar era required speed during construction and flexibility within the space. An efficient industrial design included an enclosure that was free from obstructions, adequate daylight, low maintenance, provisions for heavy machinery, flexibility of use, ease of future expansion, and specialized production.<sup>106</sup> The design for light industrial architecture in the United States needed to facilitate production in the quickest and most direct manner possible. As such, many light industrial complexes of the postwar era contained a single story with a large, rectangular plan. To speed production, many of the processes occurred under one roof; this concept was developed from the earlier “consolidated works.”<sup>107</sup> The single-story spatial arrangement is optimal for production because production could take place in a linear fashion, as evidenced in the Plant’s plan. A rectangular plan, with vast and open square bays, offered the most flexibility for potential alterations related to changing machines, layouts, and even building uses over time. To keep the floor space open, locker rooms, restrooms, and other secondary amenities were often

<sup>102</sup> Ibid.

<sup>103</sup> “Star-Kist to Close Cannery; Blames Imports,” *Los Angeles Times* (July 28, 1984), 33; Tim Waters and Julio Moran, “Workers Left High and Dry by Tuna Cannery Shutdown,” *Los Angeles Times* (October 19, 1984), 19.

<sup>104</sup> Jones and Stokes, *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, prepared for the Los Angeles Harbor Department (January 2008), 17; Waters, “Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay,” *Los Angeles Times* (July 8, 1984), 603; Waters and Moran, “Workers Left High and Dry by Tuna Cannery Shutdown,” *Los Angeles Times* (October 19, 1984), 19.

<sup>105</sup> Ajay Kumar Ghosh, *Dictionary of Geology* (New Delhi: Isha Books. 2005), 170.

<sup>106</sup> James F. Munce, *Industrial Architecture: An Analysis of International Building Practice* (New York, NY: F.W. Dodge Corporation, 1960), 88.

<sup>107</sup> Betsy Hunter Bradley, *The Works: The Industrial Architecture of the United States* (New York, NY: Oxford University Press, 1999), 74–76.

located on a mezzanine level.<sup>108</sup> The mezzanine is a common feature of industrial and light industrial architecture because it provides amenities and allows for viewing by supervisory staff and visitors. Star-Kist Plant No. 4's design sets these amenities along its west side and did not make use of mezzanine levels.

After World War II, a new corporate emphasis on teamwork and organizational psychology led to amenities such as cafeterias, athletic facilities, and lounges for workers as well as a trend away from the earlier separation of administrative offices from factory production spaces. As Rappaport explains, "head offices" increasingly "became a part of the main building structure so that the entire factory was under one roof for easy communication between research teams and production-line workers."<sup>109</sup> Star-Kist only expanded its office space circa 1980, but never consolidated its administrative personnel at the Fish Harbor location. Although large portions of such facilities were formed of utilitarian buildings or wings, office elements often incorporated Late Moderne or vernacular Modern architectural design features.

Typically, in postwar light industrial construction, the main entrance is often articulated and emphasized in a manner that the factory portion itself is not, as expressed in the design of the Plant. Such emphasis at the main entrance, along with similarly articulated reception and office areas, was designed to impress potential clients and visitors.

Lighting and ventilation mechanisms varied, with prewar and early postwar buildings relying on passive systems; later postwar manufacturing plants or warehouses incorporated electric systems. Many light industrial buildings have rhythmically spaced, periodic window bays. In many of the smaller-scale postwar variants, these windows were commonly multi-light metal-frame units with an operable awning or hopper window set within it to allow for ventilation. Often such natural lighting at exterior walls alone would not be enough to disperse across the span of a large floor so top lighting would be used. In instances where top lighting is natural, industrial buildings would commonly incorporate a "sawtooth" roof. The long, repeating angled banks of windows contain north-facing glazing so as to allow light into the space but not the penetrating sun that would occur with south-facing glazing. Sawtooth roofs are typically supported by columns at their valleys but may also be supported by any variety of truss systems that alleviate the need for columns.<sup>110</sup> After 1952, only 15 percent of American factories and manufacturing buildings of any type had natural top lighting, and artificial lighting became increasingly desirable.<sup>111</sup> For example, later postwar examples generally feature the elements of early design, but continue to rely heavily on the use of electrical systems over passive ones. Warehouses constructed in the 1970s and 1980s feature little to no fenestration. Instead, electric lights and heating, ventilating, and air conditioning systems provide light and ventilation. The idea of "process engineering" also played a role in the construction, design, and uses of light industrial architecture. Within its vast spaces, a flow of materials, employees, and order of production called "process engineering" were among the pre-planned elements of an industrial building, and mid-century factory design dictated that machines, rather than human handling, should be used whenever possible to transform raw materials into a finished product. Star-Kist and its hired designers followed this common trend. In early factories

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<sup>108</sup> Munce, 88; Bradley, 74-76; 192.

<sup>109</sup> Louise A. Mazingo, *Pastoral Capitalism: A History of Suburban Corporate Landscapes* (Cambridge, MA: MIT Press, 2011), 31, 38-41; Nina Rappaport, "Factory," *Encyclopedia of Twentieth-Century Architecture*, Volume 1, A-F, R. Stephen Sennott (ed.) (New York, NY: Fitzroy Dearborn, 2004), 434.

<sup>110</sup> Bradley, 192.

<sup>111</sup> Kenneth Reid, *Industrial Buildings: The Architectural Record of a Decade* (New York, NY: F.W. Dodge Corporation, 1951), 28-29; Munce, 50.

and light industrial buildings, the conveyor would connect various aspects of production in the most efficient manner possible. Rollers, forklifts, and, for larger-scale buildings, gantries and other cranes were also used to transport materials efficiently.<sup>112</sup> Efficient movement of materials was also important to the selection of the building's location. The earliest industrial architecture was near waterways, and with the advent of the locomotive, the property type would be constructed near railways and then, later, vehicular roads. To expedite the industrial process, fishermen delivered tuna at the Plant's south docks. The production process progressed through the building, northward, until canned tuna was loaded onto trucks at the building's northernmost end. Dependent on the sea, Star-Kist Plant No. 4 at Fish Harbor was vital, but roadways to the property also provided for the distribution of goods. Although railroad spur lines previously accessed Fish Harbor buildings, including the former French Sardine facility, one does not appear to have been aligned for the purposes of Star-Kist production or distribution. In the postwar era, trucking became a major component of industry.

It is rare for a light industrial building as a property type to be NRHP/CRHR eligible under Criteria C/3, distinct from its architectural style, such as Moderne variants or the International Style, among others. For such a property to be eligible as a light industrial property type, the building would need to have a high degree of historic integrity, which is rare in industrial structures, which were frequently upgraded to accept the latest technological innovation. Necessary features may include a combination of intact factory and amenity areas, architectural details, and landscaping, in addition to intact interior spaces and a majority of original, intact process engineering components. A light industrial building may also be historically significant under NRHP or CRHR Criteria C/3 if its design is directly associated with a *historically significant* construction or process engineering development.

## 6.4.2 Moderne Architecture (1925–1959)

Moderne architecture is a broad category that includes various modernistic and modern subtypes that evolved alongside and largely contrasted the sleeker and more austere modernism of the International Style and proved popular between the 1920s and 1950s. It is represented in Star-Kist Plant No 4.<sup>113</sup> Most popular prior to World War II, Moderne was eventually surpassed by the growing influence of the International style. The Moderne substyles evolved from Art Deco in the 1920s to Streamline Moderne in the 1930s and 1940s to Late Moderne's beginnings in the late 1930s through the 1950s.<sup>114</sup>

Art Deco derives its name from Paris's 1925 *Exposition internationale des arts décoratifs et industriels modernes*.<sup>115</sup> The style took shape as a means of enlivening simplified Classical forms with dynamic shapes, surfaces, and angles that expressed the energy and movement of the Jazz Age.<sup>116</sup> Art Deco, or "Zig-Zag," buildings had vertical emphasis and made use of bold, repetitive geometric forms and decorative motifs. Rather than presenting a flat plane, façades often step backward and forward to create visual rhythm and feature vertical projections above roof lines. The Streamline Moderne substyle, distinguished by its horizontal emphasis and an aesthetic that

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<sup>112</sup> Munce, 55.

<sup>113</sup> Arie van de Lemme, *A Guide to Art Deco Style* (New Jersey: Chartwell Books, Inc., 1986), 8.

<sup>114</sup> Stephen Sennott (ed.), "Art Deco," *Encyclopedia of Twentieth Century Architecture* (Taylor and Frances, 2004), 69.

<sup>115</sup> van de Lemme, 8–11.

<sup>116</sup> *Ibid.*, 16–23.



suggested movement, evoked associations with aerodynamically designed transportation technologies, such as automobiles, trains, airplanes, and ships.<sup>117</sup> Curved elements and teardrop forms are common to the style, but Streamline Moderne buildings always feature horizontal bands or ribbons of steel-framed windows; some even include glass block or nautical portal windows to emphasize the style's association with aerodynamics and transportation. Although limited curvature survived in some Late Moderne buildings, the style put greater emphasis on angularity, the use of stack-bond brick, and bezels surround windows—a leading feature distinguishing this substyle.<sup>118</sup> Examples include both symmetrical and asymmetrical façades, both with entry pylons. Moreover, bezels may be located around doorways or continue, horizontally, to wrap around to other elevations. Landscape features, such as built-in planters, are also common in Late Moderne buildings.

The Plant's front office portion along Ways Street conforms to the Late Moderne substyle. Originally a single story, the building featured an entrance pylon flanked by a wing on either side. The pylon rose several feet above the adjacent roofline and was capped by a fluted cornice line. Each wing featured stack-bond brick and smooth concrete. A brick sill and concrete bezel surround ribbon windows. With the second-floor addition in 1980, the Late Moderne style of the building was replicated; smooth stucco clads each wing wall, which is punctuated by a ribbon window configuration composed of alternating windows and stack-bond brick panels surrounded by a bezel. However, this addition falls outside the period of significance for the architectural style and alters key features of Plant's architectural style. For example, the second story now rises above the original entrance pylon, a key element of Late Moderne architecture.

Excellent examples of the style in Los Angeles include St. Vincent College of Nursing at 262 South Lake Street and Fire Station No. 53 at 438 North Mesa Street. Additional excellent examples in the greater Los Angeles metropolitan area include Solar Manufacturing at 4553 Seville Avenue in Vernon, Shrimpton Manufacturing and Supply Company at 2700 South Eastern Avenue in Vernon, and Western Waxed Paper Company at 2620 Commerce Way in Commerce. For example, Fire Station No. 53 in San Pedro features an asymmetrical but balanced primary elevation, with a brick firehouse garage pylon, bezels around doors and windows, and built-in brick planters, all organized in a thoughtful and artistic manner.

Under NRHP/CRHR Criteria C/3, an eligible example of Late Moderne architecture would need to embody the distinctive features of its style, possess high artistic values, or represent the work of a master architect. Distinctive features of the style would include artistic handling of volumes and massing; variegated façades; geometric forms; an emphasized entrance, commonly through the construction of a pylon rising well above the roofline; a ribbon of steel windows surrounded by a bezel; and multiple cladding materials, such as the use of stack-bond brick and rock. In addition, built-in planters, or other forms of landscaping, play a vital role in Late Moderne designs. Rote repetition of shapes, forms, and materials in a Late Moderne design does not elevate it to NRHP or CRHR eligibility; instead, a Late Moderne building would represent an artistic and thoughtful approach to design, often evident in the work of a master architect.

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<sup>117</sup> David Gebhard and Harriette von Breton, *L.A. in the Thirties, 1930–1941* (Peregrine Smith, Inc., 1975), 4; Stephen Sennott (ed.), "Art Deco," *Encyclopedia of Twentieth Century Architecture* (Taylor and Frances, 2004), 69.

<sup>118</sup> Christopher A. Joseph & Associates, *City of Riverside Modernism Context Statement* (Historic Resources Division of the City of Riverside, 2009), 13.

## Chapter 7

# Star-Kist History

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This construction history of extant Star-Kist facilities builds on the Star-Kist company history presented in the 2008 evaluation (Appendix B). This section focuses on the construction and alteration of Star-Kist Plant No. 4. It also discusses the construction of the Empty Can Warehouse and the East Plant.

### 7.1 Construction History of Star-Kist at Fish Harbor (1950–1989)

Predating the construction of the Plant, French Sardine constructed three plants and other ancillary buildings at Fish Harbor. French Sardine's Plants No. 1 and 3 were at the northern side of Fish Harbor and Plant No. 2 was north of the Plant at the southern portion of the Cannery Block along Sardine Street. The company also constructed its Laboratory building at the southeast intersection of Terminal Way and Tuna Street, across the street from Plant No. 3. All of these early company facilities were demolished between 1980 and 2018. French Sardine re-branded as Star-Kist in 1952, although it had packed tuna under the brand for years. Under the Star-Kist brand, the company constructed additional buildings in the vicinity of the Plant for its pet food production, which have since been demolished. Today, three Star-Kist facilities remain extant at Fish Harbor: the Plant, the Empty Can Warehouse, and the East Plant.

French Sardine constructed the Plant in 1951–1952 on newly reclaimed land on the eastern side of Fish Harbor, Terminal Island. Star-Kist hired M.A. Nishkian and Co., John K. Minasian, and Wohl Calhoun Co. to design and build the Plant. M.A. Nishkian and Co. functioned as the Plant's engineer and designed some of the Plant's new, state-of-the-art process equipment.<sup>119</sup> John K. Minasian acted as the Plant's architect. Wohl Calhoun Co. operated as the project contractor. French Sardine estimated that the one-story tilt-up concrete building would cost \$618,000.<sup>120</sup> Figure 7-1 and Figure 7-2, below, depict the tilt-up concrete construction in progress. The original plans changed several times during construction and included alterations to the loading area, relocation of the salt room, enclosure of the retort area, installation of a firewall to contain oil, and construction of a pump house. These changes occurred at the rear (east) elevation.<sup>121</sup>

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<sup>119</sup> M.A. Nishkian and Joseph Zelson, "Star-Kist: World's Largest tuna Packing Plant," *Pan-Pacific Fisherman* (December 1952), 15–20.

<sup>120</sup> LADBS Permit No. 1951LA15652.

<sup>121</sup> LADBS Permit Nos. 1951LA18911, 1952LA29429, 1952SP03061, and 1952SP03252.



**Figure 7-1. Construction of Star-Kist Plant No. 4.**

*Pan-Pacific Fisherman* (December 1952), 18.



**Figure 7-2. Construction of Star-Kist Plant No. 4.**

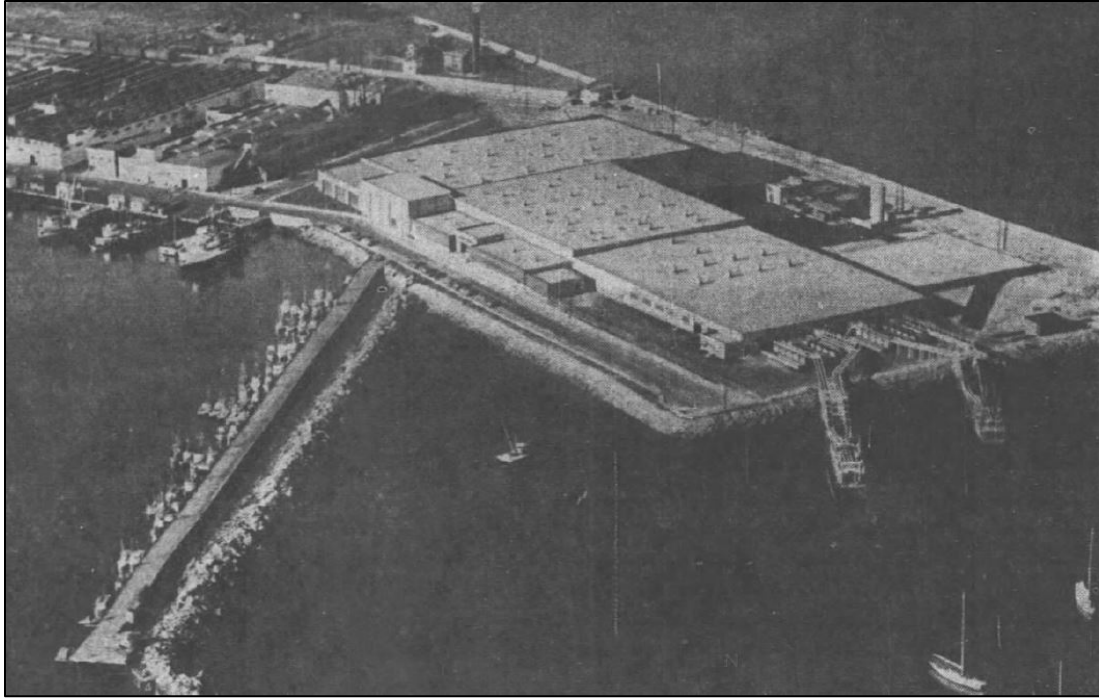
*Pan-Pacific Fisherman* (December 1952), 18.

The Plant opened in fall of 1952 to much fanfare. The *Los Angeles Times* claimed that the Plant was the largest tilt-up construction on the West Coast built by private industry. *Pan-Pacific Fisherman* magazine included a multi-page spread and called the Plant a “marvel of functional layout and high-speed automatic processing equipment.”<sup>122</sup> The *San Pedro News-Pilot* reported that the “ultra-modern” Plant could process 300 tons daily by packing 86,000 cans per hour through the use of the building’s straight line production and state-of-the-art processing engineering equipment.<sup>123</sup> Star-Kist president Joseph Bogdanovich, Los Angeles Mayor Fletcher Bowron, Utah Governor J. Bracken Lee, senators, judges, state officials, and others presided over the dedication ceremonies on November 12.<sup>124</sup> Figure 7-3 through Figure 7-6, below, show the Plant when it opened in 1952.

<sup>122</sup> Nishkian and Zelson, 15.

<sup>123</sup> “New Cannery to Open,” *San Pedro News-Pilot* (August 15, 1952), 1, quoted; “New Star-Kist Plant to Pack 86,000 Tuna Cans Per Hour,” *San Pedro News-Pilot* (November 3, 1952), 2.

<sup>124</sup> “Big Project at Harbor,” *Los Angeles Times* (November 9, 1952), 147; “Cannery to Dedicate New \$2,000,000 Plant,” *Los Angeles Times* (November 10, 1952), 49.



**Figure 7-3. Birds-eye view of Star-Kist Plant No. 4 in 1952, camera facing northeast.**

*Los Angeles Times (November 9, 1952), 147.*



**Figure 7-4. Entrance in 1952.**

*Pan-Pacific Fisherman (December 1952), cover.*



**Figure 7-5. Interior, butchering tables.**

*Pan-Pacific Fisherman (December 1952), 18.*



**Figure 7-6. Interior, cleaning tables.**

*Pan-Pacific Fisherman (December 1952), 18.*

Star-Kist expanded and altered the Plant between 1953 and 1985. This evaluation effort included a detailed and careful review of each permit available through the Los Angeles Department of Building and Safety's online permit archive. Although the 2008 evaluation conducted some permit research, not all permits were obtained and reviewed. The following list provides detailed construction history after the Plant's 1952 opening:

- A 21-foot by 30-foot one-story locker room addition was completed in 1953 at an unknown location (1953LA57822).
- A 30-foot by 61-foot stand-alone, one-story, stucco shop building was constructed in 1953 to the rear of the Plant (1953SP06487).
- A warehouse addition was appended to the northeast area of the Plant with construction to match the adjacent retort area in 1953 (1953SP06699).
- In 1954 the City of Los Angeles required the existing scale house undergo building code compliance (1954SP08512).
- Additionally, in 1954, Star-Kist installed three exterior canopies and performed interior alterations including the addition of vents, doors for the lunchroom, and a platform (1954SP08700).
- Alterations to the 1952 pump house occurred in 1954 in compliance with the building code (1954SP08713).
- Star-Kist replaced the retort area's roof in 1956 (1956SP14509).
- A triangular addition to the north elevation of the main building in 1974 (1974SP52261).
- Star-Kist installed an equipment shelter at the southeast corner of the Plant in 1974. Frank Politeo is listed as the architect/designer for the addition. A plan included with the permit details the property, which includes six tanks east of the equipment shelter and other industrial equipment buildings or sheds to the west along the south elevation of the building. (1974SP52261). The Plant has three Fish Import Docks at the south of the property at this date.
- Also in 1974, Star-Kist constructed a restroom and lockers on the existing mezzanine level of the northern triangular building addition portion of the Plant (1974SP52271).
- In 1976, additional interior alterations took place: a mezzanine level lunchroom was added to the northeast portion of the building (1976SP54373).

- Star-Kist enclosed the equipment shed in 1976 (1976SP54815).
- That same year, doorway alterations occurred at unknown locations (1976SP54872).
- In 1977 the first aid office was renovated (1977SP56358) and new interior partitions installed for office space (1977SP57284).
- 1978 saw the remodel of an unattached, exterior locker and restroom facility east of the Plant and a second-floor addition to that building (1978SP58771).
- An additional set of vents was added to the interior of the building in 1978 at an unknown location (1978SP58772).
- Star-Kist expanded the cooling room by 5,280 square feet at the northeast portion of the building, to the rear. The one-story addition rose 14 feet (1978SP58860).
- A pipe bridge, carrying pipes from the Plant to the East Plant to the east, was constructed in 1978 (1978SP59467).
- In 1979, the approximately 15-foot by 20-foot compressor room was replaced (1979SP60524).
- Also in 1979, Star-Kist constructed an approximately 20-foot by 47-foot, two-story office addition to the primary elevation, and the renovation of exterior office building (1979SP61157).
- In 1980, the primary elevation underwent further alterations with a second-floor addition on either side of the entrance. The second-floor addition included a dining room and locker room and was designed by Politeo. The permit also included interior remodeling (1980SP63624).
- In 1982 Star-Kist added a salt room to the scales house at the southeast portion of the Plant (1982SP68375).
- The truss system for cooling room was replaced in 1983 (1982SP68715).
- Interior office partitions on the second floor's 1980 addition were completed in 1986 after the Plant stopped production of canned tuna for human consumption in 1984 (1986SP02880).
- In 1987, Star-Kist undertook numerous alterations and additions: an office and lab (1987SP04279), blast freezer (1987SP04280), an approximately 37-foot by 75-foot building addition and relocation of retorts and drain trench (1987SP04281), re-roofing (1987SP04260 & 1987SP04361), loading dock and canopy (1987SP04995), and a maintenance shop and office addition (1987SP05083).
- Star-Kist completed numerous alterations in 1988: refurbished insulating panels (1988SP06872); installed new concrete drain trenches (1988SP07287); and constructed an electric panel building (1988SP08073), 10-foot by 10-foot office addition (1988SP08074), grading on the parcel (1988SP08300), housing for scales and conveyors (1988SP08515), tower support (1988SP08861), and infrastructure (1988SP09047, 1988SP09185, and 1988SP09186).
- A power room was added in 1989 (1989SP09644).
- Additional alterations after 1989 include lunchroom, office, and lobby renovations (1991SP06552 and 1991SP08250); tank foundations and platforms (1992SP10329); an addition (1992SP11224); infrastructure (1992SP11226); seismic retrofit (03016-10000-07621); and re-roofing (03016-90000-06400).

In addition to the extensive permit record for the Plant, field survey conducted on October 29, 2018, and review of historic images identified further alterations:

- Removal of original process engineering equipment (date(s) unknown; by 2008), including:
  - One (of two) original tuna import dock or a “*pecially designed* finger pier...[that] provide[d] complete docking and unloading facilities for four tuna clippers” between 1994 and 2002<sup>125</sup>
  - Conveyor system (catwalk, pedestrian-working, and waste disposal levels) throughout the Plant
  - Butchering tables
  - Pre-cooking equipment (steam pipes, pressure indicators, metal baskets, etc.)
  - “*Specially designed* cleaning tables,” which were “unique in all the canning industry”<sup>126</sup>
  - “Completely automatic” empty can conveyor and unscramblers<sup>127</sup>
  - Can washers/sterilizing equipment
  - Can filling machines
  - Flavor dispensing machines that heated oil “to prepare the finest oils for slow measured delivery which salts the tuna to accentuate the flavor”<sup>128</sup>
  - Automatic can sealer and Full Can Booster Elevators
  - Full Can Washer steam bath system “*especialy designed* for this service” (for final cooking to set flavor)<sup>129</sup>
- Permits between 1959 and 1974 are not available through the Los Angeles Department of Building and Safety’s online permit database. By 1974, however, the Plant experienced two additions identified through review of aerial photographs at the Plant’s east elevation.
- Shortening the extant Fish Import Dock’s pier between 1980 and 1994
- Vandalism since the building’s vacancy circa 2000
- Removal of roof access points in 2018

Figure 7-7 below, depicts additions and major exterior alterations completed by Star-Kist after the Plant’s construction in 1952. Many of these changes date to periods not associated with significant historic context. For example, the Plant’s position as a leading cannery at the Port and in the United States declined as globalization occurred in the 1960s through to its closure in 1984. Star-Kist established an overseas cannery in 1960 and by 1969, overseas canneries produced approximately half of all canned tuna.<sup>130</sup> In contrast, the 1950s marked the U.S. industry’s peak; at that time the Port’s Fish Harbor canneries produced 80 percent of canned tuna.<sup>131</sup> Alterations associated with these later periods have not gained significance in their own right because they are not associated with a significant historic context.

<sup>125</sup> Nishkian and Zelson, 17. Emphasis added.

<sup>126</sup> Ibid., 18. Emphasis added.

<sup>127</sup> Ibid., 19.

<sup>128</sup> Ibid., 20.

<sup>129</sup> Ibid., 20. Emphasis added.

<sup>130</sup> John Rogers, “Boomy ’60 Foreseen, with 22% Auto Rise,” *New York Daily News* (December 7, 1959), 129; Howard Morin, “Russ Move into New Fishing Area Found by U.S. Clipper,” *San Pedro News-Pilot* (September 23, 1959), 1; and David F. Belnap, “U.S.-Latin Tuna Talks Bring No Firm Results,” *Los Angeles Times* (August 18, 1969), 4.

<sup>131</sup> “Port Board Approves Permit for \$160,000 Fish Cannery,” *San Pedro News-Pilot* (January 30, 1947), 1; Grobaty, np.



**Figure 7-7. Birds-eye view of Star-Kist Plant No. 4 in 2018, with green overlay denoting extant portions of the 1952 building and red noting additions since 1952, camera facing northeast.**

*Google and ICF, 2018.*

Original Tuna Import Docks and original, state-of-the-art process engineering equipment designed and built for the Plant are key to the building's operation as a major canning facility, but have been altered and removed. Compounded with the numerous alterations noted through permit research, the Plant lacks the ability to convey itself as a Star-Kist and/or tuna canning facility.

Under the direction of Heinz, which acquired Star-Kist in 1963, the company expanded its facilities at Fish Harbor on Terminal Island. Star-Kist erected an Empty Can Warehouse northeast of the Plant in 1970. In 1971–1977, Star-Kist also constructed the East Plant, formed by Cold Storage, Can Manufacturing Plant, and Warehouse. During the construction of the East Plant, the now-demolished Food Testing and Animal Nutrition building was constructed east of the Empty Can Warehouse in 1972. Finally, Star-Kist constructed a Pet Food Plant south of the Laboratory in 1979. Many of these now-demolished buildings functioned to support the company's pet food production. The Laboratory, Food Testing and Animal Nutrition, and Pet Food Plant were demolished in 2018 (Figure 7-8).<sup>132</sup>

<sup>132</sup> The 2008 evaluation and Tables 1-1 and 2-1, above, identified Net Shed Storage, which consisted of two buildings constructed in 1947 and 1948 and demolished in 2018. Pan-Pacific Fisheries, a competitor of French Sardine (later Star-Kist), commissioned the two Net Shed Storage buildings. Star-Kist later purchased the property at an unknown date. As such, Net Shed Storage is not discussed in the construction history of Star-Kist's Terminal Island facilities.



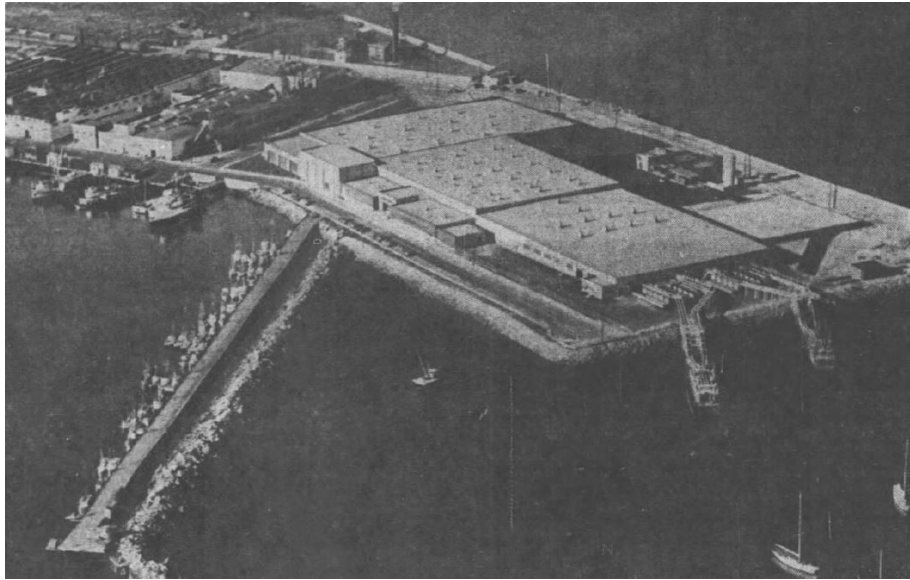


**Figure 7-8. Star-Kist Facilities Associated with Plant No. 4.**

*Google and ICF, 2018.*

## 8.1 The Plant

The seven aspects of integrity determine whether a property has the ability to convey its significance. As detailed below, Figure 8-1 through Figure 8-6 provide visual evidence for the numerous additions to the Plant since 1952.



**Figure 8-1. Birds-eye view of Star-Kist Plant No. 4 in 1952, camera facing northeast.**

*Los Angeles Times (November 9, 1952), 147.*



**Figure 8-2. Birds-eye view of Star-Kist Plant No. 4 in 2018, with green overlay denoting extant portions of the 1952 building and red noting additions since 1952, camera facing northeast.**

*Google and ICF, 2018.*



**Figure 8-3. Entrance in 1952.**

*Pan-Pacific Fisherman (December 1952), cover.*



**Figure 8-4. Entrance in 2018, camera facing east.**

*ICF, 2018.*



**Figure 8-5. Interior in 1952, cleaning tables.**

*Pan-Pacific Fisherman (December 1952), 18.*



**Figure 8-6. Interior in 2018, camera facing southeast.**

*ICF, 2018.*

### 8.1.1 Location

The Plant retains its original location on Terminal Island, bounded by Ways Street and Inner Fish Harbor to the west, Bass Street to the north, Barracuda Street to the east, and outer Fish Harbor to the south. Therefore, the Plant retains its integrity of location.

### 8.1.2 Design

Due to extensive additions and alterations, the Plant does not retain integrity of design. The Plant retains its industrial nature, with large interiors facilitating light manufacturing. However, the plan, massing, and spatial relationships have been altered. Star-Kist constructed additions along all elevations of the Plant, altering its plan and massing (Figure 8-2, above). In addition, massing and the spatial relationships of the entrance no longer retain their 1952 appearance. Originally, an entrance pylon rose well above two flanking one-story wings (Figure 8-3), but a second-story addition in 1980 raised the wings' height above that of the entrance pylon, destroying the primary (west) elevation's original Late Moderne design (Figure 8-4).

### 8.1.3 Setting

The Plant does not retain integrity of setting. The Port, including Terminal Island and Fish Harbor, has changed drastically since 1952: first, through containerization brought on by globalization, affecting Port operations and infrastructure; and second, through closure of the canning and fishing industries at Fish Harbor.

The Harbor Department reclaimed more than 7,450,000 square feet of land in the 1970s and 1980s and placed it east and southeast of the Plant, an area that now serves as massive container shipping facilities—a concept that was unheard of in 1952. The container facilities are characterized by stacked containers and dominated by numerous 130-foot-tall metal cranes along their wharves. Prior to this reclamation, the Plant was on a peninsula that was only connected to Terminal Island to the north (Figure 8-1).

The decline of fishing and the tuna industry at the Port altered the immediate setting. Fish Harbor once housed multiple fish-related industries, including sardine and tuna canning and various supportive shops and business. Once densely built up, today most parcels are vacant, and others contain infill. Railroad spurs have been removed and fish canning companies no longer operate here. For these reasons, the Plant does not retain integrity of setting.

### 8.1.4 Materials

Major alterations including new construction along all of its original elevations cause a substantial loss of integrity of materials (Figure 8-2). Although the Plant has undergone many alterations, the Plant remains extant and has not experienced wholesale removal of construction materials. However, designers, engineers, and contractors used non-original materials such as vertical seamed metal cladding, plexiglass panels, and aluminum frame slider windows for new construction that removed, obscured, and added to the original tilt-up concrete and rolled steel multi-light glass materials. Moreover, the removal of the metal conveyor systems and associated process engineering presents an additional loss of materials (Figure 8-6). The Plant lacks integrity of materials.



### 8.1.5 Workmanship

Major alterations including new construction along all of its original elevations cause a substantial loss of integrity of workmanship (Figure 8-2). The Plant is constructed of tilt-up concrete poured and cured on site, which makes the concrete an important component of the Plant's workmanship. Although the Plant has undergone many alterations, the Plant remains extant and has not experienced wholesale removal of its evidenced workmanship. However, designers, engineers, and contractors used non-original materials and methods of new construction that removed, obscured, and added to the original tilt-up concrete's workmanship. The Plant lacks integrity of materials.

### 8.1.6 Feeling

Because the Plant lacks integrity of design, workmanship, and materials, it also lacks integrity of feeling. Through the extensive alterations to the building type and architectural style, the Plant does not express its aesthetic or historic sense of potentially important dates in its history: 1952, 1959, or 1969. Late Moderne architecture, popular in the post-World War II era, identifies the Plant through its stack-bond brick cladding and rolled-steel windows, which are arranged into a ribbon and surrounded by a bezel. However, the 1980 second-story addition with its commonplace design and aluminum slider windows identifies changes to the Late-Moderne feeling (Figure 8-3 and Figure 8-4). Likewise, portions of the original tilt-up concrete warehouse with large rolled-steel windows punctuating the clerestory-level area of the walls evidence an early post-World War II light industrial type of building. However, these features are obscured by many additions that utilize metal warehouse-type buildings, which are incongruous with the 1952 construction of the Plant (Figure 8-2). The Plant's alterations are not compatible with its potentially important dates for either the industry or Star-Kist.

### 8.1.7 Association

The Plant lacks integrity of association. Removal of the bespoke process engineering equipment, such as a multi-story conveyor system, butchering and cleaning tables, pre-cooking and Full Can Washer, can scramblers, sterilizers, and filling machines, prevents the Plant from conveying its association with either the tuna canning industry or Star-Kist (Figure 8-5 and Figure 8-6). The process engineering equipment is integral to understanding the company's important United States-based tuna production at the Port's Fish Harbor in the 1950s and 1960s. This equipment efficiently facilitated entry of tuna at the Plant's southern Fish Import Docks, a linear production north through the building, with canned tuna shipping by train and truck from its northern boundary along Bass Street. This production line supported Star-Kist's leading role in the United States canning industry and at Fish Harbor. The Plant lacks physical features to convey integrity of association.

## 8.2 Empty Can Warehouse

The Empty Can Warehouse retains a high level of integrity. It has not been moved from its original 1970 location. The setting surrounding the warehouse, however, has changed since its construction. In 1970, the Port had yet to develop Terminal Island into a major containerization shipping hub. Indeed, the reclaimed land mass east of the warehouse did not exist in 1970. In addition, Fish Harbor's setting is no longer a vibrant fishing and canning community. Vacant lots now dominate the landscape. Its design, materials, and workmanship remain intact because Star-Kist and its

current tenant have not made alterations to it since it was constructed. The warehouse features metal cladding set over a metal frame, and has only two points of entry/egress: it is a common design for its era. However, it does not have a direct link to Star-Kist for the canning industry. Rather, it could be a warehouse for any purpose.

## 8.3 East Plant

The East Plant retains a moderate level of integrity. It has not been moved from its original location. The setting surrounding the warehouse, however, has changed since its construction. In the 1970s, the Port had yet to develop Terminal Island into a major containerization shipping hub. Indeed, the reclaimed land mass east of the East Plant did not exist in the 1970s. In addition, Fish Harbor's setting is no longer a vibrant fishing and canning community. Vacant lots now dominate the landscape. Its design, materials, and workmanship remain primarily intact because Star-Kist and its current tenant have made few alterations to the East Plant since it was constructed. The East Plant features metal cladding set over a metal frame and some concrete construction. It relies on electrical systems rather than passive ones. Besides loading doors along its north and west elevations, it lacks fenestration. However, it does not have a direct link to Star-Kist for the canning industry. Rather, it could have been used for any industrial purpose.

## Chapter 9

# Individual Evaluation of Star-Kist Plant and Its Associated Buildings

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This section individually evaluates the three extant Star-Kist buildings: the 1952 Plant, the 1970 Empty Can Warehouse, and the 1971–1977 East Plant.

Four buildings previously evaluated in the 2008 evaluation and found ineligible for the NRHP and the CRHR, and as HCMs under all criteria have been demolished: Net Shed Storage, Laboratory, Food Testing and Animal Nutrition, and Pet Food Plant. See Appendix A for updated DPR 523 series forms for these four demolished buildings. They are not discussed further herein. Appendix A also contains Update DPRs for the Plant, Empty Can Warehouse, and East Plant.

## 9.1 Plant

The Plant was evaluated as eligible for the NRHP, for the CRHR, and as an HCM under all criteria in 2008 but has been re-evaluated and determined individually **ineligible** for the NRHP or the CRHR or as an HCM.

This evaluation determined that although the Plant may have been important under NRHP/CRHR Criteria A/1 and as an HCM for its association with events or a pattern of events significant to our history as a United States Star-Kist tuna canning plant, it lacks sufficient integrity to convey that significance. A potentially important period associated with the U.S. tuna canning industry ends in 1969 when overseas canning facilities produced approximately 50 percent of canned tuna. Another potentially important period associated with the Plant ends in 1959, when Star-Kist opened an overseas facility. These events marked consequential changes to the industry and Star-Kist production in the United States that are linked to their decline and demise. Star-Kist completed substantial alterations to the Plant after the potentially important periods provided above, many within the past 50 years. Today, the Plant is clearly the product of light industry, but it lacks the ability to convey its significant associations with the tuna industry or Star-Kist. A detailed account of integrity is presented in Chapter 8.

### 9.1.1 NRHP/CRHR Evaluation

#### Events/Patterns: A/1

As stated above, this evaluation determined that although the Plant is associated with two historic contexts and their potentially important dates (the history of the United States canning industry from 1952 to 1969 and the history of Star-Kist tuna canning in the United States and at the Port's Fish Harbor from 1952 to 1959), the Plant is unable to convey any significance due to insufficient integrity.

Star-Kist, founded in 1917 as French Sardine, established a major presence at Terminal Island's Fish Harbor and as a major supplier of canned tuna worldwide. The 1952 Plant facilitated the United States' and company's extensive growth in the industry, ensuring that Star-Kist would become the

world's largest tuna company. Fishing was a major industry in Southern California, and Terminal Island was no exception. Indeed, the Port created Fish Harbor, beginning in 1915, to unite the fishing industries and separate them from the Port's shipping lanes.<sup>133</sup> The founder of Star-Kist, Martin Bogdanovich, is credited with enabling the canned tuna industry through the advent of refrigeration onboard vessels.<sup>134</sup> Thereafter, tuna could be caught and kept fresh in quantities suitable for canning. Fish Harbor boomed. In its heyday, approximately 2,000 fishermen served 18 canneries.<sup>135</sup> Terminal Island, noted as "the greatest fishing port in the world," led in canned tuna production world wide by 1946.<sup>136</sup> For example, in 1954, approximately 65 percent of canned tuna consumed in the United States was produced by Star-Kist and Van Camp (renamed Chicken of the Sea), also of Terminal Island.<sup>137</sup> Other Fish Harbor canneries coupled with Star-Kist and Van Camp produced 80 percent of canned tuna in the United States during the 1950s, elevating the fishing industry to California's fourth-largest industry.<sup>138</sup> So important was the tuna industry in Los Angeles, the County of Los Angeles's second seal incorporated a tuna into its design in 1957.<sup>139</sup> Although Star-Kist and its Plant played a significant role in the fishing and canned tuna industries in the United States and at the Port, the Plant in its current state fails to depict or convey its significance. The Plant no longer contains features or elements that represent either the canned tuna industry at large or the Star-Kist brand. The degree of change to the Plant is too great. Rather, the Plant could serve any light industrial purpose. Therefore, the Star-Kist Plant is not eligible under NRHP/CRHR Criteria A/1.

## Important Persons: B/2

Martin Bogdanovich founded the French Sardine Company in 1917 and was involved in its management until his passing in 1944; he is not associated with the Plant, which was constructed in 1952. Bogdanovich's son, Joseph, assumed control of the company following his father's death. The younger Bogdanovich remained active in Star-Kist's management until 1963 when Heinz acquired 90 percent of Star-Kist shares. Bogdanovich retained his presidency after the Heinz acquisition and was later promoted to chief executive officer. In 1988 he obtained a new leadership position at Heinz and stepped away from management at Star-Kist, which was no longer producing canned tuna in the United States. Bogdanovich would have been involved in decisions surrounding the company's building and expansion, but the extent of his associations with the Plant is unclear. Research, including multiple newspapers in the greater Los Angeles metropolitan area and obituaries, yielded little information on Bogdanovich and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he does not appear to have been significantly

<sup>133</sup> Hadley Meares, "San Pedro: Off the Coast of San Pedro, a Japanese Community Erased," *CurbedLA* (March 30, 2018), np, accessed December 7, 2018, <https://la.curbed.com/2018/3/30/17147942/san-pedro-history-terminal-island-internment>.

<sup>134</sup> James Phelan, "How to Put a 100-pound Tuna in a 7-ounce Can," *Independent Press Telegram* (July 11, 1954), 4, 18.

<sup>135</sup> Phelan, "How to Put a 100-pound Tuna in a 7-ounce Can," *Independent Press Telegram* (July 11, 1954), 4, 18; Grobaty, "The Boom and Bust of Fish Harbor Canneries," *Long Beach Post* (October 5, 2018), np, accessed December 7, 2018, <https://lbpost.com/local-history/the-boom-and-bust-of-the-fish-harbor-canneries/>; Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np.

<sup>136</sup> Phelan, "How to Put a 100-pound Tuna in a 7-ounce Can," *Independent Press Telegram* (July 11, 1954), 4, 18; Grobaty, np; Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np.

<sup>137</sup> Phelan, "How to Put a 100-pound Tuna in a 7-ounce Can," *Independent Press Telegram* (July 11, 1954), 4, 18.

<sup>138</sup> "Port Board Approves Permit for \$160,000 Fish Cannery," *San Pedro News-Pilot* (January 30, 1947), 1; Grobaty, np; "New Star-Kist Plant to Pack 86,000 Tuna Cans Per Hour," *San Pedro News-Pilot* (November 3, 1952), 2.

<sup>139</sup> Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np.



associated with the Plant. Star-Kist operated several administrative office spaces in San Pedro and Long Beach, and it is unlikely that Bogdanovich held an office at the Plant. Research did not yield other persons to be directly associated with the Plant. Therefore, the Star-Kist Plant is not eligible under NRHP/CRHR Criteria B/2 for its association with either Bogdanovich or anyone else.

### **Design/Construction: C/3**

The Plant consists of post–World War II light industrial manufacturing facility and warehouse fronted by a Late Moderne–style office space. Both the warehouse and office space include characteristics of their types and styles. For example, not only does the Plant include a front office, but the warehouse portion contains some natural lighting. Its single-story tilt-up concrete design facilitated speedy construction, and the warehouse allowed for flexible use of space. The office portion contains multiple cladding materials in the form of smooth stucco and stack-bond brick; a bezel surrounds the ribbon windows. Although the Plant contains these characteristics, it lacks integrity, quality of design, and high artistic values sufficient for NRHP or CRHR listing. Better examples of a warehouse would include original interior mezzanine levels for amenities such as lockers and lunchrooms, mezzanine walkways, and ample natural lighting through a monitor-type roof, such as a sawtooth. In addition, process engineering equipment specially designed for the Plant has been removed. The interior of the Plant lacks the distinctive characteristics of a state-of-the-art tuna canning facility designed at the height of the company’s and industry’s history.

Better examples of Late Moderne design would include an asymmetrical and variegated but balanced configuration, an entrance pylon rising above the roofline (originally a feature of the Plant’s design, which was overshadowed by a 1980 addition), built-in planters, and perhaps a third cladding material such as wood or rock. The Plant lacks artistic features such as an aesthetic approach to form and massing, architectural embellishments, or landscape detailing. Moreover, Late Moderne architecture’s prominence concluded long before the Plant’s 1980 addition. Rote repetition of shapes, forms, and materials in an in-kind 1980 addition does not elevate the Plant’s design to NRHP or CRHR eligibility; instead, a Late Moderne building would represent an artistic and thoughtful approach to design, often evident in the work of a master architect.

M.A. Nishkian and Co. is noted as the Plant’s engineer on the original building permit, with John K. Minasian as the architect. The engineering aspects of the Plant are commonplace (e.g., single-story, precast tilt-up concrete construction). Constructed of multiple volumes, the Plant does not appear to have required innovative engineering design, and its engineering aspects are akin to numerous other or more elaborate examples of tilt-up concrete construction in Los Angeles, albeit on a large scale. M.A. Nishkian and Co. specially designed some of the Plant’s process engineering equipment for efficiency and cleanliness of production. However, all of the process engineering equipment has been removed; only one Tuna Import Dock and an altered, interior drainage system is extant. Moreover, research does not suggest that Nishkian is a master engineer. Minasian was later responsible for the engineering aspects of the Space Needle for the Seattle World’s Fair in 1962. Research did not reveal that he was responsible for engineering aspects of the Plant’s construction or its process engineering equipment. The Plant, although a large 200,000-square-foot facility with Late Moderne elements, is not a significant example of Minasian’s engineering prowess. Therefore, the Plant is not eligible under NRHP/CRHR Criteria C/3.

## Information Potential: D/4

The Plant is not likely to yield important information. Typical of similar buildings, the Plant's tilt-up concrete construction does not have the potential to yield important information regarding building, construction, or engineering methods or technologies used in the early 1950s. The loss of the specially designed process engineering equipment further affects the Plant's potential to yield important information about the United States tuna canning industry or Star-Kist's production in the United States or at the Port. The history of tilt-up construction and tuna processing are well recorded in photographs and various publications. In addition, constructed on a landfill built up at the time of construction, the parcel is unlikely to yield contextual information regarding archaeological resources important in prehistory or history. As such, the Plant has neither yielded nor has the potential to yield information important in prehistory or history. Therefore, the Plant is not eligible under NRHP/CRHR Criteria D/4.

## 9.1.2 HCM Evaluation

### Events/Patterns

As stated above, this evaluation determined that although the Plant is associated with two historic contexts and linked to potentially important dates (the history of the United States canning industry from 1952 to 1969 and the history of Star-Kist tuna canning in the United States and at the Port's Fish Harbor from 1952 to 1959), the Plant is unable to convey any significance due to insufficient integrity.

Although Star-Kist and its Plant played a significant role in the fishing and canned tuna industries as detailed above, the Plant fails to evidence its significance. The 1952 Plant no longer contains features or elements that represent either the United States canned tuna industry or Star-Kist's production in the United States or the Port's Fish Harbor. Rather, the Plant could serve any light industrial purpose. Therefore, the Star-Kist Plant is not eligible under this criterion.

### Important Persons

Joseph Bogdanovich assumed control of the company in 1944. Research detailed above yielded little information on Bogdanovich and his career with Star-Kist. Moreover, although Joseph presided over this major tuna canning company, he does not appear to have been significantly associated with the Plant. Therefore, the Star-Kist Plant is not eligible under this criterion.

### Design/Construction

As discussed above, the Plant consists of an early post-World War II light industrial manufacturing facility and warehouse fronted by a Late Moderne-style office space. Both the warehouse and office space include characteristics of their types and styles. However, the Plant lacks quality of design and high artistic values for an HCM. Better examples of a warehouse would include original mezzanine levels for amenities such as lockers and lunchrooms, mezzanine walkways, and ample natural lighting through a monitor-type roof, such as a sawtooth. In addition, process engineering equipment specially designed for the Plant has been removed. The interior of the Plant lacks the distinctive characteristics of a state-of-the-art tuna canning facility. Better examples of Late Moderne, as discussed in the context statement, would include an asymmetrical and variegated but balanced configuration, an entrance pylon rising above the roofline (alterations have affected this

original element), built-in planters, and perhaps a third cladding material such as wood or rock. The Plant lacks artistic features such as an aesthetic approach to form and massing, architectural embellishments, or landscape detailing. Other local examples serve better examples of Late Moderne architecture.

M.A. Nishkian and Co. is noted as the Plant's engineer on the original building permit, with John K. Minasian as the architect. The engineering aspects of the Plant are commonplace (e.g., single-story, precast tilt-up concrete construction). Constructed of multiple volumes, the Plant does not appear to have required innovative engineering design, and its engineering aspects are akin to numerous other examples of tilt-up concrete construction in Los Angeles, albeit on a large scale. M.A. Nishkian and Co. specially designed some of the Plant's process engineering equipment for efficiency and cleanliness of production. However, this equipment has been removed. Moreover, research does not suggest that Nishkian is a master engineer. Minasian was later responsible for the engineering aspects of the Space Needle for the Seattle World's Fair in 1962. The Plant, although a large 200,000-square-foot facility with Late Moderne elements, is not a significant example of Minasian's engineering prowess. Therefore, the Star-Kist Plant is not eligible under this criterion.

## Information Potential

The Plant is not likely to yield important information. Typical of similar buildings, the Plant's tilt-up concrete construction does not have the potential to yield important information regarding building, construction, or engineering methods or technologies used in the early 1950s. The loss of the specially designed process engineering equipment further affects the Plant's potential to yield important information about Star-Kist or tuna canning production in the United States or the Port's Fish Harbor. Moreover, constructed on a landfill built up at the time of construction, the parcel is unlikely to yield contextual information regarding archaeological resources important in prehistory or history. Therefore, the Star-Kist Plant is not eligible under this criterion.

## 9.2 Empty Can Warehouse

The Empty Can Warehouse was previously determined ineligible for the NRHP, for the CRHR, and as an HCM under all criteria in 2008. The current evaluation confirms that finding.

### 9.2.1 NRHP/CRHR Evaluation

#### Events/Patterns: A/1

Constructed in 1970, this building served as an empty can warehouse for Star-Kist.<sup>140</sup> No additional information was discovered regarding this building. As a can warehouse, the building served a role in Star-Kist's product development, but the details regarding that process remain unclear. Research did not identify if the warehouse stored cans used for tuna canning, pet food canning, or both. The utilitarian building does not evidence a connection to can storage, Star-Kist, or the canning industry at Fish Harbor or in the United States. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria A/1.

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<sup>140</sup> LADBS Building Permit Nos. 1970SP44784 and 1975SP53460.

## Important Persons: B/2

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the Empty Can Warehouse. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he did not hold an office at this warehouse. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria B/2.

## Design/Construction: C/3

The Empty Can Warehouse is a simply constructed, low-pitch gabled warehouse with metal cladding set over a metal frame. Indicative of warehouse construction in the 1970s, the warehouse relied on electrical rather than natural lighting and ventilation systems. A simply constructed warehouse of this scale and design is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist commissioned Frank Politeo (architect), Henry Thompson (engineer), and Bailey Construction Company (contractor) to complete the warehouse.<sup>141</sup> Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Thompson. Bailey Construction Co. used steel produced by the Pascoe Steel Corp. in numerous buildings including Star-Kist facilities on Terminal Island in the 1970s and the Anaheim Hills Fire Station.<sup>142</sup> The warehouse is not the work of a master. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria C/3.

## Information Potential: D/4

The warehouse has not and is not likely to yield important information about construction or engineering methods, technologies, or materials. It is a simply designed and constructed warehouse. In addition, the building is unable to provide important information about empty can storage or Star-Kist operations without its cans and/or associated equipment. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria D/4.

## 9.2.2 HCM Evaluation

### Events/Patterns

Constructed in 1970, this building served as an empty can warehouse for Star-Kist.<sup>143</sup> While the warehouse supported Star-Kist production, it is not associated with important events and does not exemplify the significant contributions of Star-Kist or the canning industry in the United States or at the Port's Fish Harbor. Therefore, the Empty Can Warehouse is not eligible under this criterion.

### Important Persons

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the Empty Can Warehouse. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist.

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<sup>141</sup> LADBS Building Permit No. 1970SP44784.

<sup>142</sup> "Contractor in Top Ten," *Los Angeles Times* (May 4, 1975), 109.

<sup>143</sup> LADBS Building Permit Nos. 1970SP44784, 1975SP53460.

Moreover, he did not hold an office at this warehouse. Therefore, the Empty Can Warehouse is not eligible under this criterion.

## Design/Construction

The Empty Can Warehouse is a simply constructed, low-pitch gabled warehouse with metal cladding set over a metal frame. Indicative of warehouse construction in the 1970s, the warehouse relied on electrical rather than natural lighting and ventilation systems. A simply constructed warehouse of this scale and design is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist commissioned Frank Politeo (architect), Henry Thompson (engineer), and Bailey Construction Company (contractor) to complete the warehouse.<sup>144</sup> Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Thompson. Bailey Construction Co. used steel produced by the Pascoe Steel Corp. in numerous buildings including Star-Kist facilities on Terminal Island in the 1970s and the Anaheim Hills Fire Station.<sup>145</sup> Research revealed that Politeo, Thompson, and persons working for the Bailey Construction Co. are not masters whose genius influenced their age. Therefore, the Empty Can Warehouse is not eligible under this criterion.

## Information Potential

The warehouse has not and is not likely to yield important information about prehistory or history of Star-Kist, the canning industry, or Fish Harbor. As it was constructed on reclaimed land, any prehistoric artifacts would be out of context. Simply constructed, the warehouse is unable to provide important information about empty can storage or Star-Kist operations without its cans and/or associated equipment. Therefore, the Empty Can Warehouse is not eligible under this criterion.

## 9.3 East Plant

The East Plant was previously determined ineligible for the NRHP, for the CRHR, and as an HCM under all criteria in 2008. The current evaluation confirms that finding.

### 9.3.1 NRHP/CRHR Evaluation

#### Events/Patterns: A/1

Constructed between 1971 and 1977, the East Plant housed can manufacturing, warehouse/distribution, and cold storage activities for Star-Kist's tuna canning and pet food operations at Fish Harbor. While the East Plant is associated with the Plant and other Star-Kist operations at Fish Harbor, research did not identify an association with important events or patterns of events. In fact, Star-Kist constructed the East Plant during a period of globalization after the company established a cannery overseas and during a period when half or more of tuna was canned overseas. Research did not identify an important historic context representative of the 1970s. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria A/1.

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<sup>144</sup> LADBS Building Permit No. 1970SP44784.

<sup>145</sup> "Contractor in Top Ten," *Los Angeles Times* (May 4, 1975), 109.

## Important Persons: B/2

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the East Plant. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he did not hold an office at in the East Plant. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria B/2.

## Design/Construction: C/3

With regard to architecture, the East Plant's construction emphasized cost-effective, utilitarian design without distinctive architectural features. It features a common warehouse-type construction of the era that relied on electrical systems rather than passive ones. As such, metal frames support metal cladding, and the East Plant has little fenestration besides loading doors along the north and west elevations. The cold storage portion of the East Plant features small, concrete cold storage rooms. A simply constructed warehouse-type plant is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist hired Frank Politeo and Don Hellmers to construct the East Plant. Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Hellmers. Research revealed that both of these men are not masters. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria C/3.

## Information Potential: D/4

The East Plant has not and is not likely to yield important information about construction or engineering methods, technologies, or materials. It is a simply designed and constructed warehouse. In addition, the building is unable to provide important information about can manufacture, can or other types of storage, or cold storage aspects of the Star-Kist operations without associated equipment. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria D/4.

## 9.3.2 HCM Evaluation

### Events/Patterns

Constructed between 1971 and 1977, this building served several functions for Star-Kist: can manufacture, warehouse, and cold storage.<sup>146</sup> While the building supported Star-Kist production, it is not associated with important events and does not exemplify the significant contributions of Star-Kist or the canning industry in the United States or at the Port's Fish Harbor. Therefore, the East Plant is not eligible under this criterion.

### Important Persons

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the East Plant. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover,

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<sup>146</sup> LADBS Building Permit Nos. 1970SP44784 and 1975SP53460.

although Bogdanovich presided over this major tuna canning company, he did not hold an office at this plant. Therefore, the East Plant is not eligible under this criterion.

## **Design/Construction**

With regard to architecture, the East Plant's construction emphasized cost-effective, utilitarian design without distinctive architectural features. It features a common warehouse-type construction of the era that relied on electrical systems rather than passive ones. As such, metal frames support metal cladding, and the East Plant has little fenestration besides loading doors along the north and west elevations. The cold storage portion of the East Plant features small, concrete cold storage rooms. A simply constructed warehouse-type plant is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist hired Frank Politeo and Don Hellmers to construct the East Plant. Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Hellmers. Research revealed that both of these men are not masters and they did not influence their age. Therefore, the East Plant is not eligible under this criterion.

## **Information Potential**

The East Plant has not and is not likely to yield important information about prehistory or history of Star-Kist, the canning industry, or Fish Harbor. As it was constructed on reclaimed land, any prehistoric artifacts would be out of context. Simply constructed, the East Plant is unable to provide important information about Star-Kist operations without its associated equipment. Therefore, the East Plant is not eligible under this criterion.

## Chapter 10

# Potential Districts

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This chapter addresses the question of whether a historic district is present at Fish Harbor that features the Star-Kist facilities as district contributors.

## 10.1 Introduction

In 2021, the Harbor Department requested that ICF also supplement the 2019 evaluation with an analysis of whether extant Star-Kist facilities form a historic district and if any of these facilities had the potential to be a contributor to an industry-related or architectural historic district at Fish Harbor.

This section presents the methodology for analysis, site histories on all non-Star-Kist facilities that are considered as part of a potential historic district, and analysis of each potential district. The methodology for this section builds on the methodology for evaluating the Star-Kist facilities individually. ICF's architectural historians identified four themes, developed from the historic context statements, and leveraged those themes to produce a Study Area and Survey Population. Architectural historians identified nine resources for consideration (in addition to the Star-Kist facilities), conducted a survey of these nine resources, and prepared site histories of each. Each site history includes a short architectural description. Finally, they prepared potential district boundaries based on the topics and resources.

After analyzing these potential districts, architectural historians that no district that includes Star-Kist facilities is present at Fish Harbor. As with the individual Star-Kist facility evaluations provided above, a district under any of the four themes either lacks the ability to convey significance or has a large number of ineligible properties and/or vacant lots.

## 10.2 Methods

Architectural historians performed research, developed themes, established a Study Area, identified a Survey Population, and conducted field survey, and reached a consensus finding.

### 10.2.1 Research Sources Consulted

Architectural historians consulted the same research sources presented in Chapter 3. In addition, they also consulted the following sources:

- United States Geological Survey Maps
- University of California, Santa Barbara Aerial Photo Archive (FrameFinder)



## 10.2.2 Potential Historic District Themes

Based on the research obtained from the sources listed above and the development of new historic context related to Star-Kist and Fish Harbor, architectural historians developed a list of four potential historic district themes.

1. Fish Harbor: Post-World War II History
2. The United States and Fish Harbor Canning Industry
3. Star-Kist at Fish Harbor
4. Property Type/Architectural Style

### Study Area and Survey Population

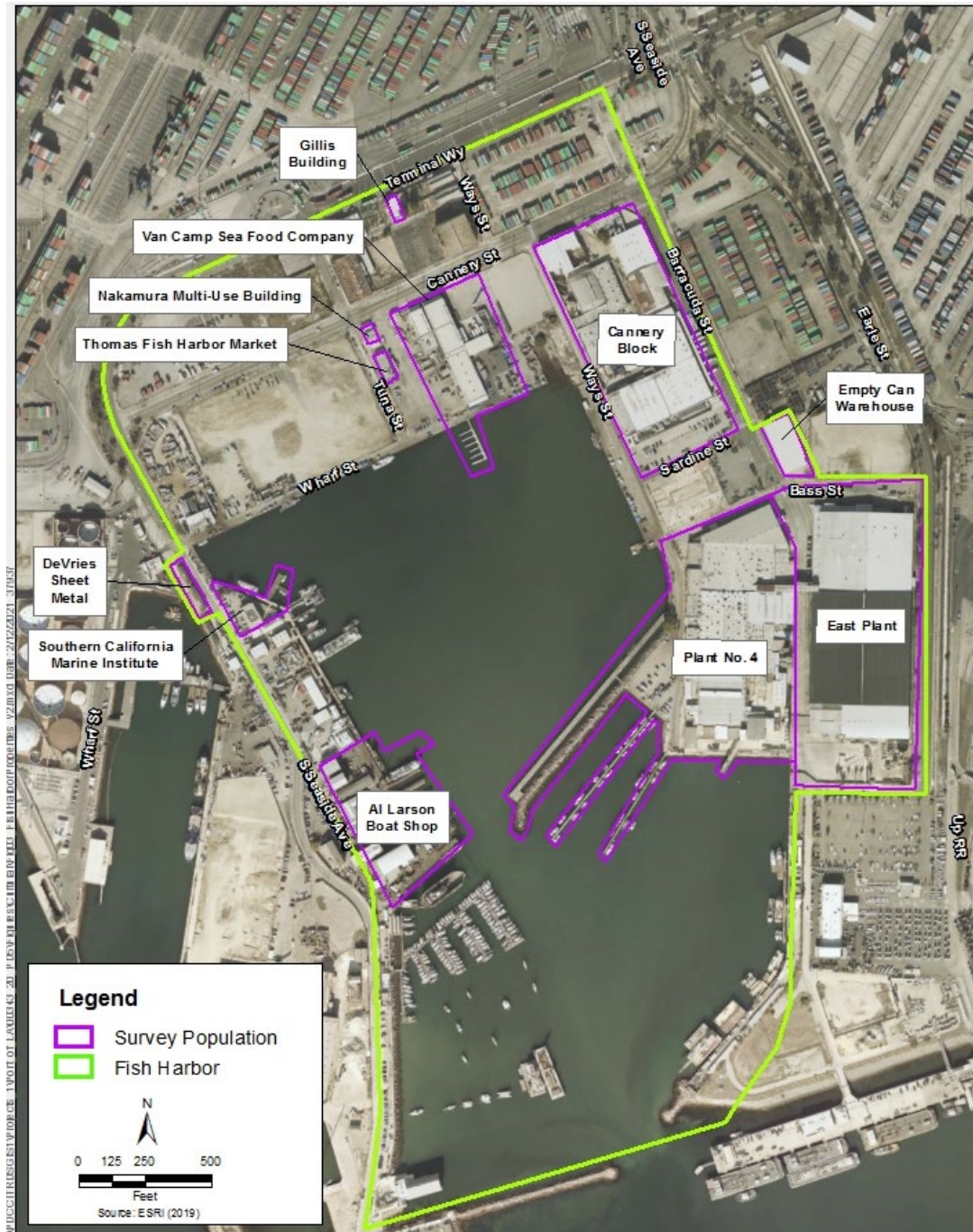
Architectural historians established a Study Area and a Survey Population to determine if an eligible historic district was present at Fish Harbor that included any of the Star-Kist facilities as contributors under the four themes listed above. To do this, they considered geographic proximity to Fish Harbor, known or potential associations with the history of Star-Kist, and potentially important dates associated with Star-Kist's historic context.

Based on this analysis, architectural historians established a Study Area surrounding Fish Harbor. The Study Area includes buildings, sites, and structures that face onto Fish Harbor from Seaside Avenue to the west, Wharf Street to the north, and Ways Street to the east. The Study Area also includes an area with buildings, sites, and structures beyond the Harbor's edge including one building along the west side of Seaside Avenue, four blocks located north of Wharf Street along Cannery Street, and four blocks located west of Barracuda Street, and one south of Bass Street and West of Earle Street.

Architectural historians established the Survey Population by reviewing historic and contemporary maps and historic photographs to determine which extant resources within the Study Area had the potential to be associated with Star-Kist under any of the four themes listed above. They identified the following nine resources, in addition to the Star-Kist facilities, as comprising the Survey Population:

- Al Larson Boat Shop
- DeVries Sheet Metal
- Oil Resources (General Petroleum & Standard Oil)
- Cannery Block
- Nakamura Multi-Use Building
- Thomas Fish Harbor Market
- Gillis Building
- Van Camp Sea Food Company
- Southern California Marine Institute

The figure below identifies the Study Area and Survey Population locations (Figure 10-1).



**Figure 10-1. Study Area and Survey Population of Potential Districts**

## Survey

Margaret Roderick and Andrew Bursan, architectural historians meeting the Professional Standards for architectural history and history (respectively), completed a field survey at Fish Harbor on June 9, 2020, accompanied by the Harbor Department's EMD and Real Estate Division staff members. Ms. Roderick and Mr. Bursan surveyed all buildings at Fish Harbor with the potential to be associated with the Plant, as listed above, because they share the same historic context required to evaluate

those facilities. These nine resources plus the Star-Kist facilities are united as being postwar buildings, cannery or cannery-related buildings, light industrial warehouse-type buildings, or buildings that feature Moderne style architecture. Ms. Roderick and Mr. Bursan used digital photography to record buildings, structures, and objects. Their visual inspection noted alterations, integrity considerations, architectural details, and potential character-defining features.

## Site-specific Summaries

Architectural historians consulted numerous sources (listed above) to prepare site-specific histories for each of the nine resources (listed above), except for the Star-Kist facilities for which they prepared a detailed construction history. Site-specific summaries are paired with brief architectural descriptions. The descriptions work with the site histories to identify alterations to resources and the level of integrity present. See Section 10.3, below.

### 10.2.3 Consensus

On November 18, 2020, Ms. Roderick, Mr. Bursan, Colleen Davis, Tim Yates, Jesse Lattig, and Jackson Loop reviewed the research to establish the potential district finding. Ms. Roderick, Mr. Bursan, Ms. Davis, Mr. Yates, and Ms. Lattig meet the Professional Standards as architectural historians and historians.

## 10.3 Site Histories

This section provides site histories for the nine resources included in the Survey Population (not including Star-Kist facilities described above):

- Nakamura Multi-Use Building
- Al Larson Boat Shop
- DeVries Sheet Metal
- Oil Resources (General Petroleum & Standard Oil)
- Cannery Block
- Thomas Fish Harbor Market
- Gillis Building
- Van Camp Sea Food Company
- Southern California Marine Institute

### 10.3.1 Nakamura Multi-Use Building (1918; 1923)

700–702 Tuna Street and 712–716 Tuna Street at the southeast corner of Cannery Street and Tuna Street are two connected buildings that feature flat roofs and non-original stucco cladding. Together these buildings are identified as the Nakamura Multi-Use Building. According to building permits and newspaper research, business owner Akimatsu Nakamura built a one-story, 40-foot by 46-foot

store at 700 Tuna Street in 1918 for a cost of \$1,600.<sup>147</sup> Although the building originally featured horizontal wood cladding, the only original features that remain include massing and some of its original fenestration: picture and transom windows accompany a recessed entrance (Figure 10-2). Known as the Nanka Company Dry Goods Store, it operated as the only clothing store in Fish Harbor. It appears that Nakamura ran the business until 1942, when he and other Japanese-Americans on Terminal Island were forcibly relocated to internment camps.<sup>148</sup> A 1921 Sanborn map depicts the building as a store and a 1950 Sanborn map depicts it as a sheet metal shop, signaling a change to Fish Harbor in the postwar era when the Japanese-American community no longer resided there.<sup>149</sup>



**Figure 10-2. Nakamura Multi-Use Building, primary (west) elevation, camera facing southeast.**  
*ICF, 2020.*

In 1923, K. Nakamura filed a permit for an adjoining one-story, 30-foot by 38-foot store and dwelling to the south.<sup>150</sup> Architect William Durr designed the building. Although K. Nakamura filed the permit, it appears that A. Nakamura owned the business because it was known as “A. Nakamura Company Grocery Store.” K. Nakamura does not appear in other permits or newspaper articles. Originally clad in horizontal wood siding like its northern counterpart at 700 Tuna Street, the building’s original façade was removed by the unknown postwar owner, who constructed the building’s Streamline Moderne style façade (Figure 10-3). The Moderne style façade features curved walls and glass block windows that follow the curved areas. A recessed entrance comprising a single door and transom also features curved walls.

<sup>147</sup> LADBS Permit No. 1918SP2674.

<sup>148</sup> Los Angeles Conservancy, “Japanese American Commercial Village Buildings” (Los Angeles, CA: Los Angeles Conservancy, n.d.), np, accessed July 3, 2020, <https://www.laconservancy.org/locations/japanese-american-commercial-village-buildings>; Los Angeles Conservancy, “Taking Tuna Mainstream,” (Los Angeles, CA: Los Angeles Conservancy, n.d.), np, accessed November 13, 2020, <https://www.laconservancy.org/node/1076>.

<sup>149</sup> Sanborn Fire Insurance Map, “Los Angeles,” Volume 19 (1921 and 1950), Sheet 1910.

<sup>150</sup> LADBS Permit No. 1923SP52372.





**Figure 10-3. Nakamura Multi-Use Building, primary (west) elevation and south elevation, camera facing northwest.**

*ICF, 2020.*

A 1948 building permit lists “712 Tuna St.” as the property owner.<sup>151</sup> No permits dating after 1948 are on file for the resource and additional research did not identify any postwar owners or tenants.

Associated with the Japanese-American community that once resided at Fish Harbor, these buildings have been substantially altered. They retain their massing and some fenestration patterns. However, the buildings’ original cladding has been removed, door and window openings infilled, and an entire new façade constructed. Limited information exists on the two buildings’ recent history. The buildings are currently unoccupied. In a report titled, *Built Environment Evaluation Report for Properties on Terminal Island, Port of Los Angeles, City and County of Los Angeles*, the Nakamura Multi-Use Building was determined individually ineligible for NRHP, CRHR, and HCM designation due to a lack of integrity.<sup>152</sup>

### 10.3.2 Al Larson Boat Shop (1924)

Swedish immigrant Al Larson relocated his boat construction business, originally established in 1903, to its current location at Fish Harbor in 1924.<sup>153</sup> The enterprise expanded over time to occupy 4 acres providing boat maintenance services to the Port’s fishing industry. The Al Larson Boat Shop complex consists of four primary buildings, five smaller ancillary storage buildings, six piers along the eastern harbor frontage, and a marina at the south end of the resource (not discussed in this report). From north to south, buildings include an industrial building named “Building No. 4,” the

<sup>151</sup> LADBS Permit No. 1948SP00395.

<sup>152</sup> SWCA, *Built Environment Evaluation Report for Properties on Terminal Island, Port of Los Angeles, City and County of Los Angeles*. Los Angeles, CA: Los Angeles Harbor Department (2011), 43.

<sup>153</sup> Mark Edward Nero, “Al Larson Boat Shop: 110 Years and Going Strong,” *Pacific Maritime Magazine*, (August 20, 2013), np, accessed August 6, 2020, <https://www.pacmar.com/story/2013/08/01/features/al-larson-boat-shop-110-years-and-going-strong/171.html>.

machine shop building, the main office and workshop building, a paint shed, and five ancillary buildings on the southeastern corner of the resource. The buildings are utilitarian and industrial in nature, and feature alterations and replacement of materials over the course of their century-long existence (Figure 10-4). The buildings are tall, two stories in height, and clad with stucco, wood, and metal. Gabled or cross-gabled roofs cap the buildings. Most of the buildings also feature loading bays that allow boat-related materials and objects to move between the land along Seaside Avenue and Fish Harbor's basin.



**Figure 10-4. Al Larson Boat Shop, multiple buildings shown from Fish Harbor, camera facing west.**

*ICF, 2020.*

Building permit data are unavailable before 1941, but Sanborn maps from 1921 and 1950 demonstrate that the site's layout has remained generally consistent, with five slipways and the central office positioned nearby to the south.<sup>154</sup> Newspaper articles give the impression of a successful and expanding business through the complex's early years, with \$200,000 worth of work and the launch of an 80-foot vessel announced in 1929.<sup>155</sup> In 1934, the *San Pedro News-Pilot* listed the Al Larson Boat Shop in a newspaper section on "Points of Interest and Leading Business Firms" in San Pedro and Terminal Island.<sup>156</sup> It was one of few Fish Harbor businesses to be included in the publication.

Larson's business grew during World War II, when the United States contracted the company to produce minesweeping vessels.<sup>157</sup> Fish Harbor's shipbuilding economy shrank following the war's end. In 1959 the Larson family sold the boat shop to Andrew Wall, whose family continued to

<sup>154</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1921), Sheet 1915; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1913.

<sup>155</sup> "80-Foot Purse Seiner to be Launched Monday," *San Pedro News-Pilot* (April 19, 1929), 19; "Port Boat-Yard Outlook Bright," *Los Angeles Times*, (November 1, 1928), 19.

<sup>156</sup> "Official Map," *San Pedro News-Pilot*, (April 7, 1934), 11.

<sup>157</sup> "Things Are Still Shipshape," *Los Angeles Times*, (March 22, 2006), 27.

operate the boat repair business after his death in 1984.<sup>158</sup> Recovery from the postwar downturn required the Wall family to rely mostly on small-scale commercial vessels for work, especially repair work. However, the business has survived as one of few shipbuilding and repair enterprises remaining from Fish Harbor's prewar era. In 2006, the *Los Angeles Times* reported that the business was "the only convenient option for large repair and overhaul jobs between San Diego and San Francisco" and was one of just eight companies across the nation still capable of building large oceangoing vessels.<sup>159</sup> The business is still in operation today for boat construction and repair services.

The Al Larson Boat Shop complex consists of several historic resources that have been previously assessed for significance individually and as a potential historic district: the main office and workshop (1924); a paint shed (1938); a machine shop (1938); building No. 4 (circa 1938–1947); docks, piers, and walls (1924 onward); a dry dock (1963); a marina (1964); and various ancillary buildings and sheds (post 1968). A 2010 evaluation found only the main office and machine shop were eligible for the CRHR. The remainder of the buildings, many of which have been continuously altered or moved to the site from elsewhere, lack sufficient integrity to be eligible.<sup>160</sup>

Since their construction in 1924, the utilitarian buildings have undergone alterations to support business needs or industrial ship building-related repairs. Alterations include recladding and replacement of fenestration. The buildings have few windows. It appears that the company replaces windows only when they are damaged so the windows that are present reflect a wide variety of materials and designs. The buildings have likely undergone repairs and periodic replacement of materials, but their utilitarian nature makes it difficult to pinpoint alteration dates and specific repairs or replacements.

### 10.3.3 DeVries Sheet Metal (1925)

Charles DeVries, a Dutch immigrant, founded a sheet metal workshop at 813 Seaside Avenue in 1925.<sup>161</sup> Original building permits show that the shop's use has remained consistent since its creation.<sup>162</sup> DeVries Sheet Metal is a rectangular one-story industrial building. It extends along the western side of Seaside Avenue, just south of its intersection with Wharf Street. The resource consists of three adjoined industrial sheds, identical in style, but of varying heights (Figure 10-5). All three are side-gabled buildings, with walls and roofs made of rusty, corrugated sheet metal. Medium pitched roofs cap each volume. Text advertising the business as a sheet metalwork runs along each volume, just below the rooflines. Moving from south to north, each building becomes slightly shorter in height. The width remains consistent throughout. The primary façade features a couple loading bays secured by metal sliding doors.

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<sup>158</sup> Nero, np.

<sup>159</sup> "Things Are Still Shipshape," *Los Angeles Times*, (March 22, 2006), 27.

<sup>160</sup> SWCA Environmental Consultants, *Built Environment Evaluation Report Al Larson Boat Shop*, prepared for CDM, (January 2010), 29–32.

<sup>161</sup> "People You Should Know," *Wilmington Daily Press Journal* (May 7, 1943), 2.

<sup>162</sup> LADBS Permit No. 1925LA39212.



**Figure 10-5. DeVries Sheet Metal, primary (west) elevation, camera facing southwest.**

*ICF, 2020.*

In 1945, Bill Hall joined the shop's management and later became sole owner.<sup>163</sup> Advertisements show that the sheet metal company specialized in boat parts, including fuel and water tanks. The company also offered services for industrial and restaurant uses.<sup>164</sup> The *News-Pilot San Pedro* placed the business on a survey of the area's significant points of interest in 1934. Later in 1943, the *Wilmington Daily Press Journal* listed DeVries under "People You Should Know."<sup>165</sup> It is unclear exactly when DeVries transferred full ownership of the business to Hall, but building permits and advertisements from the 1960s and the 1970s show that Hall continued operations as the sole owner of "Marine Sheet Metal Works," servicing boats with sheet metal and stainless steel.<sup>166</sup> Hall added an extension to the building in 1968.<sup>167</sup> Marine Sheet Metal Works continues to operate from the building.

No alterations are identifiable or recorded in the building permit record besides the 1968 addition. However, due to the utilitarian materials, design, and use of the building, it is likely that some materials or elements have been replaced over time. Rust is evident on the corrugated metal exterior.

<sup>163</sup> "Growing with the Harbor Area," *San Pedro News-Pilot* (June 4, 1951), 6.

<sup>164</sup> "Marine Sheet Metal Works," *San Pedro New-Pilot* (October 29, 1976), 34.

<sup>165</sup> "People You Should Know," *Wilmington Daily Press Journal* (May 7, 1943), 2.

<sup>166</sup> "Harbor Shipping Aided by Marine Sheet Metal Works," *San Pedro News-Pilot* (November 9, 1962), 10.

<sup>167</sup> LADBS Permit No. 1968SP40515.



### 10.3.4 Oil Resources at 818 Seaside Avenue and 1028 Seaside Avenue (General Petroleum [by 1951] and Standard Oil [1920s–1930s])

818 Seaside Avenue and 1028 Seaside Avenue operated as gas and oil businesses along the western side of Fish Harbor.<sup>168</sup> Both operated a “marine gas and oil station” in support of the fishing and canning industries.<sup>169</sup>

A Sanborn map indicates the presence of the western building at 818 Seaside Avenue by 1951 (Figure 10-6). The Sanborn map identifies this building as the machine shop, rising one story in height and built on a concrete foundation. One roof section was clad with composition materials while the other was a non-combustible material such as metal.<sup>170</sup> The building appears to retain its original footprint and massing but has likely been re-clad with a seamed corrugated metal material. The building features minimal fenestration, with a large loading door on its east elevation. Several pedestrian doors and windows also fenestrate the building. Overall, its alterations create a more modern, postwar type of industrial building supported by electric systems. The westernmost building at 818 Seaside was built in the 1990s, as evidenced by historic aerial photography.<sup>171</sup>



**Figure 10-6. East building at 818–980 Seaside Avenue (formerly 906 Seaside Avenue), east and portion of south elevations, camera facing northwest.**

*ICF, 2020.*

<sup>168</sup> Although the oil-related resources are adjacent to one another, associated addresses do not fall consecutively along Seaside Avenue. For example, Fireboat House No. 1, immediately north, has been assigned the numeric address “945.” Based on research, the current addresses are the same as the historic addresses. Research did not, however, uncover the reason for the inconsistent numbering along the street.

<sup>169</sup> Sanborn Fire Insurance Company, “Los Angeles,” Volume 19 (1950), Sheet 1913.

<sup>170</sup> Ibid.

<sup>171</sup> NETR Historic Aerials, 1952.

Newspaper articles from 1916 and 1917 identify Standard Oil as lessee of land on the west side of Fish Harbor. The site likely provided fuel to boats, but newspaper reports do not provide additional information on the exact location or configuration of the site.<sup>172</sup> The 1950 Sanborn map confirms that Standard Oil operated at the site.<sup>173</sup> Since the early 1990s, numerous buildings on the site have been demolished. Today the building is operated by Standard Oil; it is likely that Standard Oil has operated from this portion of Fish Harbor since the early 1900s.

The earliest permit available for 1028 Seaside Avenue, also identified as Berth 258, dates to 1924 and identifies the construction of an electric control house with corrugated iron siding by General Petroleum.<sup>174</sup> The one-story building measured 8 feet by 16 feet, which matches the measurements of the small building in the southwest area of the resource. Since construction, General Petroleum built additions to this small building's southern elevation that nearly doubled its size. Warning signs on the northern doorway to this building suggest it is the electric control house and may serve additional utilities. Few additional permits are available for this resource and do not identify the construction of the other buildings. Visual inspection suggests that two additional buildings (oil warehouse and office) date to this early period. The oil warehouse is to the east, along the harbor (Figure 10-7). The building has a gabled roof clad in metal sheeting with a raised, rectangular profile at the gable peak and six square roof caps at six points along the eaves. The cladding consists of painted corrugated metal sheeting across multiple elevations and wood framing around windows and doors. The office is south of the oil building. The office building has a moderately pitched cross-gabled metal clad roof with additions along the southwest and northeast elevations expressing shed-style low-pitched metal clad roofs. Exterior cladding along multiple elevations includes corrugated metal sheeting as well as horizontal plank siding. However, additions have also been added to the office over time; although not evidenced on the 1950 Sanborn map but represented in 1952 historic aerial photograph, General Petroleum appears to have enlarged the building circa 1951.<sup>175</sup>

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<sup>172</sup> "Great Catches by Fisherman," *Los Angeles Times* (August 24, 1916), 5; "Standard Oil Station for Fish Harbor," *San Pedro Daily Pilot* (July 3, 1917), 5.

<sup>173</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19, (1950), Sheet 1913.

<sup>174</sup> LADBS Permit No. 1924LA39945.

<sup>175</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1913; NETR Historic Aerials, 1952.



**Figure 10-7. 1028 Seaside, Oil Warehouse, east and north elevations, camera facing southwest.**  
*ICF, 2020.*

Visual inspection notes that additions typically used the same types of materials and style found on other buildings. The oil building's cladding and design appear to retain their original look and feel, although some sections of corrugated cladding may have been replaced since construction. Although the resource has changed over time with several additions discussed above, it retains its overall look and feel of a modest, early-1900s oil-related site. General Petroleum erected an open canopy structure at the northern portion of the site in 1988. Maxum Petroleum occupies these buildings today.

### 10.3.5 Cannery Block (1930s–1980s)

The Cannery Block is an industrial complex at the northeastern corner of Fish Harbor. The site is rectangular in shape, measuring approximately 1,000 feet by 400 feet and bordered by Cannery Street to the north, Ways Street to the west, Sardine Street to the south, and Barracuda Street to the east. Concrete, stucco, and metal make up most of the buildings on site. The site has both office buildings and warehouses, with ingress and egress patterns differing along each elevation.

The Cannery Block was built on newly reclaimed land; four companies operated within the Cannery Block by 1952. The Cannery Block saw its first development in 1936 with the construction of a cannery by South Coast Fisheries.<sup>176</sup> The California Marine Curing and Packing Company planned to construct a facility at the Cannery Block as early as 1936 but it was not completed until 1942,

<sup>176</sup> LADBS Permit No. 1936LA34205; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1921), sheet 1910.

according to a certificate of occupancy.<sup>177</sup> French Sardine constructed its Plant No. 2 at the Cannery Block's south end by 1943 and Pacific Processing Company established a facility by 1950.<sup>178</sup> Each of these four fish-related businesses maintained its own facility at the Cannery Block, with some alterations over the next two decades. The northeast portion of the block primarily remained undeveloped except for California Marine Curing and Packing Company's office, constructed in 1953, and a small warehouse, constructed between 1952 and 1960.<sup>179</sup>

Pan-Pacific Fisheries expanded its operations at Fish Harbor and became the sole operator of the Cannery Block in the early 1970s.<sup>180</sup> The former four companies operating at the Cannery Block appear to have permanently closed by the early 1970s. Pan-Pacific Fisheries demolished approximately 25 percent of the Cannery Block's original buildings and infrastructure circa 1972 and built four buildings on approximately 30 percent of the block through the 1970s.<sup>181</sup> This level of demolition, redevelopment, and new construction changed the way the Cannery Block operated as well as the way it looked. Pan-Pacific Fisheries continued to operate the Cannery Block until 1995 and built three additional buildings on the site through the 1980s. However, between the late 1970s and 1995, the company froze pay and laid off workers in an effort to continue production at Fish Harbor.<sup>182</sup>

After Pan-Pacific Fisheries ceased operations at Fish Harbor, other tenants occupied the block, including Chicken of the Sea and Fisherman's Pride. Tenants completed several alterations to the block including the construction of a circa 1997 warehouse at the northwest corner and demolition of the former French Sardine Plant No. 2 at the southern end. Plant No. 2's site is now a surface parking lot. Today, Fisherman's Pride operates from the Cannery Block. Fisherman's Pride mainly utilizes the southern and eastern portions of the block, with the southernmost building used for refrigeration.

The Cannery Block features a combination of buildings from multiple decades that display alterations. One of the oldest parts of the Cannery Block dates to the late 1930s (Figure 10-8). Although this section of the west elevation no longer functions as a main entry point, its minimal Moderne design coupled with its location identify it as a cannery's primary business entrance. The west, north, and east elevations of the Cannery Block reflect a range of construction dates and materials. Corrugated metal buildings and walls, stucco clad façades, and concrete warehouses are among them. A concrete building without fenestration forms the south elevation and faces onto a surface parking lot.

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<sup>177</sup> "Cannery Companies Rush New Plants," *Los Angeles Times* (December 8, 1936), 39; "Legal Notice: Order No. 1586," *Wilmington Daily Press Journal* (November 17, 1936), 4; LADBS Permit No. 1942LA13849.

<sup>178</sup> "Overtime Urged for Firemen: Proposal Being Studied Here to Solve Problem of Man Power Shortages," *Los Angeles Times* (January 8, 1943), 12; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheets 1910 and 1938.

<sup>179</sup> LADBS Permit No. 1953SP05767; NETR Historic Aerials, 1952; NETR Historic Aerials, 1963.

<sup>180</sup> LADBS Permit No. 1973SP49263; "Accountant," *Long Beach Independent* (March 14, 1972), 32; "Coastal Board Action Due 20 4 Applications," *Independent-Press Telegram* (April 13, 1974), 9.

<sup>181</sup> Port of Los Angeles Photograph Archive (1951–1980); NETR Historic Aerials, 1952, 1963, 1972, and 1980; ICF, *Final Historical Re-Evaluation of the Cannery Block (Formerly Chicken of the Sea), 338 Cannery Street, Terminal Island*, 46–47.

<sup>182</sup> "Last Mainland Tuna Cannery Faces Extinction," *Los Angeles Times* (February 7, 1992), 283; "Tuna Wholesaler Seeks to Buy Cannery," *Los Angeles Times* (December 23, 1995), 2; ICF, *Final Historical Re-Evaluation of the Cannery Block (Formerly Chicken of the Sea), 338 Cannery Street, Terminal Island*, 36–37.



**Figure 10-8. Cannery Block, west elevation showing an older building with Moderne elements, camera facing south.**

*ICF, 2019.*

In 2008, Jones & Stokes evaluated the Cannery Block (recorded as Chicken of the Sea) as eligible for the NRHP/CRHR under Criteria A/1 and the local HCM criterion regarding history.<sup>183</sup> This report identified the period of significance as 1950 to 1967 and highlighted the California Marine Curing and Packing Company's significance within the fishing and canning industries at Fish Harbor. It noted that the buildings related to this company "retained substantial integrity," which included process engineering equipment, such as retorts.<sup>184</sup>

ICF re-evaluated the Cannery Block in 2019, in accordance with the Port's Cultural Policy, as lacking sufficient integrity to be eligible for the NRHP, CRHR, and/or as a local HCM due to substantial alterations after 1970.<sup>185</sup> Additionally, ICF identified that the process engineering equipment, such as retorts and convey systems, was removed from the building between 2008 and 2019. Neither the buildings related to the California Marine Curing and Packing Plant nor others at the Cannery Block retain sufficient integrity to convey significance to the period during which it functioned as a tuna canning facility during the industry's height. Alterations after 1970 have not gained significance in their own right because they are not associated with a significant historic context.

### 10.3.6 Thomas Fish Harbor Market (1946)

Prior to the construction of the extant building at 746 Tuna Street, the site contained two 1920s-era buildings at 718 Tuna and 730 Tuna Street that had been owned by members of the Japanese-American community.<sup>186</sup> No demolition permits could be located for the 1920s-era buildings.

<sup>183</sup> Jones & Stokes, *Final Architectural Survey and Evaluation of the Chicken of the Sea Plant, 338 Cannery Street, Terminal Island, Port of Los Angeles* (Los Angeles, CA: Los Angeles Harbor Department, 2008), 30.

<sup>184</sup> *Ibid.*, 28–32; 30, quoted.

<sup>185</sup> For a detailed analysis of this finding see, ICF, *Final Historical Re-Evaluation of the Cannery Block (Formerly Chicken of the Sea), 338 Cannery Street, Terminal Island*.

<sup>186</sup> "Tuna Street Shops to be Rebuilt," *San Pedro News-Pilot* (April 20, 1946), 7.



However, a new construction permit filed after World War II demonstrates that the earlier buildings were demolished.

In 1946, Zorka Nizetich and Vincent Thomas built a one-story, 40-foot by 106-foot fish market and restaurant at 746 Tuna Street. Nizetich and Thomas opened the Fish Harbor Market, also known as the Thomas Fish Harbor Market.<sup>187</sup> The one-story, stucco-clad building with a rectangular footprint faces west onto Tuna Street (Figure 10-9). A flat roof with a parapet caps the building. Several pedestrian doors along the west elevation provide access to shops fronted by picture windows, although some have been infilled since construction.



**Figure 10-9. Thomas Fish Harbor Market, west (primary) elevation, camera facing northeast.**

*ICF, 2018.*

Newspaper articles state that Assemblyman Vincent Thomas owned the business, along with his brother John Thomas and Zorka Nizetich. Thomas' service in Sacramento likely prevented him from actively participating in the onsite day-to-day operation of the market.<sup>188</sup> Born in Yugoslavia in 1904, Nizetich helped run the market and restaurant from 1946 to her death in 1979. However, research did not reveal that she played a significant role in local history.<sup>189</sup> A 1950 Sanborn map depicts the building as containing three businesses: a restaurant, a store, and a paint store.<sup>190</sup> Since 1979, part of the building appears to have been continuously occupied by restaurants. Harbor Lights Restaurant currently occupies the building. Other store fronts remain vacant. Park, Chae, Won, and Young Jun lease the building from the Port.

<sup>187</sup> LADBS Permit No. 1946SP19403.

<sup>188</sup> "Assemblymen," *Los Angeles Times* (September 15, 2020), C1.

<sup>189</sup> "Funeral Services held for Zorka Nizetich," *San Pedro News-Pilot* (August 28, 1979), A5.

<sup>190</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1921 and 1950), Sheet 1910.

### 10.3.7 Gillis Building (1970)

Prior to its 1970 construction, the Gillis Building's site at 224 Terminal Way was minimally developed. In 1921, Japanese bungalows populated Terminal Way west of the site, although the subject site did not yet exist. By the mid-1930s, the Los Angeles Harbor Department had created the land with material dredged from the harbor's bottom, which forms the land beneath the Gillis Building.<sup>191</sup> By 1950, a few bungalows abutted Terminal Way at or near this location.<sup>192</sup> Historic aerial photographs confirm the presence of small buildings on this parcel prior to 1970.<sup>193</sup>

In 1970, William J. Gillis requested a permit for the construction of a one-story, 40-foot by 60-foot concrete block building at 250 Terminal Way. Gillis hired architect George V. Stokes, Engineer Paul Stone, and Contractor Carl Brooks to design and build the building. Gillis identified unspecified industrial and office use as its purpose.<sup>194</sup> Gillis filed a permit in 1970 for the construction of a shed accompanying the building to secure a grease trap.<sup>195</sup> The one-story building features concrete block construction and a flat roof (Figure 10-10). The primary elevation faces north onto Terminal Way and contains one pedestrian door and two metal slider windows fronted by security bars. The remaining elevations feature minimal fenestration. Visual inspection noted one alteration: the removal of signage along the primary elevation.

Gillis succeeded his father, Walter H. Gillis, as Production Manager of Van Camp at Fish Harbor in 1953.<sup>196</sup> Gillis continued to work for Van Camp until at least 1978.<sup>197</sup> In 1973, E. H. Carruthers Co. hired Stokes, Stone, and Brooks to design and construct a rear addition.<sup>198</sup> Research identified E. H. Carruthers Co. as an Oregon-based company that filed numerous patents, including at least one regarding canning machinery and the packaging of fish products.<sup>199</sup> Research presented above suggests that the building was used to support the canning industry.

Permit, newspaper, or historic photographs did not identify any additional information regarding the Gillis Building. Moreover, visual inspection did not identify any alterations. Star-Kist's Big Heart Pet Brands previously occupied the building. It is currently vacant.

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<sup>191</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1921), Sheet 1909.

<sup>192</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1909.

<sup>193</sup> NETR Historic Aerials, 1952, 1963, and 1972.

<sup>194</sup> LADBS Permit No. 1970LA44801.

<sup>195</sup> LADBS Permit No. 1970LA44802.

<sup>196</sup> "New Manager for Van Camp Sea Food Co.," *Wilmington Daily Press Journal* (February 19, 1953), 9.

<sup>197</sup> "U.S. Tuna Boat Burns; Crew Unhurt," *Los Angeles Times* (March 8, 1978), 19.

<sup>198</sup> LADBS Permit No. 1973SP50049.

<sup>199</sup> "Ferne M. Berg," *Astorian* (September 26, 2016), np, accessed June 23, 2020, [https://www.dailystorian.com/obituaries/ferne-m-berg/article\\_f4528de9-713a-5882-a51e-4e711cd181ac.html](https://www.dailystorian.com/obituaries/ferne-m-berg/article_f4528de9-713a-5882-a51e-4e711cd181ac.html); Eben H. Carruthers, *U.S. Patent No. 2630390A: Method of packing Fish Materials in Containers and Products Produced Thereby* (1948), np, accessed June 23, 2020, <https://patents.google.com/patent/US2630390A/en?inventor=Eben+H+Carruthers>.



**Figure 10-10. Gillis Building, north (primary) elevation, camera facing southeast.**  
*ICF, 2018.*

### 10.3.8 Van Camp Sea Food Company (1971)

The 1971 Van Camp building is at 220 Cannery Way.<sup>200</sup> Permits establish that Van Camp operated a facility at the site as early as 1966.<sup>201</sup> Permits indicate that Van Camp redeveloped the site between 1966 and 1971, which is confirmed by review of historic aerial photography.<sup>202</sup> This redevelopment demolished numerous buildings and partially demolished a curved railroad spur that accessed the resource's interior area.<sup>203</sup>

The 1971 resource consists of two rectangular buildings (Figure 10-11). The two concrete, one-story buildings are rectangular in their footprints and separated by a small alleyway. They face north onto Cannery Street. The primary (north) elevation consists of an elevated loading area, deeply set back from the road to allow room for vehicles to maneuver near the buildings. Portions of the spur line's original alignment, which were oriented to the earlier building on the site, have been altered. The buildings feature little fenestration, which is consistent with common postwar industrial design that relies on electrical systems. A small dock accessing Fish Harbor is at the building's southern elevation.

<sup>200</sup> LADBS Permit No. 1971LA23017; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1909.

<sup>201</sup> LADBS Permit No. 1966SP36046.

<sup>202</sup> Ibid.; LADBS Permit Nos. 1971LA23017, 1971LASP45484, and 1971SP45503; NETR Historic Aerials, 1963 and 1972.

<sup>203</sup> NETR Historic Aerials, 1963 and 1972.





**Figure 10-11. Van Camp Sea Food Company, primary (north) elevation and west elevation, camera facing southeast.**

*ICF, 2020.*

Van Camp operated at Fish Harbor through 1977, when the company sold its last tuna processing plant to Pan-Pacific Fisheries—then, a division of California Home Brands—in December of that year.<sup>204</sup> Van Camp focused its operations in San Diego and abroad until mid-1984, when it also closed its San Diego operations.<sup>205</sup> Tri-Marine Fish Company/Tri-Marine International building began processing fish at Fish Harbor in 1998 and remains active at 220 Cannery Way today.<sup>206</sup> Visual inspection noted no physical alterations to the building's exterior.

### 10.3.9 Southern California Marine Institute (1980)

Prior to construction of the building at 820 Seaside Avenue, this had been the location of a small commercial fishing operation and an icehouse. These earlier buildings were demolished by 1979 when grading activities took place at this location in preparation for new construction.<sup>207</sup> In 1980, the University of Southern California (USC) constructed the two-story, 47-foot by 83-foot Marine Research Laboratory building costing \$355,000. Designed by architectural firm Lyon Associates and engineers Thompson & Labrie, the building stands on a triangular site, just south of the intersection of Seaside Avenue and Wharf Street, on Fish Harbor's northwestern waterfront.<sup>208</sup> This is the resource's access point to water, which features a dock for mid-sized boats. Designed with a rectangular footprint, the building is set back from Seaside Avenue, near the water's edge. It has a flat roof with deep overhanging eaves and is clad in smooth-finished stucco. The building's primary façade faces north, toward a parking lot with approximately 15 painted stalls (Figure 10-12), and

<sup>204</sup> "Van Camp Selling its Last Terminal Island Fish Plant," *Long Beach Independent* (September 21, 1977), 3;

"Transfer of Cannery Facilities Assures Jobs," *Los Angeles Times* (December 8, 1977), 205.

<sup>205</sup> "Tunaboat Builder Plans to Move to Taiwan," *San Pedro News-Pilot* (April 13, 1984), 6.

<sup>206</sup> "Port: Fewer Local Commercial Fisherman," *Los Angeles Times* (June 3, 2001), 77.

<sup>207</sup> LADBS Permit No. 1979SP62158.

<sup>208</sup> LADBS Permit No. 1979SP62157.

consists of an entryway that protrudes slightly from the building's main body and vertical window configurations. Research and visual inspection did not identify any alterations to the building.



**Figure 10-12. Southern California Marine Institute, primary (north) and west elevations, camera facing southeast.**

*ICF, 2020.*

During construction, the California Coastal Commission temporarily revoked the building permit due to unreported information related to evictions of prior business operations at the site. The issue appears to have been quickly resolved and the building was completed by 1980. In 1981, USC added 23 fish tanks to the site.<sup>209</sup> The USC laboratory has essentially maintained the same function since the building's completion, namely water quality monitoring throughout the Port and marine science education to interested students in grades K–12.<sup>210</sup> USC originally ran the laboratory on its own. By 1993, the current Southern California Marine Institute expanded into a consortium of 23 universities, colleges, and foundations focused on marine research and education.<sup>211</sup>

## 10.4 Analysis of Potential Districts

District themes are related to potential significance under NRHP/CRHR Criteria A/1 and the HPOZ criteria for history or NRHP/CRHR Criteria C/3 and the HPOZ criteria for architecture. There are four district themes presented below with analysis as to eligibility potential. For those with eligibility potential, further analysis is provided.

<sup>209</sup> LADBS Permit No. 1981SP17853.

<sup>210</sup> "Work Ordered Halted on USC Marine Study Center," *Los Angeles Times* (March 5, 1980), 32; Southern California Marine Institute, "About Us" (n.d.), np, accessed July 5, 2020, <http://www.scmi.net/about-scmi-2/>.

<sup>211</sup> Southern California Marine Institute, np.

### 10.4.1 Historic Districts

As presented above in Chapter 3, eligibility criteria for national, state, or local historic status include associations with important events or patterns in history; important people; excellence in design; and information potential. These eligibility criteria apply to NRHP and CRHR district evaluations while HPOZs have their own set of eligibility requirements as described above. Therefore, an eligible NRHP or CRHR historic district must be associated with one or more of the criteria. In addition, the district must be “associated with an important historical context” and retain “historic integrity of those features necessary to convey its significance.”<sup>212</sup> A period of significance represents an identifiable time period or periods associated with a resource’s significance.

All historic districts must have properties that contribute to its significance (contributors) and may have properties that do not (non-contributors). However, its ability to express its linkage with the past must be apparent. According to the National Park Service, an eligible district must feature a significant group, association, or linkage of properties that are united historically or aesthetically.

NRHP and CRHR districts and HPOZs require defined boundaries but can be contiguous or non-contiguous.<sup>213</sup> A non-contiguous district boundary should not include “an isolated resource or small group of resources which were once connected to the district but have since been separated either through demolition or new construction.”<sup>214</sup> As such, a non-contiguous district boundary is not appropriate for properties at Fish Harbor, where vacant lots that once featured related buildings now proliferate. District boundaries, however, may include contributing and non-contributing properties. Boundaries should reflect the properties’ historic significance and retain sufficient integrity to convey historic significance.<sup>215</sup>

### 10.4.2 Fish Harbor: Post-World War II History

The Post-World War II history of Fish Harbor spans 75 years from 1945 to the present era and represents boom and bust economic cycles.

Eight resources are associated with this theme:

- Al Larson Boat Shop (built 1921, active in supporting Fish Harbor fishing after World War II)
- Cannery Block (portions of) (1944–1980s)
- Nakamura Multi-Use Building (1940s alterations)
- Thomas Fish Harbor Market (1946)
- Star-Kist Facilities: Plant No. 4 (1952); Empty Can Warehouse (1970); and East Plant (1971–1977)
- Gillis Building (1970)
- Van Camp Sea Food Company (1971)
- Southern California Marine Institute (1980)

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<sup>212</sup> “National Register Bulletin 15,” 3.

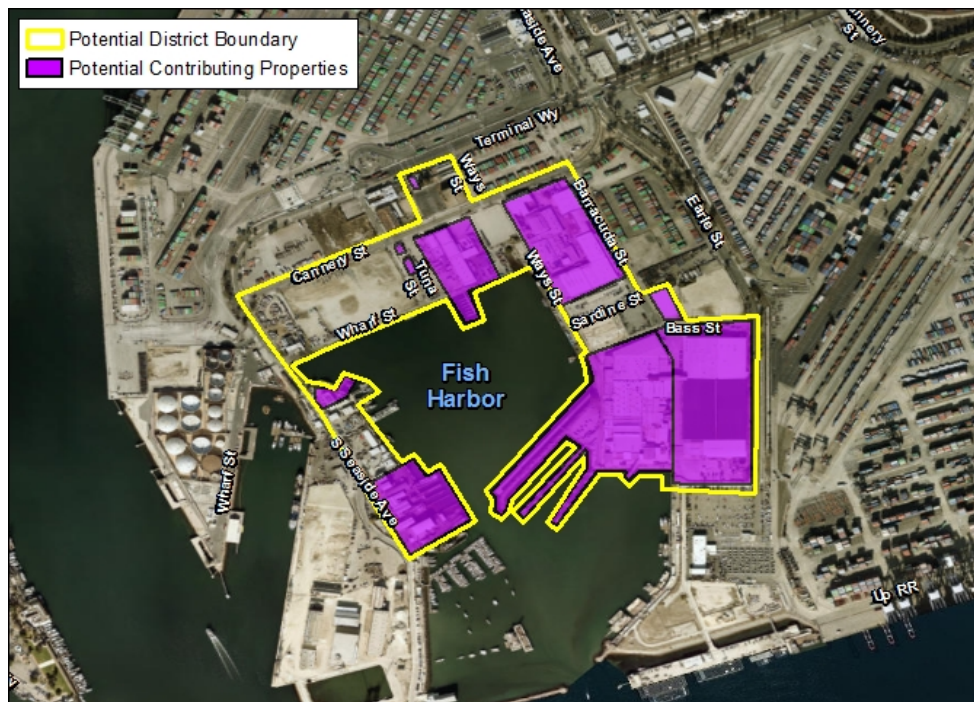
<sup>213</sup> Ibid.

<sup>214</sup> Ibid., 6.

<sup>215</sup> National Park Service, “How to Complete the National Register Registration Form (National Register Bulletin 16),” *National Register Bulletin* (Washington D.C.: NPS, 1997), 55, accessed July 24, 2020, <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>.

## Analysis

A historic district comprising resources associated with this district theme with Star-Kist as a district contributor would include resources primarily to the northeast and east of Fish Harbor (Figure 10-13).



**Figure 10-13. Post-World War II Fish Harbor Theme: Potential Boundary and Contributors**

While this era of Fish Harbor's history saw the construction of many new, large canning facilities and increased tuna canning production, it has also seen the decline and demise of both the United States fishing and canning industries. Between 1980 and 1994, numerous buildings were demolished, with more demolished since 1994. Vacant lots now dominate the landscape: the combined footprint of the eight resources would form less than 50 percent of the potential district's area. Eight contributing resources would be outnumbered by 10 vacant lots and two non-contributing properties.

Few buildings are exclusively associated with Fish Harbor's post-World War II history. Instead, many of the buildings were constructed or altered after overseas production met and superseded the United States-based tuna canning industry beginning in 1969. Major alterations to both the Cannery Block and the Plant through the 1970s and 1980s prevent them from conveying their postwar significance as thriving canning facilities and companies of the Fish Harbor community. A Fish Harbor district for the postwar period would need to include resources associated with the height of the harbor's fishing and canning era in the early postwar period.

The Cannery Block and the Plant, two resources that partially date to the early postwar period, lack sufficient integrity to convey individual significance. Any eligible district spanning this era would need to include a period of significance into the 1980s to account for alterations to and new construction associated with these buildings. In order for properties less than 50 years of age to be NRHP-eligible, Criterion Consideration G would have to be applied. Criterion Consideration G allows

properties dating from the recent past to be eligible for the NRHP, provided that they are *exceptionally* significant. Although the CRHR and local criteria requirements do not have an age limit or a special criterion consideration, they both require that sufficient time has passed to understand and determine significance. The 1970s and 1980s are not significant decades for Fish Harbor, the fishing or canning industries, or Star-Kist due to relocation and establishment of overseas canning facilities during this period. Due to lack of significance, a district would not be eligible for the NRHP, CRHR, and HPOZ under this theme. ***A historic district expressing this theme is not present at Fish Harbor.***

### 10.4.3 The United States and Fish Harbor Canning Industry

Although the earliest canneries at Fish Harbor dated to 1915 and 1916, contemporaneous with Fish Harbor's construction, these buildings are no longer extant. The oldest building within the Cannery Block dates to the late 1930s. The other buildings within the Cannery Block, the Plant and its associated buildings, Gillis Building, and Van Camp Sea Food Company, all appear after World War II. Portions of the Cannery Block and the Plant date to the early 1950s. Later alterations to the Cannery Block and the Plant and the construction of additional Star-Kist facilities, the Gillis Building, and Van Camp occurred during periods of globalization with its shift to overseas production and the end of United States canned tuna production.

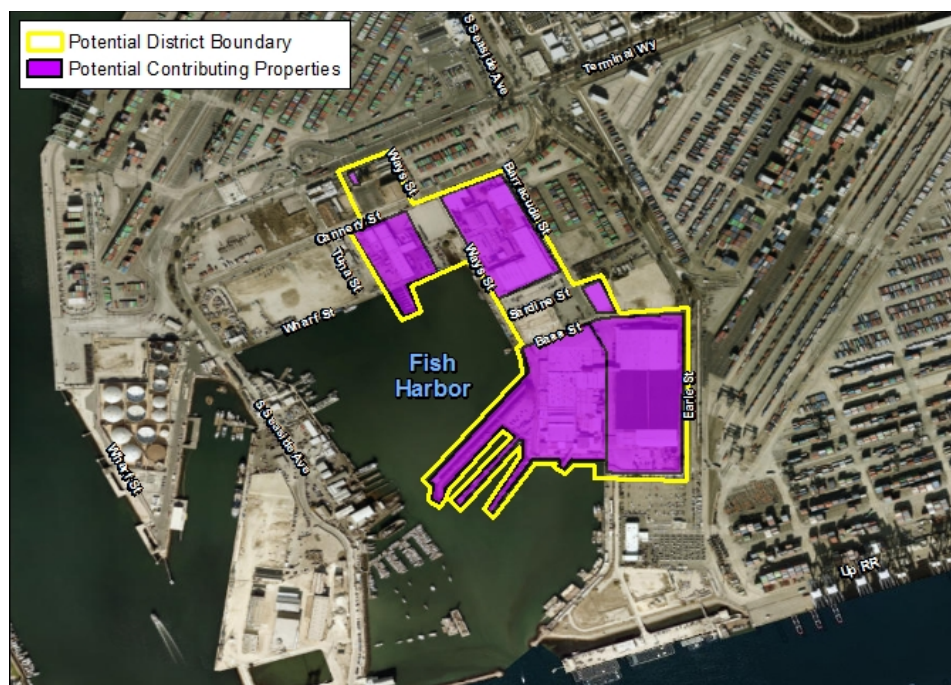
Four resources are associated with this theme:

- Cannery Block (1930–1980)
- Star-Kist Facilities: Plant No. 4 (1952), Empty Can Warehouse (1970), and East Plant (1971–1977)
- Gillis Building (1970)
- Van Camp Sea Food Company (1971)

#### Analysis

These four resources are at the northeastern and eastern areas of Fish Harbor (Figure 10-14). Several vacant lots are situated between these buildings. Non-extant canneries and canning-related buildings and structures previously occupied the now-vacant lots.





**Figure 10-14. Cannery Theme: Potential Boundary and Contributors**

Based on the date of their original construction or major alterations, the extant cannery-related resources postdate 1969. The Cannery Block's initial construction occurred in 1936. Soon after, three canneries and one related fish business operated within the Cannery Block. Although the four companies associated with the Cannery Block altered the buildings and their sites, no major changes occurred until the 1970s when Pan-Pacific Fisheries began tuna canning production within the Cannery Block. The company demolished and reconstructed a substantial portion of the Cannery Block during the 1970s and 1980s. For example, Pan-Pacific Fisheries demolished the French Sardine Plant No. 2 at the southern portion of the block in the 1980s and redeveloped the area as a surface parking lot.<sup>216</sup> Star-Kist also altered its Plant substantially throughout the 1970s and into the 1980s, including a second-story addition to the primary (west) elevation.<sup>217</sup> The addition completely reconfigured the building's main entrance and primary elevation. Additional alterations in the 1970s and 1980s altered the south, east, and north elevations of the Plant. The company also built additional facilities northeast and east of the Plant. The Gillis Building and the Van Camp facility date to 1970 and 1971, respectively.

By 1969, the U.S. canning industry was in steady decline due to overseas production. As previously noted, by 1969, approximately 50 percent of tuna was canned overseas. In contrast, the 1950s saw approximately 80 percent of tuna canned at the Port's Fish Harbor.<sup>218</sup> Although the industry suffered periodic business losses and revenue during the 1950s and into the 1960s, it maintained overall viability and profitability until 1969.

<sup>216</sup> Port of Los Angeles Photograph Archive (1951–1980); and NETR Historic Aerials, 1952, 1963, 1972, and 1980; ICF, *Final Historical Re-Evaluation of the Cannery Block (Formerly Chicken of the Sea)*, 338 Cannery Street, Terminal Island, 46–47.

<sup>217</sup> Permit record on file with the Los Angeles Department of Building and Safety; Roderick, October 29, 2018.

<sup>218</sup> David F. Belnap, "U.S.-Latin Tuna Talks Bring No Firm Results," *Los Angeles Times* (August 18, 1969), 4.

Extensive research completed for this evaluation did not identify any significant historic context associated with industry globalization in the 1970s and 1980s that could support significance for canning resources built in or after 1970 in the United States or at the Port's Fish Harbor. For this reason, alterations post-dating 1970 have not acquired significance in their own right. *The canning industry's significant period pre-dates the extant resources. A historic district expressing this theme is not present at Fish Harbor.*

### 10.4.4 Star-Kist Facilities

Only three Star-Kist facilities remain extant at Fish Harbor. These buildings are grouped under their construction history and company ownership. Three buildings are associated with this theme:

- Plant No. 4
- Empty Can Warehouse
- East Plant

### Analysis

Three extant Star-Kist resources are at Fish Harbor. Star-Kist built each building at the east side of Fish Harbor between 1952 and 1977. They are grouped together near the intersection of Bass and Barracuda Streets.

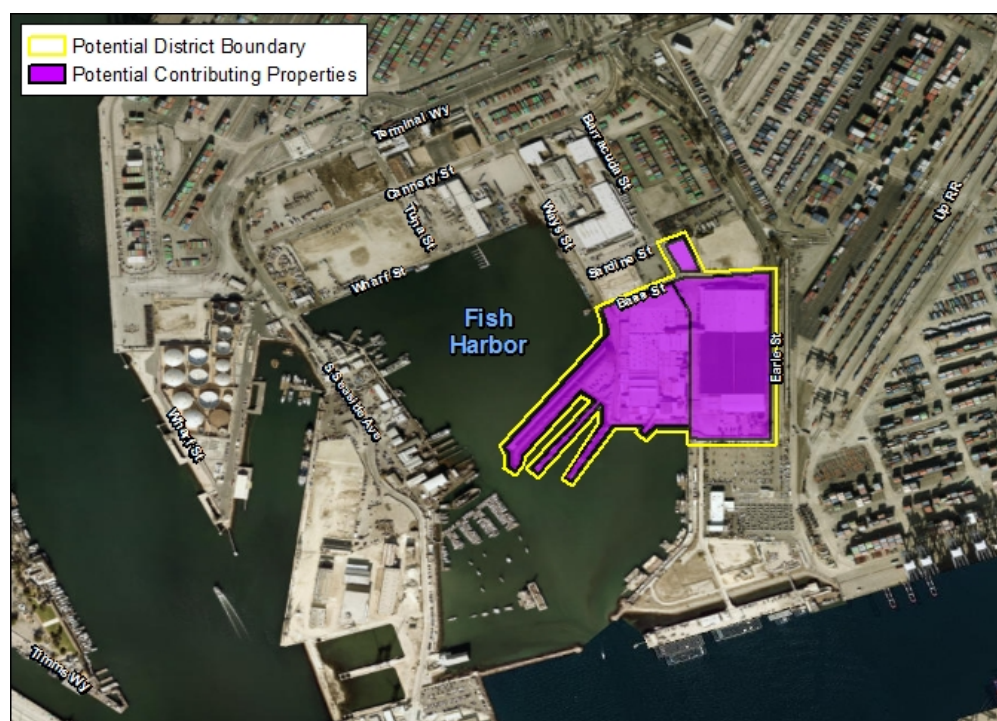


Figure 10-15. Star-Kist Facilities Theme

Based on the date of their original construction or major alterations, the extant Star-Kist facilities postdate 1969. Although the Plant was constructed in 1952, Star-Kist completed numerous alterations to the Plant in the 1970s and through the 1980s. These alterations are not significant in their own right because they are not associated with a significant historic context, as described

above. Likewise, the Empty Can Warehouse and the East Plant date to the 1970s and may have been constructed to facilitate the company's pet food products (under the direction of Heinz) rather than tuna canning for human consumption packaged under the Star-Kist label.

By 1969, the U.S. canning industry—and its leading company, Star-Kist—was in steady decline due to overseas production and globalization. Although Star-Kist suffered periodic business losses and revenue during the 1950s and into the 1960s, it maintained overall viability and profitability through its United States canning until circa 1969.

Extensive research completed for this evaluation did not identify any significant historic context associated with Star-Kist's United States or Port decline in the 1970s and 1980s or the Plant's closure in the 1980s that could support significance for its resources built in or after 1969. For this reason, new construction and alterations from and post-dating 1969 have not acquired significance in their own right. *Star-Kist's significant period pre-dates the extant resources. A historic district expressing this theme is not present at Fish Harbor.*

## 10.4.5 Architecture

### Industrial

Six resources feature a utilitarian, industrial design but vary in terms of industry-specific elements. For example, the Al Larson Boat Shop complex features large warehouses and dry docks, while Van Camp is a long, narrow building without windows or skylights. All these buildings represent common industrial building trends for their dates of construction, with earlier buildings featuring more natural-light options and those built or altered in the 1970s relying on electrical lighting with minimal fenestration.

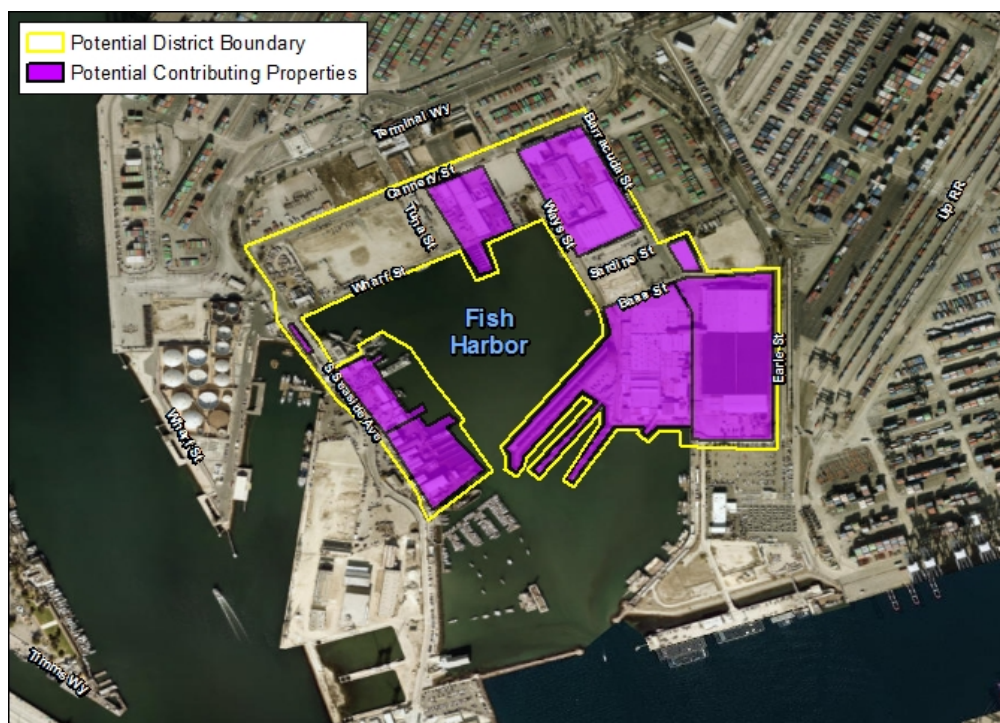
Six resources are associated with this theme:

- Al Larson Boat Shop (1924)
- DeVries Sheet Metal (1925)
- Oil Resources (General Petroleum & Standard Oil)
- Cannery Block (1930–1980)
- Star-Kist Facilities: Plant No. 4 (1952), Empty Can Warehouse (1970), and East Plant (1971–1977)
- Van Camp Sea Food Company (1971)

### Analysis

The resources associated with this theme surround Fish Harbor to the west, north, and east (Figure 10-16). Most of these resources are on the waterfront.





**Figure 10-16. Architecture (industrial) theme: potential boundary and contributors**

The period of significance of a potential district associated with this theme would need to extend from 1921 through the 1980s, to include alterations to the Star-Kist facilities as discussed above. The industrial and warehouse construction present at Fish Harbor does not feature distinctive or innovative construction or engineering methods or design. Earlier examples feature a variety of construction methods and materials and later examples feature a metal frame clad with seamed sheets of metal or corrugated metal siding. Overall, resources lack quality and distinction individually and as a group. ***A historic district expressing this theme is not present at Fish Harbor.***

## Moderne

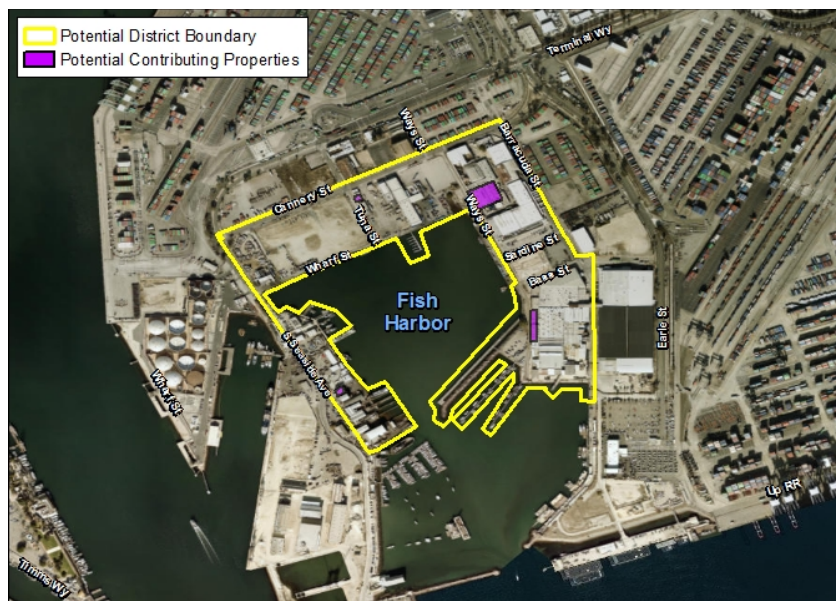
Four resources feature variants of Moderne style architecture, popular between the 1920s and the 1950s, that include symmetrical façades, horizontal or vertical massing, emphasized entrances, and ornamental embellishment such as zig-zag or fluted patterns.

Four resources are associated with this theme:

- Al Larson Boat Shop (1924)
- Cannery Block (1930s)
- Nakamura Multi-Use Building (1940s, alterations)
- Star-Kist Facilities: Plant No. 4 (1952; 1980, alterations)

## Analysis

Resources associated with this theme are to the west, north, and east of Fish Harbor. Many vacant lots intervene between the geographically dispersed buildings (Figure 10-17).



**Figure 10-17. Architecture (Moderne) theme: potential boundary and contributors**

In the 1940s, the owner of the Nakamura Multi-Use Building altered the southern portion of the building's façade to feature a modest Streamline Moderne design, including an entry pylon, curved walls, glass block, and a curvilinear porch hood. Most of the buildings associated with this theme evince one or two elements of the style but have been altered such that character-defining features have been removed. For example, the Plant features a Late Moderne façade at its west elevation. However, Star-Kist constructed its second story in 1980, well after the Moderne style's period of popularity or significance.

Although four resources have Moderne style elements, only two can be identified as representative of a specific substyle and contain sufficient character-defining features to be considered as part of the style. These two resources are commonplace and/or altered examples that are not consistent with the integrity expected of an eligible collection of such buildings. Moreover, they both lack artistic quality of design found in eligible examples. In addition, a district boundary encompassing these four resources would include more non-contributing resources and vacant sites than contributors. ***A historic district expressing this theme is not present at Fish Harbor.***

## Chapter 11

# Conclusion

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ICF prepared this historic resource assessment at the request of the Harbor Department, EMD in accordance with its Cultural Policy.

This report concluded that although Star-Kist played an important role in the tuna canning industry in the United States and at the Port, Star-Kist Plant No. 4, the East Plant, and the Empty Can Warehouse are individually **ineligible** for the NRHP, CRHR, or as an HCM.

ICF also considered if the extant Star-Kist facilities form an eligible NRHP, CRHR, or HPOZ historic district and concluded that the extant Star-Kist facilities do not constitute a historic district. They also considered whether any historic district that includes any or all of the extant Star-Kist facilities is present at Fish Harbor. ICF concluded that no district is present at Fish Harbor. Therefore, none of the Star-Kist facilities are contributors to a historic district.

## Chapter 12

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## **Attachment A: DPR 523 Series Update Forms**

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### Not Eligible

Plant No. 4

Empty Can Warehouse

East Plant (Cold Storage, Can Manufacturing, and Warehouse)

### Demolished

Net Shed Storage

Laboratory

Food Testing & Animal Nutrition

Pet Food Plant

## CONTINUATION SHEET

Page 1 of 54

\*Resource Name or # Star-Kist Plant No. 4

\*Recorded by: Margaret Roderick \*Date 08/24/2021

☒ Update

### P3a. Description:

Star-Kist Plant No. 4, at 1050 Ways Street, consists of a series of connected volumes that face west, toward Ways Street and Fish Harbor. The primary elevation spans over 400 feet and displays Late Moderne and utilitarian features. Ways Street separates the property from the San Pedro Fish Harbor as well as a circa 1963 surface parking lot, which leads to long strips of land reclaimed from jetties and boat docks. The primary (west) elevation is a low-rise, horizontally oriented nine-volume configuration with a mixture of blank walls and contrasting stack-bond brick cladding. As a whole, the building rises approximately 20 feet with a flat roof, although portions feature gabled roofs. The office portion contains two stories, while the light industrial spaces typically contain one tall story with several mezzanines. Interior spaces occasionally contain a mezzanine level.

### Primary (West) Elevation

The primary elevation is divided into nine distinct volumes (Figure 1). The central portion, or the third volume from the north, includes the building's altered main entrance, flanked by altered two-story wings designed with Late Moderne attributes (Figures 2 and 3). Three pairs of metal-framed glass doors, with each pair topped by a large steel transom, make up the tall, deeply recessed concrete entrance (Figure 4). A non-original hood surmounts the pylon's original squat-fluted cornice line. The entrance's flanking wings rise two stories and project slightly above the entrance's porch hood (Figures 5 and 6). Concrete, brick, and smooth stucco clad the wings.

At the first story, stack-bond brick cladding above a concrete water table wraps around each wing of the entrance (Figures 5 and 6). At the north wing, a centered, white, concrete bezel surrounds the window and door openings. A solid-slab, double-door configuration is adjacent to large industrial-style rolled-steel windows (with both fixed sashes and awning sashes) arranged to the north. A single solid-slab door is adjacent to a single-light, fixed-sash horizontally orientated window arranged to the south (Figure 5). A portion of the north wing's wall is framed by the concrete bezel features' non-original stucco cladding. Approximately half of this stucco cladding features inscribed lines that have been arranged to replicate the muntin pattern of the large rolled-steel window. Directly above the south door and its adjacent single-light window, the stucco cladding lacks inscribed lines. A brick sill runs across the bezel beneath the windows. At the south wing, a bezel surrounds a long, centered ribbon window configuration (Figure 6). Each individual window contains one operable metal, two-light awning sash set above a non-operable single-light sash. A brick sill ornaments the base of the bezel surround, which is otherwise formed by white concrete. Slightly north of center, a double solid-slab pedestrian door punctuates the wall. The non-original 1980 second story of each wing exhibits stucco cladding, with an alternating band of windows and stack-bond brick panels surrounded by a bezel. Each individual window is a two-light aluminum slider.

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The northernmost volume of the primary elevation forms a one-story utilitarian volume, punched with three regularly spaced garage door openings. Two openings retain metal roll-up doors, while non-original concrete blocks, a large industrial rolled-steel window, and a single pedestrian door infill southernmost of the three openings (Figure 7). A corrugated metal strip caps the concrete building. Two metal boxes with mechanical equipment hover over the central garage door.

The second volume from the north rises two stories (Figure 8). Its scored concrete construction contains two doors south of center: a metal roll-up door fronted by a sliding chain-link gate and a solid-slab pedestrian door. A non-original infilled window penetrates the wall south of the door. Both the pedestrian door and window punctuation appear to be non-original.

Described above, the third volume from the north features the main entrance and the majority of the building's surviving Late Moderne elements (Figures 2 through 6).

The fourth volume from the north, like the centered third volume, reflects Late Moderne architectural elements (Figure 9). Like the third volume's wings, the fourth volume's first story contains stack-bond brick cladding set above a concrete watertable. The stack-bond cladding, however, is lower than the brick cladding on the main entrance (third volume). A door and two windows complete this volume's fenestration. A pair of half-glazed metal doors and a transom window marks an entrance. A blade sign above the entrance reads "FIRST AID." A centered two-light awning window forms one window, and a double window configuration with a pair of awning windows sandwiched vertically between one-light fixed sashes above and below to the north forms the second window. A brick sill runs below each window configuration. The non-original 1980 stucco-clad second story mirrors the non-original second stories of the third massing's wings. Stack-bond brick panels separate the three aluminum slider windows, all of which are framed by a bezel.

The fifth volume from the north also reflects Late Moderne detailing and features additional office space for the Plant (Figure 10). An addition to the Plant, this non-original circa 1980 two-story volume features stucco cladding, aluminum sliders, and stack-bond brick. A bezel surrounds a central pair of metal-framed glass doors, which are capped by a single-light transom. A porch hood cantilevers over the entrance. At the first story, a stack-bond brick panel separates an aluminum slider. This configuration flanks the entrance on either side and is surrounded by a bezel. The second story features two bezeled window configurations; the northern one is longer than the southern, and they reflect the same arrangement as the windows on the first story below.

The remaining four volumes of this elevation are to the south (Figures 11 through 13). Set back approximately 50 feet from the entrance, the sixth volume's tilt-up concrete walls, which are divided into five bays, contain large multi-light industrial windows at the clerestory level in the three centered bays (Figure 11). A small one-story projection features a pedestrian door but otherwise lacks fenestration. In contrast, a metal roll-up door and a solid-slab pedestrian door fenestrate the southern portion of this volume. Three projecting volumes complete the primary elevation at its southern corner (Figures 12 and 13). The northernmost (non-original) projection, constructed of concrete blocks, has a

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solid slab door. The center projecting volume lacks fenestration, although non-original concrete blocks infill a former window opening. At the southernmost volume, non-original plywood sheathes three windows and a pedestrian door. An electrical system, gated by chain-link fencing, fronts the two southernmost bays. A non-attached, non-original warehouse building, formed by vertical metal siding, rests on a concrete base. The building is capped by a low-pitched gabled roof at the southwestern-most portion of the Plant's block.

### North Elevation

Seven asymmetrical bays characterize the north elevation (Figure 14). The first five bays from the east, which are non-original and date to 1974, form the bulk of the massing and rise approximately 20 feet. Stepped back from the eastern bays, the two westernmost bays, which are original, rise only approximately 10 feet. Clad with metal siding, a side-gabled roof caps the massing. The first bay from the east features a metal roll-up door at the ground level and two square louvered vents arranged just below the roofline. The second and third bays from the east maintain the same width as the first bay from the east but lack any doors. These two bays remain unpunctuated but for two square-like louvered vents below the roofline, with one in each bay. The fourth and fifth bays from the east are approximately one-half longer than the three bays to the east, and each one contains a metal roll-up door. Three square louvered vents just below the roofline embellish these two bays. A porch hood supported by two posts frames the fifth bay's roll-up door. The sixth bay features a squat, one-story massing with an off-center boarded-up window above a two-door pedestrian opening. Two louvered vents are at ground level. Finally, the westernmost bay corresponds to the primary elevation's northernmost massing and appears to contain a small centered window.

### South Elevation

The south elevation includes several detached buildings and adjacent industrial elements (Figures 15 through 21). The variegated five-volume façade reflects the function of the south elevation: tuna importation. A detached one-story warehouse building is at the southwestern corner of the Plant. Its south elevation features metal cladding set atop a concrete base, and corrugated metal infills a garage bay.

Three non-original variegated masses appended to the original south elevation of the Plant's 1952 tilt-up concrete-paneled south elevation (Figure 15). A non-original corrugated metal roof dating to the 1970s covers a large space where tuna was stored and processed upon arrival, which is appended to the western portion of the south elevation of the 1952 Plant. Visible through the non-original patio shed, the Plant's tilt-up concrete walls contain a pedestrian door, which is accessed from two steps; a metal roll-up door, which is accessed from a ramp; and at least two window openings that have been infilled with non-original concrete blocks. An approximately 3-foot-tall concrete wall minimally encloses a patio shed space with two crane-conveyor systems above, on the underside of the roof. non-original fiberglass or plastic panels clad the second from the west volume's metal-frame construction. A non-original stepped-back second story, of similar construction and cladding, caps this component. An open loading

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bay provides access to the center portion on either side. Many of its non-original panels are no longer extant. Non-original, clear plastic panels clad the non-original metal-frame construction of the third volume from the west, and a non-original corrugated metal roof caps this volume. The interior space shades infrastructure elements such as pipes and bulky, non-original bins. A non-original two-story massing rests atop the easternmost portion of this one-story massing and is associated with the remaining Fish Import Dock. A conveyor at the dock rises from sea level to the third-story level (Figures 15 and 16). The west side of this non-original pop-up contains four aluminum sliding windows, with two in each story, while the east side contains six windows, with three in each story.

Two additions form the eastern side of the south elevation. Located east of the tuna import and processing section of the south elevation, one structure features a low-pitched gabled roof and rusting metal cladding set atop a concrete block foundation (Figure 17). Centered on the volume, a projecting gabled element includes a metal roll-up door. The remaining south elevation structure is non-original and now forms the southeast corner of the Plant. Set back from the previously described sections of the south elevation, the metal siding clads a boxy flat-roofed mass, which is capped by a metal catwalk (Figure 18). Plywood partially covers sections of removed metal cladding. Separate outlying buildings and infrastructure adorns the southern portion of the Plant's land (Figures 19 through 21).

### Rear (East) Elevation

The variegated rear (east) elevation contains several detached original and non-original buildings and structures in the vicinity (Figures 22 through 24). Together, the buildings are a plethora of variegated elevations and mechanical elements, and provided storage and steam power processing for the cannery. Three sections form the rear elevation: a courtyard makes up the southern portion of the elevation, mechanical infrastructure forms the center portion, and the Plant's metal walls align the closed-off Barracuda Street to the east at the north. At the south, the courtyard's concrete flooring shows signs of previous tanks and buildings/structures. The Plant's 1952 tilt-up concrete wall, visible for approximately 150 feet along the west side of the courtyard, includes four non-original metal-clad additions (Figure 22). Two of these metal-clad additions rise approximately 20 feet and two of them rise approximately 10 feet. The first addition from the south lacks fenestration. The second addition from the south contains a solid-slab pedestrian door and a metal roll-up door. Boarded-up windows occupy the two lower-height additions. The courtyard's southern boundary is formed by a recessed portion and a projecting portion, both of which are clad in metal siding. Attached to the Plant to the north, a medium-pitch gabled building clad with metal extends along a north-south axis to form the eastern side of the courtyard (Figure 23). The northern side of the courtyard features an approximately 20-foot-tall warehouse. Corrugated metal cladding set upon a pedestrian-height concrete-block foundation forms this warehouse wall. Regularly placed windows punctuate the cladding at the clerestory level. A non-original 1970s two-story building, which contained employee restrooms and lockers, occupies the courtyard.

The center of the rear (east) elevation, as mentioned above, incorporates mechanical and infrastructure elements that appear to produce or distribute the Plant's steam/power/mechanical system. This area

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includes at least one tall, open shed and a non-original multi-story tower, the purpose of which is unknown (Figure 24). In this area, a multitude of pipes and wires adorn the landscape.

Volumes with metal cladding compose the north segment of the rear elevation. This portion, as stated above, abuts the now closed-off Barracuda Street. An enclosed metal skybridge built in the 1970s, noted in permits as a pipe bridge, over Barracuda Street connects the Plant with the East Plant.

### Interior

Interior office space is arranged along the Plant's primary (west) elevation and large warehouse spaces characterize its canned tuna production area. The altered lobby contains a small area that is open to the second story. A painting of a lighthouse has been appended to a wall opposite the entrance (non-original feature of the entrance) (Figure 25). A pedestrian doorway to the south provides access to first-floor office space and the warehouse beyond, while a staircase to the north provides access to the upper floor's non-original office space. Original square, mint-green, metal panels clad the lobby walls (Figure 26). A simple balustrade of metal infilled with corrugated green fiberglass and a wood handrail are located along the staircase and second-floor walkway – an original feature forming a mezzanine. Metal roof support posts punctuate the large warehouse spaces (Figure 27 through 29). Truss systems support wood and metal roofs. Flat truss systems are most common in the original 1952 portions of the Plant; two rooms contain non-original monitor roofs. Concrete and metal walls divide spaces; the division of spaces primarily represents additions and alterations to the original 1952 plan (Figures 30 and 31). Natural light also penetrates some of the interior spaces through original rolled-steel windows at the clerestory level. Drainage channels embedded in the floors note the Plant's need to remove viscera and other debris from the production process (Figures 27 and 28).

**P5a. Photograph** (see pages 37-54 for photos)

**P7. Owner/Address:**

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

**P8. Recorded By:**

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

**P9. Date Recorded:** November 19, 2018

**P10. Survey Type:** Intensive level survey.



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**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4: Present Use:** Vacant; proposed for demolition.

**B5. Architectural Style:** Late Moderne & Utilitarian Light Industrial warehouse

### B6. Construction History:

French Sardine constructed the Plant in 1951–1952 on newly reclaimed land on the eastern side of Fish Harbor, Terminal Island. Star-Kist hired M.A. Nishkian and Co., John K. Minasian, and Wohl Calhoun Co. to design and build the Plant. M.A. Nishkian and Co. functioned as the Plant's engineer and designed some of the Plant's new, state-of-the-art process equipment.<sup>1</sup> John K. Minasian acted as the Plant's architect. Wohl Calhoun Co. operated as the project contractor. French Sardine estimated that the one-story tilt-up concrete building would cost \$618,000.<sup>2</sup> Figures 32 and 33, depict the tilt-up concrete construction in progress. The original plans changed several times during construction and included alterations to the loading area, relocation of the salt room, enclosure of the retort area, installation of a firewall to contain oil, and construction of a pump house. These changes occurred at the rear (east) elevation.<sup>3</sup>

The Plant opened in fall of 1952 to much fanfare. The *Los Angeles Times* claimed that the Plant was the largest tilt-up construction on the West Coast built by private industry. *Pan-Pacific Fisherman* magazine included a multi-page spread and called the Plant a "marvel of functional layout and high-speed automatic processing equipment."<sup>4</sup> The *San Pedro News-Pilot* reported that the "ultra-modern" Plant could process 300 tons daily by packing 86,000 cans per hour through the use of the building's straight line production and state-of-the-art processing engineering equipment.<sup>5</sup> Star-Kist president Joseph Bogdanovich, Los Angeles Mayor Fletcher Bowron, Utah Governor J. Bracken Lee, senators, judges, state officials, and others presided over the dedication ceremonies on November 12.<sup>6</sup> Figures 34 through 37, show the Plant when it opened in 1952.

<sup>1</sup> M.A. Nishkian and Joseph Zelson, "Star-Kist: World's Largest tuna Packing Plant," *Pan-Pacific Fisherman* (December 1952), 15–20.

<sup>2</sup> LADBS Permit No. 1951LA15652.

<sup>3</sup> LADBS Permit Nos. 1951LA18911, 1952LA29429, 1952SP03061, and 1952SP03252.

<sup>4</sup> Nishkian and Zelson, 15.

<sup>5</sup> "New Cannery to Open," *San Pedro News-Pilot* (August 15, 1952), 1, quoted; "New Star-Kist Plant to Pack 86,000 Tuna Cans Per Hour," *San Pedro News-Pilot* (November 3, 1952), 2.

<sup>6</sup> "Big Project at Harbor," *Los Angeles Times* (November 9, 1952), 147; "Cannery to Dedicate New \$2,000,000 Plant," *Los Angeles Times* (November 10, 1952), 49.

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Star-Kist expanded and altered the Plant between 1953 and 1985 (Figure 38). This evaluation effort included a detailed and careful review of each permit available through the Los Angeles Department of Building and Safety's online permit archive. Although the 2008 evaluation conducted some permit research, not all permits were obtained and reviewed. The following list provides detailed construction history after the Plant's 1952 opening:

- A 21-foot by 30-foot one-story locker room addition was completed in 1953 at an unknown location (1953LA57822).
- A 30-foot by 61-foot stand-alone, one-story, stucco shop building was constructed in 1953 to the rear of the Plant (1953SP06487).
- A warehouse addition was appended to the northeast area of the Plant with construction to match the adjacent retort area in 1953 (1953SP06699).
- In 1954 the City of Los Angeles required the existing scale house undergo building code compliance (1954SP08512).
- Additionally, in 1954, Star-Kist installed three exterior canopies and performed interior alterations including the addition of vents, doors for the lunchroom, and a platform (1954SP08700).
- Alterations to the 1952 pump house occurred in 1954 in compliance with the building code (1954SP08713).
- Star-Kist replaced the retort area's roof in 1956 (1956SP14509).
- A triangular addition to the north elevation of the main building in 1974 (1974SP52261).
- Star-Kist installed an equipment shelter at the southeast corner of the Plant in 1974. Frank Politeo is listed as the architect/designer for the addition. A plan included with the permit details the property, which includes six tanks east of the equipment shelter and other industrial equipment buildings or sheds to the west along the south elevation of the building. (1974SP52261). The Plant has three Fish Import Docks at the south of the property at this date.
- Also, in 1974, Star-Kist constructed a restroom and lockers on the existing mezzanine level of the northern triangular building addition portion of the Plant (1974SP52271).
- In 1976, additional interior alterations took place: a mezzanine level lunchroom was added to the northeast portion of the building (1976SP54373).
- Star-Kist enclosed the equipment shed in 1976 (1976SP54815).
- That same year, doorway alterations occurred at unknown locations (1976SP54872).

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- In 1977 the first aid office was renovated (1977SP56358) and new interior partitions installed for office space (1977SP57284).
- 1978 saw the remodel of an unattached, exterior locker and restroom facility east of the Plant and a second-floor addition to that building (1978SP58771).
- An additional set of vents was added to the interior of the building in 1978 at an unknown location (1978SP58772).
- Star-Kist expanded the cooling room by 5,280 square feet at the northeast portion of the building, to the rear. The one-story addition rose 14 feet (1978SP58860).
- A pipe bridge, carrying pipes from the Plant to the East Plant to the east, was constructed in 1978 (1978SP59467).
- In 1979, the approximately 15-foot by 20-foot compressor room was replaced (1979SP60524).
- Also, in 1979 Star-Kist constructed an approximately 20-foot by 47-foot, two-story office addition to the primary elevation, and the renovation of exterior office building (1979SP61157).
- In 1980, the primary elevation underwent further alterations with a second-floor addition on either side of the entrance. The second-floor addition included a dining room and locker room and was designed by Politeo. The permit also included interior remodeling (1980SP63624).
- In 1982 Star-Kist added a salt room to the scales house at the southeast portion of the Plant (1982SP68375).
- The truss system for cooling room was replaced in 1983 (1982SP68715).
- Interior office partitions on the second floor's 1980 addition were completed in 1986 after the Plant stopped production of canned tuna for human consumption in 1984 (1986SP02880).
- In 1987, Star-Kist undertook numerous alterations and additions: an office and lab (1987SP04279), blast freezer (1987SP04280), an approximately 37-foot by 75-foot building addition and relocation of retorts and drain trench (1987SP04281), re-roofing (1987SP04260 & 1987SP04361), loading dock and canopy (1987SP04995), and a maintenance shop and office addition (1987SP05083).
- Star-Kist completed numerous alterations in 1988: refurbished insulating panels (1988SP06872); installed new concrete drain trenches (1988SP07287); and constructed an electric panel building (1988SP08073), 10-foot by 10-foot office addition (1988SP08074), grading on the parcel (1988SP08300), housing for scales and conveyors (1988SP08515), tower support (1988SP08861), and infrastructure (1988SP09047, 1988SP09185, and 1988SP09186).
- A power room was added in 1989 (1989SP09644).

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- Additional alterations after 1989 include lunchroom, office, and lobby renovations (1991SP06552 and 1991SP08250); tank foundations and platforms (1992SP10329); an addition (1992SP11224); infrastructure (1992SP11226); seismic retrofit (03016-10000-07621); and re-roofing (03016-90000-06400).

In addition to the extensive permit record for the Plant, field survey conducted on October 29, 2018, and review of historic images identified further alterations:

- Removal of original process engineering equipment (date(s) unknown; by 2008), including:
  - One (of two) original tuna import dock or a “*specially designed* finger pier...[that] provide[d] complete docking and unloading facilities for four tuna clippers” between 1994 and 2002<sup>7</sup>
  - Conveyor system (catwalk, pedestrian-working, and waste disposal levels) throughout the Plant
  - Butchering tables
  - Pre-cooking equipment (steam pipes, pressure indicators, metal baskets, etc.)
  - “*Specially designed* cleaning tables,” which were “unique in all the canning industry”<sup>8</sup>
  - “Completely automatic” empty can conveyor and unscramblers<sup>9</sup>
  - Can washers/sterilizing equipment
  - Can filling machines
  - Flavor dispensing machines that heated oil “to prepare the finest oils for slow measured delivery which salts the tuna to accentuate the flavor”<sup>10</sup>
  - Automatic can sealer and Full Can Booster Elevators
  - Full Can Washer steam bath system “*especially designed* for this service” (for final cooking to set flavor)<sup>11</sup>
- Permits between 1959 and 1974 are not available through the Los Angeles Department of Building and Safety’s online permit database. By 1974, however, the Plant experienced two additions identified through review of aerial photographs at the Plant’s east elevation.
- Shortening the extant Fish Import Dock’s pier between 1980 and 1994

<sup>7</sup> Nishkian and Zelson, 17. Emphasis added.

<sup>8</sup> Ibid., 18. Emphasis added.

<sup>9</sup> Ibid., 19.

<sup>10</sup> Ibid., 20.

<sup>11</sup> Ibid., 20. Emphasis added.

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- Vandalism since the building's vacancy circa 2000
- Removal of roof access points in 2018

Figure 38 depicts additions and major exterior alterations completed by Star-Kist after the Plant's construction in 1952. Many of these changes date to periods not associated with significant historic context. For example, the Plant's position as a leading cannery at the Port and in the United States declined as globalization occurred in the 1960s through to its closure in 1984. Star-Kist established an overseas cannery in 1960 and by 1969, overseas canneries produced approximately half of all canned tuna.<sup>12</sup> In contrast, the 1950s marked the U.S. industry's peak; at that time the Port's Fish Harbor canneries produced 80 percent of canned tuna.<sup>13</sup> Alterations associated with these later periods have not gained significance in their own right because they are not associated with a significant historic context.

Original Tuna Import Docks and original, state-of-the-art process engineering equipment designed and built for the Plant are key to the building's operation as a major canning facility, but have been altered and removed. Compounded with the numerous alterations noted through permit research, the Plant lacks the ability to convey itself as a Star-Kist and/or tuna canning facility.

### B8. Related Features:

Star-Kist Plant No. 4 contains numerous associated buildings and infrastructure elements boundary. Three docks served the building when it opened in 1952. One of these docks accessed directly across Ways Street from the plant's primary entrance. Two docks south of the plant were used for tuna import. By 1963, the Star-Kist Plant No. 4 operated three tuna import docks to the south. Only one tuna import dock remains today, but the mechanical infrastructure connecting the dock to the building has been altered since the Plant was constructed in 1952. Tuna and can processing infrastructure, including tanks, pipes, wires, and outbuildings also supported Star-Kist operations. These features expanded after 1952. Today the south and east portions of the property contain many of these infrastructure elements.

### B10. Significance

#### Historic Context Statements

In order to evaluate Star-Kist Plant No. 4 on Terminal Island, Los Angeles, the following context statements were expanded or developed: The Port of Los Angeles and the Rise of Containerization

<sup>12</sup> John Rogers, "Boomy '60 Forseen, with 22% Auto Rise," *New York Daily News* (December 7, 1959), 129; Howard Morin, "Russ Move into New Fishing Area Found by U.S. Clipper," *San Pedro News-Pilot* (September 23, 1959), 1; and David F. Belnap, "U.S.-Latin Tuna Talks Bring No Firm Results," *Los Angeles Times* (August 18, 1969), 4.

<sup>13</sup> "Port Board Approves Permit for \$160,000 Fish Cannery," *San Pedro News-Pilot* (January 30, 1947), 1; Tim Grobaty, "The Boom and Bust of Fish Harbor Canneries," *Long Beach Post* (October 5, 2018), np, accessed December 7, 2018, <https://lbpost.com/local-history/the-boom-and-bust-of-the-fish-harbor-canneries/>.

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(1945-1989); The History of the Cannery (1915-1985); The Post-World War II Rise and Fall of Fish Harbor (1945-1985); The End of Star-Kist's U.S. Production (1980-1984); Light Industrial Architecture (1945-1985); and Moderne Architecture (1925-1959). The Port of Los Angeles and the Rise of Containerization (1945-1989).

### The Port of Los Angeles and the Rise of Containerization (1945-1989)

The Port experienced unparalleled growth after the U.S. Navy relinquished control of the Port in late 1945 following the conclusion of World War II.<sup>14</sup> The military had commissioned the Port for shipbuilding during the war.<sup>15</sup> During that time, the Harbor Department was unable to maintain and improve the Port. After Japan surrendered in 1945, the Harbor Department promptly started its deferred maintenance and improvement projects.<sup>16</sup> The Harbor Department arranged construction of 13,360 feet of detached breakwater, an essential component to the Port's success. Without breakwaters, waves and turbulent conditions would prevent the safe passage of seafaring vessels into the Port. In 1947, the Port operated 28 miles of waterfront, with approximately 70 percent used as wharves for every type of seafaring vessel, from large-scale cargo ships to fishing boats to pleasure craft.<sup>17</sup> Although 19 canneries and numerous other business operated at the Port in the late 1940s, lumber imports saw the sharpest increase in trade during the decade. From 1947 to 1948, lumber imports through the Port more than doubled in terms of board-feet of product, consistent with the postwar construction boom in Southern California and elsewhere in the United States.<sup>18</sup> A Foreign Trade Zone charter, bestowed upon the Port in 1949, supported exponential growth in the postwar era by lessening or lifting U.S. Customs duties, fees, and taxes on traded merchandise at this and other chartered locations.<sup>19</sup>

The Harbor Department continued to expand its imports and exports through infrastructure projects in the 1950s. Port-related commerce increased by 6 percent, or approximately 3 million tons, from 1949 to 1950, which allowed the Port of Los Angeles to eclipse the Port of San Francisco's trade for the first time in history.<sup>20</sup> While the Harbor Department rectified deferred maintenance and installed new

<sup>14</sup> Michael D. White, *Images of America: The Port of Los Angeles* (Charleston, SC: Arcadia Publishing, 2008), 81.

<sup>15</sup> Port of Los Angeles, *History, Wartime Efforts*, accessed December 18, 2018, <https://www.portoflosangeles.org/about/history>.

<sup>16</sup> Charles F. Queenan, *Port of Los Angeles: From Wilderness to World Port* (Los Angeles, CA: Los Angeles Harbor Department, 1983), 93.

<sup>17</sup> *Ibid.*, 94.

<sup>18</sup> *Ibid.*, 94.

<sup>19</sup> "Foreign-Trade Zones in the United States," *Federal Register: The Daily Journal of the United States Government*. (February 28, 2012), np, accessed November 9, 2018, <https://www.federalregister.gov/documents/2012/02/28/2012-4249/foreign-trade-zones-in-the-united-states>; White, 81.

<sup>20</sup> Queenan, 96.

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improvements at the Port throughout the decade, it also increased the size of Terminal Island's land mass to support expansion and built infrastructure at old berths. Star-Kist opened Plant No. 4 on a newly created section of Terminal Island at Fish Harbor in 1952.<sup>21</sup> A new passenger-cargo terminal opened in 1950 at Berth 154, with another under construction at Berths 195–199.<sup>22</sup> These passenger-cargo terminals allowed the Harbor Department to incorporate leisure travel services at the Port in the wake of World War II's lifted travel restrictions.<sup>23</sup> Furthermore, the Japanese Peace Pact of 1951 reopened avenues of international trade through specified provisions regarding trade and commerce.<sup>24</sup> The effect of the Japanese Peace Pact was immediate and profound. Imports and exports, recorded in tonnage, increased 163 percent between the Port and Japan from September 1951 to December 1952.<sup>25</sup> Trade with Japan continued to increase through the 1950s. Indeed, Japanese seafaring vessels exceeded all other foreign flag-flying vessels at the Port by 324 in 1956.<sup>26</sup> At the end of the 1950s, the Harbor Department opened two foreign offices, one in Oslo, Norway, and another in Tokyo, Japan, to support overseas clients. The Port quickly gained recognition as a global port during the 1950s. American wares exported from the Port were sold in 114 (out of 122) countries by the close of the decade.<sup>27</sup>

Malcom McLean developed the concept of containerized shipping in the late 1950s, which affected worldwide port development beginning in the 1960s.<sup>28</sup> Containerization, or intermodalization, standardized containers through multiple facets—ship, train, truck—from its originating location to its final location without the need to unload the items inside the container. Before the advent of containerization, cargo loading was labor intensive. A crew of longshoremen loaded individual pieces of cargo (as drums, boxes, bags, crates, or raw materials) onto ships after a repetitive process of unloading from a truck or train and reloading onto the ship at the wharf, then stowing the goods in ships' holds, all by cranes or by hand. Occasionally, nets or pallets were used to move a group of packages, but the process was still lengthy.<sup>29</sup> McLean realized that shipping by container could cut down on time and

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<sup>21</sup> Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1912), Sheet 1921; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1921; Sanborn Fire Insurance Company, "Los Angeles," Volume 19 (1950), Sheet 1938.

<sup>22</sup> Queenan, 96.

<sup>23</sup> Ibid.

<sup>24</sup> *United States Senate, Committee on Foreign Relations, Japanese Peace Treaty and Other Treaties Relating to Security in the Pacific* (Washington DC: United States Government Printing Office, 1952), np, accessed November 9, 2018, <https://www.cia.gov/library/readingroom/docs/CIA-RDP58-00453R000100300001-1.pdf>.

<sup>25</sup> Queenan, 97.

<sup>26</sup> Queenan, 97; White, 81.

<sup>27</sup> Queenan, 100; White, 81.

<sup>28</sup> Edna Bonacich and Jake B. Wilson, *Getting the Goods: Ports, Labor, and the Logistic Revolution* (Ithaca, NY, and London: Cornell University Press, 2008), 51.

<sup>29</sup> Bonacich and Wilson, 50; White, 30, 32, 41, 55–56, 62, 65, and 68.

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therefore cost. Modified trucking trailers were used as containers.<sup>30</sup> The use of containers, however, did not become the standard form of shipping overnight because the design of ships and infrastructure of ports supported existing shipping methods. With containerization, ships required a flatbed on which to stack containers, while ports required gantry cranes to move containers on and off carrier ships. In addition, ports needed open space on which to stack containers as well as trucking and train hubs to move containers in and out of a port's boundaries. As such, ships required retrofits or entirely new construction, and ports required extensive new infrastructure to move and accommodate containers—both at the exporting and importing ports of a shipment.<sup>31</sup> Shippers, ship builders, ports, railroads, and trucking companies reached an agreement on the global standardization of container sizes approximately two decades after the advent of containerization. The standard measurement for containers today is the 20-foot-equivalent unit (TEU) (the container was originally 20 feet long).<sup>32</sup>

The advent of containerization dominated the Port's development beginning in the 1960s. A Los Angeles City Charter amendment, a development plan, and bond measures enacted in the late 1950s and early 1960s facilitated the Port's transition from old cargo methods to containerization by allowing for new container-related improvements.<sup>33</sup> Both new and improved berths, such as the Los Angeles Container Terminal at Berths 126–131 in the West Basin, which included a 40-ton crane to load or unload 80 containers per hour, dramatically changed the Port's landscape.<sup>34</sup> In 1960, the Port imported and exported 7,000 containers, while in 1968, the Port imported and exported 70,000 containers, evidencing the rapid transition to containerization worldwide.<sup>35</sup> Gantry cranes; new terminal construction, such as the Los Angeles Container Terminal; and other changes to the Port's design and infrastructure facilitated the tenfold increase in containers traveling through the Port between 1960 and 1968.

In addition to container-related improvements, the Harbor Department expanded other services at the Port. In 1963, the Harbor Department established a new passenger-cargo terminal at Berths 90–93, the Vincent Thomas Bridge opened, and Ports O' Call Village, a 24-acre commercial tourist complex, was developed.<sup>36</sup> The Harbor Department constructed the passenger-cargo terminal at Berths 90–93,

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<sup>30</sup> Bill Sharpsteen, *The Docks* (Berkeley, Los Angeles, and London: University of California Press, 2011), 36; Bonacich and Wilson, 51.

<sup>31</sup> Bonacich and Wilson, 51.

<sup>32</sup> *Ibid.*, 51–52.

<sup>33</sup> Queenan, 101–105; “Good Gains for Los Angeles Harbor: Shipping Facilities Expanded,” *Long Beach Independent* (January 5, 1960), 42.

<sup>34</sup> Queenan, 109.

<sup>35</sup> *Ibid.*, 105, 109.

<sup>36</sup> Queenan, 106–111; “Terminal Island Toll Bridge to Be Built,” *Redlands Daily Facts* (January 4, 1960), 1; Lou Jobst, “Target Date 1968 for New Harbor Span,” *Long Beach Independent* (May 18, 1965), 9; “Good Gains for Los Angeles Harbor: Shipping Facilities Expanded,” *Long Beach Independent* (January 5 1960), 42.



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designed by Kistner, Wright, & Wright (architects and engineers), Edward S. Fickett (architect), and S.B. Barnes & Associates (structural engineers) for the American President Lines.<sup>37</sup> The Vincent Thomas Bridge allowed direct automobile access to Terminal Island; previously, the Terminal Island ferryboat named the Islander transported passengers between San Pedro and Terminal Island (its last voyage was the day before the bridge opened).<sup>38</sup> The Harbor Department redeveloped wharves that had previously been used by the fishing industry for construction of the New England/Polynesian-themed Ports O' Call.<sup>39</sup>

The Harbor Department sought to expand the Port's containerization capabilities in the 1970s. As containerization became increasingly widespread, the Harbor Department realized that the 35-foot depth of the harbor was not enough for the new containerized vessels; the design of container carriers necessitated deeper waters to accommodate their size.<sup>40</sup> Progress to deepen the Port's waterways to a 45-foot depth through dredging continued throughout the decade, until final approval by the Coastal Commission in 1980.<sup>41</sup> Yet, the Port's facilities underwent numerous other improvements to support container shipping. The Harbor Department increasingly cultivated relationships with Pacific Rim countries and welcomed Evergreen, a Taiwan-based shipping company, to a new 20-acre container terminal at Berths 233–235 in the mid-1970s.<sup>42</sup> In addition to the aforementioned 20-acre container site, the Harbor Department facilitated construction of a 50-acre container terminal for Matson on Terminal Island at Berths 206–209; expansion of the Los Angeles Container Terminal in the West Basin; and expansion of Terminal Island to support future and ongoing containerization-related terminals and infrastructure at the Port.<sup>43</sup> Wares imported and exported through the Port generated approximately \$500 million for Southern California during the early 1970s.<sup>44</sup> During the Port's 1976–1977 fiscal year, the Port had a net income of \$14.1 million, while the following fiscal year, it nearly doubled to \$25.7 million and became the "leading port in the United States in net income."<sup>45</sup>

Large-scale infrastructure projects dominated the Port during the 1980s. Launched on March 16, 1981, dredging operations at the Port took 30 months to complete, giving the harbor a depth of 45 feet. Once

<sup>37</sup> "\$4.3 Million Port Job: Terminal Contract Goes to L.A. Firm," *Long Beach Independent* (February 8, 1961), 11.

<sup>38</sup> Sam Gnerre, "The Vincent Thomas Bridge," *The Daily Breeze* (October 21, 2009), np, accessed December 19, 2018, <http://blogs.dailybreeze.com/history/2009/10/21/the-vincent-thomas-bridge/>.

<sup>39</sup> D.J. Waldie, "San Pedro's Ports O' Call: The Theme Ends, Then What?" *KCET* (May 16, 2014), np, accessed December 19, 2018, <https://www.kcet.org/socal-focus/san-pedros-ports-ocall-the-theme-ends-then-what>.

<sup>40</sup> Queenan, 113.

<sup>41</sup> *Ibid.*, 113–119.

<sup>42</sup> Queenan, 114–115; Bonacich and Wilson, 59–60.

<sup>43</sup> Queenan, 113–115; Jack Baldwin, "Matson Dedicates Container Terminal on Terminal Island," *Independent Press-Telegram* (March 13, 1971), 50.

<sup>44</sup> Queenan, 114.

<sup>45</sup> *Ibid.*, 118.

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completed, the Port accepted all container ships, including the approximately 35 percent that had previously been unable to navigate the harbor because of its shallowness.<sup>46</sup> Dredging supported Terminal Island infill; 14 million cubic yards of material removed from the harbor floor created 190 acres of useable land on Terminal Island.<sup>47</sup> To expedite the movement of containers in and out of the Port, the Harbor Department also facilitated construction of a 114-acre Intermodal Container Transfer Facility—where railroad, trucking, and shipping meet—2.5 miles north of the Port.<sup>48</sup> Through dredging and infrastructure projects in the mid-1980s, the combined Ports of Los Angeles and Long Beach became the leading port hub in the United States in 1986, importing and exporting 14 percent more TEUs than the New York and New Jersey Port hub.<sup>49</sup>

### History of the Cannery (1915–1985)

The canning industry originated in the early nineteenth century. Initially a labor-intensive process, canning required handcrafted cans and demanded long cooking times making canned goods expensive to purchase. Driven by demand from militaries, which needed non-perishable food for troops, the canning industry grew during the late-nineteenth century. Companies met this demand, which skyrocketed during World War I, through increased mechanization. At this stage, ports throughout the United States became important hubs for canning salmon, sardines, and tuna.<sup>50</sup>

The industry grew rapidly at the Port with the creation of Fish Harbor in 1915. Sanborn maps from 1921 depict small canneries at the Port, with many lined along a single block, whereas a 1951 Sanborn map shows larger canneries, designed with areas for processing fish, canning, net making and drying, and other related tasks.<sup>51</sup> These modern plants, such as Star-Kist Plant No. 4, could occupy one or more city blocks. Regardless of their size, canneries consistently included a wharf or dock to accept the arrival of fishing vessels, a canning area with an open space to butcher fish, and a boiler house for the cooking process, described below.<sup>52</sup>

The canning process relied on multiple steps, which created some of the important character-defining features of canneries. In the nineteenth century, workers cleaned fish and packed cans manually. Steam retorts would then cook the contents, after which the cans would seal as they cooled. Throughout the

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<sup>46</sup> Ibid., 123.

<sup>47</sup> Ibid., 123.

<sup>48</sup> Ibid., 121–122, 126.

<sup>49</sup> Bonacich and Wilson, 58.

<sup>50</sup> Greg Steven Pearson, “The Democratization of Food: Tin Cans and the Growth of the American Food Processing Industry, 1810-1940” (Doctoral Dissertation, Lehigh University, 2016), 1–2.

<sup>51</sup> Sanborn Fire Insurance Map, “Los Angeles,” Volume 19 (1948), Sheet 1912.

<sup>52</sup> Sarah Steen, “Expanding Context: A Look at the Industrial Landscapes of Astoria, Oregon, 1880–1933” (Master’s Thesis, University of Oregon, 2009), 95–98.

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twentieth century, this process became increasingly mechanized. From the docks, conveyor systems lifted fish directly into the building, bypassing interruptions on the street level entirely. Machines cleaned fish rapidly and floor drains efficiently removed viscera and blood from buildings. Conveyors continued to move the fish through the complex, where workers would pack it into cans. Depending on the site and the overall design of the complex, workers may carry out all of these processes in one open space or move between ancillary buildings dedicated to a particular step.<sup>53</sup> Canning complexes included spaces for can manufacturing, net repair, boat repair, storage of excess cans, offices, mess halls, or bunkhouses, depending on how integrated the production process was.<sup>54</sup>

Technology influenced the industry. As early as the 1910s, light machinery was available to seal cans at a rate of 90 cans per minute and workers could load this equipment with sanitary cans produced either on site or purchased from other companies.<sup>55</sup> Other technologies, such as can-filling machines, fish-cleaning machines, and conveyor belts, worked to clean and cut fish or move items from one place to another. Companies incorporated mechanized production in varying stages, but by 1930 most canneries used machines to fill at least a portion of the cans.<sup>56</sup>

Cannery design changed throughout the twentieth century, as did its material composition. In the pre-World War II era, companies relied on wood for structure and cladding. Canneries had wood posts driven deep into the ground to provide a stable foundation for the structures on natural or reclaimed land. Floor systems consisted of wood planks set atop wood joists. Cannery buildings typically clad these buildings in wood board-and-batten siding. Following World War II, companies embraced new building technologies. Concrete construction became more common, as used at the Plant. Corrugated metal or stucco replaced wood as the preferred cladding. Concrete flooring replaced wood planks and joists. Postwar plants relied on electric light rather than daylight.<sup>57</sup> Although availability of electric light reduced reliance on daylight and resulted in fewer windows, skylights were still used, as demonstrated by the extant canning-related buildings at Fish Harbor.<sup>58</sup>

Under NRHP/CRHR Criteria A/1, an eligible example of a cannery would need to demonstrate the character-defining features of its process engineering, which are a combination of original process engineering canning equipment and its layout within its interior spaces. At the Plant, this layout relies on

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<sup>53</sup> Margaret Roderick, Visual Inspection of Star-Kist Plant No. 4, October 29, 2018; Margaret Roderick, Visual Inspection of Cannery Block, April 10, 2019.

<sup>54</sup> Steen, 97–98.

<sup>55</sup> “Ad-’AMS’ Four Spindle Double Steamer No. 49,” *Pacific Fisherman* (Portland, Oregon: M. Freeman Publications, 1917), 10.

<sup>56</sup> Steen, 148.

<sup>57</sup> Steen, 98; Sanborn Fire Insurance Map, “Los Angeles,” Volume 19 (1948), Sheet 1912.

<sup>58</sup> Roderick, October 29, 2018.

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a linear production with raw goods (tuna) entering at the southern end and packaged goods (canned tuna) shipping from the northern portion, and its equipment in place to demonstrate this production process. Canning properties, especially those constructed before World War II, are frequently altered to accommodate new or different product manufacturing processes or updated technologies and methods, but these changes must be significant and present in order for a cannery to be eligible under this criterion.

### The Post-World War II Rise and Fall of Fish Harbor (1945–1985)

Despite the federal government's detention and internment of the Japanese-American fishermen and cannery workers who had been the backbone of the Port's canning industry during the prewar era, the industry flourished after the war. By the 1950s, Los Angeles reigned as the world's leading tuna production location.<sup>59</sup> Sanborn maps of Fish Harbor show densely built fish processing plants surrounding Fish Harbor, with several belonging to companies dating to the 1910s and 1920s like Van Camp Sea Food Company (Van Camp), the Southern California Fish Company, and French Sardine (later renamed Star-Kist).<sup>60</sup> Additionally, in 1946, Pan-Pacific Fisheries opened a modern cannery on Sardine Street and in 1952, Star-Kist built the world's largest tuna cannery on Fish Harbor's eastern waterfront.<sup>61</sup> The 1950s marked the industry's peak; at that time these Fish Harbor canneries produced 80 percent of canned tuna in the United States.<sup>62</sup> In 1957, county authorities added the image of a tuna fish to the official County of Los Angeles seal—a testament to the role this industry had come to play in the regional economy.<sup>63</sup>

Simultaneously, trade passing through the Port increased, particularly with countries in the Pacific Rim region. The United States-Japan Security Treaty of 1951 allowed trade that had ceased during the war to resume. By 1956, Japan had become the Port's most significant trading partner.<sup>64</sup> The economic consequences of expanding trade between the United States and Japan proved consequential for the Fish Harbor canning industry. Japanese companies undercut American competitors by innovating packaging methods such as freezing goods. Freezing fish during times of prosperity compensated for times of decline, when fish were less abundant or required further travel to acquire. Moreover, Japanese products cost less than Star-Kist, Van Camp, and other American tuna and canned fish brands.

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<sup>59</sup> Grobaty, np.

<sup>60</sup> Sanborn Fire Insurance Map, "San Pedro," Volume 19 (1950), Sheet 1913.

<sup>61</sup> Los Angeles Conservancy, "Taking Tuna Mainstream," (Los Angeles, CA: Los Angeles Conservancy, n.d.), np, accessed July 9, 2020, <https://www.laconservancy.org/node/1076>.

<sup>62</sup> "Port Board Approves Permit for \$160,000 Fish Cannery," *San Pedro News-Pilot* (January 30, 1947), 1; Grobaty, np.

<sup>63</sup> Louis Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np, accessed August 5, 2020, <http://articles.latimes.com/2001/jun/03/local/me-6015>.

<sup>64</sup> White, 81.

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While the development of new purse seiner boats supported American fishermen's ability to obtain sufficient stocks of fish, the method also killed numerous dolphins since they would get caught in the nets and drown, which led to the Marine Mammal Protection Act of 1972. The Marine Mammal Protection Act called for changes to the fishing industry.<sup>65</sup> By the 1970s Fish Harbor was in decline due to the combination of reasons mentioned above.<sup>66</sup> Profits declined for Los Angeles' canneries, and their lobbying efforts pressuring Congress to implement new national tariffs against foreign competition failed in the mid-1980s.<sup>67</sup>

### The End of Star-Kist's U.S. Production (1980–1984)

Star-Kist, like other companies in the tuna canning industry, sought to reconcile instability issues and other difficulties in the early 1980s at their United States-based facilities but ultimately laid off workers and closed. In September 1980, the cannery workers at Star-Kist and Pan-Pacific Fisheries, both on Terminal Island, obtained a wage increase, raising workers' incomes and benefits by approximately 15 percent over 3 years.<sup>68</sup> The pay increase was seen as a "major victory" for Terminal Island cannery workers.<sup>69</sup> However, less than 2 years after this victory, Star-Kist, which was under pressure from foreign canned tuna production and imports, discharged 2,600 workers because of "economic uncertainties in the tuna industry."<sup>70</sup> Star-Kist soon rehired the workers after an agreement was reached to delay that year's wage increase until the following year.<sup>71</sup> Plagued by globalization since the 1960s, tuna workers lost approximately 1 million work hours in 1982 compared with 1981.<sup>72</sup> Layoffs at Star-Kist also occurred in April and November 1983.<sup>73</sup> In April, Star-Kist reduced its night staff by 350; in November, Star-Kist discontinued its night shift entirely. It also reduced its day staff.<sup>74</sup> At that time, Star-Kist laid off 600 employees, including 340 fish cleaners.<sup>75</sup> Star-Kist was not the only U.S. cannery to lay off workers in the

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<sup>65</sup> Mark Schoell, "The Marine Mammal Protection Act and Its Role in the Decline of San Diego's Tuna Fishing Industry," *The Journal of San Diego History* Vol. 45, No. 1 (Winter 1999), np, accessed March 30, 2021, <https://sandiegohistory.org/journal/1999/january/tuna-2/>.

<sup>66</sup> "Tuna Industry Started Crudely, but Has Developed Ultra-Modern Ways," *San Pedro News-Pilot* (February 7, 1968), 16.

<sup>67</sup> Robert A. Rosenblatt, "Higher Tuna Tariffs Urged to Protect Jobs," *Los Angeles Times* (June 6, 1984), A1, 4; "Tuna Industry Started Crudely, but Has Developed Ultra-Modern Ways," *San Pedro News-Pilot* (February 7, 1968), 16.

<sup>68</sup> "The Southland," *Los Angeles Times* (September 26, 1980), 2.

<sup>69</sup> "New Contract," *Los Angeles Times* (September 28, 1980), 577.

<sup>70</sup> "Back on the Job," *Los Angeles Times* (December 26, 1982), 110.

<sup>71</sup> Ibid.

<sup>72</sup> Ibid.

<sup>73</sup> Tim Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canneries," *Los Angeles Times* (November 20, 1983), 618.

<sup>74</sup> Ibid.; Tim Waters, "Star-Kist Now Says 600 Were Laid Off," *Los Angeles Times* (November 15, 1983), 54.

<sup>75</sup> *Los Angeles Times* (November 15, 1983), 54.

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early 1980s. Star-Kist is but one example of instability in the canned tuna industry in the United States. Pan-Pacific Fisheries of San Pedro, Bumble Bee of San Diego, and Van Camp of San Diego laid off approximately 1,800 workers between 1982 and 1983.<sup>76</sup>

Two cannery labor groups picketed in front of the Plant on Terminal Island in the 1980s, the Fisherman's Cooperative Association in 1981 and Star-Kist cannery workers in 1984.<sup>77</sup> The Fisherman's Cooperative Association strike resulted from changes in the way Star-Kist solicited tuna fishermen. Instead of determining a tonnage-per-day allotment, which was then distributed to all available ships in the cooperative, Star-Kist sought contracts with individual fishermen, resulting in fewer catches for fewer fishermen per day.<sup>78</sup> Picketing by Star-Kist employees in 1984 protested Star-Kist's job cuts.<sup>79</sup>

Star-Kist considered consolidating its administrative personnel headquarters in the early 1980s. Previously, administrative personnel held offices at multiple locations in San Pedro, including at the Pacific Trade Center in San Pedro.<sup>80</sup> In 1983, Star-Kist decided to expand its 75,000 square feet of office space at the Plant by approximately 35,000 square feet to accommodate its administrative personnel.<sup>81</sup> It appears that the Plant's 1980 second-story addition along Ways Street, which included office space and a staff breakroom, foreshadowed its 1983 announcement. However, Star-Kist scrapped the Terminal Island expansion in 1984 and announced the consolidation of administrative offices at Crocker Plaza in Long Beach.<sup>82</sup> Star-Kist cited Terminal Island traffic and immediate need as determining factors in the relocation of office staff.<sup>83</sup> Approximately 400 employees were affected by the move, although approximately 100 remained at the Plant.<sup>84</sup>

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<sup>76</sup> Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canneries," *Los Angeles Times* (November 20, 1983), 618.

<sup>77</sup> Jerry Ruhlow, "Conflict Over Awarding Contracts: Fishermen's Groups Claims Cannery Plot," *Los Angeles Times* (November 1, 1981), 28; Julio Moran and Tim Waters, "300 Marchers Protest Tuna Cannery Layoffs," *Los Angeles Times* (July 12, 1984), A3.

<sup>78</sup> Ruhlow, "Conflict Over Awarding Contracts: Fishermen's Groups Claims Cannery Plot," *Los Angeles Times* (November 1, 1981), 28.

<sup>79</sup> Moran and Waters, "300 Marchers Protest Tuna Cannery Layoffs," *Los Angeles Times* (July 12, 1984), A3.

<sup>80</sup> Mark Gladstone, "Star-Kist Foods Decides Against Move to Long Beach," *Los Angeles Times* (June 19, 1983), 526; Tim Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603.

<sup>81</sup> Gladstone, "Star-Kist Foods Decides Against Move to Long Beach," *Los Angeles Times* (June 19, 1983), 526.

<sup>82</sup> Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603; "Terminal Island," *Los Angeles Times* (December 6, 1984), 248.

<sup>83</sup> Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603.

<sup>84</sup> "Terminal Island," *Los Angeles Times* (December 6, 1984), 248.

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Uncertainties in tuna fishing, instability in the canning industry, and competition from foreign companies forced Star-Kist and other major U.S. canneries to seek a tariff increase on foreign canned tuna, from 6 percent to 35 percent, to remain competitive in the market in the 1980s.<sup>85</sup> In contrast, foreign canned tuna companies in Malaysia, Morocco, Mexico, and Ghana applied for tariff reductions on imports to the United States during that same time.<sup>86</sup> Foreign cannery goods sold in the U.S. were considerably cheaper than local products, necessitating Star-Kist's plea for government assistance in the form of tariffs. For example, Star-Kist's product sold wholesale for approximately \$40.60 per case under the Star-Kist brand and \$29.25 per case under a supermarket label; imported tuna from Thailand and the Philippines sold wholesale for approximately \$22 per case.<sup>87</sup> Foreign competition exported 51.7 million pounds of tuna to the U.S. in 1978; the number rose to 87.5 million pounds in 1982.<sup>88</sup>

Star-Kist, along with other tuna canneries, appealed to the U.S. International Trade Commission (USITC) for a tariff increase on imported tuna. Star-Kist stated that without a higher tariff on imports, the company would close its Terminal Island facility on October 1, 1984 and strictly produce canned tuna overseas.<sup>89</sup> Although it was no longer cost effective for Star-Kist to operate its Terminal Island facility, after being embroiled in the imported tuna tariff issue for several years, USITC decided not to support or recommend import limitations or increase tariffs on canned tuna. USITC concluded that imported tuna was "not the main source of injury to an industry saddled with debts and declining markets."<sup>90</sup>

A final plea to Congress was also unsuccessful; Congress did not take measures to impose a tariff on imported tuna. Star-Kist's tuna processing division closed on October 1, 1984.<sup>91</sup> Star-Kist laid off 1,150 cannery workers but retained its pet food, research and development, and can production operations on Terminal Island.<sup>92</sup>

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<sup>85</sup> "New Contract," *Los Angeles Times* (September 28, 1980), 577; Rosenblatt, "Higher Tuna Tariffs Urged to Protect Jobs," *Los Angeles Times* (June 6, 1984), A1, 4.

<sup>86</sup> Ibid.

<sup>87</sup> Waters, "Star-Kist Lays off 600: Tuna Imports Take Toll on U.S. Canneries," *Los Angeles Times* (November 20, 1983), 618.

<sup>88</sup> Ibid.

<sup>89</sup> Oswald Johnson and Cyndi Mitchell, "Commission Blocks Hike in Tariffs on Canned Tuna," *Los Angeles Times* (July 26, 1984), 32.

<sup>90</sup> Ibid.

<sup>91</sup> Tim Waters, "Star-Kist to Close Cannery; Blames Imports," *Los Angeles Times* (July 28, 1984), 33; Tim Waters and Julio Moran, "Workers Left High and Dry by Tuna Cannery Shutdown," *Los Angeles Times* (October 19, 1984), 19.

<sup>92</sup> Jones and Stokes, *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, prepared for the Los Angeles Harbor Department (January 2008), 17; Waters, "Star-Kist to Move Offices to L.B.: Corporate Headquarters to Be Relocated Across Bay," *Los Angeles Times* (July 8, 1984), 603; Waters and Moran, "Workers Left High and Dry by Tuna Cannery Shutdown," *Los Angeles Times* (October 19, 1984), 19.

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Research presented in the 2008 evaluation's historic context statements and above do not evidence a significant context associated with Star-Kist's U.S. decline or the Plant's closure. (See Appendix B, pages 5 through 21 for previously established historic context statements.)

### Architecture

#### *Light Industrial Architecture (1945–1985)*

The “light industrial” property type is a version of industrial architecture that focuses on the production process for smaller-scale items, which are often consumer and business oriented, or “manufacturing activity that uses moderate amounts of partially processed materials to produce items of relatively high value per unit weight.”<sup>93</sup> The term “light industrial” gained popularity during the postwar era as city planners increasingly zoned for this property type. Postwar light industrial architecture throughout the United States shares a consistent set of design features.

Light industrial architecture in the postwar era required speed during construction and flexibility within the space. An efficient industrial design included an enclosure that was free from obstructions, adequate daylight, low maintenance, provisions for heavy machinery, flexibility of use, ease of future expansion, and specialized production.<sup>94</sup> The design for light industrial architecture in the United States needed to facilitate production in the quickest and most direct manner possible. As such, many light industrial complexes of the postwar era contained a single story with a large, rectangular plan. To speed production, many of the processes occurred under one roof; this concept was developed from the earlier “consolidated works.”<sup>95</sup> The single-story spatial arrangement is optimal for production because production could take place in a linear fashion, as evidenced in the Plant's plan. A rectangular plan, with vast and open square bays, offered the most flexibility for potential alterations related to changing machines, layouts, and even building uses over time. To keep the floor space open, locker rooms, restrooms, and other secondary amenities were often located on a mezzanine level.<sup>96</sup> The mezzanine is a common feature of industrial and light industrial architecture because it provides amenities and allows for viewing by supervisory staff and visitors. Star-Kist Plant No. 4's design sets these amenities along its west side and did not make use of mezzanine levels.

<sup>93</sup> Ajay Kumar Ghosh, *Dictionary of Geology* (New Delhi: Isha Books. 2005), 170.

<sup>94</sup> James F. Munce, *Industrial Architecture: An Analysis of International Building Practice* (New York, NY: F.W. Dodge Corporation, 1960), 88.

<sup>95</sup> Betsy Hunter Bradley, *The Works: The Industrial Architecture of the United States* (New York, NY: Oxford University Press, 1999), 74–76.

<sup>96</sup> Munce, 88; Bradley, 74–76; 192.



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After World War II, a new corporate emphasis on teamwork and organizational psychology led to amenities such as cafeterias, athletic facilities, and lounges for workers as well as a trend away from the earlier separation of administrative offices from factory production spaces. As Rappaport explains, “head offices” increasingly “became a part of the main building structure so that the entire factory was under one roof for easy communication between research teams and production-line workers.”<sup>97</sup> Star-Kist only expanded its office space circa 1980, but never consolidated its administrative personnel at the Fish Harbor location. Although large portions of such facilities were formed of utilitarian buildings or wings, office elements often incorporated Late Moderne or vernacular Modern architectural design features.

Typically, in postwar light industrial construction, the main entrance is often articulated and emphasized in a manner that the factory portion itself is not, as expressed in the design of the Plant. Such emphasis at the main entrance, along with similarly articulated reception and office areas, was designed to impress potential clients and visitors.

Lighting and ventilation mechanisms varied, with prewar and early postwar buildings relying on passive systems; later postwar manufacturing plants or warehouses incorporated electric systems. Many light industrial buildings have rhythmically spaced, periodic window bays. In many of the smaller-scale postwar variants, these windows were commonly multi-light metal-frame units with an operable awning or hopper window set within it to allow for ventilation. Often such natural lighting at exterior walls alone would not be enough to disperse across the span of a large floor so top lighting would be used. In instances where top lighting is natural, industrial buildings would commonly incorporate a “sawtooth” roof. The long, repeating angled banks of windows contain north-facing glazing so as to allow light into the space but not the penetrating sun that would occur with south-facing glazing. Sawtooth roofs are typically supported by columns at their valleys but may also be supported by any variety of truss systems that alleviate the need for columns.<sup>98</sup> After 1952, only 15 percent of American factories and manufacturing buildings of any type had natural top lighting, and artificial lighting became increasingly desirable.<sup>99</sup> For example, later postwar examples generally feature the elements of early design, but continue to rely heavily on the use of electrical systems over passive ones. Warehouses constructed in the 1970s and 1980s feature little to no fenestration. Instead, electric lights and heating, ventilating, and air conditioning systems provide light and ventilation. The idea of “process engineering” also played a

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<sup>97</sup> Louise A. Mazingo, *Pastoral Capitalism: A History of Suburban Corporate Landscapes* (Cambridge, MA: MIT Press, 2011), 31, 38–41; Nina Rappaport, “Factory,” *Encyclopedia of Twentieth-Century Architecture*, Volume 1, A-F, R. Stephen Sennott (ed.) (New York, NY: Fitzroy Dearborn, 2004), 434.

<sup>98</sup> Bradley, 192.

<sup>99</sup> Kenneth Reid, *Industrial Buildings: The Architectural Record of a Decade* (New York, NY: F.W. Dodge Corporation, 1951), 28–29; Munce, 50.

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role in the construction, design, and uses of light industrial architecture. Within its vast spaces, a flow of materials, employees, and order of production called “process engineering” were among the pre-planned elements of an industrial building, and mid-century factory design dictated that machines, rather than human handling, should be used whenever possible to transform raw materials into a finished product. Star-Kist and its hired designers followed this common trend. In early factories and light industrial buildings, the conveyor would connect various aspects of production in the most efficient manner possible. Rollers, forklifts, and, for larger-scale buildings, gantries and other cranes were also used to transport materials efficiently.<sup>100</sup> Efficient movement of materials was also important to the selection of the building’s location. The earliest industrial architecture was near waterways, and with the advent of the locomotive, the property type would be constructed near railways and then, later, vehicular roads. To expedite the industrial process, fishermen delivered tuna at the Plant’s south docks. The production process progressed through the building, northward, until canned tuna was loaded onto trucks at the building’s northernmost end. Dependent on the sea, the Star-Kist Plant at Fish Harbor was vital, but roadways to the property also provided for the distribution of goods. Although railroad spur lines previously accessed Fish Harbor buildings, including the former French Sardine facility, one does not appear to have been aligned for the purposes of Star-Kist production or distribution. In the postwar era, trucking became a major component of industry.

It is rare for a light industrial building as a property type to be NRHP/CRHR eligible under Criteria C/3, distinct from its architectural style, such as Moderne variants or the International Style, among others. For such a property to be eligible as a light industrial property type, the building would need to have a high degree of historic integrity, which is rare in industrial structures, which were frequently upgraded to accept the latest technological innovation. Necessary features may include a combination of intact factory and amenity areas, architectural details, and landscaping, in addition to intact interior spaces and a majority of original, intact process engineering components. A light industrial building may also be historically significant under NRHP or CRHR Criteria C/3 if its design is directly associated with a *historically significant* construction or process engineering development.

### *Moderne Architecture (1925–1959)*

Moderne architecture is a broad category that includes various modernistic and modern subtypes that evolved alongside and largely contrasted the sleeker and more austere modernism of the International Style and proved popular between the 1920s and 1950s. It is represented in Star-Kist Plant No 4.<sup>101</sup> Most popular prior to World War II, Moderne was eventually surpassed by the growing influence of the

<sup>100</sup> Munce, 55.

<sup>101</sup> Arie van de Lemme, *A Guide to Art Deco Style* (New Jersey: Chartwell Books, Inc., 1986), 8.

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International style. The Moderne substyles evolved from Art Deco in the 1920s to Streamline Moderne in the 1930s and 1940s to Late Moderne's beginnings in the late 1930s through the 1950s.<sup>102</sup>

Art Deco derives its name from Paris's 1925 *Exposition internationale des arts décoratifs et industriels modernes*.<sup>103</sup> The style took shape as a means of enlivening simplified Classical forms with dynamic shapes, surfaces, and angles that expressed the energy and movement of the Jazz Age.<sup>104</sup> Art Deco, or "Zig-Zag," buildings had vertical emphasis and made use of bold, repetitive geometric forms and decorative motifs. Rather than presenting a flat plane, façades often step backward and forward to create visual rhythm and feature vertical projections above roof lines. The Streamline Moderne substyle, distinguished by its horizontal emphasis and an aesthetic that suggested movement, evoked associations with aerodynamically designed transportation technologies, such as automobiles, trains, airplanes, and ships.<sup>105</sup> Curved elements and teardrop forms are common to the style, but Streamline Moderne buildings always feature horizontal bands or ribbons of steel-framed windows; some even include glass block or nautical portal windows to emphasize the style's association with aerodynamics and transportation. Although limited curvature survived in some Late Moderne buildings, the style put greater emphasis on angularity, the use of stack-bond brick, and bezels surround windows—a leading feature distinguishing this substyle.<sup>106</sup> Examples include both symmetrical and asymmetrical façades, both with entry pylons. Moreover, bezels may be located around doorways or continue, horizontally, to wrap around to other elevations. Landscape features, such as built-in planters, are also common in Late Moderne buildings.

The Plant's front office portion along Ways Street conforms to the Late Moderne substyle. Originally a single story, the building featured an entrance pylon flanked by a wing on either side. The pylon rose several feet above the adjacent roofline and was capped by a fluted cornice line. Each wing featured stack-bond brick and smooth concrete. A brick sill and concrete bezel surround ribbon windows. With the second-floor addition in 1980, the Late Moderne style of the building was replicated; smooth stucco clads each wing wall, which is punctuated by a ribbon window configuration composed of alternating windows and stack-bond brick panels surrounded by a bezel. However, this addition falls outside the period of significance for the architectural style and alters key features of Plant's architectural style. For

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<sup>102</sup> Stephen Sennott (ed.), "Art Deco," *Encyclopedia of Twentieth Century Architecture* (Taylor and Frances, 2004), 69.

<sup>103</sup> van de Lemme, 8–11.

<sup>104</sup> Ibid., 16–23.

<sup>105</sup> David Gebhard and Harriette von Breton, *L.A. in the Thirties, 1930–1941* (Peregrine Smith, Inc., 1975), 4; Stephen Sennott (ed.), "Art Deco," *Encyclopedia of Twentieth Century Architecture* (Taylor and Frances, 2004), 69.

<sup>106</sup> Christopher A. Joseph & Associates, *City of Riverside Modernism Context Statement* (Historic Resources Division of the City of Riverside, 2009), 13.

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example, the second story now rises above the original entrance pylon, a key element of Late Moderne architecture.

Excellent examples of the style in Los Angeles include St. Vincent College of Nursing at 262 South Lake Street and Fire Station No. 53 at 438 North Mesa Street. Additional excellent examples in the greater Los Angeles metropolitan area include Solar Manufacturing at 4553 Seville Avenue in Vernon, Shrimpton Manufacturing and Supply Company at 2700 South Eastern Avenue in Vernon, and Western Waxed Paper Company at 2620 Commerce Way in Commerce. For example, Fire Station No. 53 in San Pedro features an asymmetrical but balanced primary elevation, with a brick firehouse garage pylon, bezels around doors and windows, and built-in brick planters, all organized in a thoughtful and artistic manner.

Under NRHP/CRHR Criteria C/3, an eligible example of Late Moderne architecture would need to embody the distinctive features of its style, possess high artistic values, or represent the work of a master architect. Distinctive features of the style would include artistic handling of volumes and massing; variegated façades; geometric forms; an emphasized entrance, commonly through the construction of a pylon rising well above the roofline; a ribbon of steel windows surrounded by a bezel; and multiple cladding materials, such as the use of stack-bond brick and rock. In addition, built-in planters, or other forms of landscaping, play a vital role in Late Moderne designs. Rote repetition of shapes, forms, and materials in a Late Moderne design does not elevate it to NRHP or CRHR eligibility; instead, a Late Moderne building would represent an artistic and thoughtful approach to design, often evident in the work of a master architect.

### Integrity

The seven aspects of integrity determine whether a property has the ability to convey its significance

### Location

The Plant retains its original location on Terminal Island, bounded by Ways Street and Inner Fish Harbor to the west, Bass Street to the north, Barracuda Street to the east, and outer Fish Harbor to the south. Therefore, the Plant retains its integrity of location.

### Design

Due to extensive additions and alterations, the Plant does not retain integrity of design. The Plant remains its industrial nature, with large interiors facilitating light manufacturing. However, the plan, massing, and spatial relationships have been altered. Star-Kist constructed additions along all elevations of the Plant, altering its plan and massing (Figure 38). In addition, massing and the spatial relationships of the entrance no longer retain their 1952 appearance. Originally, an entrance pylon rose well above

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two flanking one-story wings (Figures 34 and 35), but a second-story addition in 1980 raised the wings' height above that of the entrance pylon, destroying the primary (west) elevation's original Late Moderne design (Figures 2 and 3).

### Setting

The Plant does not retain integrity of setting. The Port, including Terminal Island and Fish Harbor, has changed drastically since 1952: First, Containerization brought on by globalization affected Port operations and infrastructure; and second, closure of the canning and fishing industries at Fish Harbor.

The Harbor Department reclaimed more than 7,450,000 square feet of land in the 1970s and 1980s and placed it east and southeast of the Plant, an area that now serves as massive container shipping facilities—a concept that was unheard of in 1952. The container facilities are characterized by stacked containers and dominated by numerous 130-foot tall metal cranes along their wharves. Prior to this reclamation, the Plant was located on a peninsula that was only connected to Terminal Island to the north (Figure 34).

The decline of fishing and the tuna industry at the Port altered the immediate setting. Fish Harbor once housed multiple fish-related industries, including sardine and tuna canning and various supportive shops and business. Once densely built up, today most parcels are vacant, and others contain infill. Railroad spurs have been removed and fish canning companies no longer operate here. For these reasons, the Plant does not retain integrity of setting.

### Materials

Major alterations including new construction along all of its original elevations causes a substantial loss of integrity of materials (Figure 38). Although the Plant has undergone many alterations, the Plant remains extant and has not experienced wholesale removal of construction materials. However, designers, engineers, and contractors used non-original materials such as vertical seamed metal cladding, plexiglass panels, and aluminum frame slider windows for new construction that removed, obscured, and added to the original tilt-up concrete and rolled steel multi-light glass materials. Moreover, the removal of the metal conveyor systems and associated process engineering presents an additional loss of materials (Figures 27 through 31; 36 and 37). The Plant lacks integrity of materials.

### Workmanship

Major alterations including new construction along all of its original elevations causes a substantial loss of integrity of workmanship (Figure 38). Constructed of tilt-up concrete poured and cured on-site, the concrete is an important component of the Plant's workmanship. Although the Plant has undergone

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many alterations, the Plant remains extant and has not experienced wholesale removal of its evidenced workmanship. However, designers, engineers, and contractors used non-original materials and methods of construction new construction that removed, obscured, and added to the original tilt-up concrete's workmanship. The Plant lacks integrity of materials.

### Feeling

Because the Plant lacks integrity of design, workmanship, and materials, it also lacks integrity of feeling. Through the extensive alterations to the building type and architectural style, the Plant does not express its aesthetic or historic sense of potentially important dates in its history: 1952; 1959; or 1969. Late Moderne architecture, popular in the post-World War II era, identifies the Plant through its stack-bond brick cladding and rolled-steel windows, which are arranged into a ribbon and surrounded by a bezel. However, the 1980 second-story addition with its common-place design and aluminum slider windows identify changes to the Late-Moderne feeling (Figures 2 and 3). Likewise, portions of the original tilt-up concrete warehouse with large rolled-steel windows punctuating the clerestory-level area of the walls evidence an early post-World War II light industrial type of building. However, these features are obscured by many additions that utilize metal warehouse-type buildings, which are incongruous with the 1952 construction of the Plant. The Plant's alterations are not compatible with its potentially important dates for either the industry or Star-Kist.

### Association

The Plant lacks integrity of association. Removal of the bespoke process engineering equipment, such as a multi-story conveyor system, butchering and cleaning tables, pre-cooking and Full Can Washer, can scramblers, sterilizers, and filling machines, prevents the Plant from conveying its association with either the tuna canning industry or Star-Kist (Figures 27 through 31; 36 and 37). The process engineering equipment is integral to understanding the company's important United States based tuna production at the Port's Fish Harbor in the 1950s and 1960s. This equipment efficiently facilitated entry of tuna at the Plant's southern Fish Import Docks, a linear production north through the building, with canned tuna shipping by train and truck from its northern boundary along Bass Street. This production line supported Star-Kist's leading role in the United States canning industry and at Fish Harbor. The Plant lacks physical features to convey integrity of association.

### Evaluation

The Plant was evaluated as eligible for the NRHP, the CRHR, and as an HCM under all criteria in 2008 but has been re-evaluated and determined individually **ineligible** for the NRHP or the CRHR or as an HCM.

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This evaluation determined that although the Plant may have been important under NRHP/CRHR Criteria A/1 and as an HCM for its association with events or a pattern of events significant to our history as a United States Star-Kist tuna canning plant, it lacks sufficient integrity to convey that significance. A potentially important period associated with the U.S. tuna canning industry ends in 1969 when overseas canning facilities produced approximately 50 percent of canned tuna. Another potentially important period associated with the Plant ends in 1959, when Star-Kist opened an overseas facility. These events marked consequential changes to the industry and Star-Kist production in the United States that are linked to their decline and demise. Star-Kist completed substantial alterations to the Plant after the potentially important periods provided above, many within the past 50 years. Today, the Plant is clearly the product of light industry, but it lacks the ability to convey its significant associations with the tuna industry or Star-Kist. A detailed account of integrity is presented in Chapter 8.

### NRHP/CRHR Evaluation

#### *Events/Patterns: A/1*

As stated above, this evaluation determined that although the Plant is associated with two historic contexts and their potentially important dates (the history of the United States canning industry from 1952 to 1969 and the history of Star-Kist tuna canning in the United States and at the Port's Fish Harbor from 1952 to 1959), the Plant is unable to convey any significance due to insufficient integrity.

Star-Kist, founded in 1917 as French Sardine, established a major presence at Terminal Island's Fish Harbor and as a major supplier of canned tuna worldwide. The 1952 Plant facilitated the United States' and company's extensive growth in the industry, ensuring that Star-Kist would become the world's largest tuna company. Fishing was a major industry in Southern California, and Terminal Island was no exception. Indeed, the Port created Fish Harbor, beginning in 1915, to unite the fishing industries and separate them from the Port's shipping lanes.<sup>107</sup> The founder of Star-Kist, Martin Bogdanovich, is credited with enabling the canned tuna industry through the advent of refrigeration onboard vessels.<sup>108</sup> Thereafter, tuna could be caught and kept fresh in quantities suitable for canning. Fish Harbor boomed. In its heyday, approximately 2,000 fishermen served 18 canneries.<sup>109</sup> Terminal Island, noted as "the greatest fishing port in the world," led in canned tuna production world wide by 1946.<sup>110</sup> For example, in 1954, approximately 65 percent of canned tuna consumed in the United States was produced by Star-Kist and Van Camp (re-named Chicken of the Sea), also of Terminal Island<sup>111</sup> Other Fish Harbor canneries coupled with Star-Kist and Van Camp produced 80 percent of canned tuna in the United States during

<sup>107</sup> Hadley Meares, "San Pedro: Off the Coast of San Pedro, a Japanese Community Erased," *CurbedLA* (March 30, 2018), np, accessed December 7, 2018, <https://la.curbed.com/2018/3/30/17147942/san-pedro-history-terminal-island-internment>.

<sup>108</sup> James Phelan, "How to Put a 100-pound Tuna in a 7-ounce Can," *Independent Press Telegram* (July 11, 1954), 4, 18.

<sup>109</sup> Ibid.; Grobaty, np; Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np.

<sup>110</sup> Ibid.

<sup>111</sup> Phelan, "How to Put a 100-pound Tuna in a 7-ounce Can," *Independent Press Telegram* (July 11, 1954), 4, 18.

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the 1950s, elevating the fishing industry to California's fourth largest industry.<sup>112</sup> So important was the tuna industry in Los Angeles, the County of Los Angeles's second seal incorporated a tuna into its design in 1957.<sup>113</sup> Although Star-Kist and its Plant played a significant role in the fishing and canned tuna industries in the United States and at the Port, the Plant in its current state fails to depict or convey its significance. The Plant no longer contains features or elements that represent either the canned tuna industry at large or the Star-Kist brand. The degree of change to the Plant is too great. Rather, the Plant could serve any light industrial purpose. Therefore, the Star-Kist Plant is not eligible under NRHP/CRHR Criteria A/1.

### *Important Persons: B/2*

Martin Bogdanovich founded the French Sardine Company in 1917 and was involved in its management until his passing in 1944: he is not associated with the Plant which was constructed in 1952. Bogdanovich's son, Joseph, assumed control of the company following his father's death. The younger Bogdanovich remained active in Star-Kist's management until 1963 when Heinz acquired 90 percent of Star-Kist shares. Bogdanovich retained his presidency after the Heinz acquisition and was later promoted to chief executive officer. In 1988 he obtained a new leadership position at Heinz and stepped away from Star-Kist management, which was no longer producing canned tuna in the United States. Bogdanovich would have been involved in decisions surrounding the company's building and expansion, but the extent of his associations with the Plant is unclear. Research, including multiple newspapers in the greater Los Angeles metropolitan area and obituaries, yielded little information on Bogdanovich and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he does not appear to have been significantly associated with the Plant. Star-Kist operated several administrative office spaces in San Pedro and Long Beach, and it is unlikely that Bogdanovich held an office at the Plant. Research did not yield other persons to be directly associated with the Plant. Therefore, the Star-Kist Plant is not eligible under NRHP/CRHR Criteria B/2 for its association with either Bogdanovich or anyone else.

### *Design/Construction: C/3*

The Plant consists of a post-World War II light industrial manufacturing facility and warehouse fronted by a Late Moderne-style office space. Both the warehouse and office space include characteristics of their types and styles. For example, not only does the Plant include a front office, but the warehouse portion contains some natural lighting. Its single-story tilt-up concrete design facilitated speedy construction, and the warehouse elicited flexible use of space. The office portion contains multiple cladding materials in the form of smooth stucco and stack-bond brick; a bezel surrounds the ribbon windows. Although the Plant contains these characteristics, it lacks integrity, quality of design, and high artistic values sufficient for NRHP or CRHR listing. Better examples of a warehouse would include original interior mezzanine levels for amenities such as lockers and lunchrooms, mezzanine walkways, and

<sup>112</sup> "Port Board Approves Permit for \$160,000 Fish Cannery," *San Pedro News-Pilot* (January 30, 1947), 1; Grobaty, np; "New Star-Kist Plant to Pack 86,000 Tuna Cans Per Hour," *San Pedro News-Pilot* (November 3, 1952), 2.

<sup>113</sup> Sahagun, "Commercial Fishing Industry Is a Waning Force in L.A. Harbor," *Los Angeles Times* (June 3, 2001), np.



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ample natural lighting through a monitor-type roof, such as a sawtooth. In addition, process engineering equipment specially designed for the Plant has been removed. The interior of the Plant lacks the distinctive characteristics of a state-of-the-art tuna canning facility designed at the height of the company's and industry's history.

Better examples of Late Moderne design would include an asymmetrical and variegated but balanced configuration, an entrance pylon rising above the roofline (originally a feature of the Plant's design, but has been overshadowed by a 1980 addition), built-in planters, and perhaps a third cladding material such as wood or rock. The Plant lacks artistic features such as an aesthetic approach to form and massing, architectural embellishments, or landscape detailing. Moreover, Late Moderne architecture's prominence concluded long before the Plant's 1980 addition. Rote repetition of shapes, forms, and materials in an in-kind 1980 addition does not elevate the Plant's design to NRHP or CRHR eligibility; instead, a Late Moderne building would represent an artistic and thoughtful approach to design, often evident in the work of a master architect.

M.A. Nishkian and Co. is noted as the Plant's engineer on the original building permit, with John K. Minasian as the architect. The engineering aspects of the Plant are commonplace (e.g., single-story, precast tilt-up concrete construction). Constructed of multiple volumes, the Plant does not appear to have required innovative engineering design, and its engineering aspects are akin to numerous other or more elaborate examples of tilt-up concrete construction in Los Angeles, albeit on a large scale. M.A. Nishkian and Co. specially designed some of the Plant's process engineering equipment for efficiency and cleanliness of production. However, all of the process engineering equipment has been removed; only one Tuna Import Dock and an altered, interior drainage system is extant. Moreover, research does not suggest that Nishkian is a master engineer. Minasian was later responsible for the engineering aspects of the Space Needle for the Seattle World's Fair in 1962. Research did not reveal that he was responsible for engineering aspects of the Plant's construction or its process engineering equipment. The Plant, although a large 200,000-square-foot facility with Late Moderne elements, is not a significant example of Minasian's engineering prowess. Therefore, the Plant is not eligible under NRHP/CRHR Criteria C/3.

### *Information Potential: D/4*

The Plant is not likely to yield important information. Typical of similar buildings, the Plant's tilt-up concrete construction does not have the potential to yield important information regarding building, construction, or engineering methods or technologies used in the early 1950s. The loss of the specially designed process engineering equipment further affects the Plant's potential to yield important information about the United States tuna canning industry or Star-Kist's production in the United States or at the Port. The history of tilt-up construction and tuna processing are well recorded in photographs and various publications. In addition, constructed on a landfill built up at the time of construction, the parcel is unlikely to yield contextual information regarding archaeological resources important in prehistory or history. As such, the Plant has neither yielded nor has the potential to yield information important in prehistory or history. Therefore, the Plant is not eligible under NRHP/CRHR Criteria D/4.

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### HCM Evaluation

#### *Events/Patterns*

As stated above, this evaluation determined that although the Plant is associated with two historic contexts and linked potentially important dates (the history of the United States canning industry from 1952 to 1969 and the history of Star-Kist tuna canning in the United States and at the Port's Fish Harbor from 1952 to 1959), the Plant is unable to convey any significance due to insufficient integrity.

Although Star-Kist and its Plant played a significant role in the fishing and canned tuna industries as detailed above, the Plant fails to evidence its significance. The 1952 Plant no longer contains features or elements that represent either the United States canned tuna industry or Star-Kist's production in the United States or the Port's Fish Harbor. Rather, the Plant could serve any light industrial purpose. Therefore, the Star-Kist Plant is not eligible under this criterion.

#### *Important Persons*

Joseph Bogdanovich assumed control of the company in 1944. Research detailed above yielded little information on Bogdanovich and his career with Star-Kist. Moreover, although Joseph presided over this major tuna canning company, he does not appear to have been significantly associated with the Plant. Therefore, the Star-Kist Plant is not eligible under this criterion.

#### *Design/Construction*

As discussed above, the Plant consists of an early post-World War II light industrial manufacturing facility and warehouse fronted by a Late Moderne-style office space. Both the warehouse and office space include characteristics of their types and styles. However, the Plant lacks quality of design and high artistic values for an HCM. Better examples of a warehouse would include original mezzanine levels for amenities such as lockers and lunchrooms, mezzanine walkways, and ample natural lighting through a monitor-type roof, such as a sawtooth. In addition, process engineering equipment specially designed for the Plant has been removed. The interior of the Plant lacks the distinctive characteristics of a state-of-the-art tuna canning facility. Better examples of Late Moderne, as discussed in the context statement, would include an asymmetrical and variegated but balanced configuration, an entrance pylon rising above the roofline (alterations have affected this original element), built-in planters, and perhaps a third cladding material such as wood or rock. The Plant lacks artistic features such as an artistic approach to form and massing, architectural embellishments, or landscape detailing. Other local examples serve better examples of Late Moderne architecture.

M.A. Nishkian and Co. is noted as the Plant's engineer on the original building permit, with John K. Minasian as the architect. The engineering aspects of the Plant are commonplace (e.g., single-story, precast tilt-up concrete construction). Constructed of multiple volumes, the Plant does not appear to have required innovative engineering design, and its engineering aspects are akin to numerous other examples of tilt-up concrete construction in Los Angeles, albeit on a large scale. M.A. Nishkian and Co. specially designed some of the Plant's process engineering equipment for efficiency and cleanliness of

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production. However, this equipment has been removed. Moreover, research does not suggest that Nishkian is a master engineer. Minasian was later responsible for the engineering aspects of the Space Needle for the Seattle World's Fair in 1962. The Plant, although a large 200,000-square-foot facility with Late Moderne elements, is not a significant example of Minasian's engineering prowess. Therefore, the Star-Kist Plant is not eligible under this criterion.

### *Information Potential*

The Plant is not likely to yield important information. Typical of similar buildings, the Plant's tilt-up concrete construction the Plant does not have the potential to yield important information regarding building, construction, or engineering methods or technologies used in the early 1950s. The loss of the specially designed process engineering equipment further affects the Plant's potential to yield important information about Star-Kist or tuna canning production in the United States or the Port's Fish Harbor. Moreover, constructed on a landfill built up at the time of construction, the parcel is unlikely to yield contextual information regarding archaeological resources important in prehistory or history. Therefore, the Star-Kist Plant is not eligible under this criterion.

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### Sketch Map:



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### Photographs:



Figure 1: Star-Kist Plant No. 4, primary (west) elevation, camera facing northeast. ICF, 2018.



Figure 2: Star-Kist Plant No. 4, primary (west) elevation showing entrance, camera facing northeast. ICF, 2018.



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Figure 3: Star-Kist Plant No. 4, primary (west) elevation, detail of third volume from the north, entrance pylon, camera facing east. ICF, 2018.



Figure 4: Star-Kist Plant No. 4, primary (west) elevation, detail of third volume from the north, detail of entrance, camera facing east. ICF, 2018.

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Figure 5: Star-Kist Plant No. 4, primary elevation, detail of third volume from the north, north wing, camera facing east. ICF, 2018.



Figure 6: Star-Kist Plant No. 4, primary (west) elevation, detail of third building from the north, south wing, camera facing east. ICF, 2018.

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Figure 7: Star-Kist Plant No. 4, primary (west) elevation, detail of northern volume, camera facing northeast. ICF, 2018.



Figure 8: Star-Kist Plant No. 4, primary (west) elevation, detail of second volume from the north, camera facing east. ICF, 2018.



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Figure 9: Star-Kist Plant No. 4, primary (west) elevation, detail of fourth volume from the north, camera facing southeast. ICF, 2018.



Figure 10: Star-Kist Plant No. 4, primary (west) elevation, detail of fifth volume from the north, camera facing northeast. ICF, 2018.

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Figure 11: Star-Kist Plant No. 4, primary elevation, detail of lunch patio and recessed warehouse/manufacturing building, sixth volume from the north, camera facing northeast. ICF, 2018.



Figure 12: Star-Kist Plant No. 4, primary (west) elevation, overview of southwest corner of Plant No. 4 (volumes 7-9), camera facing southeast. ICF, 2018.

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Figure 13: Star-Kist Plant No. 4, primary (west) elevation, detail of southwest corner of Plant No. 4, showing gated electrical area and detached volume, camera facing southeast. ICF, 2018.



Figure 14: Star-Kist Plant No. 4, north elevation, camera facing south. ICF, 2019.



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Figure 15: Star-Kist Plant No. 4, south elevation, southwest corner of Plant, showing tuna import bridge, camera facing northwest. ICF, 2018.



Figure 16: Star-Kist Plant No. 4, ancillary/related buildings/structures adjacent to south elevation, showing the only remaining tuna import bridge and dock, camera facing south. ICF, 2018.

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Figure 17: Star-Kist Plant No. 4, south elevation, southeast corner of Plant No. 4 including tanks, camera facing east. ICF, 2018.



Figure 18: Star-Kist Plant No. 4, south and rear (east) elevations, southeast corner of Plant No. 4, camera facing north. ICF, 2018.



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Figure 19: Star-Kist Plant No. 4, south elevation's ancillary/related buildings/structures, showing tuna import bridge in background, camera facing southeast. ICF, 2018.



Figure 20: Star-Kist Plant No. 4, ancillary/related buildings/structures adjacent to south elevation, showing pipes, railings, fencing, and concrete pads, camera facing southeast. ICF, 2018.

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Figure 21: Star-Kist Plant No. 4, ancillary/related buildings/structures adjacent to south elevation, southeast corner of Plant No. 4, camera facing southeast. ICF, 2018.



Figure 22: Star-Kist Plant No. 4, rear (east) elevation, southeast corner of Plant, detail showing rear of warehouse/manufacturing building (left) and ancillary building/structure (right [with purple graffiti]), camera facing northwest. ICF, 2018.

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Figure 23: Star-Kist Plant No. 4, rear (east) elevation, detail of ancillary two buildings/structures (left, with staircase; right, with roll-up door) and warehouse/manufacturing building (center), camera facing north. ICF, 2018.

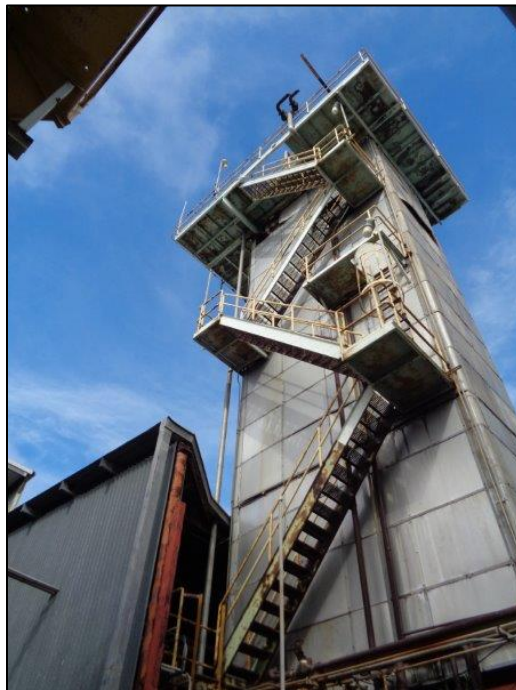


Figure 24: Star-Kist Plant No. 4, rear (east) elevation, multi-story tower at center of rear (east) elevation, camera facing north. ICF, 2018.



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Figure 25: Star-Kist Plant No. 4, interior, entrance lobby, camera facing northeast. ICF, 2018.



Figure 26: Star-Kist Plant No. 4, interior, entrance lobby shown from staircase landing, camera facing south. ICF, 2018.

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Figure 27: Star-Kist Plant No. 4, interior, warehouse/manufacturing area showing drains in floor, camera facing southeast. ICF, 2018.



Figure 28: Star-Kist Plant No. 4, interior, warehouse/manufacturing area showing drains in floor, camera facing east. ICF, 2018.

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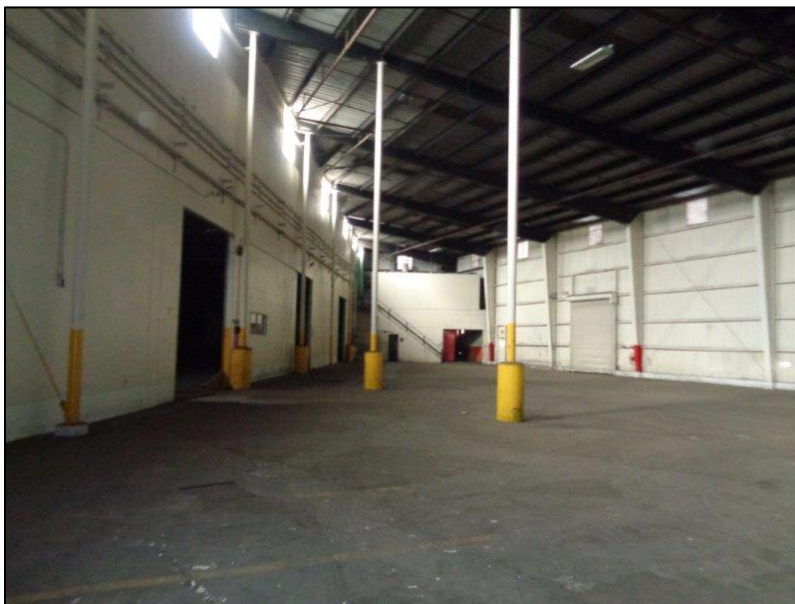


Figure 29: Star-Kist Plant No. 4, interior, warehouse/manufacturing area at north portion of Plant, camera facing west. ICF, 2018.

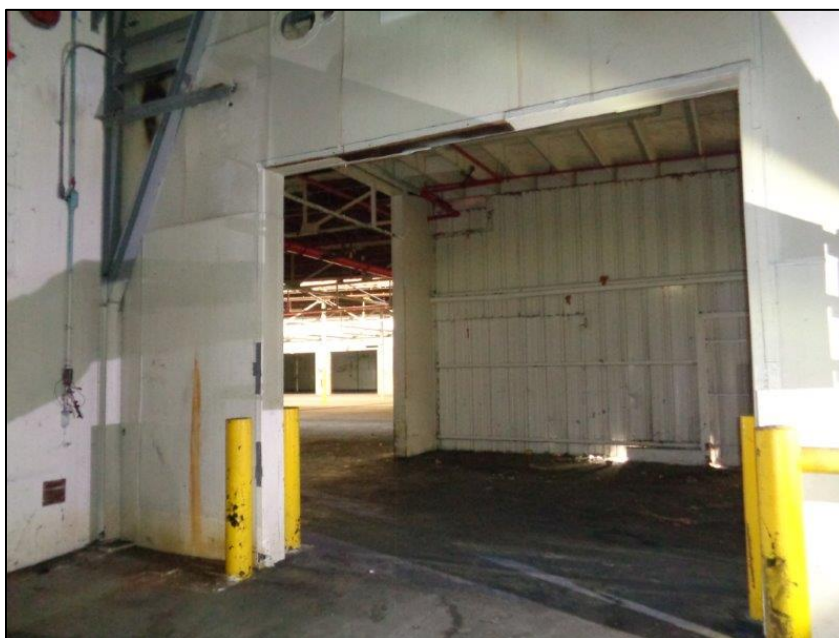


Figure 30: Star-Kist Plant No. 4, interior, warehouse/manufacturing area, camera facing east. ICF, 2018.



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Figure 31: Star-Kist Plant No. 4, interior, warehouse. ICF, 2018.



Figure 32: Construction of Star-Kist Plant No. 4.  
*Pan-Pacific Fisherman* (December 1952), 18.

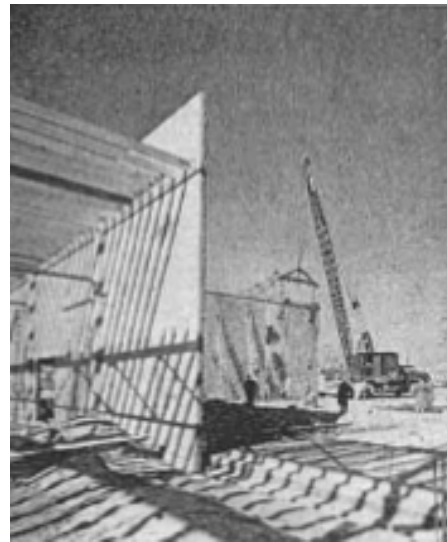


Figure 33: Construction of Star-Kist Plant No. 4.  
*Pan-Pacific Fisherman* (December 1952), 18.

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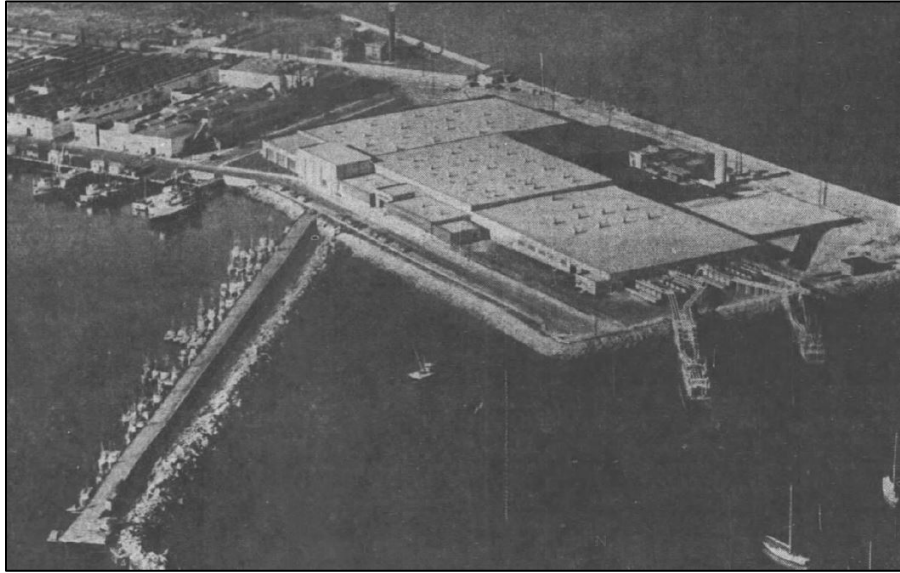


Figure 34: Birds-eye view of Star-Kist Plant No. 4 in 1952, camera facing northeast. *Los Angeles Times* (November 9, 1952), 147.



Figure 35: Entrance in 1952. *Pan-Pacific Fisherman* (December 1952), cover.



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Figure 36: Interior, butchering tables. *Pan-Pacific Fisherman* (December 1952), 18.



Figure 37: Interior, cleaning tables. *Pan-Pacific Fisherman* (December 1952), 18.



Figure 38: Birds-eye view of Star-Kist Plant No. 4 in 2018, with green overlay denoting extant portions of the 1952 building and red noting additions since 1952, camera facing northeast. Google and ICF, 2018.

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\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

### P3a. Description:

The Empty Can Warehouse is at the northeast corner of the intersection of Bass and Barracuda Streets. It faces north onto a surface parking lot/storage area accessed by a driveway from Barracuda Street. This one-story warehouse building has an approximately 100-foot by 200-foot rectangular plan and is constructed of steel and clad in corrugated metal. A shallow-pitched gabled roof with no eaves caps the building.

The north (primary) elevation faces a parking lot and outdoor storage area. A centered door opening punctuates the north elevation (Figure 1). A partially enclosed shed projects from the north elevation east of the opening. A single light fixture is above and to the west of the centered opening.

The west and east elevations are minimally elaborated, with only regularly placed vents arranged just below the roofline (Figures 1 and 2). The west elevation abuts Barracuda Street. The east elevation fronts additional surface storage space.

The south elevation contains a secondary large, centrally located loading door. Several vents punctuate the south elevation west of the door, while two light fixtures flank it.

The Empty Can Warehouse's steel frame construction is visible on the interior of the building. Asphalt covers the ground inside the warehouse. A small square office is at the northwest interior corner of the building atop a larger concrete platform. A mezzanine level with enclosed space below is at the southwest corner of the building. The office and mezzanine appear to be constructed of wood. Otherwise, the interior of the building remains an open space (Figure 3). The utilitarian design expresses common warehouse-type construction of the 1970s that relies on electrical systems rather than natural lighting.

**P5a. Photograph** (see pages 15-16 for photographs)

**P6. Date Constructed:** 1970

**P7. Owner/Address:**

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

**P8. Recorded By:**

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

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\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

**P9. Date Recorded:** November 19, 2018

**P10. Survey Type:** Intensive level survey.

**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4. Present Use:** Chassis Manufacturing/Storage

**B5. Architectural Style:** Utilitarian/Light Industrial

**B6. Construction History:**

Constructed in 1970 (LADBS Permit No. 1970SP44784); Open shed attached to north elevation at an unknown date (visual inspection); Interior mezzanine and small office at an unknown date (visual inspection—may have been an original feature of the building).

**B10. Significance**

### Historic Context Statements

In order to reevaluate Star-Kist's Empty Can Warehouse on Terminal Island, Los Angeles, the following context statements were expanded or developed: Post-World War II: The Port of Los Angeles and the Rise of Containerization (1945-1989) and Light Industrial Architecture (1945-1985).

#### The Port of Los Angeles and the Rise of Containerization (1945-1989)

POLA experienced unparalleled growth after the U.S. Navy relinquished control of the port in late 1945 following the conclusion of World War II.<sup>1</sup> The military had commissioned POLA for shipbuilding during the war.<sup>2</sup> During that time, the LAHD was unable to maintain and improve the port. After Japan surrendered in 1945, the LAHD promptly started its deferred maintenance and improvement projects.<sup>3</sup> The LAHD arranged construction of 13,360 feet of detached breakwater, an essential component to the port's success. Without breakwaters, waves and turbulent conditions would prevent the safe passage of seafaring vessels into POLA. In 1947, POLA operated 28 miles of waterfront, with approximately 70 percent

<sup>1</sup> Michael D. White, *Images of America: The Port of Los Angeles* (Charleston, SC: Arcadia Publishing, 2008), 81,

<sup>2</sup> Port of Los Angeles, *History, Wartime Efforts*, accessed: December 18, 2018, <https://www.portoflosangeles.org/about/history>.

<sup>3</sup> Charles F. Queenan, *Port of Los Angeles: From Wilderness to World Port* (Los Angeles, CA: Los Angeles Harbor Department, 1983), 93.

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used as wharves for every type of seafaring vessel, from large-scale cargo ships to fishing boats to pleasure craft.<sup>4</sup> Although 19 canneries and numerous other business operated at POLA in the late 1940s, lumber imports saw the sharpest increase in trade during the decade. From 1947 to 1948, lumber imports through POLA more than doubled in terms of board-feet of product, consistent with the postwar construction boom in Southern California and elsewhere in the United States.<sup>5</sup> A Foreign Trade Zone charter, bestowed upon POLA in 1949, supported exponential growth in the postwar era by lessening or lifting U.S. Customs duties, fees, and taxes on traded merchandise at this and other chartered locations.<sup>6</sup>

POLA continued to expand its imports and exports through infrastructure projects in the 1950s. POLA-related commerce increased by 6 percent, or approximately 3 million tons, from 1949 to 1950, which allowed Los Angeles to eclipse San Francisco port trade for the first time in history.<sup>7</sup> While LAHD rectified deferred maintenance and installed new improvements at POLA throughout the decade, it also increased the size of Terminal Island's land mass to support expansion. Star-Kist opened Plant No. 4 on a newly created section of Terminal Island at Fish Harbor in 1952.<sup>8</sup> A new passenger-cargo terminal opened in 1950 at Berth 154, with another under construction at Berths 195–199.<sup>9</sup> These passenger-cargo terminals allowed the LAHD to incorporate leisure travel services at POLA in the wake of World War II's lifted travel restrictions.<sup>10</sup> Furthermore, the Japanese Peace Pact of 1951 reopened avenues of international trade through specified provisions regarding trade and commerce.<sup>11</sup> The effect of the Japanese Peace Pact was immediate and profound. Imports and exports, recorded in tonnage, increased 163 percent between POLA and Japan from September 1951 to December 1952.<sup>12</sup> Trade with Japan continued to increase through the 1950s. Indeed, Japanese seafaring vessels exceeded all other foreign flag-flying vessels at POLA by 324 in 1956.<sup>13</sup> At the end of the 1950s, the LAHD opened two foreign offices, one in Oslo, Norway, and another in

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<sup>4</sup> Queenan, 94.

<sup>5</sup> Queenan, 94.

<sup>6</sup> "Foreign-Trade Zones in the United States," *Federal Register: The Daily Journal of the United States Government* (February 28, 2012), np, accessed: November 9, 2018, <https://www.federalregister.gov/documents/2012/02/28/2012-4249/foreign-trade-zones-in-the-united-states>; White, 81.

<sup>7</sup> Queenan, 96.

<sup>8</sup> Sanborn Fire Insurance Company, *Los Angeles*, Volume 19 (1912), Sheet 1921; Sanborn Fire Insurance Company, *Los Angeles*, Volume 19 (1950), Sheet 1921; Sanborn Fire Insurance Company, *Los Angeles*, Volume 19 (1950), Sheet 1938.

<sup>9</sup> Queenan, 96.

<sup>10</sup> Queenan, 96.

<sup>11</sup> *United States Senate, Committee on Foreign Relations, Japanese Peace Treaty and Other Treaties Relating to Security in the Pacific* (Washington DC: United States Government Printing Office, 1952), np, Accessed: November 9, 2018, <https://www.cia.gov/library/readingroom/docs/CIA-RDP58-00453R000100300001-1.pdf>.

<sup>12</sup> Queenan, 97.

<sup>13</sup> White, 81; Queenan, 97.

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\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

Tokyo, Japan, to support overseas clients. POLA quickly gained recognition as a global port during the 1950s. American wares exported from POLA were sold in 114 (out of 122) countries by the close of the decade.<sup>14</sup>

Malcom McLean developed the concept of containerized shipping in the late 1950s, which affected port development worldwide beginning in the 1960s.<sup>15</sup> Containerization, or intermodalization, transports standardized containers through multiple facets—ship, train, truck—from its originating location to its final location without the need to unload the items inside the container. Before the advent of containerization, cargo loading was labor intensive. A crew of longshoremen loaded individual pieces of cargo (as drums, boxes, bags, crates, or raw materials) onto ships after a repetitive process of unloading from a truck or train and reloading onto the ship at the wharf, then stowing the goods in ships' holds, all by cranes or by hand. Occasionally, nets or pallets were used to move a group of packages, but even then, the process was lengthy.<sup>16</sup> McLean realized that shipping by container could cut down on time and therefore cost. Modified trucking trailers were used as containers.<sup>17</sup> The use of containers, however, did not become the standard form of shipping overnight because the design of ships and infrastructure of the ports supported existing shipping methods. With containerization, ships required a flatbed on which to stack containers, while ports required gantry cranes to move containers on and off carrier ships. In addition, ports needed open space on which to stack containers as well as trucking and train hubs to move containers in and out of the port's boundaries. As such, ships required retrofits or entirely new construction, and ports required extensive new infrastructure to move and accommodate containers—both at the exporting and importing ports of a shipment.<sup>18</sup> Shippers, ship builders, ports, railroads, and trucking companies reached an agreement on the global standardization of container sizes approximately two decades after the advent of containerization. The standard measurement for containers today is the twenty-foot-equivalent unit (TEU) (the container is typically 20 feet long).<sup>19</sup>

The advent of containerization dominated POLA's development beginning in the 1960s. A Los Angeles City Charter amendment, a development plan, and bond measures enacted in the late 1950s and early 1960s facilitated POLA's transition from old cargo methods to containerization by allowing for new container-related improvements.<sup>20</sup> Both new and improved berths, such as the Los Angeles Container Terminal

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<sup>14</sup> White, 81; Queenan, 100.

<sup>15</sup> Edna Bonacich and Jake B. Wilson, *Getting the Goods: Ports, Labor, and the Logistic Revolution* (Ithaca, NY, and London: Cornell University Press, 2008), 51.

<sup>16</sup> Bonacich and Wilson, 50; White, 30, 32, 41, 55–56, 62, 65, and 68.

<sup>17</sup> Bill Sharpsteen, *The Docks* (Berkeley, Los Angeles, and London: University of California Press, 2011), 36; Bonacich and Wilson, 51.

<sup>18</sup> Bonacich and Wilson, 51.

<sup>19</sup> Bonacich and Wilson, 51–52.

<sup>20</sup> Queenan, 101–105; “Good Gains for Los Angeles Harbor: Shipping Facilities Expanded,” *Independent* (January 5 1960), 42.

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(LACT) in the West Basin, which included a 40-ton crane to load or unload 80 containers per hour, dramatically changed the POLA landscape.<sup>21</sup> In 1960, POLA imported and exported 7,000 containers, while in 1968, POLA imported and exported 70,000 containers, evidencing the rapid transition to containerization worldwide.<sup>22</sup> Gantry cranes; new terminal construction, such as the LACT; and other changes to POLA's design and infrastructure facilitated the ten-fold increase in containers traveling through POLA between 1960 and 1968.

In addition to container-related improvements, the LAHD expanded other port services. In 1963, the LAHD established a new passenger-cargo terminal at Berths 90–93, the Vincent Thomas Bridge opened, and Ports O' Call Village was developed, a 24-acre commercial tourist complex.<sup>23</sup> The LAHD constructed the passenger-cargo terminal at Berths 90–93, which was designed by Kistner, Wright, & Wright (architects and engineers), Edward S. Fickett (architect), and S.B. Barnes & Associates (structural engineers) for the American President Lines.<sup>24</sup> The Vincent Thomas Bridge allowed direct automobile access to Terminal Island; previously, the *Islander*, or the Terminal Island ferryboat, transported passengers between San Pedro and Terminal Island (its last voyage was the day before the bridge opened).<sup>25</sup> The LAHD redeveloped wharves that had previously been used by the fishing industry for construction of the New England/Polynesian-themed Ports O' Call.<sup>26</sup>

The LAHD sought to expand POLA's containerization capabilities in the 1970s. As containerization became increasingly widespread, the LAHD realized that the 35-foot depth of the harbor was not enough for the new containerized vessels; the design of container carriers necessitated deeper waters to accommodate their size.<sup>27</sup> Progress to deepen the port's waterways to a 45-foot depth through dredging continued throughout the decade, until final approval by the Coastal Commission in 1980.<sup>28</sup> Yet, the port's facilities underwent numerous other improvements to support container shipping. The LAHD increasingly cultivated relationships with Pacific Rim countries and welcomed Evergreen, a Taiwan-based shipping company, to a new 20-acre container terminal at Berths 233–235 in the mid-1970s.<sup>29</sup> In addition to the

<sup>21</sup> Queenan, 109.

<sup>22</sup> Queenan, 105, 109.

<sup>23</sup> Queenan, 106–111; "Terminal Island Toll Bridge to Be Built," *Redlands Daily Facts* (January 4, 1960), 1; Lou Jobst, "Target Date 1968 for New Harbor Span," *Long Beach Independent* (May 18, 1965), 9; "Good Gains for Los Angeles Harbor: Shipping Facilities Expanded," *Independent* (January 5 1960), 42.

<sup>24</sup> "\$4.3 Million Port Job: Terminal Contract Goes to L.A. Firm," *Long Beach Independent* (February 8, 1961), 11.

<sup>25</sup> Sam Gnerre, "The Vincent Thomas Bridge," *The Daily Breeze* (October 21, 2009), np, accessed: December 19, 2018, <http://blogs.dailybreeze.com/history/2009/10/21/the-vincent-thomas-bridge/>.

<sup>26</sup> D.J. Waldie, "San Pedro's Ports O' Call: The Theme Ends, Then What?," KCET (May 16, 2014), np, accessed: December 19, 2018. <https://www.kcet.org/socal-focus/san-pedros-ports-ocall-the-theme-ends-then-what>.

<sup>27</sup> Queenan, 113.

<sup>28</sup> Queenan, 113-119.

<sup>29</sup> Queenan, 114–115; Bonacich and Wilson, 59–60.

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aforementioned 20-acre container site, the LAHD facilitated construction of a 50-acre container terminal for Matson on Terminal Island; a 20-acre automobile import and export facility, including a temporary storage area for vehicles and a processing/administrative center, in the West Basin; expansion of the LACT in the West Basin; and expansion of Terminal Island to support future and ongoing containerization-related terminals and infrastructure at POLA.<sup>30</sup> Wares imported and exported through POLA generated approximately \$500 million for Southern California during the early 1970s.<sup>31</sup> During POLA's 1976–1977 fiscal year, the port had a net income of \$14.1 million, while the following fiscal year, it nearly doubled to \$25.7 million and became the “leading port in the United States in net income.”<sup>32</sup>

Large-scale infrastructure projects dominated POLA during the 1980s. Launched on March 16, 1981, dredging operations at POLA took 30 months to complete, giving the harbor a depth of 45 feet. Once completed, the port accepted all container ships, including the approximately 35 percent that had previously been unable to navigate the harbor because of its shallowness.<sup>33</sup> Dredging supported Terminal Island infill; 14 million cubic yards of material removed from the harbor floor created 190 acres of useable land on Terminal Island.<sup>34</sup> Promptly, the LAHD constructed a large loading terminal for coal on those 190 newly created acres (an effort to entice Pacific Rim shippers that relied on coal as a result of oil shortages abroad). To expedite the movement of containers in and out of POLA, the LAHD also facilitated construction of a 114-acre Intermodal Container Transfer Facility—where railroad, trucking, and shipping meet—2.5 miles north of POLA.<sup>35</sup> Through dredging and infrastructure projects in the mid-1980s, the combined ports of Los Angeles and Long Beach became the leading port hub in the United States in 1986, importing and exporting 14 percent more TEUs than the New York and New Jersey port hub.<sup>36</sup>

### Light Industrial Architecture (1945-1985)

The “light industrial” property type is a version of industrial architecture that focuses on the production process for smaller-scale items, which are often consumer and business oriented, or “manufacturing activity that uses moderate amounts of partially processed materials to produce items of relatively high value per unit weight.”<sup>37</sup> The term “light industrial” gained popularity during the postwar era as city

<sup>30</sup> Queenan, 113-115; Jack Baldwin, “Matson Dedicates Container Terminal on Terminal Island,” *Independent Press-Telegram* (March 13, 1971), 50.

<sup>31</sup> Queenan, 114.

<sup>32</sup> Queenan, 118.

<sup>33</sup> Queenan, 123.

<sup>34</sup> Queenan, 123.

<sup>35</sup> Queenan, 121-122, 126.

<sup>36</sup> Bonacich and Wilson, 58,

<sup>37</sup> Ajay Kumar Ghosh, *Dictionary of Geology* (New Delhi: Isha Books. 2005), 170.

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planners increasingly zoned for this property type. Postwar light industrial architecture throughout the United States shares a consistent set of design features.

Light industrial architecture in the postwar era required speed during construction and flexibility within the space. An efficient industrial design included an enclosure that was free from obstructions, adequate daylight, low maintenance, provisions for heavy machinery, flexibility of use, ease of future expansion, and specialized production.<sup>38</sup> The design for light industrial architecture in the United States needed to facilitate production in the quickest and most direct manner possible. As such, many light industrial complexes of the postwar era contained a single story with a large, rectangular plan. To speed production, many of the processes occurred under one roof; this concept was developed from the earlier “consolidated works.”<sup>39</sup> The single-story spatial arrangement is optimal for production because production could take place in a linear fashion, as evidenced in the Plant’s plan. A rectangular plan, with vast and open square bays, offered the most flexibility for potential alterations related to changing machines, layouts, and even building uses over time. To keep the floor space open, locker rooms, restrooms, and other secondary amenities were often located on a mezzanine level. <sup>40</sup> The mezzanine is a common feature of industrial and light industrial architecture because it provides amenities and allows for viewing by supervisory staff and visitors. Star-Kist Plant No. 4’s design sets these amenities along its west side and did not make use of mezzanine levels.

After World War II, a new corporate emphasis on teamwork and organizational psychology led to amenities such as cafeterias, athletic facilities, and lounges for workers as well as a trend away from the earlier separation of administrative offices from factory production spaces. As Rappaport explains, “head offices” increasingly “became a part of the main building structure so that the entire factory was under one roof for easy communication between research teams and production-line workers.”<sup>41</sup> Star-Kist only expanded its office space circa 1980, but never consolidated its administrative personnel at the Fish Harbor location. Although large portions of such facilities were formed of utilitarian buildings or wings, office elements often incorporated Late Moderne or vernacular Modern architectural design features.

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<sup>38</sup> James F. Munce, *Industrial Architecture: An Analysis of International Building Practice* (New York, NY: F.W. Dodge Corporation, 1960), 88.

<sup>39</sup> Betsy Hunter Bradley, *The Works: The Industrial Architecture of the United States* (New York, NY: Oxford University Press, 1999), 74–76.

<sup>40</sup> Munce, 88; Bradley, 74–76; 192.

<sup>41</sup> Louise A. Mazingo, *Pastoral Capitalism: A History of Suburban Corporate Landscapes* (Cambridge, MA: MIT Press, 2011), 31, 38–41; Nina Rappaport, “Factory,” *Encyclopedia of Twentieth-Century Architecture*, Volume 1, A-F, R. Stephen Sennott (ed.) (New York, NY: Fitzroy Dearborn, 2004), 434.



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Typically, in postwar light industrial construction, the main entrance is often articulated and emphasized in a manner that the factory portion itself is not, as expressed in the design of the Plant. Such emphasis at the main entrance, along with similarly articulated reception and office areas, was designed to impress potential clients and visitors.

Lighting and ventilation mechanisms varied, with prewar and early postwar buildings relying on passive systems; later postwar manufacturing plants or warehouses incorporated electric systems. Many light industrial buildings have rhythmically spaced, periodic window bays. In many of the smaller-scale postwar variants, these windows were commonly multi-light metal-frame units with an operable awning or hopper window set within it to allow for ventilation. Often such natural lighting at exterior walls alone would not be enough to disperse across the span of a large floor so top lighting would be used. In instances where top lighting is natural, industrial buildings would commonly incorporate a “sawtooth” roof. The long, repeating angled banks of windows contain north-facing glazing so as to allow light into the space but not the penetrating sun that would occur with south-facing glazing. Sawtooth roofs are typically supported by columns at their valleys but may also be supported by any variety of truss systems that alleviate the need for columns.<sup>42</sup> After 1952, only 15 percent of American factories and manufacturing buildings of any type had natural top lighting, and artificial lighting became increasingly desirable.<sup>43</sup> For example, later postwar examples generally feature the elements of early design, but continue to rely heavily on the use of electrical systems over passive ones. Warehouses constructed in the 1970s and 1980s feature little to no fenestration. Instead, electric lights and heating, ventilating, and air conditioning systems provide light and ventilation. The idea of “process engineering” also played a role in the construction, design, and uses of light industrial architecture. Within its vast spaces, a flow of materials, employees, and order of production called “process engineering” were among the pre-planned elements of an industrial building, and mid-century factory design dictated that machines, rather than human handling, should be used whenever possible to transform raw materials into a finished product. Star-Kist and its hired designers followed this common trend. In early factories and light industrial buildings, the conveyor would connect various aspects of production in the most efficient manner possible. Rollers, forklifts, and, for larger-scale buildings, gantries and other cranes were also used to transport materials efficiently.<sup>44</sup> Efficient movement of materials was also important to the selection of the building’s location. The earliest industrial architecture was near waterways, and with the advent of the locomotive, the property type would be constructed near railways and then, later, vehicular roads. To expedite the industrial process, fishermen delivered tuna at the Plant’s south docks. The production process progressed through the building, northward, until canned tuna was loaded onto

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<sup>42</sup> Bradley, 192.

<sup>43</sup> Kenneth Reid, *Industrial Buildings: The Architectural Record of a Decade* (New York, NY: F.W. Dodge Corporation, 1951), 28–29; Munce, 50.

<sup>44</sup> Munce, 55.

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trucks at the building's northernmost end. Dependent on the sea, the Star-Kist Plant at Fish Harbor was vital, but roadways to the property also provided for the distribution of goods. Although railroad spur lines previously accessed Fish Harbor buildings, including the former French Sardine facility, one does not appear to have been aligned for the purposes of Star-Kist production or distribution. In the postwar era, trucking became a major component of industry.

It is rare for a light industrial building as a property type to be NRHP/CRHR eligible under Criteria C/3, distinct from its architectural style, such as Moderne variants or the International Style, among others. For such a property to be eligible as a light industrial property type, the building would need to have a high degree of historic integrity, which is rare in industrial structures, which were frequently upgraded to accept the latest technological innovation. Necessary features may include a combination of intact factory and amenity areas, architectural details, and landscaping, in addition to intact interior spaces and a majority of original, intact process engineering components. A light industrial building may also be historically significant under NRHP or CRHR Criteria C/3 if its design is directly associated with a historically significant construction or process engineering development.

### Evaluation

The Empty Can Warehouse was previously evaluated as ineligible for the NRHP, the CRHR, and as an HCM under all criteria in 2008.<sup>45</sup> The current evaluation confirms that finding.

### NRHP/CRHR Evaluation

#### *Events/Patterns: A/1*

Constructed in 1970, this building served as an empty can warehouse for Star-Kist.<sup>46</sup> No additional information was discovered regarding this building. As a can warehouse, the building served a role in Star-Kist's product development, but the details regarding that process remain unclear. Research did not identify if the warehouse stored cans used for tuna canning, pet food canning, or both. The utilitarian building does not evidence a connection to can storage, Star-Kist, or the canning industry at Fish Harbor or in the United States. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria A/1.

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<sup>45</sup> Jones and Stokes, *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, Prepared for the Los Angeles Harbor Department (January 2008), 40 and Appendix A, "Green Warehouse" DPR.

<sup>46</sup> LADBS Building Permit Nos. 1970SP44784 and 1975SP53460.

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### *Important Persons: B/2*

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the Empty Can Warehouse. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he did not hold an office at this warehouse. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria B/2.

### *Design/Construction: C/3*

The Empty Can Warehouse is a simply constructed, low-pitch gabled warehouse with metal cladding set over a metal frame. Indicative of warehouse construction in the 1970s, the warehouse relied on electrical rather than natural lighting and ventilation systems. A simply constructed warehouse of this scale and design is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist commissioned Frank Politeo (architect), Henry Thompson (engineer), and Bailey Construction Company (contractor) to complete the warehouse.<sup>47</sup> Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Thompson. Bailey Construction Co. used steel produced by the Pascoe Steel Corp. in numerous buildings including Star-Kist facilities on Terminal Island in the 1970s and the Anaheim Hills Fire Station.<sup>48</sup> The warehouse is not the work of a master. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria C/3.

### *Information Potential: D/4*

The warehouse has not and is not likely to yield important information about construction or engineering methods, technologies, or materials. It is a simply designed and constructed warehouse. In addition, the building is unable to provide important information about empty can storage or Star-Kist operations without its cans and/or associated equipment. Therefore, the Empty Can Warehouse is not eligible under NRHP/CRHR Criteria D/4.

<sup>47</sup> LADBS Building Permit No. 1970SP44784.

<sup>48</sup> "Contractor in Top Ten," *Los Angeles Times* (May 4, 1975), 109.

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### HCM Evaluation

#### *Events/Patterns*

Constructed in 1970, this building served as an empty can warehouse for Star-Kist.<sup>49</sup> While the warehouse supported Star-Kist production, it is neither associated with important events nor exemplifies the significant contributions of Star-Kist or the canning industry in the United States or at the Port's Fish Harbor. Therefore, the Empty Can Warehouse is not eligible under this criterion.

#### *Important Persons*

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the Empty Can Warehouse. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover, he did not hold an office at this warehouse. Therefore, the Empty Can Warehouse is not eligible under this criterion.

#### *Design/Construction*

The Empty Can Warehouse is a simply constructed, low-pitch gabled warehouse with metal cladding set over a metal frame. Indicative of warehouse construction in the 1970s, the warehouse relied on electrical rather than natural lighting and ventilation systems. A simply constructed warehouse of this scale and design is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist commissioned Frank Politeo (architect), Henry Thompson (engineer), and Bailey Construction Company (contractor) to complete the warehouse.<sup>50</sup> Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Thompson. Bailey Construction Co. used steel produced by the Pascoe Steel Corp. in numerous buildings including Star-Kist facilities on Terminal Island in the 1970s and the Anaheim Hills Fire Station.<sup>51</sup> Research revealed that Politeo, Thompson, and persons working for the Bailey Construction Co. are not masters whose genius influenced their age. Therefore, the Empty Can Warehouse is not eligible under this criterion.

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<sup>49</sup> LADBS Building Permit Nos. 1970SP44784, 1975SP53460.

<sup>50</sup> LADBS Building Permit No. 1970SP44784.

<sup>51</sup> "Contractor in Top Ten," *Los Angeles Times* (May 4, 1975), 109.

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### *Information Potential*

The warehouse has not and is not likely to yield important information about prehistory or history of Star-Kist, the canning industry, or Fish Harbor. As it was constructed on reclaimed land, any prehistoric artifacts would be out of context. Simply constructed, the warehouse is unable to provide important information about empty can storage or Star-Kist operations without its cans and/or associated equipment. Therefore, the Empty Can Warehouse is not eligible under this criterion.

### Integrity

The Empty Can Warehouse retains a high level of integrity. It has not been moved from its original 1970 location. The setting surrounding the warehouse, however, has changed since its construction. In 1970, the Port had yet to develop Terminal Island into a major containerization shipping hub. Indeed, the reclaimed landmass east of the warehouse did not exist in 1970. In addition, Fish Harbor's setting is no longer a vibrant fishing and canning community. Vacant lots now dominate the landscape. Its design, materials, and workmanship remain intact because Star-Kist and its current tenant have not made alterations to it since it was constructed. The warehouse features metal cladding set over a metal frame, and has only two points of entry/egress: it is a common design for its era. However, it does not have a direct link to Star-Kist for the canning industry. Rather, it could be a warehouse for any purpose.

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**B14. Evaluator & Date of Evaluation:** Margaret Roderick, August 24, 2021

### Sketch Map:



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### Photographs:



Photograph 1: North and west elevations, camera facing south. ICF, 2018.



Photograph 2: west elevation, camera facing southwest. ICF, 2018.



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Photograph 3: Interior, camera facing south. ICF, 2018.

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### P3a. Description:

The East Plant contains three buildings built between 1971 and 1977: Can Manufacturing Plant, Warehouse, and Cold Storage. The Can Manufacturing Plant is in the northern portion of the East Plant, the Warehouse in the center, and Cold Storage to the south. These three functional components correspond to aspects of the Star-Kist operations in specific areas of the East Plant. The East Plant is approximately the same size as the Plant to the west. The East Plant lot is bound by Bass Street to the north, Earle Street to the east (formerly harbor bay), Marina Street to the south (formerly harbor bay), and Barracuda Street to the east. A concrete loading and storage area are at the southernmost portion of the East Plant site. The buildings are primarily constructed of metal. Front gabled roofs cap the Can Manufacturing Plant and Warehouse portions, while side-gabled roofs cap the three Cold Storage units.

The East Plant's north elevation's metal warehouse (corresponding to the Can Manufacturing Plant portion of the East Plant) addresses Bass Street (Figure 1). A loading dock with loading doors and a metal canopy occupies the western half of the primary elevation. A rectangular storage or office building original to the 1972 construction of the Can Manufacturing Plant occupies a portion of the east half of elevation, adjacent the loading dock. It projects from the north elevation's overall plane and contains a pedestrian door and a loading door to the east, and six irregularly placed windows to the west. Another loading door is along the primary elevation, east of the rectangular storage or office.

The west elevation features the East Plant's three functional components: the Can Manufacturing Plant to the north, the Warehouse in the center, and a Cold Storage to the south as mentioned above (Figures 2 and 3). The Can Manufacturing Plant portion of the west elevation consists of a full-length (approximately 300-foot) raised concrete loading dock with a canopy, and at least two loading doors. Regularly spaced vents punctuate the wall just below the roofline and above the canopy. Clad in corrugated metal with a concrete block watertable, the Warehouse at the center of the west elevation contains multiple loading doors. A small porch, a pedestrian entrance, and four raised loading doors arranged at irregular intervals characterize the northern section. Regularly spaced vents below the roofline punctuate the Warehouse along its length. The southern section of the west elevation, corresponding to the Cold Storage portion of the East Plant, features 13 regularly spaced at-grade loading doors.

The south elevation is clad in corrugated white metal and features approximately four large door openings (Figures 4 and 5). Tanks, metal pipes, metal railings, concrete pads, concrete paving, small buildings, metal cabinets, and catwalks sit in front of the south elevation near the south loading area of the property. Corrugated metal siding and concrete block clad the single-story south elevation. Cold Storage areas are to the west, accessed by large metal swinging doors (Figure 6), while a metal roll-up door accesses storage to the east. Two small rectangular volumes with tanks and catwalks form the

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elevation. The two small volumes appear to contain support facilities, such as restrooms, offices, or storage space. The western projection contains two solid-core pedestrian doors separated by a window. The eastern projection also features fenestration: two four-light windows flank a double door.

The east elevation originally overlooked water but now abuts Earle Street. In the mid- to late-1970s, Los Angeles Harbor Department filled this location to expand Terminal Island. Similar to the west elevation, the east elevation denotes the East Plant's three functional components: The Can Manufacturing Plant to the north, the Warehouse in the center, and a Cold Storage Room to the south. The Can Manufacturing Plant portion consists of a pedestrian door to the north and a loading door surmounted by a canopy to the south. The elevation also has irregularly placed vents of varying sizes. Some vents are louvered while others are covered. The center (Warehouse) portion of the elevation rises approximately 6 feet higher than the north and south portions that flank it. The elevation features two loading doors, one each within the north and south portions. Seven regularly placed louvered vents punctuate the elevation approximately 6 feet below the roofline. Several pipes and light fixtures are also attached to this portion of the east elevation. Finally, a solid metal wall forms the southern, Cold Storage portion of the east elevation.

Cement and blacktop parking and loading areas are arranged along the north, south, and west elevations. The southernmost portion of the grounds serves as outdoor storage for metal pipes, wood beams, and other equipment, and includes a stand-alone raised loading ramp and a collection

**P5a. Photographs** (see pages 16-18 for photos)

**P6. Date Constructed:** 1971-1972; 1974-1977

**P7. Owner/Address:**

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

**P8. Recorded By:**

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

**P9. Date Recorded:** November 19, 2018

**P10. Survey Type:** Intensive level survey

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**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4: Present Use:** Vacant. The northern portion, also known as the Can Manufacturing Plant, is proposed for demolition.

**B5. Architectural Style:** Utilitarian, warehouse; Light Industrial property type

**B6. Construction History:**

The East Plant was constructed between 1971 and 1975 as follows:

Cold Storage building at southwest portion of the parcel and adjacent parking lot constructed in 1971 (1970SP45496); Can Manufacturing Plant (Impress Building) constructed at northern portion of parcel in 1972 (1972SP48532); Warehouse (Distribution) Building, including conveyer sky-bridge across Barracuda Street to Star-Kist Plant No. 4, within the center portion of the parcel constructed in 1974 (1974SP51065); Second cold storage building and compressor room, east of the 1971 cold storage room, constructed in 1974 (1974SP52284 & 1974SP52285); addition of mezzanine office above the interior condenser room of the manufacturing building constructed in 1975 (1975SP53942); third cold storage building to southern portion of the lot adjacent to former two cold storage rooms constructed in 1975 or 1977 (1975SP53998 and 1977SP57785); office and restroom built at southern portion of lot in 1975 (1975SP53999); construction of a shed roof between the warehouse (distribution) building and first cold storage room in 1976 (1976SP54938); interior alterations in 1977 through 1982 (1977SP56676, 1977SP57609, 1978SP58198, 1979SP61198, 1979SP62656, 1981SP65431, 1982SP67513); and canopy additions to east elevation (at Can Manufacturing) in 1978 and 1985 (1978SP60231 & 1985SP01503).

**B10. Significance**

**Historic Context Statements**

In order to reevaluate Star-Kist's East plant on Terminal Island, Los Angeles, the following context statements were expanded or developed: Post-World War II: The Port of Los Angeles and the Rise of Containerization (1945-1989) and Light Industrial Architecture (1945-1985).

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### *The Port of Los Angeles and the Rise of Containerization (1945-1989)*

POLA experienced unparalleled growth after the U.S. Navy relinquished control of the port in late 1945 following the conclusion of World War II.<sup>1</sup> The military had commissioned POLA for shipbuilding during the war.<sup>2</sup> During that time, the LAHD was unable to maintain and improve the port. After Japan surrendered in 1945, the LAHD promptly started its deferred maintenance and improvement projects.<sup>3</sup> The LAHD arranged construction of 13,360 feet of detached breakwater, an essential component to the port's success. Without breakwaters, waves and turbulent conditions would prevent the safe passage of seafaring vessels into POLA. In 1947, POLA operated 28 miles of waterfront, with approximately 70 percent used as wharves for every type of seafaring vessel, from large-scale cargo ships to fishing boats to pleasure craft.<sup>4</sup> Although 19 canneries and numerous other business operated at POLA in the late 1940s, lumber imports saw the sharpest increase in trade during the decade. From 1947 to 1948, lumber imports through POLA more than doubled in terms of board-feet of product, consistent with the postwar construction boom in Southern California and elsewhere in the United States.<sup>5</sup> A Foreign Trade Zone charter, bestowed upon POLA in 1949, supported exponential growth in the postwar era by lessening or lifting U.S. Customs duties, fees, and taxes on traded merchandise at this and other chartered locations.<sup>6</sup>

POLA continued to expand its imports and exports through infrastructure projects in the 1950s. POLA-related commerce increased by 6 percent, or approximately 3 million tons, from 1949 to 1950, which allowed Los Angeles to eclipse San Francisco port trade for the first time in history.<sup>7</sup> While LAHD rectified deferred maintenance and installed new improvements at POLA throughout the decade, it also increased the size of Terminal Island's land mass to support expansion. Star-Kist opened Plant No. 4 on a newly created section of Terminal Island at Fish Harbor in 1952.<sup>8</sup> A new passenger-cargo terminal opened in 1950

<sup>1</sup> Michael D. White, *Images of America: The Port of Los Angeles* (Charleston, SC: Arcadia Publishing, 2008), 81,

<sup>2</sup> Port of Los Angeles, *History, Wartime Efforts*, accessed: December 18, 2018, <https://www.portoflosangeles.org/about/history>.

<sup>3</sup> Charles F. Queenan, *Port of Los Angeles: From Wilderness to World Port* (Los Angeles, CA: Los Angeles Harbor Department, 1983), 93.

<sup>4</sup> Queenan, 94.

<sup>5</sup> Queenan, 94.

<sup>6</sup> "Foreign-Trade Zones in the United States," *Federal Register: The Daily Journal of the United States Government* (February 28, 2012), np, accessed: November 9, 2018, <https://www.federalregister.gov/documents/2012/02/28/2012-4249/foreign-trade-zones-in-the-united-states>.; White, 81.

<sup>7</sup> Queenan, 96.

<sup>8</sup> Sanborn Fire Insurance Company, *Los Angeles*, Volume 19 (1912), Sheet 1921; Sanborn Fire Insurance Company, *Los Angeles*, Volume 19 (1950), Sheet 1921; Sanborn Fire Insurance Company, *Los Angeles*, Volume 19 (1950), Sheet 1938.

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at Berth 154, with another under construction at Berths 195–199.<sup>9</sup> These passenger-cargo terminals allowed the LAHD to incorporate leisure travel services at POLA in the wake of World War II's lifted travel restrictions.<sup>10</sup> Furthermore, the Japanese Peace Pact of 1951 reopened avenues of international trade through specified provisions regarding trade and commerce.<sup>11</sup> The effect of the Japanese Peace Pact was immediate and profound. Imports and exports, recorded in tonnage, increased 163 percent between POLA and Japan from September 1951 to December 1952.<sup>12</sup> Trade with Japan continued to increase through the 1950s. Indeed, Japanese seafaring vessels exceeded all other foreign flag-flying vessels at POLA by 324 in 1956.<sup>13</sup> At the end of the 1950s, the LAHD opened two foreign offices, one in Oslo, Norway, and another in Tokyo, Japan, to support overseas clients. POLA quickly gained recognition as a global port during the 1950s. American wares exported from POLA were sold in 114 (out of 122) countries by the close of the decade.<sup>14</sup>

Malcom McLean developed the concept of containerized shipping in the late 1950s, which affected port development worldwide beginning in the 1960s.<sup>15</sup> Containerization, or intermodalization, transports standardized containers through multiple facets—ship, train, truck—from its originating location to its final location without the need to unload the items inside the container. Before the advent of containerization, cargo loading was labor intensive. A crew of longshoremen loaded individual pieces of cargo (as drums, boxes, bags, crates, or raw materials) onto ships after a repetitive process of unloading from a truck or train and reloading onto the ship at the wharf, then stowing the goods in ships' holds, all by cranes or by hand. Occasionally, nets or pallets were used to move a group of packages, but even then, the process was lengthy.<sup>16</sup> McLean realized that shipping by container could cut down on time and therefore cost. Modified trucking trailers were used as containers.<sup>17</sup> The use of containers, however, did not become the standard form of shipping overnight because the design of ships and infrastructure of the ports supported existing shipping methods. With containerization, ships required a flatbed on which to stack containers, while ports required gantry cranes to move containers on and off carrier ships. In addition, ports needed open space on which to stack containers as well as trucking and train hubs to move containers in and out of the port's

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<sup>9</sup> Queenan, 96.

<sup>10</sup> Queenan, 96.

<sup>11</sup> *United States Senate, Committee on Foreign Relations, Japanese Peace Treaty and Other Treaties Relating to Security in the Pacific* (Washington DC: United States Government Printing Office, 1952), np, Accessed: November 9, 2018,. <https://www.cia.gov/library/readingroom/docs/CIA-RDP58-00453R000100300001-1.pdf>.

<sup>12</sup> Queenan, 97.

<sup>13</sup> White, 81; Queenan, 97.

<sup>14</sup> White, 81; Queenan, 100.

<sup>15</sup> Edna Bonacich and Jake B. Wilson, *Getting the Goods: Ports, Labor, and the Logistic Revolution* (Ithaca, NY, and London: Cornell University Press, 2008), 51.

<sup>16</sup> Bonacich and Wilson, 50; White, 30, 32, 41, 55–56, 62, 65, and 68.

<sup>17</sup> Bill Sharpsteen, *The Docks* (Berkeley, Los Angeles, and London: University of California Press, 2011), 36; Bonacich and Wilson, 51.

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boundaries. As such, ships required retrofits or entirely new construction, and ports required extensive new infrastructure to move and accommodate containers—both at the exporting and importing ports of a shipment.<sup>18</sup> Shippers, ship builders, ports, railroads, and trucking companies reached an agreement on the global standardization of container sizes approximately two decades after the advent of containerization. The standard measurement for containers today is the twenty-foot-equivalent unit (TEU) (the container is typically 20 feet long).<sup>19</sup>

The advent of containerization dominated POLA's development beginning in the 1960s. A Los Angeles City Charter amendment, a development plan, and bond measures enacted in the late 1950s and early 1960s facilitated POLA's transition from old cargo methods to containerization by allowing for new container-related improvements.<sup>20</sup> Both new and improved berths, such as the Los Angeles Container Terminal (LACT) in the West Basin, which included a 40-ton crane to load or unload 80 containers per hour, dramatically changed the POLA landscape.<sup>21</sup> In 1960, POLA imported and exported 7,000 containers, while in 1968, POLA imported and exported 70,000 containers, evidencing the rapid transition to containerization worldwide.<sup>22</sup> Gantry cranes; new terminal construction, such as the LACT; and other changes to POLA's design and infrastructure facilitated the ten-fold increase in containers traveling through POLA between 1960 and 1968.

In addition to container-related improvements, the LAHD expanded other port services. In 1963, the LAHD established a new passenger-cargo terminal at Berths 90–93, the Vincent Thomas Bridge opened, and Ports O' Call Village was developed, a 24-acre commercial tourist complex.<sup>23</sup> The LAHD constructed the passenger-cargo terminal at Berths 90–93, which was designed by Kistner, Wright, & Wright (architects and engineers), Edward S. Fickett (architect), and S.B. Barnes & Associates (structural engineers) for the American President Lines.<sup>24</sup> The Vincent Thomas Bridge allowed direct automobile access to Terminal Island; previously, the *Islander*, or the Terminal Island ferryboat, transported passengers between San Pedro and Terminal Island (its last voyage was the day before the bridge opened).<sup>25</sup> The LAHD redeveloped

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<sup>18</sup> Bonacich and Wilson, 51.

<sup>19</sup> Bonacich and Wilson, 51-52.

<sup>20</sup> Queenan, 101–105; "Good Gains for Los Angeles Harbor: Shipping Facilities Expanded," *Independent* (January 5 1960), 42.

<sup>21</sup> Queenan, 109.

<sup>22</sup> Queenan, 105, 109.

<sup>23</sup> Queenan, 106–111; "Terminal Island Toll Bridge to Be Built," *Redlands Daily Facts* (January 4, 1960), 1; Lou Jobst, "Target Date 1968 for New Harbor Span," *Long Beach Independent* (May 18, 1965), 9; "Good Gains for Los Angeles Harbor: Shipping Facilities Expanded," *Independent* (January 5 1960), 42.

<sup>24</sup> "\$4.3 Million Port Job: Terminal Contract Goes to L.A. Firm," *Long Beach Independent* (February 8, 1961), 11.

<sup>25</sup> Sam Gnerre, "The Vincent Thomas Bridge," *The Daily Breeze* (October 21, 2009), np, accessed: December 19, 2018, <http://blogs.dailybreeze.com/history/2009/10/21/the-vincent-thomas-bridge/>.

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wharves that had previously been used by the fishing industry for construction of the New England/Polynesian-themed Ports O' Call.<sup>26</sup>

The LAHD sought to expand POLA's containerization capabilities in the 1970s. As containerization became increasingly widespread, the LAHD realized that the 35-foot depth of the harbor was not enough for the new containerized vessels; the design of container carriers necessitated deeper waters to accommodate their size.<sup>27</sup> Progress to deepen the port's waterways to a 45-foot depth through dredging continued throughout the decade, until final approval by the Coastal Commission in 1980.<sup>28</sup> Yet, the port's facilities underwent numerous other improvements to support container shipping. The LAHD increasingly cultivated relationships with Pacific Rim countries and welcomed Evergreen, a Taiwan-based shipping company, to a new 20-acre container terminal at Berths 233–235 in the mid-1970s.<sup>29</sup> In addition to the aforementioned 20-acre container site, the LAHD facilitated construction of a 50-acre container terminal for Matson on Terminal Island; a 20-acre automobile import and export facility, including a temporary storage area for vehicles and a processing/administrative center, in the West Basin; expansion of the LACT in the West Basin; and expansion of Terminal Island to support future and ongoing containerization-related terminals and infrastructure at POLA.<sup>30</sup> Wares imported and exported through POLA generated approximately \$500 million for Southern California during the early 1970s.<sup>31</sup> During POLA's 1976–1977 fiscal year, the port had a net income of \$14.1 million, while the following fiscal year, it nearly doubled to \$25.7 million and became the “leading port in the United States in net income.”<sup>32</sup>

Large-scale infrastructure projects dominated POLA during the 1980s. Launched on March 16, 1981, dredging operations at POLA took 30 months to complete, giving the harbor a depth of 45 feet. Once completed, the port accepted all container ships, including the approximately 35 percent that had previously been unable to navigate the harbor because of its shallowness.<sup>33</sup> Dredging supported Terminal Island infill; 14 million cubic yards of material removed from the harbor floor created 190 acres of useable land on Terminal Island.<sup>34</sup> Promptly, the LAHD constructed a large loading terminal for coal on those 190 newly created acres (an effort to entice Pacific Rim shippers that relied on coal as a result

<sup>26</sup> D.J. Waldie, “San Pedro's Ports O' Call: The Theme Ends, Then What?,” KCET (May 16, 2014), np, accessed: December 19, 2018. <https://www.kcet.org/socal-focus/san-pedros-ports-ocall-the-theme-ends-then-what>.

<sup>27</sup> Queenan, 113.

<sup>28</sup> Queenan, 113–119.

<sup>29</sup> Queenan, 114–115; Bonacich and Wilson, 59–60.

<sup>30</sup> Queenan, 113–115; Jack Baldwin, “Matson Dedicates Container Terminal on Terminal Island,” *Independent Press-Telegram* (March 13, 1971), 50.

<sup>31</sup> Queenan, 114.

<sup>32</sup> Queenan, 118.

<sup>33</sup> Queenan, 123.

<sup>34</sup> Queenan, 123.



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of oil shortages abroad). To expedite the movement of containers in and out of POLA, the LAHD also facilitated construction of a 114-acre Intermodal Container Transfer Facility—where railroad, trucking, and shipping meet—2.5 miles north of POLA.<sup>35</sup> Through dredging and infrastructure projects in the mid-1980s, the combined ports of Los Angeles and Long Beach became the leading port hub in the United States in 1986, importing and exporting 14 percent more TEUs than the New York and New Jersey port hub.<sup>36</sup>

### *Light Industrial Architecture (1945-1985)*

The “light industrial” property type is a version of industrial architecture that focuses on the production process for smaller-scale items, which are often consumer and business oriented, or “manufacturing activity that uses moderate amounts of partially processed materials to produce items of relatively high value per unit weight.”<sup>37</sup> The term “light industrial” gained popularity during the postwar era as city planners increasingly zoned for this property type. Postwar light industrial architecture throughout the United States shares a consistent set of design features.

Light industrial architecture in the postwar era required speed during construction and flexibility within the space. An efficient industrial design included an enclosure that was free from obstructions, adequate daylight, low maintenance, provisions for heavy machinery, flexibility of use, ease of future expansion, and specialized production.<sup>38</sup> The design for light industrial architecture in the United States needed to facilitate production in the quickest and most direct manner possible. As such, many light industrial complexes of the postwar era contained a single story with a large, rectangular plan. To speed production, many of the processes occurred under one roof; this concept was developed from the earlier “consolidated works.”<sup>39</sup> The single-story spatial arrangement is optimal for production because production could take place in a linear fashion, as evidenced in the Plant’s plan. A rectangular plan, with vast and open square bays, offered the most flexibility for potential alterations related to changing machines, layouts, and even building uses over time. To keep the floor space open, locker rooms, restrooms, and other secondary amenities were often located on a mezzanine level.<sup>40</sup> The mezzanine is a common feature of industrial and light industrial architecture because it provides amenities and allows

<sup>35</sup> Queenan, 121-122, 126.

<sup>36</sup> Bonacich and Wilson, 58,

<sup>37</sup> Ajay Kumar Ghosh, *Dictionary of Geology* (New Delhi: Isha Books. 2005), 170.

<sup>38</sup> James F. Munce, *Industrial Architecture: An Analysis of International Building Practice* (New York, NY: F.W. Dodge Corporation, 1960), 88.

<sup>39</sup> Betsy Hunter Bradley, *The Works: The Industrial Architecture of the United States* (New York, NY: Oxford University Press, 1999), 74–76.

<sup>40</sup> Munce, 88; Bradley, 74-76; 192.

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for viewing by supervisory staff and visitors. Star-Kist Plant No. 4's design sets these amenities along its west side and did not make use of mezzanine levels.

After World War II, a new corporate emphasis on teamwork and organizational psychology led to amenities such as cafeterias, athletic facilities, and lounges for workers as well as a trend away from the earlier separation of administrative offices from factory production spaces. As Rappaport explains, "head offices" increasingly "became a part of the main building structure so that the entire factory was under one roof for easy communication between research teams and production-line workers."<sup>41</sup> Star-Kist only expanded its office space circa 1980, but never consolidated its administrative personnel at the Fish Harbor location. Although large portions of such facilities were formed of utilitarian buildings or wings, office elements often incorporated Late Moderne or vernacular Modern architectural design features.

Typically, in postwar light industrial construction, the main entrance is often articulated and emphasized in a manner that the factory portion itself is not, as expressed in the design of the Plant. Such emphasis at the main entrance, along with similarly articulated reception and office areas, was designed to impress potential clients and visitors.

Lighting and ventilation mechanisms varied, with prewar and early postwar buildings relying on passive systems; later postwar manufacturing plants or warehouses incorporated electric systems. Many light industrial buildings have rhythmically spaced, periodic window bays. In many of the smaller-scale postwar variants, these windows were commonly multi-light metal-frame units with an operable awning or hopper window set within it to allow for ventilation. Often such natural lighting at exterior walls alone would not be enough to disperse across the span of a large floor so top lighting would be used. In instances where top lighting is natural, industrial buildings would commonly incorporate a "sawtooth" roof. The long, repeating angled banks of windows contain north-facing glazing so as to allow light into the space but not the penetrating sun that would occur with south-facing glazing. Sawtooth roofs are typically supported by columns at their valleys but may also be supported by any variety of truss systems that alleviate the need for columns.<sup>42</sup> After 1952, only 15 percent of American factories and manufacturing buildings of any type had natural top lighting, and artificial lighting became increasingly desirable.<sup>43</sup> For example, later postwar examples generally feature the elements of early design, but continue to rely heavily on the use of electrical systems over passive ones. Warehouses constructed in

<sup>41</sup> Louise A. Mazingo, *Pastoral Capitalism: A History of Suburban Corporate Landscapes* (Cambridge, MA: MIT Press, 2011), 31, 38–41; Nina Rappaport, "Factory," *Encyclopedia of Twentieth-Century Architecture*, Volume 1, A-F, R. Stephen Sennott (ed.) (New York, NY: Fitzroy Dearborn, 2004), 434.

<sup>42</sup> Bradley, 192.

<sup>43</sup> Kenneth Reid, *Industrial Buildings: The Architectural Record of a Decade* (New York, NY: F.W. Dodge Corporation, 1951), 28–29; Munce, 50.

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the 1970s and 1980s feature little to no fenestration. Instead, electric lights and heating, ventilating, and air conditioning systems provide light and ventilation. The idea of “process engineering” also played a role in the construction, design, and uses of light industrial architecture. Within its vast spaces, a flow of materials, employees, and order of production called “process engineering” were among the pre-planned elements of an industrial building, and mid-century factory design dictated that machines, rather than human handling, should be used whenever possible to transform raw materials into a finished product. Star-Kist and its hired designers followed this common trend. In early factories and light industrial buildings, the conveyor would connect various aspects of production in the most efficient manner possible. Rollers, forklifts, and, for larger-scale buildings, gantries and other cranes were also used to transport materials efficiently.<sup>44</sup> Efficient movement of materials was also important to the selection of the building’s location. The earliest industrial architecture was near waterways, and with the advent of the locomotive, the property type would be constructed near railways and then, later, vehicular roads. To expedite the industrial process, fishermen delivered tuna at the Plant’s south docks. The production process progressed through the building, northward, until canned tuna was loaded onto trucks at the building’s northernmost end. Dependent on the sea, the Star-Kist Plant at Fish Harbor was vital, but roadways to the property also provided for the distribution of goods. Although railroad spur lines previously accessed Fish Harbor buildings, including the former French Sardine facility, one does not appear to have been aligned for the purposes of Star-Kist production or distribution. In the postwar era, trucking became a major component of industry.

It is rare for a light industrial building as a property type to be NRHP/CRHR eligible under Criteria C/3, distinct from its architectural style, such as Moderne variants or the International Style, among others. For such a property to be eligible as a light industrial property type, the building would need to have a high degree of historic integrity, which is rare in industrial structures, which were frequently upgraded to accept the latest technological innovation. Necessary features may include a combination of intact factory and amenity areas, architectural details, and landscaping, in addition to intact interior spaces and a majority of original, intact process engineering components. A light industrial building may also be historically significant under NRHP or CRHR Criteria C/3 if its design is directly associated with a historically significant construction or process engineering development.

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<sup>44</sup> Munce, 55.

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### Evaluation

The East Plant was previously evaluated as ineligible for the NRHP, the CRHR, and as an HCM under all criteria in 2008.<sup>45</sup> The current evaluation confirms that finding.

#### NRHP/CRHR Evaluation

##### *Events/Patterns: A/1*

Constructed between 1971 and 1977, the East Plant housed can manufacturing, warehouse/distribution, and cold storage activities for Star-Kist's tuna canning and pet food operations at Fish Harbor. While the East Plant is associated with the Plant and other Star-Kist operations at Fish Harbor, research did not identify an association with important events or patterns of events. In fact, Star-Kist constructed the East Plant during a period of globalization after the company established a cannery overseas and during a period when half or more of tuna was canned overseas. Research did not identify an important historic context representative of the 1970s. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria A/1.

##### *Important Persons: B/2*

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the Empty Can Warehouse. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he did not hold an office at this warehouse. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria B/2.

##### *Design/Construction: C/3*

With regard to architecture, the East Plant's construction emphasized cost-effective, utilitarian design without distinctive architectural features. It features a common warehouse-type construction of the era that relied on electrical systems rather than passive ones. As such, metal frames support metal cladding, and the East Plant has little fenestration besides loading doors along the north and west elevations. The cold storage portion of the East Plant features small, concrete cold storage rooms. A simply constructed warehouse-type plant is not distinctive. For these reasons, it also lacks high artistic values.

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<sup>45</sup> Jones and Stokes, *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*, Prepared for the Los Angeles Harbor Department (January 2008), 40 and Appendix A, "Green Warehouse" DPR.

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Star-Kist hired Frank Politeo and Don Hellmers to construct the East Plant. Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Hellmers. Research revealed that both of these men are not masters. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria C/3.

### *Information Potential: D/4*

The East Plant has not and is not likely to yield important information about construction or engineering methods, technologies, or materials. It is a simply designed and constructed warehouse. In addition, the building is unable to provide important information about can manufacture, can or other types of storage, or cold storage aspects of the Star-Kist operations without associated equipment. Therefore, the East Plant is not eligible under NRHP/CRHR Criteria D/4.

### HCM Evaluation

#### *Events/Patterns*

Constructed between 1971 and 1977, this building served several functions for Star-Kist: can manufacture, warehouse, and cold storage.<sup>46</sup> While the building supported Star-Kist production, it is neither associated with important events nor exemplifies the significant contributions of Star-Kist or the canning industry in the United States or at the Port's Fish Harbor. Therefore, the East Plant is not eligible under this criterion.

#### *Important Persons*

Although Joseph Bogdanovich would have been involved in decisions surrounding Star-Kist's building and expansion, he is not associated with the East Plant. Bogdanovich was a capable businessman but research yielded little information on him and his career with Star-Kist. Moreover, although Bogdanovich presided over this major tuna canning company, he did not hold an office at this plant. Therefore, the East Plant is not eligible under this criterion.

#### *Design/Construction*

With regard to architecture, the East Plant's construction emphasized cost-effective, utilitarian design without distinctive architectural features. It features a common warehouse-type construction of the era that relied on electrical systems rather than passive ones. As such, metal frames support metal cladding, and the East Plant has little fenestration besides loading doors along the north and west elevations. The

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<sup>46</sup> LADBS Building Permit Nos. 1970SP44784 and 1975SP53460.

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cold storage portion of the East Plant features small, concrete cold storage rooms. A simply constructed warehouse-type plant is not distinctive. For these reasons, it also lacks high artistic values.

Star-Kist hired Frank Politeo and Don Hellmers to construct the East Plant. Politeo designed numerous utilitarian buildings for Star-Kist and its facilities on Terminal Island in the 1970s. Extensive research did not yield information regarding Politeo or Hellmers. Research revealed that both of these men are not masters and they did not influence their age. Therefore, the East Plant is not eligible under this criterion.

### *Information Potential*

The East Plant has not and is not likely to yield important information about prehistory or history of Star-Kist, the canning industry, or Fish Harbor. As it was constructed on reclaimed land, any prehistoric artifacts would be out of context. Simply constructed, the East Plant is unable to provide important information about Star-Kist operations without its associated equipment. Therefore, the East Plant is not eligible under this criterion.

### Integrity

The East Plant retains a moderate level of integrity. It has not been moved from its original location. The setting surrounding the warehouse, however, has changed since its construction. In the 1970s, the Port had yet to develop Terminal Island into a major containerization shipping hub. Indeed, the reclaimed landmass east of the East Plant did not exist in the 1970s. In addition, Fish Harbor's setting is no longer a vibrant fishing and canning community. Vacant lots now dominate the landscape. Its design, materials, and workmanship remain primarily intact because Star-Kist and its current tenant have made few alterations to the East Plant since it was constructed. The East Plant features metal cladding set over a metal frame and some concrete construction. It relies on electrical systems rather than passive ones. Besides loading doors along its north and west elevations, it lacks fenestration. However, it does not have a direct link to Star-Kist for the canning industry. Rather, it could have been used for any industrial purpose.

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\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

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Page 15 of 18 \*Resource Name or # Star-Kist – East Plant

\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

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**B14. Evaluator & Date of Evaluation:** Margaret Roderick, August 24, 2021

**Sketch Map:**





## CONTINUATION SHEET

Page 16 of 18 \*Resource Name or # Star-Kist – East Plant

\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

### Photographs:



Photograph 1: North elevation, Can Manufacturing (formerly Impress Plant) portion of facility, camera facing south. ICF, 2018.



Photograph 2: West elevation, Can Manufacturing (formerly Impress) portion of facility in distance (left), sky-bridge to Star-Kist Plant No. 4 Main Facility and Empty Can (formerly Green Building) (center) and Warehouse (formerly Distribution) portion of facility in foreground (right) , camera facing north. ICF, 2018.

## CONTINUATION SHEET

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\*Resource Name or # Star-Kist – East Plant

\*Recorded by: Margaret Roderick \*Date 08/24/2021

☒ Update



Photograph 3: West elevation, Warehouse (formerly distribution) portion of facility in foreground (left) and Cold Storage portion in the distance (right), camera facing south. ICF, 2018.



Photograph 4: South elevation, Cold Storage portion of the facility, camera facing northeast. ICF, 2018.

## CONTINUATION SHEET

Page 18 of 18

\*Resource Name or # Star-Kist – East Plant

\*Recorded by: Margaret Roderick \*Date 08/24/2021

☒ Update



Photograph 5: South elevation, Cold Storage portion of the facility, camera facing northeast. ICF, 2018.



Photograph 6: South elevation, Cold Storage portion of the facility, detail showing a cold storage door, camera facing northeast. ICF, 2018.

## CONTINUATION SHEET

Page 1 of 3

\*Resource Name or # Star-Kist – Net Shed

\*Recorded by: Margaret Roderick

\*Date 08/24/2021

☒ Update

### P3a. Description:

The two net storage, or “boneyard,” buildings are no longer extant. A fenced-in vacant dirt lot forms the site of the former buildings.

**P6. Date Constructed:** 1947 and 1948

### P7. Owner/Address:

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

### P8. Recorded By:

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

**P9. Date Recorded:** November 21, 2018

**P10. Survey Type:** Intensive level survey.

**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4. Present Use:** None; Demolished

### B10. Significance

The property was field checked on October 29, 2018. The two net shed building are no longer extant; The Port of Los Angeles filed demolition permits in February 2018.

In the 2008, the Net Repair Sheds—“Boneyard” DPR 523a-b form set included in the “Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, port of Los Angeles, Los Angeles, California” (2008 evaluation) the resource boundary was recorded to include three buildings: Two net storage sheds and one vernacular modern office building to the west identified through research as the Gillis Building. However, the text included in the DPR forms did not describe or reference the Gillis Building.

The Gillis Building remains intact. Research yielded that William J. Gillis commissioned George V. Stokes (architect), Paul Stone (Engineer), and Carl Brooks (contractor) to construct the one-story, concrete



## CONTINUATION SHEET

Page 2 of 3

\*Resource Name or # Star-Kist – Net Shed

\*Recorded by: Margaret Roderick

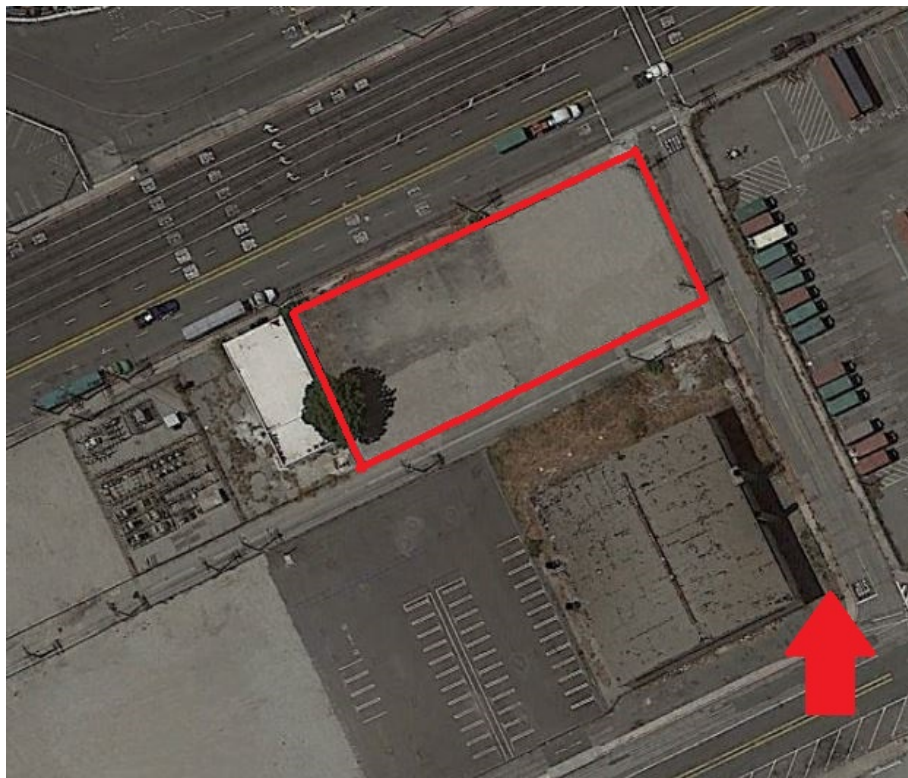
\*Date 08/24/2021

☒ Update

block constructed building in 1970.<sup>1</sup> The permit requested the construction of an industrial and office building measuring 40-feet by 60-feet. In 1973, E.H. Carruthers Co. commissioned the same group of designers and builders to construct an addition to the rear.<sup>2</sup> Neither of these two permits included reference to the Star-Kist company. Instead, research identified Gillis as the vice president of production of Van Camp Sea Food Co, a competitor to Star-Kist, from 1936 to 1971.<sup>3</sup>

Since the Gillis Building was only identified in the 2008 evaluation in the sketch-map and not in the text, and given that the building was not constructed by Star-Kist or for Star-Kist facilities on Terminal Island, the Gillis Building evaluation is outside the scope of the proposed evaluation. The 2008 evaluation sketch-map was drawn incorrectly and is corrected below for the purposes of this update form set.

**Sketch Map (showing boundary for the former net-shed property):**



<sup>1</sup> Los Angeles Department of Building and Safety, "LA1970SP44801," (10/6/70).

<sup>2</sup> Los Angeles Department of Building and Safety, "1973SP50049" (7/11/73).

<sup>3</sup> "William J. Gillis, 80," *The Desert Sun* (September 17, 1996), 4.

## CONTINUATION SHEET

Page 3 of 3

\*Resource Name or # Star-Kist – Net Shed

\*Recorded by: Margaret Roderick

\*Date 08/24/2021

☒ Update

### B12. References

Jones and Stokes. *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*. Prepared for the Los Angeles Harbor Department. January 2008.

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**B14. Evaluator & Date of Evaluation:** Margaret Roderick, August 24, 2021

## CONTINUATION SHEET

Page 1 of 1

\*Resource Name or # Star-Kist--- Laboratory

\*Recorded by: Margaret Roderick

\*Date 08/24/2021

☒ Update

### P3a. Description:

The building is no longer extant. A vacant dirt lot forms the site of the former building.

**P6. Date Constructed:** 1950; 1961-1969

### P7. Owner/Address:

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

### P8. Recorded By:

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

**P9. Date Recorded:** November 19, 2018

**P10. Survey Type:** Intensive level survey.

**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4. Present Use:** None; demolished.

### B10. Significance

The property was field checked on October 29, 2018. The Pet Products Building is no longer extant; it was demolished in 2017-2018 according to Los Angeles Harbor Department staff.

**B14. Evaluator & Date of Evaluation:** Margaret Roderick, August 24, 2021

## CONTINUATION SHEET

Page 1 of 1 \*Resource Name or # Star-Kist--- Food Testing & Animal Nutrition  
\*Recorded by: Margaret Roderick \*Date 08/24/2021 ☒ Update

**P3a. Description:**

The building is no longer extant. A vacant dirt lot forms the site of the former building.

**P6. Date Constructed:** 1972

**P7. Owner/Address:**

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

**P8. Recorded By:**

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

**P9. Date Recorded:** November 19, 2018

**P10. Survey Type:** Intensive level survey.

**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4. Present Use:** None; demolished.

**B10. Significance**

The property was field checked on October 29, 2018. The Food Testing & Animal Nutrition building is no longer extant; it was demolished in 2017-2018 according to Los Angeles Harbor Department staff.

**B14. Evaluator & Date of Evaluation:** Margaret Roderick, August 24, 2021



## CONTINUATION SHEET

Page 1 of 1      \*Resource Name or # Star-Kist---- Pet Food Plant  
\*Recorded by: Margaret Roderick      \*Date 08/24/2021      ☒ Update

**P3a. Description:**

The building is no longer extant. A vacant dirt lot forms the site of the former building.

**P6. Date Constructed:** 1979

**P7. Owner/Address:**

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

**P8. Recorded By:**

Margaret Roderick, ICF  
555 W. 5<sup>th</sup> Street, Suite 3100  
Los Angeles, CA 90013

**P9. Date Recorded:** November 19, 2018

**P10. Survey Type:** Intensive level survey.

**P11. Report Citation:** ICF. *Final Historic Resources Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California*. APP No. 190311-032. Prepared for the Los Angeles Harbor Department, Environmental Management Division. August 2021.

**B4. Present Use:** None; demolished.

**B10. Significance**

The property was field checked on October 29, 2018. The Pet Food Plant Building is no longer extant; it was demolished in 2017-2018 according to Los Angeles Harbor Department staff.

**B14. Evaluator & Date of Evaluation:** Margaret Roderick, August 24, 2021

## **Attachment B: 2008 Evaluation**

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**Final Architectural Survey and Evaluation of the  
Star-Kist Plant  
Terminal Island  
Port of Los Angeles  
Los Angeles, California**



Port of Los Angeles

ADP# 070323-629

*Prepared for:*

Los Angeles Harbor Department  
425 South Palos Verdes Street  
San Pedro, CA 90733-0151  
Contact: Dennis Hagner  
310/732-3949

*Prepared by:*



**Jones & Stokes**

811 West 7<sup>th</sup> Street, Suite 800  
Los Angeles, CA 90017  
Contact: Katy Lain  
213/627-5376

January 2008

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APPENDIX A. DPR 523 Forms

APPENDIX B. Building Permit History and Timeline of the Fishing Industry in Los Angeles Harbor

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## INTRODUCTION

The Los Angeles Harbor Department (LAHD) has contracted with Jones & Stokes to perform an evaluation of the cultural and historic significance of the Star-Kist Plant located at Fish Harbor, Terminal Island (see Figure 1 and Figure 2). The LAHD is planning redevelopment of the area, which may include demolition of the buildings on the site. The purpose of this historic assessment is to evaluate whether the Star-Kist Plant is eligible for listing the National Register of Historic Places (NRHP).

This evaluation also includes application of the criteria for eligibility for listing in the California Register of Historical Resources (CRHR). In addition, the property has been evaluated to determine whether the Star-Kist Plant qualifies for designation as a cultural resource, according to the criteria set forth in the City of Los Angeles' Cultural Heritage Ordinance.

## METHODOLOGY

In order to support a determination of the building's eligibility or ineligibility for the NRHP, CRHR, or City of Los Angeles Cultural Heritage Monument list, information was assembled from various sources, including

1. previous historic surveys completed in the City of Los Angeles;
2. building permit records and/or Assessor improvement records;
3. historic city directories;
4. California Historical Resources File System maintained by the State Office of Historic Preservation;
5. TRW/Experian property data records;
6. Riordan Los Angeles Public Library Catalog;
7. Riordan Los Angeles Public Library, California Index;
8. Riordan Los Angeles Public Library photo database;
9. ProQuest: Historic *Los Angeles Times*; and
10. Internet.

The following inventories and sources were also consulted:

- The National Register of Historic Places, National Register Information System;
- California Historical Landmarks;
- California Points of Historical Interest



Figure 1. Project Vicinity Map





Figure 2. Star-Kist Site Plan

This information is presented on State of California forms for recording historical resources, along with a detailed description of the building and a statement of its significance. The forms are required by the regulations of the CRHR, which were formally adopted by the State Historical Resources Commission on January 1, 1998. At a minimum, these regulations require a qualified architectural historian to complete a Primary Record (DPR 523A) and a Building, Structure, and Object Record (DPR 523B).

Jones & Stokes Architectural Historian I Andrew Bursan and Senior Architectural Historian Roger Hatheway visited the site and photographed the buildings' interior and exterior on September 11, 2007, in order to make an assessment. Katy Lain served as project manager and she, Andrew Bursan, and Roger Hatheway prepared this report. Jones and Stokes architectural historian Madeline Bowen wrote the early history of the Port; Andrew Bursan wrote the history of Star-Kist; and Roger Hatheway prepared the architectural descriptions and evaluations of the buildings recorded on DPR forms.

### **Previous Surveys**

In 1983, the U. S. Army Corps of Engineers inventoried and evaluated Port of Los Angeles (Port) facilities at Fish Harbor and determined the harbor to be potentially eligible for listing in the NRHP. In 1995, San Buenaventura Research Associates inventoried Fish Harbor and its environs as part of a larger reconnaissance-level survey for Fugro West, Inc. The purpose of the larger port-wide reconnaissance survey was to identify areas with potential historical significance. The report concluded that the Fish Harbor area as a whole did not appear to meet the criteria for listing in NRHP due to a lack of integrity. The inventory did not include an analysis of the subject Star-Kist properties on Fish Harbor.

### **Summary of Findings**

Jones & Stokes has concluded that the Star-Kist Main Plant, located at 1050-1054 Ways Street, appears to be eligible for listing in the National Register of Historic Places under Criteria A, B, C, and D; it appears to be eligible for listing in the California Register of Historical Resources under Criteria 1, 2, 3, and 4; and it appears to be eligible for listing as a City of Los Angeles local landmark. All other buildings surveyed on the site do not appear to be eligible for listing under any criteria. Please see page 38 of this report for further explanation of the findings.

## HISTORIC SETTING

### Early History

The Port of Los Angeles is located at the southern most point in Los Angeles County, approximately 20 miles from downtown Los Angeles. Given its location on the Pacific Ocean, the surrounding area historically served as a general port facility. The Port sits within the boundaries of three historic ranchos conferred by Governor Pedro Fages to three veterans of the 1769 Portola expedition. The three ranchos included Rancho San Pedro, Rancho Los Palos Verdes, and Rancho Los Cerritos. The combined total acreage for the three ranchos equated to nearly 84,000 acres (Beck and Haase 1974). As was common for the time, owners of the rancho lands earned a living through the raising of cattle and participation in the hide and tallow trade (Rawls and Bean 1993). By 1830, San Pedro was known as the leading hide center on the west coast (Queenan 1986).

The annexation of California by the United States in 1848 and the gold rush of 1849 resulted in an influx of new settlers to the San Pedro area. While a few older residents realized the profit potential of the port area, it was largely underused for shipping during this period (Queenan 1986). However, the area continued to serve as a center for cattle and sheep ranching (Beck and Haase 1974).

### Initial Commercial Shipping, 1857–1897

Phineas Banning, one of the area's earliest residents, realized the promise of a commercial shipping port. The endpoints of two primary routes to the southwest gold fields, the Gila River Trail and the Old Spanish Trail, stood at Los Angeles. In 1857, Banning constructed new docks to capitalize on the increasing trade coming in and out of Los Angeles. With his base location up the bay at a Wilmington, Banning could shuttle materials on smaller boats to and from a second location on the Rancho San Pedro waterfront.

Banning also realized the importance of rail transportation and in 1869 organized the Los Angeles & San Pedro Railroad (LA&SP), the first route offering a reliable means of moving cargo from the ships coming into San Pedro Harbor to the City of Los Angeles. Improved transportation to and from the harbor had a significant effect on



**Photo 1. Los Angeles Harbor, 19<sup>th</sup> Century**

the growth of Los Angeles. By the turn of the twentieth century, city population had reached 102,000, resulting in increased demand for lumber and goods at San Pedro Harbor (Matson 1920).

### **San Pedro Bay—Founding of Port of Los Angeles, 1897–1913**

The growth of commerce in Los Angeles required the formal establishment of a shipping port. The federal government agreed to assist the City of Los Angeles by establishing its official harbor in San Pedro. Following an extensive battle with railroad magnate Collis Huntington, who advocated a site near his holdings in Santa Monica, the city of Los Angeles won authorization from Congress for the establishment of a shipping port in March of 1897.

In preparation for the opening of the Panama Canal, and in conjunction with its annexation of San Pedro in 1906, the City of Los Angeles extended its boundaries to coastal tidewaters. The Port of Los Angeles and the Los Angeles Harbor Commission were officially created in December 1907. Numerous harbor improvements followed, including the completion of the 2.11-mile breakwater, the broadening and dredging of the main channel, the completion of the first major wharf by the Southern Pacific Railroad, the construction of the Angel's Gate lighthouse, and the construction of the city's first municipal pier and wholesale fish market. By 1909, both Wilmington and San Pedro were part of the City of Los Angeles (Matson 1920). Since the opening of the Panama Canal in 1915 was expected to decrease the time spent by ships traveling between eastern and western U.S. ports, the City of Los Angeles completed one of many large municipal terminals in the harbor. The completion of this building symbolized the Port's transition from a small, poorly equipped landing to a significant seaport able to handle deep-sea ships with varied cargo (Queenan 1986).



**Photo 2. San Pedro Waterfront, ca. 1910**

### **Wartime Changes, 1914–1950**

While the outbreak of World War I temporarily brought the idea of expanded worldwide trade to a halt, the principal uses of the Port changed considerably when England declared war on Germany in 1914. During this period, a significant increase in trade encouraged distributors to construct a large number of new warehouses and sheds between 1917 and 1930.



Improvements to transportation systems within the harbor area also facilitated the growth of the import and export trade. By 1917, a vast railroad network existed around the Harbor and Los Angeles, allowing for the efficient movement of goods throughout the country (San Buenaventura Research Associates 1996).

Following the conclusion of World War I in 1918, the importation of lumber and other types of raw materials into the Port increased exponentially. Although some harbor facilities existed at the time for products such as oil, lumber, shipbuilding, and fish, new facilities were developed to handle products such as cotton, borax, citrus crops, and steel. In 1923, the City of Los Angeles passed a harbor improvement bond measure, which resulted in the construction of additional wharves to meet the demands of increased imports and exports (Queenan 1986; San Buenaventura Research Associates 1996).

During the Depression years, traffic within the Port slowed as part of the far-reaching effects of the collapse of the American economy. The Port witnessed a sharp decline in international trade, but the Harbor Commission continued to make improvements including a new breakwater extension, completed by 1937, and the construction of new or the expansion of existing cargo and passenger terminals. The federal government's Works Progress Administration (WPA) helped the Port finance passenger and freight terminals as well as wharf and other improvements (Queenan 1986).

World War II brought new life and distinction to San Pedro, one of the major American ports closest to the fighting in the Pacific Ocean. The Port served as a location for the production of wartime materials, and as embarkation point for military personnel and equipment sent to the war zones. In addition, the U.S. Government acquired some 400 acres of Terminal Island for Navy uses in September 1942 (Queenan 1986). Following the war, the Los Angeles Harbor Department launched a broad restoration program for facilities within the harbor that required maintenance delayed during the war years, improved a number of older buildings, and removed many temporary wartime buildings (Queenan 1986).

### **Containerization: 1950 to Present**

Methods of shipping changed dramatically following World War II with the advent of containerization. Previously, cargo loading was labor intensive: individual pieces of cargo, drums, boxes, bags, or crates, were loaded into ships after a repetitive process of unloading and reloading at the wharf, and stowing into ships' holds by cranes or by hand. Once in the ship's holds, the cargo was stowed by longshoremen. Some efficiency was achieved by placing several individual packets (e.g., drums, bags, or boxes) on a pallet and then loading the pallet into the cargo hold. Alternatively, longshoremen would place the individual pieces of cargo into cargo nets, and then hoist the nets into the ship where the individual pieces of cargo were again unloaded and stowed.

Containerization required the maritime industry to adapt to the needs of this mode of transport, utilizing not only specially designed ships, truck trailers, rail cars, and cargo cranes, but also new port facilities. Major improvements in the 1970s included the deepening of the main channel to accommodate the larger container vessels entering the bay, the purchase of land to expand terminals, and the replacement of older wharves that could not bear the increased weight of newer containers.

### **Port of Los Angeles Fishing and Canning Industry**

Commercial fishing in the San Pedro area began with the establishment of the Golden Gate Packing Company on the wharf alongside the Main Ship Channel in 1893. The Golden Gate Packing Company moved its operation from San Francisco to the Port because it was suffering from a periodic slump in the anchovy and sardine business. Once at the Port, the company reestablished itself as the California Fish Company. Prior to 1903, San Pedro canneries packed sardines only. However, during the early 1900s, the sardine catch quantities began to decline in the Los Angeles Harbor also, and canners needed to find another fish to pack and sell. Albacore tuna, an oily fish which often weighed between 20 and 40 pounds, abounded off the Southern California Coast. However, albacore was unfamiliar to most consumers and its oil made it difficult to can.

In 1903, Albert P. Halfhill, co-owner of the California Fish Company, working with his superintendent Wilbur F. Wood, invented a method for steaming albacore that removed the oil. He persuaded grocers in the Los Angeles area to give away cans of tuna when customers purchased coffee. This successful tuna promotional campaign along with generally affordable prices encouraged the public to try the new fish product and opened the way for nationwide marketing (Matson 1945; Queenan 1983). In 1912, Wood opened the California Tunny Canning Company located at the head of the Southern Pacific slip on the west side of the Main Channel. Two years later, Frank L. Van Camp bought the company from Wood and renamed it “Van Camp Sea Food Company” (Van Camp 1925). The new business, marketing “Chicken of the Sea,” went on to become the leader in the tuna industry and was instrumental in popularizing tuna on the national market (Queenan 1983).

Throughout the early twentieth century, the fishing and canning industry at the Port of Los Angeles continued to grow rapidly. As early as 1893, Southern California fishermen began to use the purse seiner, a type of boat that catches surface fish by encircling them with a net and then drawing the net. The boat enabled fishermen to catch the elusive blue-fin and yellow-fin tuna. Soon purse seiners filled the harbor. In 1917, Martin J. Bogdanovich founded the French Sardine Company, which would become Star-Kist, and eventually, the company became the largest fish cannery in the world. By World War I, the Port led the nation in commercial fishing, harvesting vast quantities of tuna, mackerel, and sardines from the Pacific Ocean (Skogsberg 1925; Queenan 1983).

During the mid-1920s, to enable the various canning companies to expedite the handling of fish and to provide them with railroad distribution connections to the rest of the country, the Harbor Department built a small, protected anchorage known as Fish Harbor. Fish Harbor was completed by 1928 at a cost of \$1.5 million (Queenan, 1983; Board of Harbor Commissioners 1925:16-17, 1928:50). By this time, the municipal wholesale fish market operated at Berth 80 on the Main Channel. Just to the south at Berths 77–78, fishermen could moor their boats at a wharf, and they built a cluster of sheds for storage and fish net mending (Sanborn 1920). By 1925, approximately 1,200 tuna fishing boats served the wholesale fish markets and seven canneries at the Port. While at least 80 percent of the sardine pack was exported to markets in Argentina, Manila, India, Belgium, England, and the Dutch East Indies, almost the entire tuna pack was consumed in the United States. Fish by-products, including fertilizer, supported both the California citrus industry and the rice fields in Japan.

Through the 1920s and 1930s, fishing and canning operations expanded at Fish Harbor, and that area became the focus of the industry at the Port. Twelve canneries leased space at Fish Harbor during this period. Although sardines remained important to the industry, tuna became dominant in volume and value during this period. In 1934, the volume of the tuna pack exceeded the sardine pack for the first time. During the 1930s, fishing and canning was a significant industry at the Port. In 1936, the value of the Los Angeles fish pack represented half the total for all of California and was twice that of the next largest fishing port. By 1939, the canneries and fishing fleet at the Port employed over 6,000 workers with a combined payroll of \$6.75 million (Board of Harbor Commissioners 1936:55, 1939:25).



**Photo 3. Fish Harbor, 1938**

To increase the efficiency of the canneries through a ready supply of labor, the Harbor Commissioners leased and developed land adjacent to Fish Harbor for cannery employees. By the early 1930s, more than 600 Japanese-Americans lived at Fish Harbor, manning the fishing boats and working in the canneries. However, during World War II the entire Japanese-American community was relocated as part of Executive Order 9066, signed by President Franklin D. Roosevelt, which brought about the forced internment of nearly 120,000 Japanese-Americans from the West Coast of the United States. By the late-1940s, the Port had demolished the remaining buildings (Queenan 1983; Pacific Air Industries 1949). The Japanese community never returned to Terminal Island. Following the United States' entry into World War II in December 1941, the Port turned its attention to the war effort. Fishing and canning continued to expand to meet wartime demand. After the war, the Port of Los Angeles immediately began restoring its property to pre-war status and resuming normal operations. Projects included completing general maintenance of Fish Harbor and constructing a new municipal fish market at Berth 72 on Fishermen's Wharf (Queenan 1983).

Due to growing demand for tuna and through expansion of fishing and canning operations, the Los Angeles Harbor, led by Fish Harbor, was the homeport to the world's largest fisheries in value and in tonnage of fish by the early-1950s (see Figure 6). Some 950 million pounds of fish were landed in the San Pedro district during the 1950–1951 seasons, with a total value of the catch and canning distribution at approximately \$78 million. The Los Angeles Harbor area produced nearly half of the 9.5 million cases of tuna packed in the United States during that season (Board of Harbor Commissioners 1951–1952:47).

The fishing and canning industry remained strong through the 1960s, though the future of the San Pedro facilities became doubtful as Van Camp and Star-Kist, the largest canners, opened new plants overseas, including American Samoa and Mexico. For a period of 75 years, canneries had expanded their building sites and sold their products all over the world. Tuna canning became a large and thriving industry, but plants and labels were kept within a small community of owners. After 1975, mergers and acquisition with large corporations changed the pattern of the industry (*Daily Breeze* 2001).



Photo 4. Fish Harbor, Terminal Island, 1958 (Source: Port of Los Angeles). Star-Kist Plant No. 4 is in the lower right of the photograph.



## HISTORIC RESOURCES – STAR-KIST CANNERY

### French Sardine Company/Star-Kist History

French Sardine Company was founded in 1917 by Martin Bogdanovich, who later built the company into the world's largest tuna canning enterprise under the Star-Kist label. Bogdanovich originally began his enterprise as a sardine-packing firm under the name French Sardine Company. By 1926, he was also packing tuna as part of a consortium of Terminal Island Packers that extended the fishery to Mexican waters. Prior to the construction of Star-Kist Plant No. 4 in the early 1950s, French Sardine Co. maintained a plant location at 580-582 Tuna Way, 181 Fish Harbor Way (Plant No. 1), and a portion of the facility at 338 Cannery Street (French Sardine Co. Plant No. 2, later absorbed into Chicken of the Sea).



Photo 5. Photo of the French Sardine operation in the 1920s. Martin Bogdanovich is seen wearing a dark suit and grey hat. (Source: The Port of Los Angeles, 1983)



Photo 6. 1940s photo of “Tuna Nurses” outside the French Sardine plant. Female cannery workers were often referred to as “tuna nurses” because of their white uniforms which resembled that of a medical nurses. (Source: Los Angeles Maritime Museum)

**Founder of French Sardine Company/Star-Kist: Martin Bogdanovich**



Photo 7. French Sardine President: Martin Bogdanovich (Source: Star-Kist Company pamphlet)

Martin Bogdanovich was born in 1882 in Dalmatia, a region of present-day Croatia, where he was educated and served his briefly in the Austrian Navy (1903-07) before he came to the United States in 1908. He settled in San Pedro, and quickly engaged in the region's growing fishing industry. After running a wholesale fish market called the California Fish Company for two years, he sold the business to the DiRocco Brothers. In 1917, he started the French Sardine Company on Terminal Island, which specialized in the packing of sardines and tuna. Bogdanovich built the French Sardine Company into one of the leading fish packing concerns in the United States by the 1930s (*Los Angeles Times* 1937).

As a result of Bogdanovich's success, Prince Paul of the Kingdom of Yugoslavia bestowed the San Pedro industrialist with the "Order of the Yugoslav Crown" in 1937, the highest award a civilian could receive from the Kingdom (*Los Angeles Times* 1937). During his lifetime, Bogdanovich became president and general manager of the French Sardine Company, president of the High Seas Tuna Packing Company, San Diego vice-president of South Coast Fisheries Company, treasurer of the United Committee of Southern Slavic Americans, and a member of the board of directors of San Pedro Chamber of Commerce (*Los Angeles Times* 1944).

### **French Sardine Company Becomes Star-Kist**

In 1944, Martin Bogdanovich died en route to a meeting of the Yugoslav Club in San Pedro. His son, Joseph J. Bogdanovich then assumed control of the French Sardine Company, and the operation continued to expand under his leadership (*Los Angeles Times*, 1944). By 1952, the company completed ambitious expansion plans with the construction of the largest tuna-packing facility in the world, built along Fish Harbor at a cost of \$2 million dollars. In order to facilitate the construction, the Port of Los Angeles undertook a "gigantic dredging and filling operation" that provided the landfill necessary for the sprawling plant (Board of Harbor Commissioners 1951–1952:47). The annual Board of Harbor Commissioners report praised the cooperation between the Port of Los Angeles and French Sardine and reported "Plant No. 4 as an outstanding accomplishment and the continually expanding sales records [of French Sardine products] as another" (Board of Harbor Commissioners 1951–1952:47). The 10-acre plant would become the largest tilt-up structure ever built by private industry in the Western United States, and helped the company attain the number-one position among fish packers in the United States. Tilt-up is a site-based construction method which involves casting large concrete panels horizontally and tilting them into place to form walls or other building elements (Glass 2000). In 1952, French Sardine also officially changed its name to Star-Kist Company, after the Star-Kist product line that had been in existence since 1939 (*Los Angeles Times* 1952).



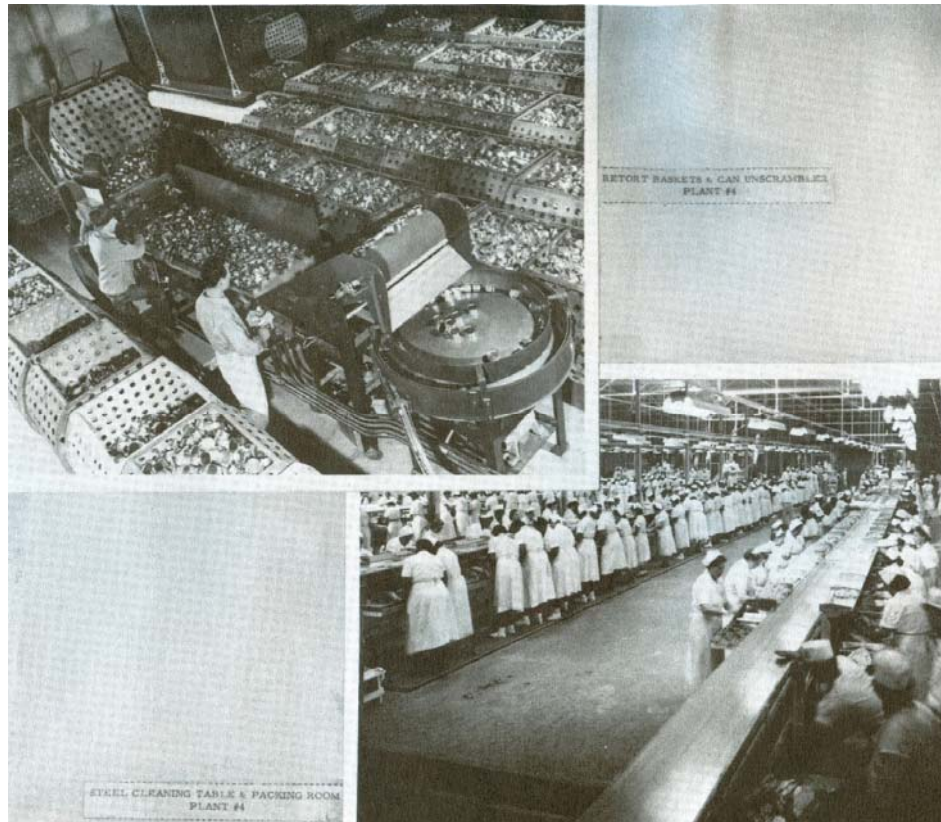


Photo 8. Star-Kist plant and workers in the early 1950s (Source: Star-Kist Company pamphlet)

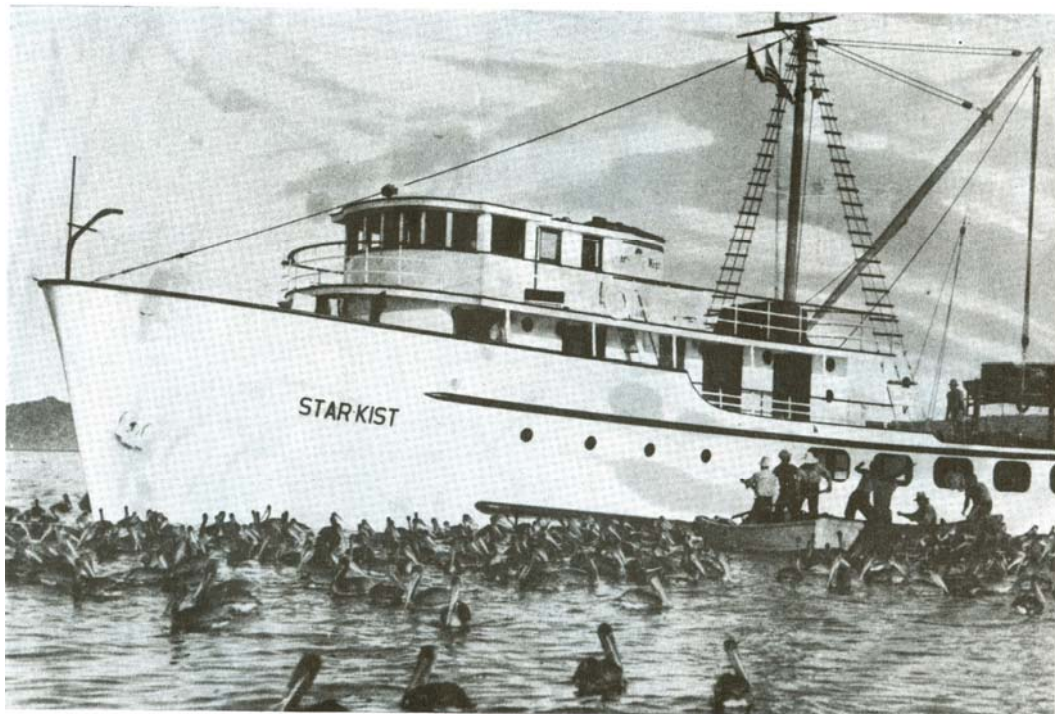


Photo 9. Star-Kist tuna boat in the early 1950s (Source: Star-Kist Company pamphlet)

Star-Kist continued to be one of the largest tuna producers through the 1950s and remained a privately held company owned by the Bogdanovich family until the early 1960s. In 1963, H.J. Heinz Co. acquired the Star-Kist Co., with the purchase of 90% of Star-Kist stock from its principal shareholders. At the time of the sale, Star-Kist posted annual sales of \$70 million and processed and marketed both fish products and cat food (*The Wall Street Journal* 1963). Through the 1960s and 1970s, H.J. Heinz would continually expand Star-Kist canning operations on Terminal Island, using Plant No. 4 as its primary production facility. Star-Kist tuna sales remained strong in these decades and appear to have been bolstered by the popular “Charlie the Tuna” television commercials that had become well entrenched into the American culture landscape by the 1960s (*Washington Post* 2005).

## STAR-KIST ADVERTISING/MARKETING



Photo 10. Star-Kist product display at the Los Angeles Maritime Museum in San Pedro, CA (Source: Los Angeles Maritime Museum)





Photo 11. Collection of Star-Kist advertisements feature in newspapers and magazines (Source: eBay)

Much of the success of the Star-Kist product line, as well as those of other tuna companies, can be credited to successful marketing over the decades. Companies, like Star-Kist, promoted their tuna products as healthy, affordable, and convenient meals accessible to almost all American consumers. Starting in the 1930s, the Star-Kist Company produced newspaper and magazine ads which highlighted various recipes containing Star-Kist tuna. Celebrities like Bob Hope, John Wayne, and Alan Ladd were incorporated into many of these ads as each celebrity would share their own personal favorite tuna recipe. Star-Kist also published a number of cook books that offered easy to prepare tuna dishes in an effort to promote their product.

In 1961, Star-Kist introduced the first of a long-running series of TV commercials and print ads featuring Charlie the Tuna as the Star-Kist “spokesfish.” The animated tuna not only successfully marketed Star-Kist’s line of tuna products, but also became an American pop culture icon. Created by advertising copywriter Tom Rogers, Charlie was presented in each commercial as a beret- and sunglasses-wearing hipster who never met the taste standards of Star-

Kist tuna. Commercials typically ended with the statement, “Sorry, Charlie. Star-Kist wants tuna that tastes good, not tuna with good taste.” Charlie appeared in 86 commercials and guest spots throughout the 1960s and '70s before he was retired from Star-Kist commercials (*Washington Post* 2005).

## THE DECLINE OF STAR-KIST ON TERMINAL ISLAND



Photo 12. Aerial view of main plant in the 1970s (Source: Port of Los Angeles)

While the Star-Kist operations on Terminal Island remained the largest tuna cannery in the world through the late in 1970s, globalization and foreign competition began to have a major impact on the U.S. tuna industry by the 1980s (*Los Angeles Times*, 1977). Even with tariffs applied to tuna imports, U.S. tuna makers, like Star-Kist, found it increasingly difficult to compete with foreign competition, which could pay substantially less for non-union tuna processing labor and ultimately produce a cheaper tuna product. By 1983, Star-Kist began to decrease its work force at the Terminal Island plant by laying off 750 night shift workers, in addition to reducing the work week to three days. At this same time, the Star-Kist plant came under fire for continued Cal-OHSA worker safety violations and questionable treatment of

undocumented workers hired by the company. In October of 1984, in response to high labor costs and competition from low-priced tuna imports, Star-Kist closed its last mainland canning facility on Terminal Island and moved operations to American Samoa. Despite efforts by workers to prevent the plant closure, nearly 1,150 Star-Kist employees were laid off at the Terminal Island location. The Star-Kist cannery in Samoa became the largest cannery in the world at this time and remains the largest to present day (U.S. Department of Labor 2007).



Photo 13. Workers meet for protest of Star-Kist tuna plant closure in 1984 (Source: *Los Angeles Times*, 1984)

According to a 2007 report on the tuna industry by the U.S. Department of Labor, Star-Kist is currently the leading brand of canned tuna sold in the United States, and held 45% of the canned tuna market share in the U.S. as of 2000. In 2002, Del Monte acquired the Star-Kist food division from H.J. Heinz in a stock swap that would also give H.J. Heinz shareholders considerable shares on Del Monte stock. Del Monte Company reported the continued success of the Star-Kist brand in its 2004 annual report and oversees Star-Kist tuna processing plants in Ecuador, American Samoa, Seychelles, France, Portugal, and Ghana. Industry reports have noted that Star-Kist also entered the European market with the acquisitions of distributors in the United Kingdom, France, and Italy. In recent years, the Star-Kist brand has shifted some of its products from the traditional canned tuna, to “value-added products” such as pouched tuna and Lunch-To-Go packs. This alternative to traditional packaging has become a success and is gaining momentum among consumers world-wide (U.S. Department of Labor 2007).



## THE “TUNA NURSES” -- WOMEN CANNERY WORKERS OF STAR-KIST



Photo 14. Workers at the Star-Kist plant in early 1980s (Source: The Port of Los Angeles, 1983)



Port of Los Angeles

Photo 15. Workers leaving the Star-Kist plant in 1963 (Source: The Port of Los Angeles)

Hispanic women constituted a sizable portion of the labor force at the Star-Kist plant during its operation on Terminal Island. During their tenure at Star-Kist, most of these women held unskilled positions, such as fish cleaning, and were likely to be among the lowest paid employees at the plant. While the unskilled work was far from glamorous, many employees considered cannery work desirable over jobs in the service industry, which typically paid less and offered few or no benefits. The workers were supported by an industrial union and could make reasonable income to help support families and purchase modest homes (Ruiz 1987).

Most workers typically lived in the adjacent communities of San Pedro and Wilmington, and belonged to ethnic enclaves within these communities. In the early 1980s, both communities felt the impact of the Star-Kist closure, which contributed to a relatively high unemployment rate in the area. Many Hispanic women found it difficult to transition into the changing job market after the Star-Kist layoffs, because former workers often had limited education and some spoke very little English. Economic decline and industrial disinvestment in other industries during this time further compounded the problem for many unskilled workers in search of employment (Casillas 1993).

## STAR-KIST PLANT ARCHITECT:

**John K. Minasian**

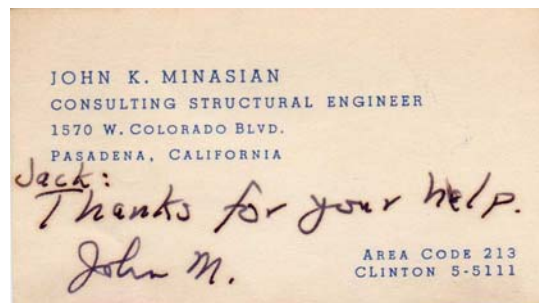


Photo 16. John K. Minasian business card, circa 1962 (Source: <http://steelage.net/>)

Born in Alexandria, Egypt, John K. Minasian immigrated to the United States at age 3. He was raised in New Jersey and attended the City College of New York. In 1935, he moved to Los Angeles and became a student at Caltech, earning a B.S. and M.S. in Civil Engineering. After working during the war years for L.A. Water & Power and the City of Los Angeles Building Department, Minasian established a structural engineering practice in 1947. He had a distinguished career and engineered many notable projects, including the Space Needle for the 1962 Seattle World's Fair. Minasian's other projects included missile gantries at Cape Canaveral, missile test stands at Edwards Rocket Base, and structural design on radio and TV towers on the West Coast (*Orange County Register* 2007). Later in his career, he worked on office developments throughout the San Gabriel Valley, primarily in Pasadena (*Los Angeles*

*Times* 1974). Minasain was appointed a member of the California Board of Civil & Professional Engineers and served as its president. He was also a professor of engineering at Cal State University, Los Angeles. The Star-Kist cannery and offices at 1050 Ways Street in Terminal Island represent one of his earliest architectural and civil engineering projects in Southern California (*Los Angeles Times* 1952).

## **STAR-KIST TUNA CANNERY PROPERTY DESCRIPTION**

### **Introduction**

The Star-Kist Tuna Cannery consists of three separate properties comprising a Main Plant, a Research Laboratory Complex, and a set of Net Repair Sheds. The three properties are all associated with the growth and development of the Star-Kist Tuna Cannery during the period of time extending from 1950 to 1984. As discussed below, the most historic, architecturally interesting, and unique engineering features, structures, and buildings are those associated with the 1951/1952 construction of the Main Plant.

### **Star-Kist Tuna Cannery Main Plant**

The Star-Kist Tuna Cannery Main Plant consists of a large complex of industrial buildings located on Terminal Island, Los Angeles, California, between Earle Street and Ways Street on the east and west, and to the north of Marina Way which serves as the southern boundary of the manufacturing complex. The northern boundary of the complex is defined by an irregular line formed by Bass Street, Barracuda Way, and a parking lot to the east of Sardine Street. The approximate acreage of the Main Plant Complex is 25 acres, and the total improved square footage of existing building improvements is approximately 641,000.

The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from 1971 to the late-1980s. In general, the historic portion of the Star-Kist Cannery Main Plant consists of the eastern portion of the manufacturing complex, while the western and northern portions of the complex consist of alterations and additions to the original 1951/1952 complex. Approximately 200,000 square feet of the original 1951/1952 facility stands today, as part of the existing 641,000 square foot Main Plant manufacturing complex. In addition, three piers extend southwesterly into Fish Harbor off of Ways Street (eastern elevation of complex). The largest of these piers is indirectly associated with the original 1951/1952 construction of the Star-Kist Cannery. The main entrance of the building was constructed at the end of the preexisting pier to facilitate employee access when they arrived on ferries from San Pedro. An additional pier (original 1951/1952 fish loading



dock) extends southwesterly into Fish Harbor off of the southern elevation of the historic complex.

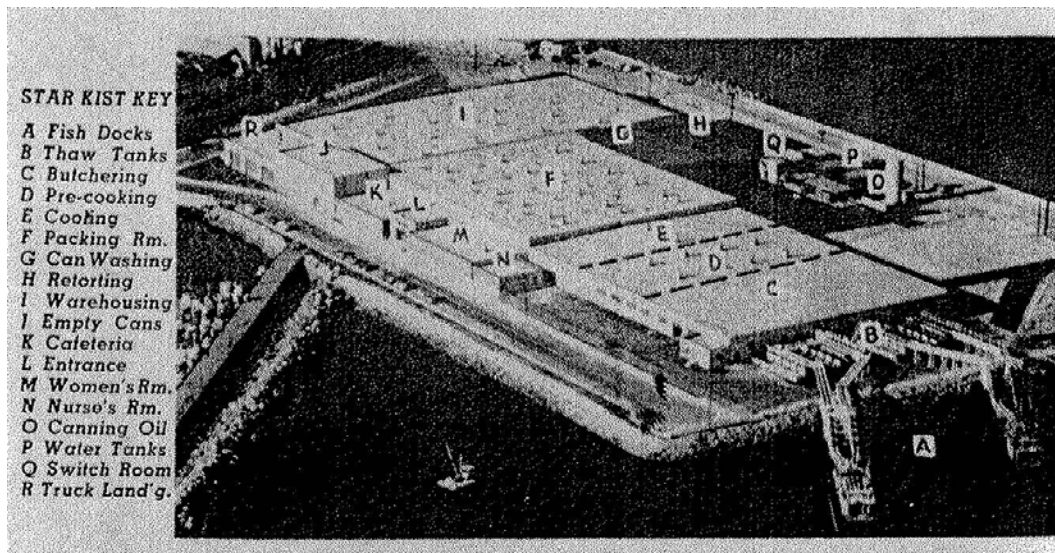


Photo 17. Historic 1952 Aerial/Oblique of Original Star-Kist Cannery (Source: Star-Kist Company pamphlet)



Photo 18. Entrance (L) as Identified in the Above Historic Aerial/Oblique (Source: Star-Kist Company pamphlet)



Photo 19. Entrance as it stands in 2007

As seen above, the photographs of the original Star-Kist Cannery depict the facility as opened in 1952. Note, in particular, that the areas identified as G (Can Washing), H (Retorting), Q (Switch Room), P (Water Tanks), and O (Canning Oil), as well as the building located in the extreme lower right-hand corner of the picture (aerial/oblique) have been demolished. They have been replaced by the existing Cold Storage Building, the Warehouse, and the Impress Building. In addition, one of the original Fish Docks (A) has also been demolished. The Star-Kist Tuna Cannery is of considerable architectural and/or engineering interest. First, the industrial complex does have an architect designed main entrance fronting on Ways Street and, therefore, facing outward towards Fish Harbor. The design is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Second, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. Third, at the time it was built, the Star-Kist Tuna Cannery was the largest example of tilt-up construction in the western United States.

## 1050-1054 Ways Street: Historic Star-Kist Tuna Cannery “Historic” Main Plant



Photo 20. Looking northeast at the center of the western elevation of original plant

The buildings located at 1050-1054 Ways Street consist of an industrial tuna cannery complex located on the eastern side of Fish Harbor, Terminal Island. The facility has an interesting western orientation facing the harbor with an architect designed main entrance. The historic portion of the existing facility is built in a largely rectangular shaped plan (with a large L-shaped historic building unit), and is designed or “engineered” in a primarily industrial/utilitarian style with the exception of the main entry fronting on Ways Street. The architect designed main entry was designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. Historically, tuna fishing boats tied up at the large pier extending into Fish Harbor while waiting to unload at the cannery fish docks, and employees commonly arrived to work on a ferry from San Pedro at the Evergreen Terminal prior to construction of the Vincent Thomas Bridge. The pier leads directly to the historic main entrance of the cannery. Relatively few Los Angeles Harbor area industrial buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-Kist Cannery is unusual in this regard.

Upon completion in 1952, the entire facility covered an area of ten +/- acres, and had approximately 200,000 square feet under roof. At this time, it was not only the largest tilt-up structure built by private industry in the western United States, but also the largest tuna packing



facility in the world. The 1951/1952 cannery complex consisted of a set of interconnected building spaces and manufacturing areas with varying roof shapes, number of stories, and functions. In general, the manufacturing process (see aerial/oblique) began at the southern end of the complex where fish was offloaded onto the Fish Docks (A). The frozen fish was then transported to Thaw Tanks (B). After being thawed, the fish was Butchered (C), Pre-Cooked (D), and then Cooked (E). After being cooked, the fish was then Packed (F) into cans, and placed into a Warehouse (E), where it was ultimately loaded at a Truck Landing (R) for shipping. Clearly, the facility was designed in a highly efficient manner whereby the manufacturing process progressed from south (unloading of fish) to north (loading of canned fish).

Construction of the cannery began in 1951. John K. Minasian is listed as the architect, and M.A. Nishkian & Co. is listed as the licensed engineer. Minasian, although primarily known as a structural engineer (Seattle Space Needle), is known to have worked on numerous projects with the Nishkian firm.

Today, major architectural features of the historic Star-Kist and existing Del Monte facility consist of a low and extended building mass punctuated by silos and towers, a harbor-facing façade and entrance, piers and loading docks extending onto Fish Harbor, multiple entrance points and service entry doorways, and a second manufacturing area with connecting conveyor/ bridge located immediately to the east of the historic facility. Additional or associated facilities include water tanks, a water treatment plan, parking areas, a detached warehouse, and an animal care facility. Architectural details consist of multiple window and doorway types (metal frame, roll up, tilt, fixed, etc.), multiple types of roof ventilation units, and varying exterior wall surfaces (metal, concrete, brick, wood). Construction materials include concrete foundations, tilt-up concrete walls, metal framing, metal siding, brick, glass, and an assortment of metal pipes and vents. The western elevation of the historic facility faces Fish Harbor. It is largely unaltered, with the exception of the addition of a parking area and the addition of two small piers, and consists of an architect designed main entry area in the middle, and industrial designed manufacturing areas to the south and north. The southern elevation of the historic complex is purely industrial in nature, and consists of a loading dock/pier, an elevator and conveyor unit, and a receiving area (thaw tanks) leading into the interior of the manufacturing plant. The northern elevation of the historic plant consists of a one-story 1970s warehouse addition that is purely industrial in nature with a largely blank wall surface containing several entries and loading areas. The eastern elevation of the historic plant is also purely industrial in nature. This elevation has been altered by the demolition of a can washing area, and the addition of sterilizer towers, an elevator bridge/conveyor leading to the newer can manufacturing, cold storage, and warehouse facilities, a set of silos used in the manufacture of pet foods, and a detached one-story rectangular metal repair shop. Although the interior spaces of the complex remain virtually unaltered, the original equipment has been removed. Several historic alterations to the interior are also evident, including the conversion of use of individual areas (i.e., butchering, pre-cooking, and cooking areas no longer extant), and various code-related improvements including new doorways and tile.

In summary, the building at 1050-1054 Ways is an unusual architectural example of industrial design. The physical structure of the “historic” Main Plant is relatively intact

(approximately 75%), and this portion of the Star-Kist Cannery should be regarded as having considerable significance as a purpose-built industrial facility.

### **936-950 Barracuda Street (Impress/Warehouse/Cold Storage)**



Photo 21. Looking southeast at the northwest corner and northern elevation of the Impress facility

The buildings located at 936-950 Barracuda Street, just to the east of the historic Star-Kist cannery, consist of five separately constructed buildings joined to form one interconnected building unit. Although they were an integral part of the Star-Kist facility as operated immediately prior to closure of the cannery in 1984, they should best be regarded as additions and alterations to the original 1951/1952 facility. From north to south, these five building units consist of the Impress building (built 1972) at the northern end, a large Warehouse (built 1971) in the middle, and a Cold Storage facility (built in 1971, 1973, and 1975) built as three separate units at the southern end. In addition, a set of water treatment tanks are located immediately to the south of the Cold Storage unit.

The Impress can manufacturing facility, located at 936 Barracuda Street, consists of a two-story industrial unit (primarily a one-story manufacturing floor with a two-story interior office area). It is rectangular-shaped in plan, and is designed in a purely industrial/utilitarian style. Major architectural features include large loading docks with awnings on the northern and western elevations, multiple entrance points, a conveyor bridge connecting the southwestern



corner of the structure to the historic 1951/1952 cannery, a low pitched roof shape, and a southern elevation connected to the Warehouse. Architectural details consist of metal awnings, nearly square windows set into each elevation, and a variety of doorway entries. Construction materials include a massive concrete foundation, metal exterior siding, and a metal roof with ventilator pipes and fans. The building retains a relatively high degree of architectural integrity. Alterations include the addition of a small, one-story shelter building on the northern elevation. The interior of the building, including the equipment and equipment layout, is virtually unaltered. Associated property features include the historic Star-Kist manufacturing complex. Landscape features are minimal, but do include several trees running the length of the eastern or Earle Street elevation. In summary, the Impress Plant is simply designed in a cost-effective utilitarian manner, and although it has a relatively high degree of architectural integrity, it has no unique architectural features of interest. The only engineering feature of interest is an unusually deep concrete foundation feet in depth to withstand the pounding from heavy can manufacturing presses, and this feature would not appear to be of “exceptional importance.” Metal industrial buildings of this type are common throughout southern California and this building should best be regarded as having minimal architectural significance.



Photo 22. Looking southeast at the western elevation of the Warehouse/Distribution Center

The Warehouse/Distribution Center located at 938 Barracuda Street consists of a two-story industrial unit. It is built in a rectangular-shaped plan, and designed in a purely industrial/utilitarian style or manner. Major architectural features consist of a large one-story

interior mass with smaller two-story interior components, multiple loading dock entrances on the western elevation, a single service entry on the eastern elevation, and a low pitched roof shape. Architectural details consist of square vents spaced evenly on the building exterior, projecting light fixtures near the loading entrances on the west elevation, and multiple ventilation units extending along the ridge of the roof. Construction materials include a concrete foundation, metal exterior siding, and metal roofing. The building retains a medium degree of architectural integrity, despite additions and expansion throughout the 1970s and 1980s, as all modifications have been made utilizing the same basic material types. Associated property-specific features include the connected Impress Plant on the northern elevation, and the connected Cold Storage facilities on the southern elevation. Landscape features are minimal, but do include trees running the length of the eastern elevation along Earle Street. In summary, the Warehouse/Distribution Center is simply designed in a cost-effective utilitarian manner, and although it has a medium degree of architectural integrity, it has no unique architectural or design features of interest. Metal industrial buildings of this type are common throughout southern California and this building should best be regarded as having minimal architectural significance.



Photo 23. Looking northeast at the southwest corner and southern elevation of the Cold Storage buildings

The Cold Storage buildings located at 950 Barracuda Street consist of three separately constructed units connected to the southern elevation of the Warehouse/Distribution Center. The buildings were constructed during the period of time extending from 1971 to 1979. They are built in an essentially rectangular shaped plan, and are designed in a purely industrial/utilitarian style or manner. Major architectural features consist of an equipment bridge that connects the



northwestern corner of the cold storage buildings to the historic Main Plant across Barracuda Street, a compressor room and machinery connected to the southern elevation, low pitched roofs, and varying roof heights. Architectural details consist of an awning and entrance way at the southern elevation and minimal fenestration. Construction materials include a concrete foundation and the use of metal exterior siding. The building retains a relatively low degree of architectural integrity due to several additions. Associated property-specific features include the Warehouse/Distribution Center connected to the northern elevation and a water treatment center (see two tanks) adjacent to the southeastern corner of the cold storage unit. There are no landscape features directly adjacent to the structure. In summary, the Cold Storage buildings are simply designed in a cost-effective and highly utilitarian manner, have a relatively low degree of architectural integrity, and have no unique architectural or design features of interest. Industrial buildings of this design are common throughout southern California, and the Cold Storage buildings should best be regarded as having minimal architectural significance.

### **916 Barracuda Street (Green Warehouse)**

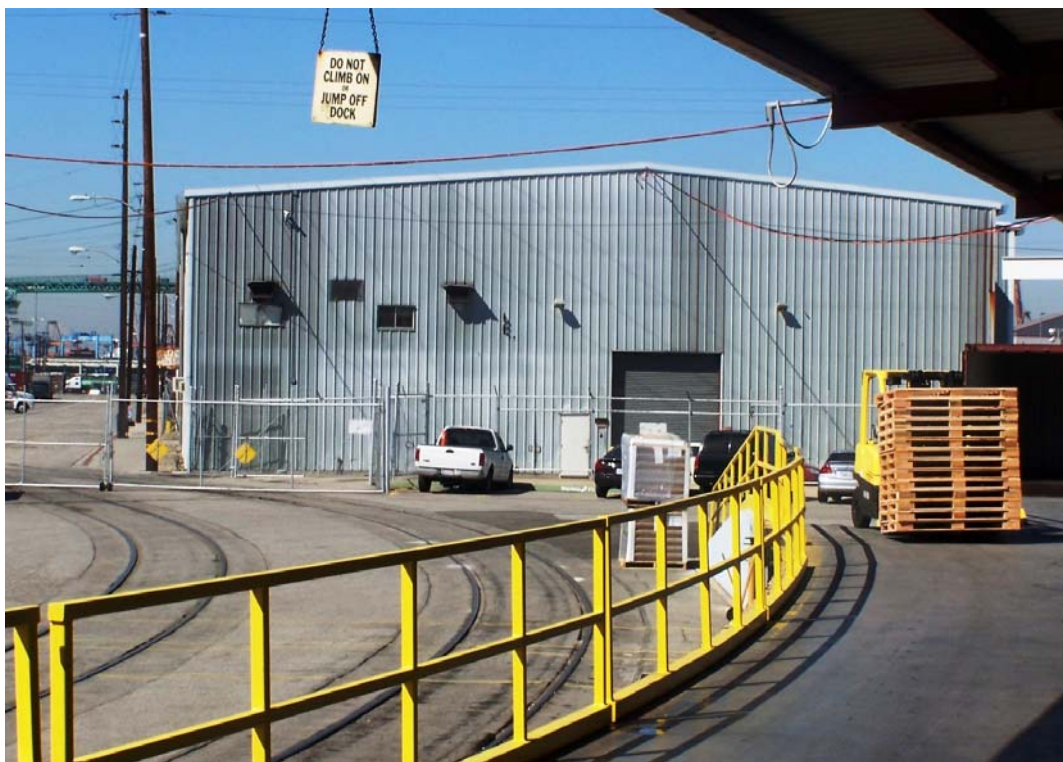


Photo 24. Looking north at the southern elevation of the “Green Warehouse”

The “Green Warehouse” building, so named because of its color, is located at 916 Barracuda Street, or just north of the main complex. It consists of a one-story industrial warehouse built in a rectangular shaped plan, and designed in a purely industrial/utilitarian style. Major architectural features consist of a level main entry, a building mass with a small

rectangular gap in the southeast corner, a low pitched roof, and large metal service/roll-up doors on the north and south elevations. Architectural details consist of rectangular windows and vents in the western end of the southern elevation, and projecting light fixtures above service entries. Construction types/materials include a concrete foundation, a metal exterior, and a metal roof. The building retains a medium degree of architectural integrity. Alterations consist of the replacement of some metal siding and the addition of a doorway. Associated property-specific features include the adjacent Animal Care Facility to the west as well as nearby water tanks. There are no landscaping features worthy of note. In summary, the Green Warehouse is simply designed in a cost-effective utilitarian manner, and although it has a medium degree of architectural integrity, it has no unique architectural or design features of interest. Metal industrial buildings of this type are common throughout southern California and this building should best be regarded as having minimal architectural significance.

### **919 Earle Street (Animal Care Facility)**



Photo 25. Looking south at the northern elevation of the Animal Care Facility

The Animal Care Facility, located at 919 Earle Street, consists of a highly utilitarian unit designed for a specific purpose. Built circa 1980, it is constructed in an irregular shaped plan, and is designed in a generally non-descript utilitarian style or manner. Major architectural features consist of an irregular massing of one-story buildings, several entry areas, a composite hipped roof shape, and a large canopy/roof over open air animal pens to the rear of the main building. Architectural details consist of flat window and doorway openings, ventilation units running along the ridge of the roof, and a solid concrete block wall surrounding the structure.

Construction types/materials include a concrete foundation, stucco exterior wall surfaces, and the use of concrete block walls and wire mesh fencing. The building appears to retain a medium to high degree of architectural integrity. Associated property-specific features include a container storage area to the south of the structure, a large parking lot, and two large water tanks to the immediate southeast. Landscape features include trees and shrubs planted throughout the perimeter of the building. In summary, the Animal Care Facility is simply designed in a cost-effective utilitarian manner, and although it has a high degree of architectural integrity, it has no unique architectural or design features of interest. Stucco utilitarian designed buildings are common throughout southern California, and this building should, therefore, be regarded as having minimal architectural significance.

### Research Laboratory Complex



Photo 26. Looking southeast across Terminal Way at the northwestern corner of the Research Laboratory Complex

The Research Laboratory Complex is located at the southeast corner of the intersection of Tuna Street and Terminal Way, between Terminal Way and Cannery Street, on Terminal Island. Today, the complex continues to serve as a research laboratory operated by the Del Monte Corporation. The original Star-Kist laboratory facility consisted of a small one-story building fronting on Terminal Way east of the intersection with Tuna Street. The original laboratory was repeatedly enlarged by additions in 1963, 1965, 1967, 1972, and 1990. Today, the original laboratory (including additions) is described below as the Pet Products Division building. In



1979, the Pilot Plant was constructed to complete the facility referred to herein as the Research Laboratory Complex.

### **Research Laboratory Complex - Pet Products Division: 212-214 Terminal Way**



Photo 27. Looking northeast across Tuna Street at the western elevation of the Pet Products Division Building

The Pet Products Division is part of the Research Laboratory Complex located at the southeast corner of the intersection of Tuna Street and Terminal Way. The building address is 212-214 Terminal Way, Los Angeles, CA (Terminal Island). The original laboratory building consisted of a one-story 29' by 77' foot unit fronting on Terminal Way. The original laboratory was repeatedly enlarged by additions in 1963, 1965, 1967, 1972, and 1990. Today, the Research Laboratory Complex, Pet Products Division, consists of a one- and two-story U-shaped laboratory building. Major architectural features consist of an offset level main entry with courtyard entrance, one- and two-story building components, and primarily flat roofs. Architectural details consist of pilaster wall features, a stucco exterior on the northern and eastern elevations, and concrete block exterior on the southern elevation. There are also flat rectangular windows on the northern elevation, and structural piers and piping along the southern elevation. Construction types/materials include a concrete foundation, and stucco and concrete block exterior surfacing. The building retains a low degree of architectural integrity. Building permit research reveals multiple additions and alterations, as the structure expanded to the north and west over a period of two decades. Associated property-specific features include wrought iron fencing along the northwest corner and alley to the south. Landscape features include a

large courtyard area formed by the building “U” with trees and flowering plants. The Pet Products Division building also is associated with the Research Laboratory Complex Pilot Plant located directly to the south. In summary, the Research Laboratory Complex - Pet Products Division building is a common architectural example of utilitarian/industrial design, and it has no unique architectural or design features of interest. In addition, it has been massively altered by periodic additions during the period of time extending from 1963 to 1990, and has an extremely low degree of architectural integrity. This building should, therefore, be regarded as having minimal architectural significance.

### **Research Laboratory Complex - Pilot Plant: 642 Tuna Street**



Photo 28. Looking southeast across Tuna Street at the western elevation of the Pilot Plant

The Pilot Plant is part of the Research Laboratory Complex. It is located at 642 Tuna Street, Los Angeles, CA (Terminal Island), or at the northeast corner of the intersection of Tuna Street and Cannery Street. It consists of a one-story industrial unit built in a 94' by 169'-foot rectangular shaped plan, and is designed in a simple industrial/utilitarian style or manner. Major architectural features consist of an offset level main entry with hood, primarily flat and blank wall surfaces, a flat roof, and a rectangular boiler room addition on the east elevation. Architectural details include structural piers and pilaster wall features, flat windows with awnings on the west elevation, and two metal roll-up service entries on the south elevation. Construction details include a concrete foundation, and a concrete block exterior. The building retains a high degree of architectural integrity. Alterations consist primarily of the addition of a rectangular boiler room to the east elevation. Associated features include a storage structure to the immediate east of the building, as well as all additional building components of the Research

Laboratory Complex. No landscape features are specifically associated with this building. The Pilot Plant building also is associated with the Research Laboratory Complex, Pet Products Division building, located directly to the north. In summary, the Research Laboratory Complex - Pilot Plant is a common architectural example of 1970s industrial architecture. It is simply designed in a cost-effective utilitarian manner, and although it has a high degree of architectural integrity, it has no unique architectural or design features of interest. Concrete block industrial buildings are common throughout southern California and this building should, therefore, be regarded as having minimal architectural significance.

### **Original Star-Kist Net Repair Sheds – “Boneyard”: 250 Terminal Way**



Photo 29. Looking northeast at the western elevation of the Net Repair Sheds (“Boneyard”)

The buildings located at 250 Terminal Way, at the southwest corner of Terminal Way and Ways Street, serve today as two “paired” one-story industrial storage units. According to long-term Star-Kist/Heinz/Del Monte company employees, the buildings were originally built as “net repair sheds” by the Star-Kist Company. Today, the buildings are referred to as the “Boneyard” by Del Monte employees due to the fact that it is common practice in manufacturing plants to have temporary equipment storage area called “boneyard(s).” The Net Repair Sheds appear to have been built circa 1950, according to its architectural style. They are built in rectangular-shaped plans, and are designed in a cost-effective industrial/utilitarian style or manner with function as the primary design intent. Major architectural features consist of a long and low rectangular building mass, multiple service doors on both buildings, and a low pitched (gabled) roof with “pop-up” monitor shaped vents running along the rooflines. Architectural details consist of oversized wooden service doorways on the northern elevation fronting on



Terminal Way (these doorways appear as original), roll-up doorways (alterations) in the court between the two buildings, and small windows in the southern elevation of the southern structure. Construction materials include a concrete foundation, and a primarily stucco exterior with the exception of the wooden doorways and wood siding on the monitor roof vents. The buildings retain a medium degree of architectural integrity. Alterations consist of the addition of metal service/roll-up doors between buildings, repairs to the stucco exterior surface of both buildings, and the possible enclosure of several openings on the southern elevation of the southern building. Associated features include a small detached storage shed of recent vintage, and an outdoor storage area. The property's only landscape features are two trees located just west of the buildings. The Net Repair Sheds/Boneyard buildings are simply designed in a cost-effective utilitarian manner, and although they have a medium degree of architectural integrity, they have no unique or outstanding architectural or design features of interest. Small stucco industrial/commercial buildings are common throughout southern California, and it is concluded that the Net Repair Shed buildings located at 250 Terminal Way should be regarded as having minimal architectural significance.

## **SIGNIFICANCE CRITERIA**

### **National Register of Historic Places Criteria**

This report evaluates cultural resources significance in terms of eligibility for listing in the NRHP. NRHP significance criteria applied to evaluate the cultural resources in this study are defined in 36 CFR 60.4 as follows:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and

- a. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b. that are associated with the lives of persons significant in our past; or
- c. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d. that have yielded, or may be likely to yield, information important in prehistory or history.

The question of integrity also must be addressed. In order for a property to convey its historical significance, it must retain intact the physical qualities or character defining features that illustrate its significance under NRHP criteria. Integrity is judged on seven aspects: location, design, setting, workmanship, materials, feeling, and association. These seven factors can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship most often apply to historic buildings and relate to construction methods and architectural details. Feeling and association are the least objective criteria, pertaining to the overall ability of the property to convey a sense of the historical time and place in which it was constructed (National Park Service 1991).

### **California Register of Historical Resources Criteria**

CEQA guidelines define three ways that a property can qualify as a significant historical resource for the purposes of CEQA review. 1) The resource is listed in or determined eligible for listing in the California Register of Historical Resources (CRHR). 2) The resource is included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the preponderance of evidence demonstrates that it is not historically or culturally significant. 3) The lead agency determines the resource to be significant as supported by substantial evidence in light of the whole record (California Code of Regulations, Title 14, Division 6, Chapter 3, section 15064.5).

The CRHR was created by the State Legislature in 1992 and is intended to serve as an authoritative listing of historical and archaeological resources in California. Additionally, the eligibility criteria for the CRHR are intended to serve as the definitive criteria for assessing the significance of historical resources for purposes of CEQA, in this way establishing a consistent set of criteria to the evaluation process for all public agencies statewide.

For a historical resource to be eligible for listing in CRHR, it must be significant at the local, state, or national level under one or more of the following four criteria:

1. is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. is associated with the lives of persons important in our past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
4. or has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource.

Integrity is the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the CRHR must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data (California Office of Historic Preservation 2001).

### **Local Regulations**

The Los Angeles Municipal and Administrative Codes address the preservation of historic and cultural monuments, and Preservation Zones. A list of historical and cultural monuments has been compiled and is maintained by the Cultural Heritage Commission, a board of five persons appointed by the Mayor and approved by the City Council. It is the responsibility of the Cultural Heritage Commission to oversee and approve the establishment of Preservation zones (LA Municipal Code Sec. 12.20.3) and to preserve monuments when such action is not in conflict with the public health, safety, and general welfare (LA Administrative Code Sec. 22.128).

According to Section 22.130 of the Los Angeles Municipal Code, a historical or cultural monument is "any site (including significant trees or other plant life located thereon), building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history or which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age."

## **Significant Resource Types**

The historic significance of the Port relates to the role that the Port facilities played in expanding the commercial and economic success of Los Angeles, which coincided with Los Angeles' emergence as an "international" city between the 1920s and the 1940s. Facilities typically associated with this theme include buildings and structures constructed to facilitate transshipment of goods from oceangoing vessels to rail or truck systems, especially those improvements added either by major shipping companies or by the Port in a portwide expansion aimed at meeting the demands of increased usage of the Port during this period. In the Fish Harbor area, properties associated with fishing and canning, a major Port industry from the 1920s through the 1950s, may be historically significant.

## **EVALUATION OF SIGNIFICANCE**

### **Introduction and Summary of Findings**

The following conclusions regarding National Register of Historic Places (NRHP) criteria (a-d) and California Register of Historical Resources (CRHR) criteria (1-4) are based upon information presented in the Historic Setting, Historic Resources-Star-Kist Cannery, and Historic Resources-Architectural Descriptions sections of this report. Please also refer to the Significance Criteria section of this report for a detailed discussion of the criteria for evaluation utilized below.

The following eligibility statements apply to three separate properties comprising the greater Star-Kist Tuna Cannery facility at Terminal Island. This includes the:

- Star-Kist Tuna Cannery: Main Plant
- Star-Kist Tuna Cannery: Research Laboratory Complex
- Star-Kist Tuna Cannery: Net Repair Sheds

The most important considerations influencing the following NRHP, CRHR, and City of Los Angeles Cultural Heritage Commission (CHC) determinations of eligibility are:

1. The importance of the tuna and fish canning industry to the Port of Los Angeles.
2. The importance of the French Sardine Company, later known as the Star-Kist Company, to the American tuna canning industry. The Star-Kist Company did, in fact, operate the largest tuna canning facilities in the world, and when opened in

1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest cannery in the world.

3. The historical significance of Joesph J. Bogdanovich, owner of French Sardine Company/Star-Kist and son of the French Sardine Company founder Martin Bogdanovich, as an individual of importance to the American tuna canning industry, the development of the tuna fishing industry in California, and the growth and development of the Port of Los Angeles.
4. The historical significance of John K. Minasian, architect of the Star-Kist Tuna Cannery Historic Main Plant, as a prominent engineer and designer. Minasian was the chief engineer of the widely acclaimed Space Needle, opened in 1962 as part of the Seattle World's Fair. He also designed and engineered projects at Cape Canaveral, Edwards Air Force Base, and was the recipient of awards and prestigious appointments.
5. When opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest example of tilt-up construction built by private industry on the West Coast.
6. The historic portion of the Star-Kist Main Plant has a relatively high degree of architectural and/or design integrity. The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from the mid-1970s to the late-1980s. The Star-Kist Tuna Cannery is of considerable architectural and/or engineering interest.
7. The design of the main entrance to the historic Main Plant, located at 1050-1054 Ways Street, is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Second, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. The architect designed main entry was designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. Historically, tuna fishing boats tied up at the large pier extending into Fish Harbor while waiting to unload at the cannery fish docks and the pier leads directly to the historic main entrance of the cannery. Prior to construction of the Vincent Thomas Bridge, employees commonly arrived to work on a ferry from San Pedro at the Evergreen Terminal directly adjacent to Fish Harbor. Relatively few Los Angeles Harbor area industrial buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-Kist Cannery is unusual in this regard. In brief, the main entrance to the historic portion of

the Star-Kist Main Plant, located at 1050-1054 Ways Street, is an unusual architectural example of industrial design in Los Angeles Harbor area.

8. The Star-Kist Tuna Cannery Main Plant stands today as the most complete and operative cannery facility in the Port of Los Angeles. Although nearly all of the original equipment has been removed from the Main Plant, the canning process itself is still well represented. In brief, the existing Star-Kist facility is representative of a “Factory Complex” facility whereby a large and varied building typology accommodates multiple manufacturing processes. Essentially, a variety of raw materials come into the complex and finished products are shipped out. This type of property is becoming extremely rare in the Port of Los Angeles due largely to the growth of the container shipping industry.

### **Summary of Findings: National Register and California Register**

The following Resource Attribute and NRHP/CRHR Status Codes apply to the historic portion of the Star-Kist Tuna Cannery Main Plant, located at 1050-1054 Ways Street.

RESOURCE ATTRIBUTE CODE(S):

HP8. Industrial Building  
HP11. Engineering Structure

STATUS CODE(S):

3S Appears eligible for NR as an individual property through survey evaluation.  
3CS Appears eligible for CR as an individual property through survey evaluation.  
5S3 Appears to be individually eligible for local listing or designation through survey evaluation.

The following Resource Attribute and NRHP/CRHR Status Codes apply to the non-historic portion of the Star-Kist Tuna Cannery Main Plant, located at 936-950 Barracuda Street (Impress/Warehouse/Cold Storage), 916 Barracuda Street (Green Warehouse), and 919 Earle Street (Animal Care Facility).

RESOURCE ATTRIBUTE CODE(S):

HP8. Industrial Building

STATUS CODE(S):

6Z Found ineligible for NR, CR, or Local designation through survey evaluation.

The following Resource Attribute and Status Codes apply to the Star-Kist Tuna Cannery Research Laboratory Complex, located at 212-214 Terminal Way (Pet Products Division), and 642 Tuna Street (Pilot Plant).

RESOURCE ATTRIBUTE CODE(S):

HP8. Industrial Building

STATUS CODE(S):

6Z Found ineligible for NR, CR, or Local designation through survey evaluation.

The following Resource Attribute and Status Codes apply to the Star-Kist Tuna Cannery: Net Repair Sheds, located at 250 Terminal Way.

RESOURCE ATTRIBUTE CODE(S):

HP8. Industrial Building

STATUS CODE(S):

6Z Found ineligible for NR, CR, or Local designation through survey evaluation.

## **Federal: National Register of Historic Places**

### **Criterion (a-d)**

The following conclusions regarding National Register of Historic Places criteria (a-d) are based upon information presented in the Historic Setting, Historic Resources-Star-Kist Cannery, and Historic Resources-Architectural Descriptions sections of this report. Please also refer to the Significance Criteria section of this report for a detailed discussion of the criteria for evaluation utilized below.

- (a) *that are associated with events that have made a significant contribution to the broad patterns of our history; or,*

Several historical events of interest are known to be associated with the Star-Kist Tuna Cannery. This includes the importance of the tuna canning industry to the Port of Los Angeles, and the importance of the French Sardine Company, later known as the Star-Kist Company, to the American tuna canning industry. The Star-Kist Company historically operated the largest tuna canning facilities in the world, and when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest cannery in the world. The twentieth century development of the tuna canning industry did, in fact, represent a major change in the consumption of fish products, and the historic portion of the 1951/1952 Star-Kist Main Plant is highly representative of several “broad patterns” of American history. In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, located at 1050-1054 Ways Street, **does appear to qualify as eligible for listing in the National Register of Historic Places in relation to Criterion (a).**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they are not directly associated with the main production facility, and/or the initial and most historic phase of construction of the Star-Kist facility. As such, they are not directly associated with the “broad patterns” of history that link the 1951/1952 historic portion of the Main Plant to the American tuna canning industry.

(b) that are associated with the lives of persons significant in our past; or,

Several individuals associated with the historic portion of the 1951/1952 Star-Kist Main Plant are known to provide sufficient historic evidence for a positive determination of historic significance in relation to this Criterion. Two individuals are of particular importance. These are Joseph Bogdanovich, son of the founder of the French Sardine Company, and architect and engineer John K. Minasian. Bogdanovich was an individual of pervasive importance to the American tuna canning industry, the development of the tuna fishing industry in California, and the growth and development of the Port of Los Angeles. Minasian was the chief engineer of the widely acclaimed Space Needle, opened in 1962 as part of the Seattle World's Fair. He also designed and engineered projects at Cape Canaveral, Edwards Air Force Base, and was the recipient of awards and prestigious appointments. These two individuals are clearly "persons significant in our past." In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, **does appear to qualify as eligible for listing in the National Register of Historic Places in relation to Criterion (b).**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they are not directly and/or intimately associated with John K. Minasian and/or Joseph Bogdanovich in the same manner that the historic portion of the Main Plant, or that portion built in 1951/1952 is associated with these two "persons significant in our past."

(c) that embody distinctive characteristics of a type, period, or method of construction or,

The historic portion of the 1951/1952 Star-Kist Main Plant is an early and large example of a type of construction (tilt-up) and a period of construction (early 1950s) as it presents several unusual design features (harbor facing entryway), and has a relatively high degree of integrity. First, when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest example of tilt-up construction built by private industry on the West Coast. Second, the design of the main entrance to the historic Main Plant, located at 1050-1054 Ways Street, is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Third, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. The architect designed main entry was designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. Historically, tuna fishing boats tied up at the large pier extending into Fish Harbor while waiting to unload at the cannery fish docks, and employees commonly arrived to work on a ferry from San Pedro at the Evergreen Terminal prior to construction of the Vincent Thomas Bridge. The pier leads directly to the historic main entrance of the cannery. Relatively few Los Angeles Harbor area industrial



buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-Kist Cannery is unusual in this regard. Finally, the historic portion of the Star-Kist Main Plant has a relatively high degree of architectural and/or design integrity. The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from the mid-1970s to the late-1980s. In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant **does appear to qualify** as eligible for listing in the National Register of Historic Places in relation to Criterion (c).

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they have no unique or distinguishing architectural and/or design qualities, have no readily apparent significant historical associations, and/or the fact that individual building components are substantially less than 50 years in age.

(d) that have yielded or may be likely to yield, information important in prehistory or history.

Although the history of this resource is well documented, the Star-Kist Tuna Cannery Main Plant stands today as the most complete and operative cannery in the Port of Los Angeles. Although nearly all of the original equipment has been removed from the Main Plant, the canning process itself is still well represented, and it is the process that has the potential “to yield” important historical information. The existing Star-Kist facility is representative of a “Factory Complex” facility whereby a large and varied building typology accommodates multiple manufacturing processes. Essentially, a variety of raw materials come into the complex and finished products are shipped out. This type of property is becoming extremely rare in the Port of Los Angeles. In summary, it is here concluded that the Star-Kist Tuna Cannery Main Plant, **does appear to qualify** as eligible for listing in the National Register of Historic Places in relation to Criterion (d).

### **Buildings Less Than Fifty Years Old**

No building, object, or structural feature of significance less than 50 years in age was identified in association with the Terminal Island Star-Kist Tuna Cannery. This includes:

- The Research Laboratory Complex (Pilot Plant), located at 642 Tuna Street, Los Angeles, CA.
- The Impress Building, Warehouse, and Cold Storage Building, located at 936-950 Barracuda Street.

- The Green Warehouse, located at 916 Barracuda Street.
- The Animal Care Facility, located at 919 Earle Street.

**The above listed properties do not appear to be of “exceptional importance.” They are not integral parts of a National Register eligible district, they have not been the subject of scholarly evaluation, and they have no apparent importance to the recent development of American history, architecture, archeology, engineering, and/or culture. For additional information please refer to *Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years* (Revised 1998), by Marcella Sherfy and W. Ray Luce.**

### **District Evaluation**

The Star-Kist Tuna Cannery consists of three separate properties comprising a Main Plant, a Research Laboratory Complex, and a set of Net Repair Sheds. The three properties are all associated with the growth and development of the Star-Kist Tuna Cannery during the period of time extending from 1950 to the late-1980s. The most historic, architecturally interesting, and unique engineering features, structures, and buildings are those facilities associated with the 1951/1952 construction of the Main Plant. The Research Laboratory Complex and the Net Repair Sheds are a part of the greater Star-Kist Tuna Cannery “Factory Complex,” but they cannot be regarded as individually significant and/or as contributing features to an architectural and historic district of resources due to the fact that they are either altered (lack of integrity) or have no distinguishing architectural or design features.

### **NRHP Summary Conclusions and Recommendations**

In summary, it is here concluded that the historic portion of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street, **does appear to qualify as individually eligible for listing in the National Register of Historic Places in relation to Criteria (a), (b), and (c).** This is the most important and historic component of the Star-Kist Terminal Island Tuna Cannery, and it also includes the original 1951/1952 Pier projecting into Fish Harbor leading to the main entry, and the remaining Fish Dock projecting into Fish Harbor from the rear (south) elevation of the historic Main Plant.

However, the entire Star-Kist Tuna Cannery “Factory Complex,” manufacturing process also **appears to qualify as eligible for listing in the National Register of Historic Places in relation to Criterion (d).** Please note that this determination does not include any individual building and/or structural features apart from those previously identified in association with the historic Star-Kist Main Plant. Rather, it is the basic “manufacturing process” that is identified here as having historic importance. Once this process is recorded through appropriate and relatively minimal mitigation techniques, all non-historic components of the Star-Kist Tuna Cannery “Factory Complex” may be removed without damaging the NRHP eligibility (criteria a-c) of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street.

## State of California: California Register of Historical Resources (CRHR)

### Criterion (1-4)

The following conclusions regarding California Register of Historical Resources criteria (1-4) are based upon information presented in the Historic Setting, Historic Resources-Star-Kist Cannery, and Historic Resources-Architectural Descriptions sections of this report. Please also refer to the Significance Criteria section of this report for a detailed discussion of the criteria for evaluation utilized below.

(1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

Several historical events of interest are known to be associated with the Star-Kist Tuna Cannery. This includes the importance of the tuna canning industry to the Port of Los Angeles, and the importance of the French Sardine Company, later known as the Star-Kist Company, to the American tuna canning industry. The Star-Kist Company historically operated the largest tuna canning facilities in the world, and when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest cannery in the world. The twentieth century development of the tuna canning industry did, in fact, represent a major change in the consumption of fish products, and the historic portion of the 1951/1952 Star-Kist Main Plant is highly representative of several “broad patterns” of American history. In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, located at 1050-1054 Ways Street, **does appear to qualify as eligible for listing in the California Register of Historical Resources in relation to Criterion (1).**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they are not directly associated with the main production facility, and/or the initial and most historic phase of construction of the Star-Kist facility. As such, they are not directly associated with the “broad patterns” of history that link the 1951/1952 historic portion of the Main Plant to the American tuna canning industry.

(2) Associated with the lives of persons important to local, California, or national history.

Several individuals associated with the historic portion of the 1951/1952 Star-Kist Main Plant are known to provide sufficient historic evidence for a positive determination of historic significance in relation to this Criterion. Two individuals are of particular importance. These are Joseph Bogdanovich, son of the founder of the French Sardine Company, and architect and engineer John K. Minasian. Bogdanovich was an individual of pervasive importance to the American tuna canning industry, the development of the tuna fishing industry in California, and the growth and development of the Port of Los Angeles. Minasian was the chief engineer of the

widely acclaimed Space Needle, opened in 1962 as part of the Seattle World's Fair. He also designed and engineered projects at Cape Canaveral, Edwards Air Force Base, and was the recipient of awards and prestigious appointments. These two individuals are clearly "persons significant in our past." In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, **does appear to qualify as eligible for listing in the California Register of Historical Resources in relation to Criterion (2).**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they are not directly and/or intimately associated with John K. Minasian and/or Joseph Bogdanovich in the same manner that the historic portion of the Main Plant, or that portion built in 1951/1952 is associated with these two "persons significant in our past."

(3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

The historic portion of the 1951/1952 Star-Kist Main Plant is an early and large example of a type of construction (tilt-up) and a period of construction (early 1950s) as it presents several unusual design features (harbor facing entryway), and has a relatively high degree of integrity. First, when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest example of tilt-up construction built by private industry on the West Coast. Second, the design of the main entrance to the historic Main Plant, located at 1050-1054 Ways Street, is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Third, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. The architect designed main entry was designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. The pier leads directly to the historic main entrance of the cannery. Relatively few Los Angeles Harbor area industrial buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-Kist Cannery is unusual in this regard. Finally, the historic portion of the Star-Kist Main Plant has a relatively high degree of architectural and/or design integrity. The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from the mid-1970s to the late-1980s. In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, **does appear to qualify as eligible for listing in the California Register of Historical Resources in relation to Criterion (3).**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they have no unique or distinguishing architectural and/or design qualities, have no readily apparent significant historical associations, and/or the fact that individual building components are substantially less than 50 years in age.

(4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Although the history of this resource is well documented, the Star-Kist Tuna Cannery Main Plant stands today as the most complete and operative cannery in the Port of Los Angeles. Although nearly all of the original equipment has been removed from the Main Plant, the canning process itself is still well represented, and it is the process that has the potential “to yield” important historical information. The existing Star-Kist facility is representative of a “Factory Complex” facility whereby a large and varied building typology accommodates multiple manufacturing processes. Essentially, a variety of raw materials come into the complex and finished products are shipped out. This type of property is becoming extremely rare in the Port of Los Angeles. In summary, it is here concluded that the Star-Kist Tuna Cannery Main Plant, **does appear to qualify as eligible for listing in the California Register of Historical Resources in relation to Criterion (4).**

### **CRHR Summary Conclusions and Recommendations**

In summary, it is here concluded that the historic portion of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street, **does appear to qualify as individually eligible for listing in the California Register of Historical Resources in relation to Criteria (1), (2), and (3).** This is the most important and historic component of the Star-Kist Terminal Island Tuna Cannery, and it also includes the original 1951/1952 Pier projecting into Fish Harbor leading to the main entry, and the remaining Fish Dock projecting into Fish Harbor from the rear (south) elevation of the historic Main Plant.

However, the entire Star-Kist Tuna Cannery “Factory Complex,” manufacturing process also **appears to qualify as eligible for listing in the California Register of Historical Resources in relation to Criterion (4).** Please note that this determination does not include any individual building and/or structural features apart from those previously identified in association with the historic Star-Kist Main Plant. Rather, it is the basic “manufacturing process” that is identified here as having historic importance. Once this process is recorded through appropriate and relatively minimal mitigation techniques, all non-historic components of the Star-Kist Tuna Cannery “Factory Complex” may be removed without damaging the CRHR eligibility (criteria 1-3) of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street.

## City of Los Angeles: Cultural Heritage Commission (CHC)

### Criterion

The following conclusions regarding Los Angeles Historic –Cultural Monuments criteria are based upon information presented in the Historic Setting, Historic Resources-Star-Kist Cannery, and Historic Resources-Architectural Descriptions sections of this report. Please also refer to the Significance Criteria section of this report for a detailed discussion of the criteria for evaluation utilized below.

- Historic structures or sites in which the broad cultural, political, economic or social history of the nation, state or community is reflected or exemplified;

Several historical events of interest are known to be associated with the Star-Kist Tuna Cannery. This includes the importance of the tuna canning industry to the Port of Los Angeles, and the importance of the French Sardine Company, later known as the Star-Kist Company, to the American tuna canning industry. The Star-Kist Company historically operated the largest tuna canning facilities in the world, and when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest cannery in the world. The twentieth-century development of the tuna canning industry did, in fact, represent a major change in the consumption of fish products, and the historic portion of the 1951/1952 Star-Kist Main Plant is highly representative of several “broad patterns” of American history. In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, located at 1050-1054 Ways Street, **does appear to qualify as eligible for listing in the Los Angeles Historic – Cultural Monuments.**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they are not directly associated with the main production facility, and/or the initial and most historic phase of construction of the Star-Kist facility. As such, they are not directly associated with the “broad patterns” of history that link the 1951/1952 historic portion of the Main Plant to the American tuna canning industry.

- Which are identified with historic personages or with important events in the main currents of national, state, or local history;
- Are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age;

Several individuals associated with the historic portion of the 1951/1952 Star-Kist Main Plant are known to provide sufficient historic evidence for a positive determination of historic significance in relation to this Criterion. Two individuals are of particular importance. These

are Joseph Bogdanovich, son of the founder of the French Sardine Company, and architect and engineer John K. Minasian. Bogdanovich was an individual of pervasive importance to the American tuna canning industry, the development of the tuna fishing industry in California, and the growth and development of the Port of Los Angeles. Minasian was the chief engineer of the widely acclaimed Space Needle, opened in 1962 as part of the Seattle World's Fair. He also designed and engineered projects at Cape Canaveral, Edwards Air Force Base, and was the recipient of awards and prestigious appointments. These two individuals are clearly "persons significant in our past." In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, **does appear to qualify as eligible for listing in the Los Angeles Historic –Cultural Monuments.**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they are not directly and/or intimately associated with John K. Minasian and/or Joseph Bogdanovich in the same manner that the historic portion of the Main Plant, or that portion built in 1951/1952 is associated with these two "persons significant in our past."

- Which embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style, or method of construction;

The historic portion of the 1951/1952 Star-Kist Main Plant is an early and large example of a type of construction (tilt-up) and a period of construction (early 1950s) as it presents several unusual design features (harbor facing entryway), and has a relatively high degree of integrity. First, when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest example of tilt-up construction built by private industry on the West Coast. Tilt-up is a site-based construction method which involves casting large concrete panels horizontally and tilting them into place to form walls or other building elements (Glass 2000). Second, the design of the main entrance to the historic Main Plant, located at 1050-1054 Ways Street, is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Third, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. The architect designed main entry was designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. Historically, tuna fishing boats tied up at the large pier extending into Fish Harbor while waiting to unload at the cannery fish docks, and employees commonly arrived to work on a ferry from San Pedro at the Evergreen Terminal prior to construction of the Vincent Thomas Bridge. The pier leads directly to the historic main entrance of the cannery. Relatively few Los Angeles Harbor area industrial buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-

Kist Cannery is unusual in this regard. Finally, the historic portion of the Star-Kist Main Plant has a relatively high degree of architectural and/or design integrity. The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from the mid-1970s to the late-1980s. In summary, it is here concluded that the historic portion of the Star-Kist Tuna Cannery Main Plant, **does appear to qualify as eligible for listing in the Los Angeles Historic – Cultural Monuments.**

**Note:** This recommendation applies only to the historic portion of the Main Plant, or that portion built in 1951/1952, excluding the additions made to the Main Plant during the period of time extending from the 1970s to the 1990s (Impress, Warehouse, Cold Storage, Green Warehouse, Animal Care Facility). The Research Laboratory Complex, including both the Pet Products Division and the Pilot Plant, and the Net Repair Sheds are also excluded as individually eligible, due to the fact that they have no unique or distinguishing architectural and/or design qualities, have no readily apparent significant historical associations, and/or the fact that individual building components are substantially less than 50 years in age.

### **Los Angeles Historic – Cultural Monument Summary Conclusions and Recommendations**

In summary, it is here concluded that the historic portion of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street, **does appear to qualify as individually eligible for listing in the Los Angeles Historic – Cultural Monument.** This is the most important and historic component of the Star-Kist Terminal Island Tuna Cannery, and it also includes the original 1951/1952 Pier projecting into Fish Harbor leading to the main entry, and the remaining Fish Dock projecting into Fish Harbor from the rear (south) elevation of the historic Main Plant.

Please note that this determination does not include any individual building and/or structural features apart from those previously identified in association with the historic Star-Kist Main Plant. Rather, it is the basic “manufacturing process” that is identified here as having historic importance. Once this process is recorded through appropriate and relatively minimal mitigation techniques, all non-historic components of the Star-Kist Tuna Cannery “Factory Complex” may be removed without damaging the Los Angeles Historic – Cultural Monument eligibility of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street.

## **RECOMMENDATIONS**

Due to its significant historic associations, the Star-Kist buildings on Fish Harbor, Terminal Island appear to be eligible for the NRHP under Criteria A, B, C, and D and for the CRHR under Criteria 1, 2, 3, and 4.

It is further recommended that the LAHD document the historical significance of the Star-Kist buildings through an interpretive program that utilizes current and historic photographs, results of archival research and associated materials, and the results of focused oral history



documentation. This interpretive program would be exhibited electronically via the Port of Los Angeles historical website, [www.laporthistory.org](http://www.laporthistory.org). This website is organized in historic tours or “modules” that relate to a particular aspect of Port history. The module for the Star-Kist facilities would be expanded to interpret the fishing and canning industry focused at Fish Harbor, and it could include the wholesale fish market and Fisherman’s Slip at Berths 73–80.

Photo documentation should be completed to support the web module and to record the historic physical qualities of the cannery property before its condition further deteriorates. This documentation should be prepared by a professional photographer, utilizing black-and-white, medium format negatives archivally processed, as well as 35mm color format. Photo documentation of the buildings should be performed prior to the removal of any part of the buildings, including historic processing equipment. The photography should include overall contextual shots, some portraits of individual features, and some detail shots. Efforts should be made to coordinate the photography of the current condition with the expected needs of the interpretive program, so that opportunities to illustrate archival or oral history information are not missed.

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## **Appendix A. DPR Forms**

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Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 3S

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: STARKIST TUNA CANNERY MAIN PLANT

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.  
c. Address 1050-1050 Ways St. City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTM's, etc. as app)

\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

### STARKIST TUNA CANNERY MAIN PLANT

The Star-Kist Tuna Cannery Main Plant consists of a large complex of industrial buildings located on Terminal Island, Los Angeles, California, between Earle Street and Ways Street on the east and west, and to the north of Marina Way which serves as the southern boundary of the manufacturing complex. The northern boundary of the complex is defined by an irregular line formed by Bass Street, Barracuda Way, and a parking lot to the east of Sardine Street. The approximate acreage of the Main Plant Complex is 25 acres, and the total improved square footage of existing building improvements is approximately 641,000.

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

### STARKIST TUNA CANNERY MAIN PLANT

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

1951 Historic Report/

\* P7. Owner and Address:

Los Angeles Harbor Department

425 S. Palos Verdes Street

San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)

Andrew Bursan

Jones & Stokes

811 W 7th ST, Suite 800

Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

Intensive Survey

P--Project Review

CEQA Compliance

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the Historical Assessment and Impacts Analysis

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 3S

\* **Resource Name or #:** STARKIST TUNA CANNERY MAIN PLANT

B1. Historic Name: STARKIST TUNA CANNERY MAIN PLANT

B2. Common Name: STARKIST TUNA CANNERY MAIN PLANT

B3. Original Use: Industrial

B4. Present Use: MTA

\* **B5. Architectural Style:** industrial/utilitarian

\* **B6. Construction History:** (Construction date, alterations, and date of alterations.)

August 7, 1951: French Sardine Co. was granted Building Permit No. 15652 for a two-story concrete structure at 1050 Ways Street. John K. Minasian was the architect, M.A. Nishkian was the engineer, and Nohl Calhoun Co. is the contractor. The cost of the structure was \$500,000.

August 7, 1951: French Sardine Co. was granted Building Permit No. 15653 for a one-story 51' - by 25'6"-foot concrete structure. John K.

\* **B7. Moved?** ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* **B8. Related Features:**

B9a. Architect: John K. Minasian

b. Builder: Nohl Calhoun Co.

\* **B10. Significance:** Theme Architecture, Canning Industry

Area Los Angeles

Period of Significance 1951

Property Type Industrial

Applicable Criteria A,B,C,D

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### NRHP Summary Conclusions and Recommendations

In summary, it is here concluded that the historic portion of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street, does appear to qualify as individually eligible for listing in the National Register of Historic Places in relation to Criteria (a), (b), and (c). This is the most important and historic component of the Star-Kist Terminal Island Tuna Cannery, and it also includes the original 1951/1952 Pier projecting into Fish Harbor leading to the main entry, and the remaining Fish Dock projecting into Fish Harbor from the rear (south) elevation of the historic Main Plant.

However, the entire Star-Kist Tuna Cannery "Factory Complex," manufacturing process also appears to qualify as eligible for listing in the National Register of Historic Places in relation to Criterion (d). Please note that this determination does not include any individual building and/or structural features apart from those previously identified in association with the historic Star-Kist Main Plant. Rather, it is the basic "manufacturing process" that is identified here as having historic importance. Once this process is recorded through appropriate and relatively minimal mitigation techniques, all non-historic components of the Star-Kist Tuna Cannery "Factory Complex" may be removed without damaging the NRHP eligibility (criteria a-c) of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways Street.

### CRHR Summary Conclusions and Recommendations

In summary, it is here concluded that the historic portion of the 1951/1952 Star-Kist Main Plant, located at 1050-1054 Ways

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* **B12. References:**

Los Angeles Building and Safety Department Archives

Sanborn Fire Insurance Maps (Volume 19, 1960)

Proquest Los Angeles Times

B13. Remarks:

\* **B14. Evaluator:** Roger Hatheway

Date of Evaluation: 12/18/2007

(This space reserved for official comments.)



## CONTINUATION SHEET

Page 1 of 2 \* Resource Name or #: (Assigned by recorder) STARKIST TUNA CANNERY MAIN PLANT

\* Recorded by: Andrew Bursan

\* Date: 12/14/2007

☒ Continuation

☐ Update

The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from 1971 to the late-1980s. In general, the historic portion of the Star-Kist Cannery Main Plant consists of the eastern portion of the manufacturing complex, while the western and northern portions of the complex consist of alterations and additions to the original 1951/1952 complex. Approximately 200,000 square feet of the original 1951/1952 facility stands today, as part of the existing 641,000 square foot Main Plant manufacturing complex. In addition, three piers extend southwesterly into Fish Harbor off of Ways Street (eastern elevation of complex). The largest of these piers is historically indirectly associated with the original 1951/1952 construction of the Star-Kist Cannery. An additional pier (original 1951/1952 fish loading dock) extends southwesterly into Fish Harbor off of the southern elevation of the historic complex.

The Star-Kist Tuna Cannery is of considerable architectural and/or engineering interest. First, the industrial complex does have an architect designed main entrance fronting on Ways Street and, therefore, facing outward towards Fish Harbor. The design is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Second, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. Third, at the time it was built, the Star-Kist Tuna Cannery was the largest example of tilt-up construction in the western United States.

### 1050-1054 Ways Street: Historic Star-Kist Tuna Cannery "Historic" Main Plant

The buildings located at 1050-1054 Ways Street, consist of an historic industrial tuna cannery complex located on the eastern side of Fish Harbor, Terminal Island. The facility has an interesting western orientation facing the harbor with an architect designed main entrance. The historic portion of the existing facility is built in a largely rectangular shaped plan (with a large L-shaped historic building unit), and is designed or "engineered" in a primarily industrial/utilitarian style with the exception of the main entry fronting on Ways Street. The architect designed main entry was designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. Historically, tuna fishing boats tied up at the large pier extending into Fish Harbor while waiting to unload at the cannery fish docks, and employees commonly arrived to work on a ferry from San Pedro prior to construction of the Vincent Thomas Bridge. The pier leads directly to the historic main entrance of the cannery. Relatively few Los Angeles Harbor area industrial buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-Kist Cannery is unusual in this regard.

Upon completion in 1952, the entire facility covered an area of ten +/- acres, and had approximately 200,000 square feet under roof. At this time, it was not only the largest tilt-up structure built by private industry in the western United States, but also the largest tuna packing facility in the world. The 1951/1952 cannery complex consisted of a set of interconnected building spaces and manufacturing areas with varying roof shapes, number of stories, and functions. In general, the manufacturing process (see aerial/oblique) began at the southern end of the complex where fish was offloaded onto the Fish Docks (A). The frozen fish was then transported to Thaw Tanks (B). After being thawed, the fish was Butchered (C), Pre-Cooked (D), and then Cooked (E). After being cooked, the fish was then Packed (F) into cans, and placed into a Warehouse (E), where it was ultimately loaded at a Truck Landing (R) for shipping. Clearly, the facility was designed in a highly efficient manner whereby the manufacturing process progressed from south (unloading of fish) to north (loading of canned fish).

Construction of the cannery began in 1951. John K. Minasian is listed as the architect, and M.A. Nishkian & Co. is listed as the licensed engineer. Minasian, although primarily known as a structural engineer (Seattle Space Needle), is known to have worked on numerous projects with the Nishkian firm.

Today, major architectural features of the historic Star-Kist and existing Del Monte facility consist of a low and extended building mass punctuated by silos and towers, a harbor-facing façade and entrance, piers and loading docks extending onto Fish Harbor, multiple entrance points and service entry doorways, and a second manufacturing area with connecting conveyor/bridge located immediately to the east of the historic facility. Additional or associated facilities include water tanks, a water

## CONTINUATION SHEET

Page 2 of 2 \* Resource Name or #: (Assigned by recorder) STARKIST TUNA CANNERY MAIN PLANT

\* Recorded by: Andrew Bursan

\* Date: 12/14/2007

☒ Continuation

☐ Update

treatment plan, parking areas, a detached warehouse, and an animal care facility. Architectural details consist of multiple window and doorway types (metal frame, roll up, tilt, fixed, etc.), multiple types of roof ventilation units, and varying exterior wall surfaces (metal, concrete, brick, wood). Construction materials include concrete foundations, tilt-up concrete walls, metal framing, metal siding, brick, glass, and an assortment of metal pipes and vents. The western elevation of the historic facility faces Fish Harbor. It is largely unaltered, with the exception of the addition of a parking area and the addition of two small piers, and consists of an architect designed main entry area in the middle, and industrial designed manufacturing areas to the south and north. The southern elevation of the historic complex is purely industrial in nature, and consists of a loading dock/pier, an elevator and conveyor unit, and a receiving area (thaw tanks) leading into the interior of the manufacturing plant. The northern elevation of the historic plant consists of a one story 1970s warehouse addition that is purely industrial in nature with a largely blank wall surface containing several entries and loading areas. The eastern elevation of the historic plant is also purely industrial in nature. This elevation has been altered by the demolition of a can washing area, and the addition of sterilizer towers, an elevator bridge/conveyor leading to the newer can manufacturing, cold storage, and warehouse facilities, a set of silos used in the manufacture of pet foods, and a detached one story rectangular metal repair shop. Although the interior spaces of the complex remain virtually unaltered, the original equipment has been removed. Several historic alterations to the interior are also evident, including the conversion of use of individual areas (i.e. butchering, pre-cooking, and cooking areas no longer extant), and various code related improvements including new doorways and tile.

In summary, the building at 1050-1054 Ways is an unusual architectural example of industrial design. The physical structure of the "historic" Main Plant is relatively intact (approximately 75%), and this portion of the Star-Kist Cannery should be regarded as having considerable significance as a purpose-built industrial facility.

The following eligibility statements apply to three separate properties comprising the greater Star-Kist Tuna Cannery facility at Terminal Island. This includes the:

- ☐ Star-Kist Tuna Cannery: Main Plant
- ☐ Star-Kist Tuna Cannery: Research Laboratory Complex
- ☐ Star-Kist Tuna Cannery: Net Repair Sheds

The most important considerations influencing the following NRHP, CRHR, and City of Los Angeles Cultural Heritage Commission (CHC) determinations of eligibility are:

1. ☐ The importance of the tuna and fish canning industry to the Port of Los Angeles.
2. ☐ The importance of the French Sardine Company, later known as the Star-Kist Company, to the American tuna canning industry. The Star-Kist Company did, in fact, operate the largest tuna canning facilities in the world, and when opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest cannery in the world.
3. ☐ The historical significance of Joesph J. Bogdanovich, owner of French Sardine Company/Star-Kist and son of the French Sardine Company founder Martin Bogdanovich, as an individual of importance to the American tuna canning industry, the development of the tuna fishing industry in California, and the growth and development of the Port of Los Angeles.
4. ☐ The historical significance of John K. Minasian, architect of the Star-Kist Tuna Cannery Historic Main Plant, as a prominent engineer and designer. Minasian was the chief engineer of the widely acclaimed Space Needle, opened in 1962 as part of the Seattle World's Fair. He also designed and engineered projects at Cape Canaveral, Edwards Air Force Base, and was the recipient of awards and prestigious appointments.
5. ☐ When opened in 1952, the Star-Kist Tuna Cannery Main Plant on Terminal Island was the single-largest example of tilt-up construction built by private industry on the West Coast. Tilt-up is a site-based construction method which involves casting large concrete panels horizontally and tilting them into place to form walls or other building elements (Glass 2000).
6. ☐ The historic portion of the Star-Kist Main Plant has a relatively high degree of architectural and/or design integrity. The majority (approximately 75%) of the original Star-Kist Cannery Main Plant as constructed in 1951/1952 remains standing, although several large non-historic additions have been made to the facility during the period of time extending from the mid-1970s to the late-1980s. The Star-Kist Tuna Cannery is of considerable architectural and/or engineering interest.
7. ☐ The design of the main entrance to the historic Main Plant, located at 1050-1054 Ways Street, is relatively unsophisticated, but it does exhibit several hallmark characteristics of late-1940s and/or early-1950s design, including the contrasting horizontal brick and concrete façade with metal framed window and doorway treatments. This façade also helps to define the non-manufacturing portion of the facility (offices, cafeteria, and restrooms). Second, the fact that any industrial building in the Los Angeles Harbor District was built to impress viewers from the harbor is unusual. The architect designed main entry was

## CONTINUATION SHEET

Page 3 of 2 \* Resource Name or #: (Assigned by recorder) STARKIST TUNA CANNERY MAIN PLANT

\* Recorded by: Andrew Bursan

\* Date: 12/14/2007

☒ Continuation

☐ Update

designed specifically for viewing by fishermen in the harbor and/or employees entering the facility. Historically, tuna fishing boats tied up at the large pier extending into Fish Harbor while waiting to unload at the cannery fish docks, and employees commonly arrived to work on a ferry from San Pedro prior to construction of the Vincent Thomas Bridge. The pier leads directly to the historic main entrance of the cannery. Relatively few Los Angeles Harbor area industrial buildings were originally designed with any regard to architectural detail, and many of those that were so designed tended to pay greater attention to street facing entries rather than to views from the harbor. The Star-Kist Cannery is unusual in this regard. In brief, the main entrance to the historic portion of the Star-Kist Main Plant, located at 1050-1054 Ways Street, is an unusual architectural example of industrial design in Los Angeles Harbor area.

8. ☐ The Star-Kist Tuna Cannery Main Plant stands today as the most complete and operative cannery facility in the Port of Los Angeles. Although nearly all of the original equipment has been removed from the Main Plant, the canning process itself is still well represented. In brief, the existing Star-Kist facility is representative of a "Factory Complex" facility whereby a large and varied building typology accommodates multiple manufacturing processes. Essentially, a variety of raw materials come into the complex and finished products are shipped out. This type of property is becoming extremely rare in the Port of Los Angeles due largely to the growth of the container shipping industry.



## CONTINUATION SHEET

Page 1 of 2 \* Resource Name or #: (Assigned by recorder) STARKIST TUNA CANNERY MAIN PLANT

\* Recorded by: Andrew Bursan

\* Date: 12/14/2007

☒ Continuation

☐ Update



Center of the western elevation of original plant



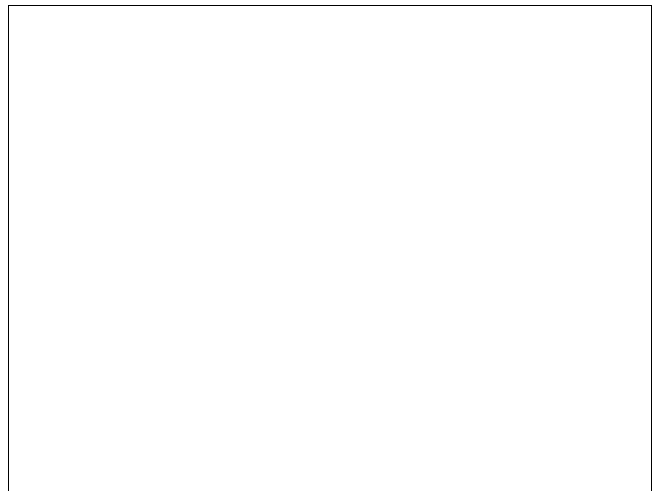
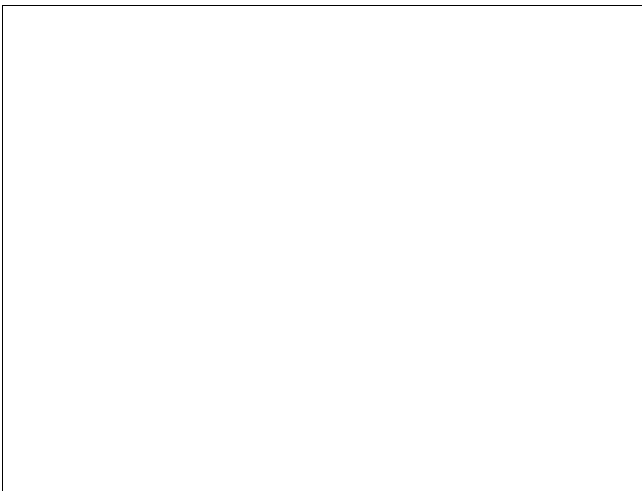
Western elevation



Center of the western elevation of original plant



West Elevation



Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Z

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: Impress/Warehouse/Cold Storage

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.  
c. Address 936-950 950 Barracuda ST. City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTM's, etc. as app)

\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)  
936-950 Barracuda Street (Impress/Warehouse/Cold Storage)

The buildings located at 936-950 Barracuda Street, just to the east of the historic Star-Kist cannery consist of five separately constructed buildings joined to form one interconnected building unit. Although they were an integral part of the Star-Kist facility as operated immediately prior to closure of the cannery in 1984, they should best be regarded as additions and alterations to the original 1951/1952 facility. From north to south, these five building units consist of the Impress building (built 1972) at the northern end, a large Warehouse (built 1971) in the middle, and a Cold Storage facility (built in 1971, 1973, and 1975) built as three separate units at the southern end. In addition, a set of water treatment tanks are located immediately to the south of the Cold Storage unit.

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

Looking southeast at northern elevation of the Impress facility

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

#Error

\* P7. Owner and Address:

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)

Andrew Bursan

Jones & Stokes

811 W 7th ST, Suite 800

Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 6Z

\* **Resource Name or #:** Impress/Warehouse/Cold Storage

B1. Historic Name: Impress/Warehouse/Cold Storage

B2. Common Name: Impress/Warehouse/Cold Storage

B3. Original Use: Industrial

B4. Present Use: Industrial

\* **B5. Architectural Style:** industrial/utilitarian

\* **B6. Construction History:** (Construction date, alterations, and date of alterations.)

February 10, 1971: Star-Kist Foods was granted Building Permit No. SP45496 for a one-story 106' 9"- by 121' 5"- foot structure. Frank Politeo was the architect, Don Hellmers was the engineer, and Star-Kist was the contractor. The cost of the structure was \$180,000.

April 20, 1973: Star-Kist was granted Building Permit No. SP49613 for a water treatment tank. No engineer is listed. Frank Politeo was the

\* **B7. Moved?** ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* **B8. Related Features:**

B9a. Architect: Frank Politeo

b. Builder: Star-Kist

\* **B10. Significance:** Theme \_\_\_\_\_ Area \_\_\_\_\_  
Period of Significance 1971 Property Type \_\_\_\_\_ Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### Buildings Less Than Fifty Years Old

No building, object, or structural feature of significance less than 50 years in age was identified in association with the Terminal Island Star-Kist Tuna Cannery. This includes:

- ☐ ☐ The Research Laboratory Complex (Pilot Plant), located at 642 Tuna Street, Los Angeles, CA.
- ☐ ☐ The Impress Building, Warehouse, and Cold Storage Building, located at 936-950 Barracuda Street.
- ☐ ☐ The Green Warehouse, located at 916 Barracuda Street.
- ☐ ☐ The Animal Care Facility, located at 919 Earle Street.

The above listed properties do not appear to be of "exceptional importance." They are not integral parts of a National Register eligible district, they have not been the subject of scholarly evaluation, and they have no apparent importance to the recent development of American history, architecture, archeology, engineering, and/or culture. For additional information please refer to Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years (Revised 1998), by Marcella Sherfy and W. Ray Luce.

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* **B12. References:**

Los Angeles Department of Building and Safety Archives

B13. Remarks:

\* **B14. Evaluator:** Roger Hatheway

Date of Evaluation: 12/18/2007

(This space reserved for official comments.)





## CONTINUATION SHEET

Page 1 of 2 \* Resource Name or #: (Assigned by recorder) Impress/Warehouse/Cold Storage

\* Recorded by: Andrew Bursan

\* Date: 12/14/2007

☒ Continuation ☐ Update

The Impress can manufacturing facility, located at 936 Barracuda Street, consists of a two story industrial unit (primarily a one story manufacturing floor with a two story interior office area). It is rectangular shaped in plan, and is designed in a purely industrial/utilitarian style. Major architectural features include large loading docks with awnings on the northern and western elevations, multiple entrance points, a conveyor bridge connecting the southwestern corner of the structure to the historic 1951/1952 cannery, a low pitched roof shape, and a southern elevation connected to the Warehouse. Architectural details consist of metal awnings, nearly square windows set into each elevation, and a variety of doorway entries. Construction materials include a massive concrete foundation, metal exterior siding, and a metal roof with ventilator pipes and fans. The building retains a relatively high degree of architectural integrity. Alterations include the addition of a small, one story shelter building on the northern elevation. The interior of the building, including the equipment and equipment layout, is virtually unaltered. Associated property features include the historic Star-Kist manufacturing complex. Landscape features are minimal, but do include several trees running the length of the eastern or Earle Street elevation. In summary, the Impress Plant is simply designed in a cost-effective utilitarian manner, and although it has a relatively high degree of architectural integrity, it has no unique architectural features of interest. The only engineering feature of interest is an unusually deep concrete foundation feet in depth to withstand the pounding from heavy can manufacturing presses, and this feature would not appear to be of "exceptional importance." Metal industrial buildings of this type are common throughout southern California and this building should best be regarded as having minimal architectural significance.

The Warehouse/Distribution Center located at 938 Barracuda Street consists of a two story industrial unit. It is built in a rectangular shaped plan, and designed in a purely industrial/utilitarian style or manner. Major architectural features consist of a large one story interior mass with smaller two story interior components, multiple loading dock entrances on the western elevation, a single service entry on the eastern elevation, and a low pitched roof shape. Architectural details consist of square vents spaced evenly on the building exterior, projecting light fixtures near the loading entrances on the west elevation, and multiple ventilation units extending along the ridge of the roof. Construction materials include a concrete foundation, metal exterior siding, and metal roofing. The building retains a medium degree of architectural integrity, despite additions and expansion throughout the 1970's and 1980's, as all modifications have been made utilizing the same basic material types. Associated property-specific features include the connected Impress Plant on the northern elevation, and the connected Cold Storage facilities on the southern elevation. Landscape features are minimal, but do include trees running the length of the eastern elevation along Earle Street. In summary, the Warehouse/Distribution Center is simply designed in a cost-effective utilitarian manner, and although it has a medium degree of architectural integrity, it has no unique architectural or design features of interest. Metal industrial buildings of this type are common throughout southern California and this building should best be regarded as having minimal architectural significance.

The Cold Storage buildings located at 950 Barracuda Street consist of three separately constructed units connected to the southern elevation of the Warehouse/Distribution Center. The buildings were constructed during the period of time extending from 1971 to 1979. They are built in an essentially rectangular shaped plan, and are designed in a purely industrial/utilitarian style or manner. Major architectural features consist of an equipment bridge that connects the northwestern corner of the cold storage buildings to the historic Main Plant across Barracuda Street, a compressor room and machinery connected to the southern elevation, low pitched roofs, and varying roof heights. Architectural details consist of an awning and entrance way at the southern elevation and minimal fenestration. Construction materials include a concrete foundation and the use of metal exterior siding. The building retains a relatively low degree of architectural integrity due to several additions. Associated property-specific features include the Warehouse/Distribution Center connected to the northern elevation and a water treatment center (see two tanks) adjacent to the southeastern corner of the cold storage unit. There are no landscape features directly adjacent to the structure. In summary, the Cold Storage buildings are simply designed in a cost-effective and highly utilitarian manner, they have a relatively low degree of architectural integrity, and have no unique architectural or design features of interest. Industrial buildings of this design are common throughout southern California, and the Cold Storage buildings should best be regarded as having minimal architectural significance.

Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Z

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: Green Warehouse

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.  
c. Address 916-0 Barracuda St. City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTMs, etc. as app)

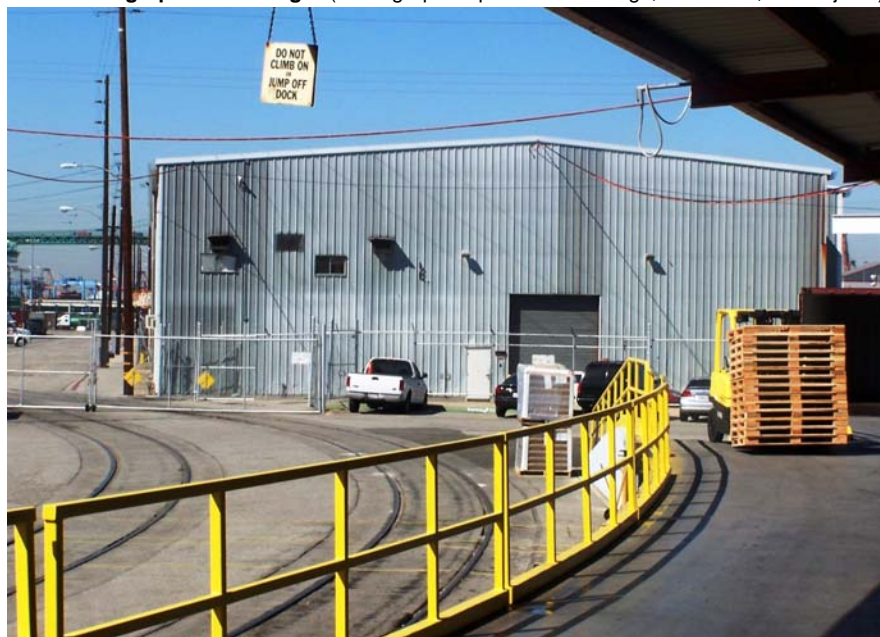
\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)  
916 Barracuda Street (Green Warehouse)

The "Green Warehouse" building, so named because of its color, is located at 916 Barracuda Street, or just north of the main complex. It consists of a one-story industrial warehouse built in a rectangular shaped plan, and designed in a purely industrial/utilitarian style. Major architectural features consist of a level main entry, a building mass with a small rectangular gap in the southeast corner, a low pitched roof, and large metal service/roll-up doors on the north and south elevations. Architectural details consist of rectangular windows and vents in the western end of the southern elevation, and projecting light fixtures above service entries. Construction types/materials include a concrete foundation, a metal exterior, and a metal roof. The building retains a medium degree of architectural integrity. Alterations consist of the replacement of some metal siding and the addition of a doorway. Associated property-specific features include the adjacent Animal Care Facility to the west as well as nearby water tanks. There are no landscaping features worthy of note. In summary, the Green Warehouse is simply designed in a cost-effective utilitarian manner, and although it has a medium degree of architectural integrity, it has no unique architectural or design features of interest. Metal industrial buildings of this type are common throughout southern California and this building should best be regarded as having minimal architectural significance.

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

Looking north at the southern elevation of the "Green Warehouse"

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

#Error

\* P7. Owner and Address:

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)  
Andrew Bursan

Jones & Stokes  
811 W 7th ST, Suite 800  
Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 6Z

\* Resource Name or #: Green Warehouse

B1. Historic Name: Green Warehouse

B2. Common Name: Green Warehouse

B3. Original Use: Industrial

B4. Present Use: Industrial

\* B5. Architectural Style: industrial/utilitarian

\* B6. Construction History: (Construction date, alterations, and date of alterations.)

\* B7. Moved? ☐ No ☐ Yes ☒ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* B8. Related Features:

B9a. Architect: NA

b. Builder: NA

\* B10. Significance: Theme \_\_\_\_\_ Area \_\_\_\_\_

Period of Significance 1950s

Property Type \_\_\_\_\_

Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### Buildings Less Than Fifty Years Old

No building, object, or structural feature of significance less than 50 years in age was identified in association with the Terminal Island Star-Kist Tuna Cannery. This includes:

☐ ☐ The Research Laboratory Complex (Pilot Plant), located at 642 Tuna Street, Los Angeles, CA.

☐ ☐ The Impress Building, Warehouse, and Cold Storage Building, located at 936-950 Barracuda Street.

☐ ☐ The Green Warehouse, located at 916 Barracuda Street.

☐ ☐ The Animal Care Facility, located at 919 Earle Street.

The above listed properties do not appear to be of "exceptional importance." They are not integral parts of a National Register eligible district, they have not been the subject of scholarly evaluation, and they have no apparent importance to the recent development of American history, architecture, archeology, engineering, and/or culture. For additional information please refer to Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years (Revised 1998), by Marcella Sherfy and W. Ray Luce.

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* B12. References:

B13. Remarks:

\* B14. Evaluator: Roger Hatheway

Date of Evaluation: 12/18/2007

(This space reserved for official comments.)



Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Z

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: Animal Care Facility

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.  
c. Address 919-0 Earle ST. City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTMs, etc. as app)

\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)  
The Animal Care Facility, located at 919 Earle Street, consists of a highly utilitarian unit designed for a specific purpose. Built circa 1980, it is constructed in an irregular shaped plan, and is designed in a generally non-descript utilitarian style or manner. Major architectural features consist of an irregular massing of one story buildings, several entry areas, a composite hipped roof shape, and a large canopy/roof over open air animal pens to the rear of the main building. Architectural details consist of flat window and doorway openings, ventilation units running along the ridge of the roof, and a solid concrete block wall surrounding the structure. Construction types/materials include a concrete foundation, stucco exterior wall surfaces, and the use of concrete block walls and wire mesh fencing. The building appears to retain a medium to high degree of architectural integrity. Associated property-specific features include a container storage area to the south of the structure, a large parking lot, and two large water tanks to the immediate southeast. Landscape features include trees and shrubs planted throughout the perimeter of the building. In summary, the Animal Care Facility is simply designed in a cost-effective utilitarian manner, and although it has a high degree of architectural integrity, it has no unique architectural or design features of interest. Stucco utilitarian designed buildings are common throughout southern California, and this building should, therefore, be regarded as having minimal architectural significance.

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

Looking south at the northern elevation of the Animal Care Facility

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

\* P7. Owner and Address:

Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)

Andrew Bursan

Jones & Stokes  
811 W 7th ST, Suite 800  
Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the Historical Assessment and Impacts Analysis

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_



## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 6Z

\* **Resource Name or #:** Animal Care Facility

B1. Historic Name: Animal Care Facility

B2. Common Name: Animal Care Facility

B3. Original Use: Industrial

B4. Present Use: Industrial

\* **B5. Architectural Style:** industrial/utilitarian

\* **B6. Construction History:** (Construction date, alterations, and date of alterations.)

\* **B7. Moved?** ☐ No ☐ Yes ☒ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* **B8. Related Features:**

B9a. Architect: NA

b. Builder: NA

\* **B10. Significance:** Theme \_\_\_\_\_ Area Los Angeles

Period of Significance \_\_\_\_\_ Property Type \_\_\_\_\_ Applicable Criteria \_\_\_\_\_

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### Buildings Less Than Fifty Years Old

No building, object, or structural feature of significance less than 50 years in age was identified in association with the Terminal Island Star-Kist Tuna Cannery. This includes:

- ☐ ☐ The Research Laboratory Complex (Pilot Plant), located at 642 Tuna Street, Los Angeles, CA.
- ☐ ☐ The Impress Building, Warehouse, and Cold Storage Building, located at 936-950 Barracuda Street.
- ☐ ☐ The Green Warehouse, located at 916 Barracuda Street.
- ☐ ☐ The Animal Care Facility, located at 919 Earle Street.

The above listed properties do not appear to be of "exceptional importance," tThey are not integral parts of a National Register eligible district, they have not been the subject of scholarly evaluation, and they have no apparent importance to the recent development of American history, architecture, archeology, engineering, and/or culture. For additional information please refer to Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years (Revised 1998), by Marcella Sherfy and W. Ray Luce.

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* **B12. References:**

B13. Remarks:

\* **B14. Evaluator:** Roger Hatheway

**Date of Evaluation:** 12/18/2007

(This space reserved for official comments.)



Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Z

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: Research Laboratory Complex - Pet Products Division

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.  
c. Address 212-214 Terminal Way City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTM's, etc. as app)

\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)  
The Pet Products Division is part of the Research Laboratory Complex located at the southeast corner of the intersection of Tuna Street and Terminal Way. The building address is 212-214 Terminal Way, Los Angeles, CA (Terminal Island). The original laboratory building consisted of a one-story 29' by 77' foot unit fronting on Terminal Way. The original laboratory was repeatedly enlarged by additions in 1963, 1965, 1967, 1972, and 1990. Today, the Research Laboratory Complex, Pet Products Division, consists of a one and two-story U-shaped laboratory building. Major architectural features consist of an offset level main entry with courtyard entrance, one and two story building components, and primarily flat roofs. Architectural details consist of pilaster wall features, a stucco exterior on the northern and eastern elevations, and concrete block exterior on the southern elevation. There are also flat rectangular windows on the northern elevation, and structural piers and piping along the southern elevation. Construction types/materials include a concrete foundation, and stucco and concrete block exterior surfacing. The building retains a low degree of architectural integrity. Building permit research reveals multiple additions and alterations, as the structure expanded to the north and west over a period of two decades. Associated property-specific features include wrought iron fencing along the northwest corner and alley to the south. Landscape features include a large courtyard area formed by the building "U" with trees and flowering plants. The Pet Products Division building also is associated with the Research Laboratory Complex Pilot Plant located directly to the south. In summary, the Research Laboratory Complex - Pet Products Division building

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

Looking at the western elevation of the Pet Products Division Building

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

1950

\* P7. Owner and Address:

Los Angeles Harbor Department

425 S. Palos Verdes Street

San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)

Andrew Bursan

Jones & Stokes

811 W 7th ST, Suite 800

Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the Historical Assessment and Impacts Analysis

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 6Z

\* **Resource Name or #:** Research Laboratory Complex - Pet Products Division

B1. Historic Name: Research Laboratory Complex - Pet Products Division

B2. Common Name: Research Laboratory Complex - Pet Products Division

B3. Original Use: Industrial

B4. Present Use: Industrial

\* **B5. Architectural Style:** industrial/utilitarian

\* **B6. Construction History:** (Construction date, alterations, and date of alterations.)

June 15, 1950: French Sardine Co. was granted Building Permit No. 17049 to construct a one-story 29'7" - by 77'-foot stucco laboratory at 214 Terminal Way. There is no architect listed. M.A. Nishkian is listed as the engineer. The cost of the structure was \$10,000.

July 10, 1963: Star-Kist Foods was granted Building Permit No. SP29835 for a 42' - by 15' -foot concrete block addition to the existing

\* **B7. Moved?** ☐ No ☐ Yes ☒ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* **B8. Related Features:**

B9a. Architect: NA

b. Builder: French Sardine Co.

\* **B10. Significance:** Theme \_\_\_\_\_ Area Los Angeles

Period of Significance 1950

Property Type \_\_\_\_\_

Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### District Evaluation

The Star-Kist Tuna Cannery consists of three separate properties comprising a Main Plant, a Research Laboratory Complex, and a set of Net Repair Sheds. The three properties are all associated with the growth and development of the Star-Kist Tuna Cannery during the period of time extending from 1950 to the late-1980s. The most historic, architecturally interesting, and unique engineering features, structures, and buildings are those facilities associated with the 1951/1952 construction of the Main Plant. The Research Laboratory Complex and the Net Repair Sheds are a part of the greater Star-Kist Tuna Cannery "Factory Complex," but they cannot be regarded as individually significant and/or as contributing features to an architectural and historic district of resources due to the fact that they are either altered (lack of integrity) or have no distinguishing architectural or design features.

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* **B12. References:**

Los Angeles County Department of Building and Safety Archives

B13. Remarks:

\* **B14. Evaluator:** Roger Hatheway

Date of Evaluation: 12/18/2007

(This space reserved for official comments.)





Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Z

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: Pilot Plant

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M.  
c. Address 642-0 Tuna St. City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTMs, etc. as app)

\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)  
The Pilot Plant is part of the Research Laboratory Complex. It is located at 642 Tuna Street, Los Angeles, CA (Terminal Island), or at the northeast corner of the intersection of Tuna Street and Cannery Street. It consists of a one-story industrial unit built in a 94' by 169'-foot rectangular shaped plan, and is designed in a simple industrial/utilitarian style or manner. Major architectural features consist of an offset level main entry with hood, primarily flat and blank wall surfaces, a flat roof, and a rectangular boiler room addition on the east elevation. Architectural details include structural piers and pilaster wall features, flat windows with awnings on the west elevation, and two metal roll-up service entries on the south elevation. Construction details include a concrete foundation, and a concrete block exterior. The building retains a high degree of architectural integrity. Alterations consist primarily of the addition of a rectangular boiler room to the east elevation. Associated features include a storage structure to the immediate east of the building, as well as all additional building components of the Research Laboratory Complex. No landscape features are specifically associated with this building. The Pilot Plant building also is associated with the Research Laboratory Complex, Pet Products Division building, located directly to the north. In summary, the Research Laboratory Complex - Pilot Plant is a common architectural example of 1970's industrial architecture. It is simply designed in a cost-effective utilitarian manner, and although it has a high degree of architectural integrity, it has no unique architectural or design features of interest. Concrete block industrial buildings are common throughout southern California and this building should, therefore, be regarded as

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

Looking at the western elevation of the Pilot Plant

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

1979

\* P7. Owner and Address:

Los Angeles Harbor Department

425 S. Palos Verdes Street

San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)

Andrew Bursan

Jones & Stokes

811 W 7th ST, Suite 800

Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the Historical Assessment and Impacts Analysis

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_



## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 6Z

\* **Resource Name or #:** Pilot Plant

B1. Historic Name: Pilot Plant

B2. Common Name: Pilot Plant

B3. Original Use: Industrial

B4. Present Use: Industrial

\* **B5. Architectural Style:** industrial/utilitarian

\* **B6. Construction History:** (Construction date, alterations, and date of alterations.)

February 9, 1979: Star-Kist Foods Inc. was granted Building Permit No. SP61680 to construct a two-story 93' 8" - by 169-foot concrete block office building at 642 Tuna Street. Frank Politeo is the listed architect and George Yassinski is the engineer. The cost of the structure was \$740,000.

\* **B7. Moved?** ☐ No ☐ Yes ☒ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* **B8. Related Features:**

B9a. Architect: Frank Politeo

b. Builder: Star-Kist Foods Inc

\* **B10. Significance:** Theme Cannery

Area Los Angeles

Period of Significance 1979

Property Type \_\_\_\_\_

Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### Buildings Less Than Fifty Years Old

No building, object, or structural feature of significance less than 50 years in age was identified in association with the Terminal Island Star-Kist Tuna Cannery. This includes:

- ☐ ☐ The Research Laboratory Complex (Pilot Plant), located at 642 Tuna Street, Los Angeles, CA.
- ☐ ☐ The Impress Building, Warehouse, and Cold Storage Building, located at 936-950 Barracuda Street.
- ☐ ☐ The Green Warehouse, located at 916 Barracuda Street.
- ☐ ☐ The Animal Care Facility, located at 919 Earle Street.

The above listed properties do not appear to be of "exceptional importance." They are not integral parts of a National Register eligible district, they have not been the subject of scholarly evaluation, and they have no apparent importance to the recent development of American history, architecture, archeology, engineering, and/or culture. For additional information please refer to Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years (Revised 1998), by Marcella Sherfy and W. Ray Luce.

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* **B12. References:**

Los Angeles Department of Building and Safety Archives

B13. Remarks:

\* **B14. Evaluator:** Roger Hatheway

Date of Evaluation: 12/18/2007

(This space reserved for official comments.)



Primary # \_\_\_\_\_  
HR # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 6Z

## PRIMARY RECORD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 2

\* Resource Name or #: NET REPAIR SHEDS -- "BONEYARD"

P1. Other Identifier: \_\_\_\_\_

\* P2. Location: ☒ Not for Publication ☐ Unrestricted a. County Los Angeles  
b. USGS 7.5' Quad \_\_\_\_\_ Date \_\_\_\_\_ T \_\_\_\_\_; R \_\_\_\_\_; \_\_\_\_\_ 1/4 of \_\_\_\_\_ 1/4 of Sec \_\_\_\_\_; \_\_\_\_\_ B.M. \_\_\_\_\_  
c. Address 250-0 Terminal Way City Terminal Island (Los Angeles, Ca) Zip 90731  
d. UTM: (Give more than one for large and/or linear feature) Zone \_\_\_\_\_, \_\_\_\_\_ mE/ \_\_\_\_\_ mN  
e. Other Locational Data: (e.g. parcel #, legal description, directions to resource, elevation, additional UTM's, etc. as app)

\* P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)  
The buildings located at 250 Terminal Way, at the southwest corner of Terminal Way and Ways Street, serve today as two "paired" one-story industrial storage units. According to long-term Star-Kist/Heinz/Del Monte company employees, the buildings were originally built as "net repair sheds" by the Star-Kist Company. Today, the buildings are referred to as the "Boneyard" by Del Monte employees due to the fact that it is common practice in manufacturing plants to have temporary equipment storage area called "boneyard(s)". The Net Repair Sheds appear to have been built circa 1950, according to its architectural style. They are built in rectangular shaped plans, and are designed in a cost-effective industrial/utilitarian style or manner with function as the primary design intent. Major architectural features consist of a long and low rectangular building mass, multiple service doors on both buildings, and a low pitched (gabled) roof with "pop-up" monitor shaped vents running along the rooflines. Architectural details consist of oversized wooden service doorways on the northern elevation fronting on Terminal Way (these doorways appear as original), roll-up doorways (alterations) in the court between the two buildings, and small windows in the southern elevation of the southern structure. Construction materials include a concrete foundation, and a primarily stucco exterior with the exception of the wooden doorways and wood siding on the monitor roof vents. The buildings retain a medium degree of architectural integrity. Alterations consist of the addition of metal service/roll-up doors between buildings, repairs to the stucco exterior surface of both buildings, and the possible enclosure of several openings on the southern elevation of the southern building. Associated features

\* P3b. Resource Attributes: (List attributes and codes) HP8 Industrial building

\* P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects)



P5b. Description of Photo: (View, date, etc.)

Looking at the western elevation of the Net Repair Sheds ("Boneyard")

\* P6. Date Constructed/Age and Sources:

☐ Prehistoric ☒ Historic ☐ Both

1950

\* P7. Owner and Address:

Los Angeles Harbor Department

425 S. Palos Verdes Street

San Pedro, CA 90731

\* P8. Recorded by: (Name, affiliation, address)

Andrew Bursan

Jones & Stokes

811 W 7th ST, Suite 800

Los Angeles, CA 90017

\* P9. Date Recorded: 12/14/2007

\* P10. Survey Type: (Describe)

\* P11. Report Citation: (Cite survey report/other sources or "none") Architectural Survey and Evaluation of the

\* Attachments: ☐ NONE ☐ Location Map ☐ Sketch Map ☐ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record ☐ Artifact Record  
☐ Photograph Record ☐ Other: (List) \_\_\_\_\_

## BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 2

\* NRHP Status Code 6Z

\* **Resource Name or #:** NET REPAIR SHEDS -- "BONEYARD"

B1. Historic Name: NET REPAIR SHEDS -- "BONEYARD"

B2. Common Name: NET REPAIR SHEDS -- "BONEYARD"

B3. Original Use: Industrial

B4. Present Use: Industrial

\* **B5. Architectural Style:** industrial/utilitarian

\* **B6. Construction History:** (Construction date, alterations, and date of alterations.)

NA

\* **B7. Moved?** ☐ No ☐ Yes ☒ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\* **B8. Related Features:**

B9a. Architect: NA

b. Builder: NA

\* **B10. Significance:** Theme Warehouse

Area Los Angeles

Period of Significance 1950

Property Type \_\_\_\_\_

Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

### District Evaluation

The Star-Kist Tuna Cannery consists of three separate properties comprising a Main Plant, a Research Laboratory Complex, and a set of Net Repair Sheds. The three properties are all associated with the growth and development of the Star-Kist Tuna Cannery during the period of time extending from 1950 to the late-1980s. The most historic, architecturally interesting, and unique engineering features, structures, and buildings are those facilities associated with the 1951/1952 construction of the Main Plant. The Research Laboratory Complex and the Net Repair Sheds are a part of the greater Star-Kist Tuna Cannery "Factory Complex," but they cannot be regarded as individually significant and/or as contributing features to an architectural and historic district of resources due to the fact that they are either altered (lack of integrity) or have no distinguishing architectural or design features.

B11. Additional Resource Attributes: (List attributes and codes): \_\_\_\_\_

\* **B12. References:**

Los Angeles Department of Building and Safety Archives

B13. Remarks:

\* **B14. Evaluator:** Roger Hatheway

Date of Evaluation: 12/18/2007

(This space reserved for official comments.)



## **Appendix B. Building Permit History and Timeline of the Fishing Industry in Los Angeles Harbor**

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### **Building Permit History**

#### **642 Tuna**

**February 9, 1979:** Star-Kist Foods Inc. was granted Building Permit No. SP61680 to construct a two-story 93' 8" - by 169-foot concrete block office building at 642 Tuna Street. Frank Politeo is the listed architect and George Yassinski is the engineer. The cost of the structure was \$740,000.

#### **212-214 Terminal Way**

**June 15, 1950:** French Sardine Co. was granted Building Permit No. 17049 to construct a one-story 29' 7" - by 77' -foot stucco laboratory at 214 Terminal Way. There is no architect listed. M.A. Nishkian is listed as the engineer. The cost of the structure was \$10,000.

**July 10, 1963:** Star-Kist Foods was granted Building Permit No. SP29835 for a 42' - by 15' -foot concrete block addition to the existing laboratory. No architect is listed. G. Clapp is listed as the engineer and Star-Kist Foods is the contractor. The cost of the addition was \$5,000.

**August 10, 1965:** Star-Kist Foods was granted Building Permit No. SP34743 for a two-story office addition to the existing laboratory. Frank Politeo was the architect, Don Helmers was the engineer, and Star-Kist Foods was the contractor. The cost of the addition was \$40,000.

**May 10, 1967:** Star-Kist Foods was granted Building Permit No. SP38413 for a 50' - by 32' -foot stucco cat food testing facility addition. Frank Politeo was the architect and Star-Kist Foods was the contractor. The cost of the structure was \$13,000.

**June 10, 1972:** Star-Kist Foods was granted Building Permit No. SP48074 for a 26' - by 32' 6" -foot office and storage addition. Frank Politeo was the architect and Star-Kist Foods was the contractor. The cost of the addition was \$22,000.

#### **1050 Ways**

**August 7, 1951:** French Sardine Co. was granted Building Permit No. 15652 for a two-story concrete structure at 1050 Ways Street. John K. Minasian was the architect, M.A. Nishkian was the engineer, and Nohl Calhoun Co. is the contractor. The cost of the structure was \$500,000.

**August 7, 1951:** French Sardine Co. was granted Building Permit No. 15653 for a one-story 51'- by 25'6"-foot concrete structure. John K. Minasian was the architect, M.A. Nishkian was the engineer, and Nohl Calhoun Co. is the contractor. The cost of the structure was \$10,000.

**August 14, 1953:** Star-Kist Foods was granted Building Permit No. SP6487 for a one-story 30'- by 61'-foot stucco structure. John K. Minasian was the architect, M.A. Nishkian was the engineer, and Nohl Calhoun Co. is the contractor. The cost of the structure was \$5,000.

**September 11, 1953:** Star-Kist Foods was granted Building Permit No. SP6699 for a 51'- by 180'- foot concrete addition. No architect or contractor listed. M.A. Nishkian was the engineer. The cost of the addition was \$60,000.

**May 13, 1954:** Star-Kist Foods was granted Building Permit No. SP8512 to make improvements to meet City building code. No architect is listed. M.A. Nishkian was the engineer and Star-Kist was contractor. The cost of the improvements were \$1,500.

**June 11, 1954:** Star-Kist Foods was granted Building Permit No. SP8700 for the addition of a lunch room and two canopies. The cost of the additions were \$2,900.

**October 18, 1974:** Star-Kist Foods was granted Building Permit No. SP52261 for the addition of a 47'- by 51'-foot concrete equipment shelter. Don Helmers was the architect, Frank Politeo was the engineer, and Star-Kist Foods was the contractor. The cost of the addition was \$8,000.

**October 21, 1974:** Star-Kist Foods was granted Building Permit No. SP52271 for the addition of an 18'- by 27'-foot toilet facilities and locker room. No engineer is listed. Frank Politeo was the architect and Star-Kist was the contractor. The cost of the addition was \$12,000.

**April 28, 1978:** Star-Kist Foods was granted Building Permit No. SP58771 for the addition of a 21'4"- by 26'7"- foot 2<sup>nd</sup> story locker room. No engineer or contractor is listed. Frank Politeo was the architect. The cost of the addition was \$15,000.

**May 12, 1978:** Star-Kist Foods was granted Building Permit No. SP58860 for the addition of a 22'- by 240'- foot cooling room. Don Hellmers was the architect, Frank Politeo was the engineer and Star-Kist was the contractor. The cost of the addition was \$110,000.

**August 2, 1978:** Star-Kist Foods was granted Building Permit No. SP59467 for a 4'8"- by 72'8"- foot equipment bridge. Frank Politeo was the architect, R. Parlee was the engineer, and Star-Kist was the contractor. The cost of the bridge was \$10,000.

**May 1, 1979:** Star-Kist Foods was granted Building Permit No. SP61157 for the addition of a 20'- by 47'- foot office area. No engineer or contractor is listed. Frank Politeo was the architect. The cost of the addition was \$70,000.

**June 11, 1980:** Star-Kist Foods was granted Building Permit No. SP63624 for the addition of a 100'- by 50' 2-story dining room and locker room. No engineer or contractor is listed. Frank Politeo was the architect. The cost of the addition was \$413,000.

**March 18, 1983:** Star-Kist Foods was granted Building Permit No. SP68715 for the replacement of existing trusses with tapered girder. Frank Politeo was the architect, George Yassinski was the engineer, and Star-Kist was the contractor. The cost of the addition was \$25,000.

**February 5, 1987:** Star-Kist Foods was granted Building Permit No. SP4279 for a 20' - by 14' - foot addition to the office/lab. Frank Politeo was the architect, George Yassinski was the engineer, and Star-Kist was the contractor. The cost of the addition was \$15,000.

**February 5, 1987:** Star-Kist Foods was granted Building Permit No. SP4280 for the addition of a 32' - by 36' - foot blast freezer. Frank Politeo was the architect, George Yassinski was the engineer, and Star-Kist was the contractor. The cost of the addition was \$50,000.

**February 5, 1987:** Star-Kist Foods was granted Building Permit No. SP4281 for a 36' - by 25' - foot addition. Frank Politeo was the architect, George Yassinski was the engineer, and Star-Kist was the contractor. The cost of the addition was \$75,000.

**October 16, 1992:** Heinz Pet Food was granted Building Permit No. SP11224 for a 50' - by 82' - foot addition. Frank Politeo was the architect, Davis Design Group was the engineer, and Equidyne was the contractor. The cost of the addition was \$180,000.

### **950 Barracuda**

**August 7, 1951:** French Sardine Co. was granted Building Permit No. 15653 for a one-story 51'5" - by 25'6" concrete structure at 950 Barracuda. John K. Minasian was the architect, M.A. Nishkian was the engineer, and Nohl Calhoun Co. is the contractor. The cost of the structure was \$10,000.

**February 10, 1971:** Star-Kist Foods was granted Building Permit No. SP45496 for a one-story 106' 9" - by 121' 5" - foot structure. Frank Politeo was the architect, Don Hellmers was the engineer, and Star-Kist was the contractor. The cost of the structure was \$180,000.

**April 20, 1973:** Star-Kist was granted Building Permit No. SP49613 for a water treatment tank. No engineer is listed. Frank Politeo was the architect and Star-Kist was the contractor. The cost of the structure was \$42,000.

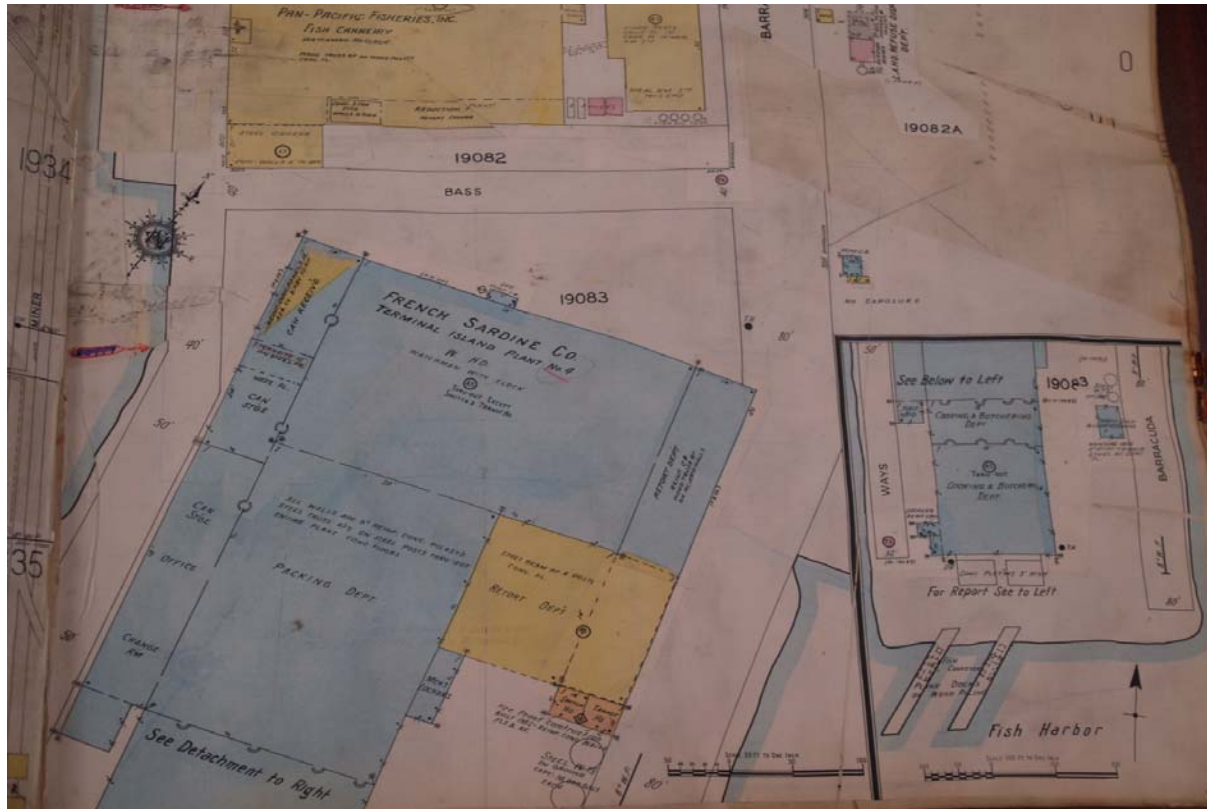
**October 24, 1974:** Star-Kist was granted Building Permit No. SP52284 for a one-story compressor room. Frank Politeo was the architect, Don Hellmers was the engineer, and Star-Kist was the contractor. The cost of the structure was \$17,000.

**October 24, 1974:** Star-Kist was granted Building Permit No. SP52285 for a one-story 120' - by 80' - foot structure. Frank Politeo was the architect, Don Hellmers was the engineer, and Star-Kist was the contractor. The cost of the structure was \$550,000.

**December 22, 1975:** Star-Kist was granted Building Permit No. SP53998 for an addition of a 120' - by 91' - foot structure. Frank Politeo was the architect, Don Hellmers was the engineer, and Star-Kist was the contractor. The cost of the structure was \$340,000.



### 1960 Sanborn of Star-Kist Plant No. 4



# Timeline of the Fishing Industry in Los Angeles Harbor

- 1893 Golden Gate Packing Company moved its operations from San Francisco to Los Angeles and re-established itself as the California Fish Company. A small sardine cannery began in San Pedro.
- 1897 Admiral John C. Walker recommended that port development continue in San Pedro, creating plans of expanding port activity to help create today the Port of Los Angeles.
- 1903 Albert Halfhill, co-owner of the California Fish Company, developed a method of canning whereby albacore were steamed (removing the oils and changing the color white), and the meat was packed in vegetable oil. This gave the tuna a more acceptable taste and appearance (some said like chicken) to Euro-American consumers.
- 1905 Tuna canning began due to depletion of sardines.
- 1906 City annexed the harbor.  
City of Los Angeles annexed a 16-miles of land along the ocean in San Pedro and Wilmington; three years later they would become the City of Los Angeles.
- 1907 On December 9th the Los Angeles City Council created the Los Angeles Board of Harbor Commissioners, marking the official founding of the Port of Los Angeles.
- 1909 Numerous harbor improvements occurred, including completion of a two mile breakwater, broadening and dredging of the main channel, construction of Angel's Gate lighthouse, and completion of wharfs, piers, and warehouses.  
Canning sardines stopped due to desire for white meat of albacore.  
San Pedro and Wilmington were annexed.
- 1912 Wilbur Wood opened the California Tuna Canning Company at Los Angeles Harbor. Two years later, Frank Van Camp bought the company and renamed it Van Camp Sea Food Company. This new company became best known for its Chicken of the Sea product line.
- 1914 Panama Canal opened with the Port of Los Angeles as became the natural port-of-call for most transpacific and coastal users.  
California Fish Company's first building was destroyed by fire.



Rear Admiral John C. Walker (Queenan 1983).

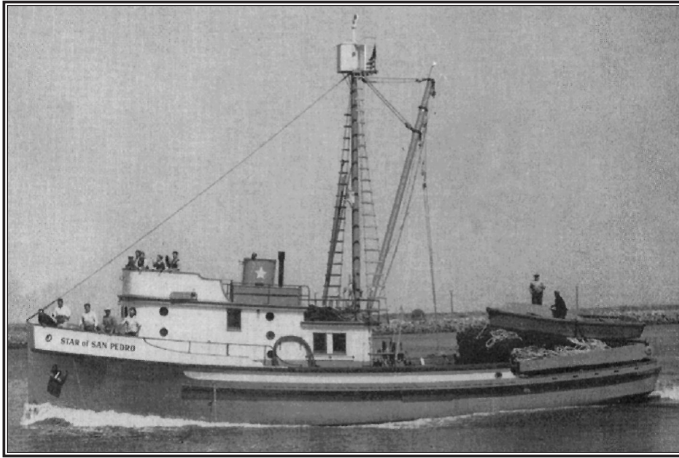


Pacific Tuna Canning Co. (top) opened in 1911. White Star Canning Co. (above) opened in 1912 (Pacific Fishermen 1952).

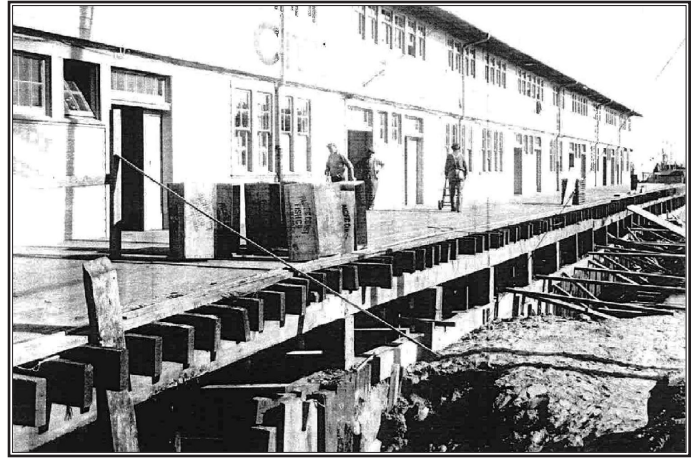


California Fish Company's first building, destroyed by fire in 1914 (Queenan 1983).





Purse seine boat, circa 1916 (Scofield 1951).



The rear elevation of the Wholesale Municipal Fish Market at Berths 79–80, 1917 (San Pedro Historical Society).

1915 As a part of the LA port development program Fish Harbor was constructed.

1916 The purse seiner, a type of boat that catches surface fish by encircling them with a net and then drawing (pursing) the net, was introduced.

16 tuna canneries in Southern California had 1,800 workers and were valued at approximately \$1 million.

1917 Martin Bogdanovich founded the French Sardine Company, better known by its later name Star-Kist. Eventually, the company became the largest fish cannery in the world.

Peak year of albacore with 34 million pounds caught.

Warehouse No. 1 was completed.

Market value of Albacore dropped and desire for other types of tuna arose.

Within 2 years, sardines caught rose from under 16 million to 158 million pounds, and a total of 40 canneries were established.

The first Municipal Fish Market was constructed at the port.

1928 Fish Harbor was completed for \$1.5 million, where canning operations congregated, allowing for more efficient landings of raw fish and a concentrated railroad and truck distribution point.

Mackerel became 2nd in popularity under sardines and tuna.

1929 75% of the catches in California were canned in Los Angeles Harbor.

Los Angeles brought in 45% of catches in California and 1/4th of total catches in the United States, including Alaska, with a total of 857 million pounds.

LA Harbor generated 2.25 million gallons of fish oil and 20,000 tons of fish meal.



Warehouse No. 1, 1917 (Queenan 1983).



The French Sardine Company first established a building in 1917. In the picture is owner Martin Bogdanovich (Queenan 1983).

1930 Beginning in 1917, increase in trade at the Port led distributors to construct a large number of warehouses and transit sheds, and a vast railroad network developed around the harbor and Los Angeles. Harbor facilities served a diverse range of products, including oil, lumber, shipbuilding, cotton, citrus crops, steel, and fishing and canning.

Peak year for tuna fishing with 40% of 111 million pounds from LA Harbor.

1930s Fishing and canning became a significant industry in Los Angeles; it was tied with San Diego as the largest center for fish canning in the country, and it ranked among the world's largest.

1931 Loss in markets with 37% of state catches, only 441 million pounds.

1932 75% of over 1,800 commercial fishermen were foreign born.

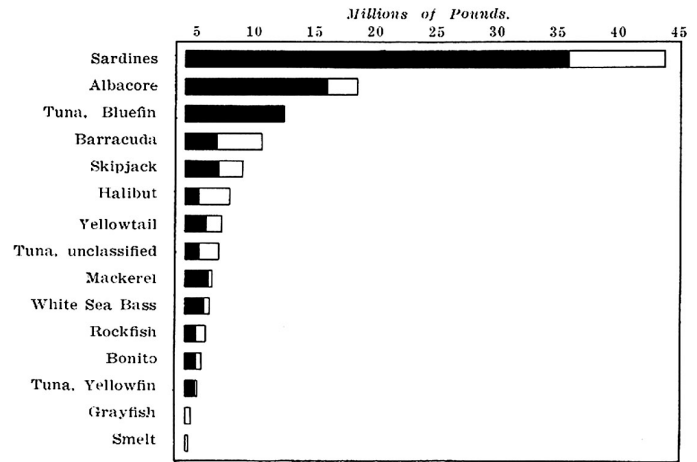
1939 The canneries and fishing fleet at the Los Angeles harbor employed more than 6,000 workers with a combined payroll of \$6.75 million.

1941 Municipal Ferry Terminal was established to carry cars and people from San Pedro to Terminal Island until 1963 when the bridge was completed; it later turned into the Maritime Museum when the bridge was completed.

1944 French Sardine (Star-Kist) founder Martin Bogdanovich died

1945 Formerly known as Sardamack Fisheries and an established canner of tuna, mackerel and sardines, Pan Pacific broke ground on a new cannery in September of 1945. This plant was the first of a number of expansions in cannery facilities following WWII.

1946 Tuna canning in Los Angeles Harbor became the largest in the world in following WW II.



Average annual landings of common marine fish in Southern California, 1919-1921. Black, of local origin landed in Los Angeles County (Skogsberg 1925).



Municipal Ferry, constructed in 1941 (Queenan 1983).



Main Channel and Municipal Fish Market, circa 1940 (Port of Los Angeles).



Pan Pacific Sea Food plant was completed on October 1, 1946, opening day of the sardine season. The new cannery plant cost approximately \$500,000 and was designed by James R. Friend, who worked in the Long Beach and Los Angeles areas and designed other Port buildings. The cannery was considered the most modern plant of its kind at Fish Harbor in 1946.

1947 Coast Fisheries Company constructed a building at Fries Avenue and Water Street.

1950 Los Angeles Harbor area produced nearly half of the 9.5 million cases of tuna packed in the U.S. during that season, approximately \$78 million.

1950s LA Harbor accounted for 80% of the 12 million cases of tuna produced in the U.S.; the canneries employed 5,000 people with payrolls of \$15 million, and they maintained a yearly volume of business exceeding \$150 million.

1951 Municipal Wholesale Fish Market was constructed.

The new Canner's Cooperative Steam Company was formed to supply steam to canneries throughout Fish Harbor. The cooperative was incorporated in December 1950 and consisted of five Fish Harbor tuna canneries: Van Camp, French Sardine, South Coast Fisheries, Terminal Island Sea Foods, and California Marine Curing & Packing. By the early 1950s, the five participating canneries were so successful that they required their own steam processing plant. Eventually, other canneries at Fish Harbor, including Pan Pacific, joined the cooperative.

1952 French Sardine Company became Star-Kist.

The new Star-Kist plant was completed at a cost of \$1 million was said to be the largest tuna-packing facility in the world. The plant covered 10 acres, could pack more than 400 tons of tuna in a single 8 hour shift, and contained modern docking facilities and innovative machinery.

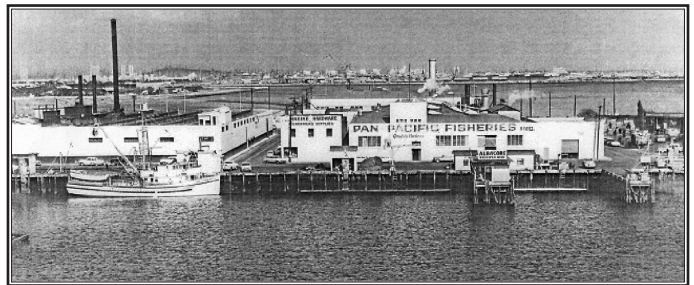
1953 Coast Fisheries had become a division of the Quaker Oats Company and was advertising and marketing "Puss 'n Boots" cat food extensively around the United States, labeling the product's maker as "Coast Fisheries Division of Quaker Oats Company, Wilmington, California."



One of the Star-Kist Canning facilities, built in 1943 (courtesy J. Deluca, 2007)



Inside of one of the Star-Kist facilities, no date (Queenan 1983).



Pan Pacific Fisheries Canning Building, no date (San Pedro Historical Society).

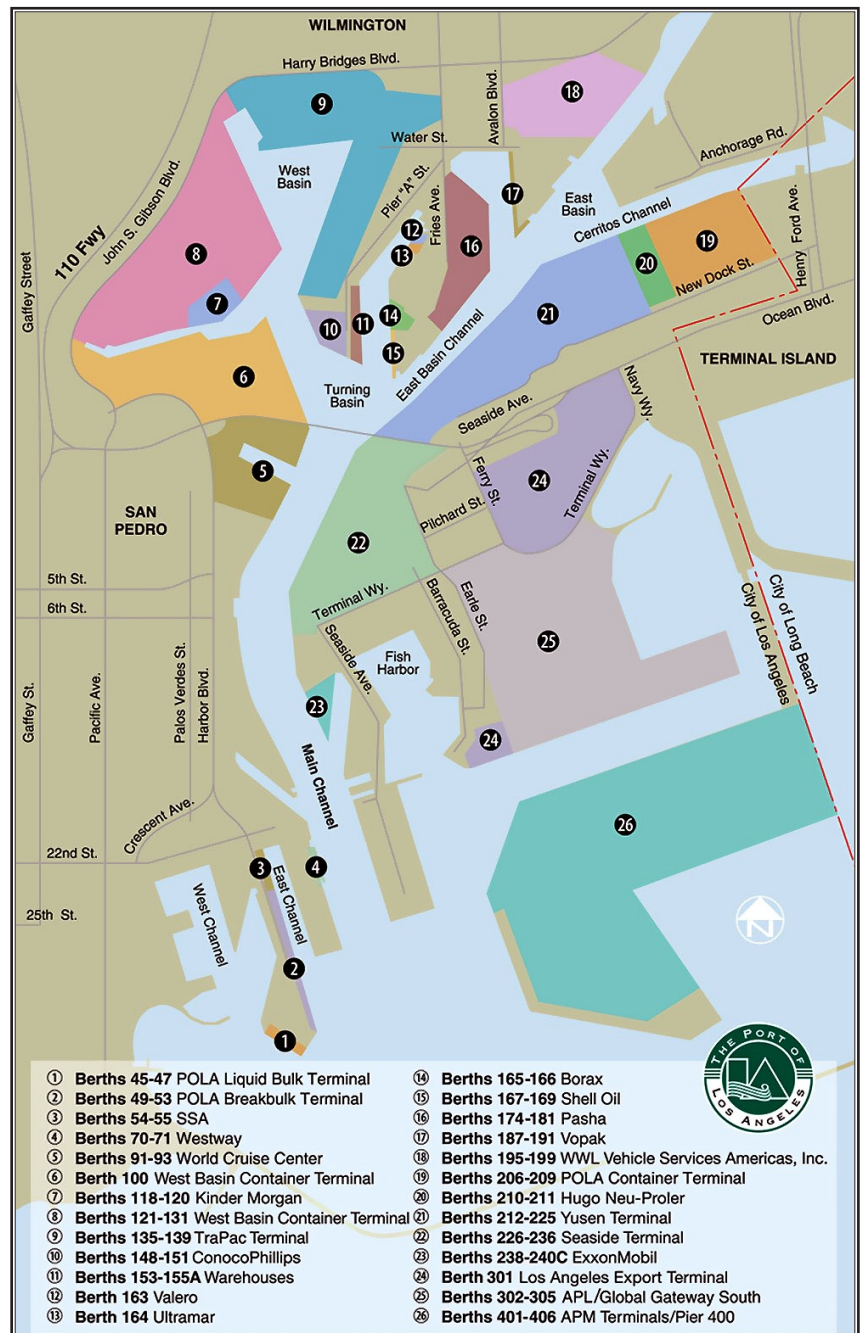


Municipal Wholesale Fish Market (San Pedro Historical Society, 1951).

- 1954 LA County seal was established and included a tuna fish, along with other well-known industries—oil, film, and cattle in the early days.
- 1961 Star-Kist Tuna introduces the “Charlie the Tuna” cartoon mascot.
- 1963 C.H.B. Seafoods acquired Pan Pacific, Heinz Corporation acquired Star-Kist, and Ralston Purina acquired Van Camp. The dominant tuna canning operations, once locally based, were now part of multinational food-processing conglomerates.
- 1972 San Pedro fishermen begin to face serious competition from foreign fleets.
- 1973 The Commercial Diving Center Inc. bought the Coast Fishing Company Building and was renamed the National Polytechnic College of Engineering and Oceaneering.
- 1977 Star-Kist Cannery becomes the largest fish-processing plant in the world.
- 1980s Tuna industry became contracted to one small operation.
- 1984 Star-Kist was the first big cannery to shut down.
- 1992 CHB Foods cannery, formerly known as Pan Pacific, was shut down.
- 1994 Pier 300/400 underwent construction as the largest capital improvement undertaking of all US seaports and the Port’s most ambitious development project.
- 2001 Chicken of the Sea tuna canning plant at the Los Angeles Harbor closed down, displacing 250 workers in the San Pedro area of Los Angeles and representing the last tuna fish canning operation in the continental U.S.
- 2006 Ports of Los Angeles and Long Beach together create the San Pedro Bay Ports Clean Air Action Plan, which plans to reduce emissions by 50% within five years.
- 2007 The Port’s Centennial birthday.



Coast Fisheries Building (David Greenwood, Jones & Stokes, 2006).





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## **Attachment C: City of Los Angeles Harbor Department**

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## Inventory

- A. Harbor Department staff shall maintain a Built Inventory (Inventory)
- B. The Inventory shall include, but not be limited to, historic, architectural and cultural resources consisting of:
  - a. Buildings, structures, objects and districts listed on the following registers or lists of historic and cultural resources (Register(s)): federal National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, California Points of Historical Interest or City of Los Angeles Historic-Cultural Monuments are within the scope of this policy.
  - b. Buildings, structures, objects and districts determined by the Executive Director designee to be a historic resource. The Executive Director designee should consult with a person or persons meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61), for assistance in determining what may be potentially eligible for inclusion on Registers either individually or as a historic district.
  - c. Buildings, structures, objects and districts determined by the Executive Director designee that do not qualify as a historic resource. The Executive Director designee should consult with a person or persons meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61), for assistance in determining what may not be potentially eligible for inclusion on Registers either individually or as part of a historic district.
- C. Inventory shall include, but not be limited to, information concerning:
  - a. Location of building, structure, object or district.
  - b. Name or description.
  - c. Whether building, structure, object or district is listed on a Register, determined to be potentially eligible for listing on a Register or determined to not be potentially eligible for listing on a Register.
    - i. If listed, identification of the Register.
    - ii. If determined to be potentially eligible for listing on a Register, identification of criteria under which it is eligible.
    - iii. If determined to not be eligible for listing on a Register.
  - d. Whether the building, structure, or object is listed or potentially eligible for listing on a Register as part of a historic district.
  - e. Date of evaluation or listing on a Register.
- D. If a building, structure or object forms part of an historic district, all buildings, structures or objects contributing to the district shall be identified as well as buildings, structures or objects that do not contribute to the historic district.



## Evaluation

- A. All evaluations concerning recommendations as to the historic status pertaining to buildings, structures, objects, districts or areas under this policy should be carried out by person or persons meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61).
- B. All evaluations shall include SurveyLA and California Department of Parks and Recreation recordation forms for evaluated objects, buildings, structures and districts.
- C. Two years from the adoption of this policy, and every five years thereafter, Harbor Department staff shall identify buildings, structures, objects and districts that may be potential historic resources. Harbor Department staff may identify these buildings, structures, objects and districts by, but not limited to, information in Harbor Department records, other government records, private records; published reports; newspapers; magazines or information from the public. Once buildings, structures, objects and districts have been identified by the Harbor Department, staff shall determine which, if any, of the buildings and structures will undergo evaluation.
- D. The benchmark for evaluation shall be 50-years of age in keeping with the National Park Service guidance. Buildings, structures, objects and districts less than 50 years of age will be evaluated if the Executive Director or his or her designee identifies a reason, including but not limited to the building or structure, object or district possessing exceptional importance, such as to believe an evaluation is warranted.

## Preservation

- A. The Harbor Department shall promote and establish priorities for the preservation and adaptive reuse, where feasible, of historic buildings, structures, objects and districts owned, or located on property owned, by the Harbor Department, consistent with the mandates imposed upon it by the Tideland Trust Doctrine, Tideland Trust Grant, California Coastal Act, City of Los Angeles Charter, the Port Master Plan, and laws of the United States and the State of California.
- B. The Harbor Department shall also promote preservation and adaptive reuse of its historic resources through the Port of Los Angeles Real Estate Leasing Policy and through its issuance of Harbor Department General Engineering Permits.
- C. Harbor Department staff shall consider historic resources during the earliest stages of project planning to determine the feasibility of reuse in its current capacity or its adaptive reuse while preserving its character defining features. This consideration will include direct and indirect effects upon the historic resource.
- D. If historic resources are involved in any potential leasing transaction by the Harbor Department, the Executive Director shall direct that evaluation criteria related to preservation and adapted reuse of this historic resource be one of the criteria to evaluate the extent to which the proposed lease promotes and provides for an adaptive reuse of

the building or structure and the preservation of character defining features of the historic resource. In all cases where historic resources are involved, preservation and adaptive reuse shall be encouraged.

- E. The environmental review process for analysis of potential impacts to a building, structure or object shall include, but not be limited to, the following steps implemented by the Director of the Environmental Management Division in consultation with the Director of the Engineering Division:
  - a. If a building, structure, object or district is included on the Inventory, but not listed on a federal, state or local Register, Environmental Management Division shall reevaluate its status if the previous evaluation is greater than five years old.
  - b. If a building, structure, object or district is not included in the Inventory and is over 50-years of age the building or structure shall be evaluated to determine potentially eligible for listing in a Register.
  - c. If a building, structure object or district is less than 50-years of age, Harbor Department staff will determine whether its evaluation is warranted. Criteria to be considered regarding a decision to evaluate shall include, but not limited to:
    - i. The age of the buildings structures, object or district shall be one of the criteria in the determination, with older buildings, structures, objects and districts having a higher value in the consideration on whether to evaluate.
    - ii. Innovation in engineering or architecture recognized through time as trend setting in national or regional periodicals and widely emulated.
    - iii. If resource is the only one remaining having an important association with a historic person or event.
    - iv. Whether or not the resource is an integral part of a district that is potentially eligible for listing on a Register. Only after completion of environmental review (as applicable) will a General Engineering Permit, including those for demolition or substantial alternation, be issued.
- F. Any alteration or changes to a building, structure, object and district identified as a historic resource shall be done, if practicable, in conformance with the Secretary of the Interior's Standards for Treatment of Historic Properties as determined the Executive Director or Board of Harbor Commissioners based on recommendations of a person or persons meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61).
- G. The Executive Director shall ensure that any historic building, structure, object or district owned by the Harbor Department shall be secured until such time as its ultimate disposition has been determined by the Harbor Department. Further, and if appropriate to the situation, the Executive Director shall take additional steps to ensure that such building, structure, object or district is stabilized or maintained at a standard so as not to

produce a detrimental effect upon its character. In making the determination to take such additional steps, the Executive Director shall balance the public interests associated with preservation of any such building, structure, object or district with such factors as cost, protection of public safety, protection of public health and the environment. Each such determination shall be guided by information from organizations (e.g. National Park Service, English Heritage), publications, and consideration of the recommendations of persons meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61).

- H. Historic buildings, structures and objects will not be demolished in the absence of a proposed project, unless such demolition is required by considerations of property redevelopment, public health or safety, protection of the environment by remediation or the requirements of Port operations and subject to compliance of California Environmental Quality Act (CEQA).
- I. In undertaking projects involving historic resources, the Harbor Department shall comply with all applicable laws, rules and regulations including but not limited to the CEQA. The Harbor Department staff shall consider the potential effects on historic resources as early in the environmental process as possible

#### Documentation of Historic Resources

- A. Prior to issuance of permits for demolition or substantial alteration of a historic resource, the Harbor Department shall ensure that documentation of the buildings proposed for demolition is completed in the form of a Historic American Building Survey (HABS) Level II documentation that shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a person or persons meeting the Secretary of the Interior Professional Qualification Standards (Appendix A, 36 CFR Part 61). The original archival-quality documentation shall be placed in the Harbor Department Archive, under the care of the Harbor Department Archivist.
- B. Items of historic or cultural value salvaged or removed from the historic resource before demolition or alteration may be offered to a museum, historical society or placed in the Harbor Department Archive, under the care of the Harbor Department Archivist.
- C. Make information on Port historic and cultural resources available to the public through, but not limited to:
  - a. Enhanced use of Web media such as the Harbor Department Virtual History Tour website; and
  - b. Through support of heritage tourism by ongoing Port tours, community events and outreach.

**APPENDIX D**  
**Archaeological Resources Inventory Report**

# **ARCHAEOLOGICAL INVENTORY REPORT FOR THE PORT OF LOS ANGELES STAR-KIST PROJECT, LOS ANGELES, CALIFORNIA**

## **PREPARED FOR:**

City of Los Angeles Harbor Department  
Environmental Management Division  
425 South Palos Verdes Street  
San Pedro, California 90731

## **PREPARED BY:**

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**April 2021**



ICF. 2021. Archaeological Inventory Report for the Port of Los Angeles Star-Kist Project, Los Angeles, California. April. (ICF 00656.19) Prepared for the City of Los Angeles Harbor Department, San Pedro, California.

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## Acronyms and Abbreviations

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BP	before present
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
LAHD	Los Angeles Harbor Department
NAHC	Native American Heritage Commission
Port	Port of Los Angeles
PRC	Public Resources Code
Project	Star-Kist Cannery Facility Project
Tribe	Gabrieleño Band of Mission Indians-Kizh Nation

## Executive Summary

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ICF was retained by the Los Angeles Harbor Department (LAHD) to conduct an archaeological inventory for the Star-Kist Cannery Facility Project (Project). This technical report has been prepared to evaluate potential environmental impacts that may result from the proposed Project. It describes the location for the proposed Project and discusses its background and objectives. This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.).

The records search, Native American consultation, and review of aerial photographs from Google Earth provided negative results for the presence of archaeological resources within the Project footprint. The Project site is composed of modern fill or nonnative sediments; no native ground is present. No known archaeological resources are within 0.25 mile of the Project site. In addition, because the Project site is composed of fill materials, there is little to no potential for encountering buried cultural resources within the area.

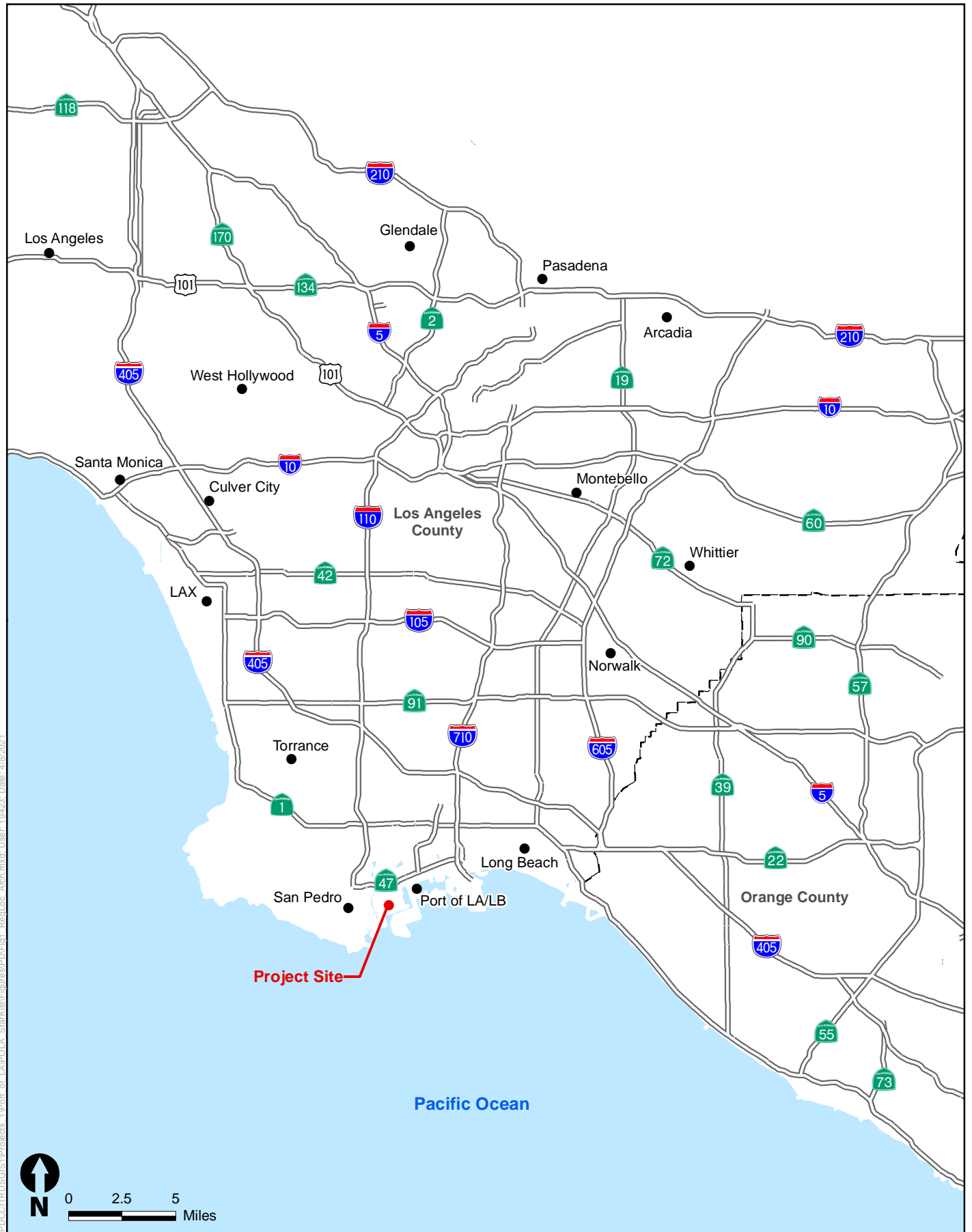
## Project Description

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The proposed Project would occur on a 14-acre site that was home to the former Star-Kist facilities on Terminal Island. LAHD is the lead agency under CEQA.

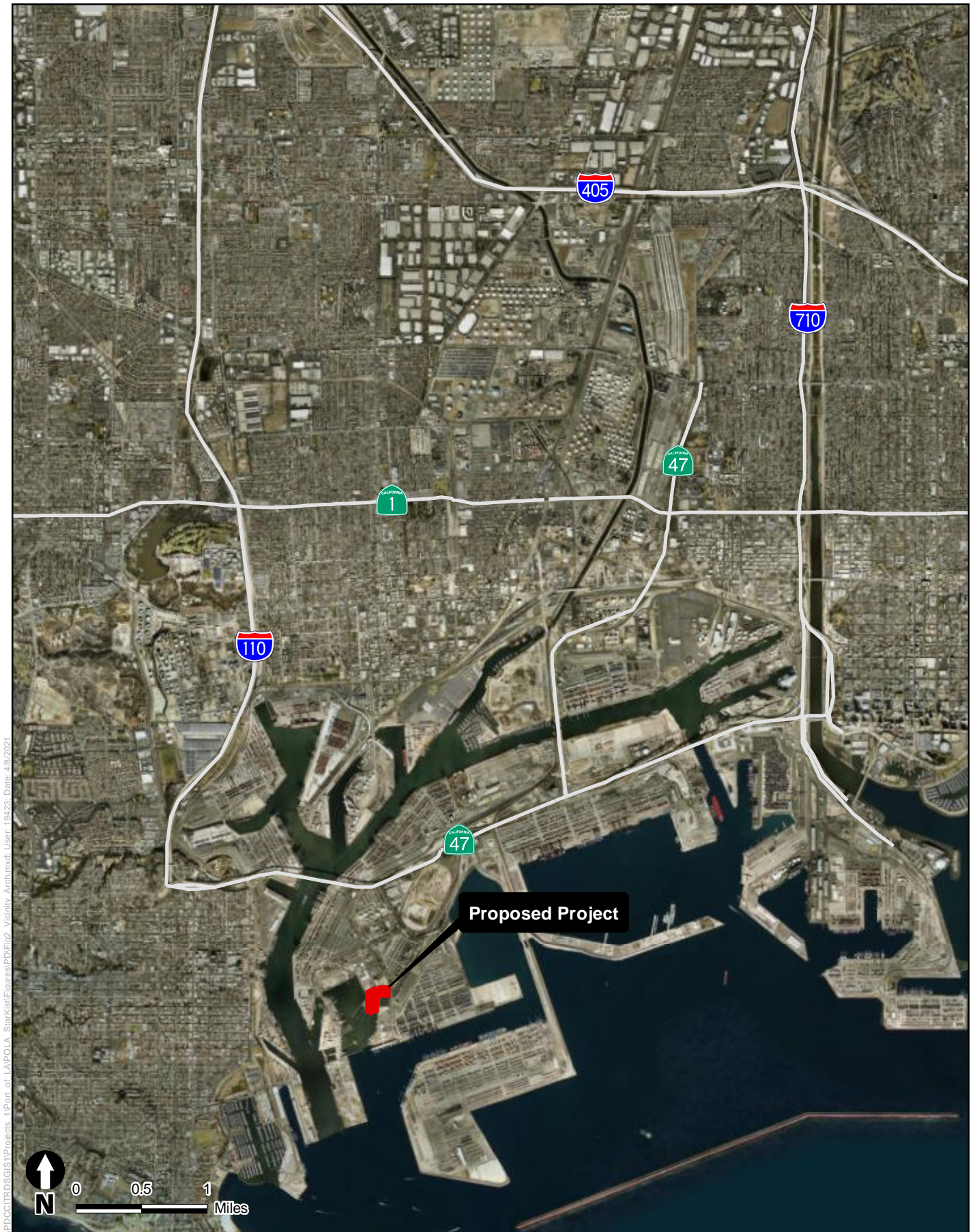
The primary objectives of the proposed Project are to create a parcel of land that is more marketable for future development, reuse and capitalize the site more efficiently, alleviate public nuisance, and establish an off-terminal chassis repair and maintenance yard to support container terminal operations on Terminal Island, consistent with the Port Master Plan. The proposed Project would be a more efficient use of the Project site and result in increased efficiency. The facility would provide maritime support services to container terminals within the Port of Los Angeles (Port), specifically those on Terminal Island, which are in close proximity to the Project site. LAHD has solicited multiple requests for proposals for the proposed Project site but has received no viable responses and has had no success in finding a feasible future use due to the complex's incurable functional obsolescence as well as irreparable infrastructure. However, for the purposes of CEQA, the proposed Project assumes the potential future use of the Project site for cargo support, which can vary from container or chassis storage to chassis repair and maintenance. For the purposes of this evaluation, the proposed Project involves operation of the site as a chassis repair and maintenance depot.

The proposed Project would be at the Port, on San Pedro Bay, 20 miles south of downtown Los Angeles (Figure 1, Regional Location Map, and Figure 2, Vicinity Map). The proposed Project site is at 1000, 1040, 1050, 1054 and 1098 S. Ways Street and 936 and 1099 S. Barracuda Street. The site is bounded by Bass Street to the north, Earle Street to the east, Marina Street to the south, and Ways Street to the west. Access to the Project site is provided from State Route 47, the Harbor Freeway (Interstate 110), the Long Beach Freeway (Interstate 710), and the San Diego Freeway (Interstate 405).



**Figure 2**  
**Regional Location Map**





**Figure 2**  
**Vicinity Map**

## Regulatory Setting

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Background research and this study was conducted in compliance with CEQA as amended (PRC §21000 et seq.), pursuant to the *Guidelines for Implementation of the California Environmental Quality Act* (CCR Title 14 §15000 et seq.), and in accordance with industry standards for similar projects in Los Angeles County. State CEQA Guidelines Section 15064.5(a.3) and PRC Section 21084.1 define below the criteria used to determine the significance of cultural resources, characterized as “historical resources.”

Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (CRHR) (PRC Section 5024.1, Title 1429 CCR, Section 4852).

The State CEQA Guidelines (Section 15064.5(b)) state that “a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” To this end, the State CEQA Guidelines list the following definitions:

1. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
2. The significance of an historical resource is materially impaired when a project:
  - A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources
  - B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant
  - C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA

When an archaeological resource is listed in, or is eligible to be listed in, the CRHR, PRC Section 21084.1 requires that any substantial adverse effect on that resource be considered a significant environmental effect. PRC Sections 21083.2 and 21084.1 operate independently to ensure that potential effects on archaeological resources are considered as part of the environmental analysis for a project. Either of these benchmarks may indicate that a proposal may have a potential adverse effect on archaeological resources.

PRC Section 21084.1 states that an historical resource is a resource listed in, or is determined to be eligible for listing in, the CRHR, or listed in a local register of historical resources, or deemed significant pursuant to criteria identified in PRC Section 5024.1(g) defined above, unless the

preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or is determined not to be eligible for listing in, the CRHR, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 does not preclude a lead agency from determining whether the resource may be an historical resource.

The State CEQA Guidelines Sections 15064.5 and 15126.4 guide the evaluation of impacts on prehistoric and historic archaeological resources. Section 15064.5(c) provides that, to the extent an archaeological resource is also a historical resource, the provisions regarding historical resources apply. These provisions endorse the first set of standardized mitigation measures for historic resources by providing that projects following the Secretary of the Interior's Standards for Treatment of Historic Properties be considered as mitigated to a less-than-significant level.

PRC Section 21083.2 states that as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place. Other state-level requirements for cultural resources management are written into the PRC, Chapter 1.7, Section 5097.5 (Archaeological, Paleontological, and Historical Sites).

State CEQA Guidelines Section 15064.5 (revised July 27, 2007) indicates a project may have a significant environmental effect if it causes "substantial adverse change" in the significance of an "historical resource" or a "unique archaeological resource," as defined or referenced in State CEQA Guidelines Section 15064.5 (b, c). Such changes include "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (State CEQA Guidelines 1998 Section 15064.5(b)).

The disposition of Native American burials is governed by Section 7050.5 of the California Health and Safety Code and Sections 5097.94 and 5097.98 of the PRC and falls within the jurisdiction of the Native American Heritage Commission (NAHC). Section 7052 of the Health and Safety Code establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives. Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historical or archaeological interest located on public or private lands, but specifically excludes the landowner. PRC Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, or historical, resources located on public lands.

# Environmental Setting

The Project site is on Terminal Island in Los Angeles County, California. Terminal Island consists primarily of an artificially built environment that serves industrial and port-related activities shared by the Port of Los Angeles and the Port of Long Beach. Terminal Island is within the southwestern structural block of the Los Angeles Basin province, one of four such blocks underlying the Los Angeles Basin that are marked by a northwest-southeast trending fault system (Yerkes et al. 1965). The sedimentation of the area consists of varying thicknesses of artificial fill deposits and alluvial sands and silts that underlie the artificial fill. These sands were deposited from Recent and Pleistocene river action as outwash from the Los Angeles Basin (Yerkes et al. 1965).

The Project site is primarily composed of developed lands. The developed lands are mostly paved and contain facilities such as buildings, lights, roads, and paved container storage areas with little or no vegetation. In undeveloped areas of Terminal Island the natural environment is composed of limited riparian corridors that include coastal sage scrub and California least tern habitat (Cox and Allen 2008).

## Cultural Setting

### Prehistoric Context

In Southern California, researchers attempting to define local or subregional traditions have created numerous cultural chronologies using various nomenclatures (Moratto 1984). Nonetheless, these chronologies are more notable for their similarities than their differences. Building on early studies and focusing on data synthesis, Wallace (1955, 1978) developed a prehistoric chronology for the Southern California coastal region that is widely used today (Table 1). Previous studies have followed the cultural chronology proposed by William Wallace in 1955. Archaeologists have updated the Wallace model over the succeeding decades, but the Wallace model still offers a general timeline for the prehistory of the area.

**Table 1. Cultural Chronology**

Horizon	Period	Date Range
Horizon 1	Early Man	Pre 7,000 before present (BP)
Horizon 2	Millingstone	7000 BP–3000 BP
Horizon 3	Intermediate	3000 BP–1000 BP
Horizon 4	Late Prehistoric	1000 BP–244 BP
Mission Period	Historic	244 BP–Present

### Early Man

Wallace (1955) describes the Early Man horizon as being typified by a hunting culture with large projectile points and crescentics. The hunting culture of the Early Man horizon is often associated with the Clovis culture of North America from the Paleoindian Period (12,000–10,000 before present [BP]). The Clovis culture is indicated by the presence of fluted (e.g., Clovis) projectile points.



Many Clovis-era sites are often ephemeral and only associated with lithic surface manifestations, making dating of these Early Man sites very difficult.

When Wallace developed the Horizon I (Early Man) in the 1950s, there was little evidence of human presence on the Southern California coast prior to 6000 B.C. Archaeological work in the intervening years has identified numerous sites older than this date including coastal and Channel Islands sites (e.g., Erlandson 1991; Johnson et al. 2002; Moratto 1984).

## Millingstone

The Millingstone Horizon represents a period of population growth throughout Southern California. As a result of the population increase, the archaeological record indicates a transition from a subsistence strategy heavily reliant on hunting to gathering strategy (Glassow et al. 2007). Groundstone artifacts including manos, metates, soapstone, and cogstones became more prevalent during this Millingstone Horizon (Padon 1995). Few projectile points are found at sites originating from the Millingstone Horizon, suggesting a greater emphasis on gathering and plant food processing.

## Intermediate

Large, stemmed projectile points appear during the Intermediate Horizon, indicating a shift from gathering back to hunting. Greater numbers of marine resources appear in coastal sites with deep-sea fish remains present. The mortar and pestle also replace the mano and metate during the intermediate period, suggesting a shift from hard-shell seeds to the acorn (Padon 1995). The abundance of California oak trees provided the highly nutritious acorns. Once the tannins are leached from acorns, they can be processed into dry flour that may be easily stored offering a more stable foodstuff. The period also saw an increase in marine resource procurement. Tools identified at Intermediate sites include shellfish hooks and bone harpoon barbs. Faunal remains from Intermediate sites may include whale, sea lions, seals, sea otter, and porpoise (Weinman and Stickel 1978). Artiodactyl remains are also present, suggesting skill at both marine and terrestrial food procurement.

## Late Prehistoric

The cultural systems present at the time of European contact developed during the Late Prehistoric period. The Late Prehistoric Horizon saw new cultural practices reflecting wide-ranging subsistence practices and an increase in ceremonial artifacts, personal adornment artifacts (i.e., jewelry), and trade items such as obsidian and steatite (Del Chario 1982). The bow and arrow were also introduced to the region during the Late Prehistoric period as evidenced by the presence of smaller projectile points (Padon 1995). The introduction of the bow and arrow and emphasis on material culture may have coincided with the immigration of the Takic-speaking Tongva people, who inhabited the Los Angeles Basin until European Contact (Padon 1995).

## Ethnographic Context

The Project area lies within the territory of the Gabrielino Native American people (Bean and Smith 1978). The Gabrielino are characterized as one of the most complex societies in native Southern California, second perhaps only to the Chumash, their coastal neighbors to the northwest. This

complexity derives from their overall economic, ritual, and social organization (Bean and Smith 1978:538; Kroeber 1925:621).

The Gabrielino, a Uto-Aztecan (or Shoshonean) group, may have entered the Los Angeles Basin as recently as 1500 BP. In early protohistoric times, the Gabrielino occupied a large territory including the entire Los Angeles Basin. This region encompasses the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern parts of the Santa Ana Mountains, and much of the middle to the lower Santa Ana River. They also occupied the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities with populations ranging from 50 to 150 individuals. The Gabrielino had access to a broad and diverse resource base. This wealth of resources, coupled with an effective subsistence technology, well-developed trade network, and ritual system, resulted in a society that was among one of the most materially wealthy and culturally sophisticated cultural groups in California at the time of contact.

In 1770, Father Junípero Serra was commissioned to establish a mission system extending from San Diego to San Francisco. The mission San Gabriel Arcángel was founded in 1771. The local Tongva inhabitants were forced to work under the missionaries as general laborers and farm hands. The people were forbidden to speak their native language and to practice any forms of traditional life and ceremonies. The neophytes were later referred to as the Gabrielino to identify them as subjects of the San Gabriel mission. The introduction of European diseases (e.g., measles and smallpox) along with poor diet and living conditions decimated the Gabrielino population.

## Historic Context

In 1542, Juan Rodríguez Cabrillo discovered the San Diego and San Pedro Bays. Cabrillo described San Pedro as an excellent harbor with good country with many plains and groves of trees (Defense Fuels Support San Pedro 2008).

The Spanish made few attempts to colonize the northern portion of California, then known as Alta California. After Russian incursions along the northern coast into Alaska and Oregon, the Spanish renewed their interest in settling Alta California (Defense Fuels Support San Pedro 2008).

In 1766, Spain ordered José de Gálvez to Mexico to oversee expeditions into California. The goal of the expeditions was to lead groups of ships north along the California coast to “rediscover the people of the bays of San Diego and Monterey.” In July of 1769, the first mission at San Diego was established. One month later, the explorers discovered an Indian village named Yang-na and renamed the settlement as *Nuestra Señora la Reina de Los Angeles*. The expedition continued north to what is now the San Francisco Bay and then returned to San Diego in January of 1770.

The mission system was reliant on outside supplies for survival during the early years. During the first years of the mission system, inhabitants were threatened by food shortages and hostile native groups. In an effort to alleviate these problems, Juan Bautista de Anza led an overland expedition to San Francisco to establish a presidio and two missions. Spanish expeditions from 1769 through 1771 resulted in the establishment of five missions and two presidios in California. Over the next 50 years, 16 more missions were established, with the final mission established at San Francisco Solano in July 1823. The missions were important in the colonization of California by creating a series of outposts approximately one day’s journey apart.

In 1821, Mexico won independence from Spain. By 1825, California became a formal territory of the Republic of Mexico. The Mexican government attempted to control access into the territory but keeping foreign settlers out of the region was difficult. Groups from the United States began settling the area as early as 1841.

One of the more famous American explorers at the time was Captain John C. Fremont. Fremont entered California in 1844 with two detachments of U.S. soldiers on a scientific expedition. In 1846, California Governor General José Castro ordered Fremont to leave sensing trouble. In May of 1846, the United States declared war on Mexico. The Mexican army could not organize to resist American forces in California. A group of frontiersmen captured the Mexican headquarters at Sonoma where the grizzly bear California Republic flag was raised. The U.S. Navy then captured the harbors in Monterey and San Francisco while ground troops captured Los Angeles without a single shot being fired (Defense Fuels Support San Pedro 2008). The Mexican-American War ended on February 2, 1848, with the signing of the Treaty of Guadalupe Hidalgo. As a result of the treaty, California was transferred to the United States.

In an effort to make Los Angeles more of a shipping hub for the West Coast, harbors were constructed in Los Angeles and San Pedro followed by a transcontinental railroad in 1869. The commercial industry boomed in Los Angeles as people began moving west, capitalizing on the railways. In 1873, the first orange groves were planted in Los Angeles, making agriculture a primary industry for the region. The established railway helped ship fruit to eastern markets. Soon after, other agricultural industries such as dairy, ranching, and wineries sprang up in and around Los Angeles. By 1910, Los Angeles was the nation's agricultural leader.

## **Port of Los Angeles**

### **Early History**

The Port is at the southernmost point in Los Angeles County, approximately 20 miles from downtown Los Angeles. Given its location on the Pacific Ocean, the surrounding area historically served as a general port facility. The Port sits within the boundaries of three historic ranchos conferred by Governor Pedro Fages to three veterans of the 1769 Portola expedition. The three ranchos included Rancho San Pedro, Rancho Los Palos Verdes, and Rancho Los Cerritos. The combined total acreage for the three ranchos equated to nearly 84,000 acres (Beck and Haase 1974). As was common for the time, owners of the rancho lands earned a living through the raising of cattle and participation in the hide and tallow trade. By 1830, San Pedro was known as the leading hide center on the West Coast (Queenan 1986).

The annexation of California by the United States in 1848 and the gold rush of 1849 resulted in an influx of new settlers to the San Pedro area. While a few older residents realized the profit potential of the Port area, it was largely underused for shipping during this period (Queenan 1986). However, the area continued to serve as a center for cattle and sheep ranching (Beck and Haase 1974).

### **Initial Commercial Shipping, 1857–1897**

Phineas Banning, one of the area's earliest residents, realized the promise of a commercial shipping port. The endpoints of two primary routes to the southwest gold fields, the Gila River Trail and the Old Spanish Trail, stood at Los Angeles. In 1857, Banning constructed new docks to capitalize on the increasing trade coming in and out of Los Angeles. With his base location up the bay at Wilmington,

Banning could shuttle materials on smaller boats to and from a second location on the Rancho San Pedro waterfront.

Banning also realized the importance of rail transportation and in 1869 organized the Los Angeles & San Pedro Railroad, the first route offering a reliable means of moving cargo from the ships coming into San Pedro Harbor to the city of Los Angeles. Improved transportation to and from the harbor had a significant effect on the growth of Los Angeles. By the turn of the twentieth century, city population had reached 102,000, resulting in increased demand for lumber and goods at San Pedro Harbor (Matson 1920).

### **San Pedro Bay—Founding of Port of Los Angeles, 1897–1913**

The growth of commerce in Los Angeles required the formal establishment of a shipping port. The federal government agreed to assist the city of Los Angeles by establishing its official harbor in San Pedro. Following an extensive battle with railroad magnate Collis Huntington, who advocated a site near his holdings in Santa Monica, the city of Los Angeles San Pedro won authorization from Congress for the establishment of a shipping port in March of 1897.

In preparation for the opening of the Panama Canal, and in conjunction with its annexation of San Pedro in 1906, the city of Los Angeles extended its boundaries to coastal tidewaters. The Port and the Los Angeles Harbor Commission were officially created in December 1907. Numerous harbor improvements followed, including the completion of the 2.11-mile breakwater, the broadening and dredging of the main channel, the completion of the first major wharf by the Southern Pacific Railroad, the construction of the Angel's Gate lighthouse, and the construction of the city's first municipal pier and wholesale fish market. By 1909, both Wilmington and San Pedro were part of the city of Los Angeles (Matson 1920). Because the opening of the Panama Canal in 1915 was expected to decrease the time spent by ships traveling between eastern and western U.S. ports, the city of Los Angeles completed one of many large municipal terminals in the harbor. The completion of this building symbolized the Port's transition from a small, poorly equipped landing to a significant seaport able to handle deep-sea ships with varied cargo (Queenan 1986).

### **Containerization: 1950 to Present**

Methods of shipping changed dramatically following World War II with the advent of containerization. Previously, cargo loading was labor intensive: individual pieces of cargo, drums, boxes, bags, or crates were loaded into ships after a repetitive process of unloading and reloading at the wharf, and stowing into ships' holds by cranes or by hand. Once in the ships' holds, the cargo was stowed by longshoremen. Some efficiency was achieved by placing several individual packets (e.g., drums, bags, or boxes) on a pallet and then loading the pallet into the cargo hold. Alternatively, longshoremen would place the individual pieces of cargo into cargo nets and then hoist the nets into the ship, where the individual pieces of cargo were again unloaded and stowed.

Containerization required the maritime industry to adapt to the needs of this mode of transport, using not only specially designed ships, truck trailers, rail cars, and cargo cranes but also new Port facilities. Major improvements in the 1970s included the deepening of the main channel to accommodate the larger container vessels entering the bay, the purchase of land to expand terminals, and the replacement of older wharves that could not bear the increased weight of newer containers.

## Port of Los Angeles Fishing and Canning Industry

Commercial fishing in the San Pedro area began with the establishment of the Golden Gate Packing Company on the wharf alongside the Main Ship Channel in 1893. The Golden Gate Packing Company moved its operation from San Francisco to the Port because it was suffering from a periodic slump in the anchovy and sardine business. Once at the Port, the company reestablished itself as the California Fish Company. Prior to 1903, San Pedro canneries packed sardines only. However, during the early 1900s, the sardine catch quantities began to decline in the Los Angeles Harbor also, and canners needed to find another fish to pack and sell. Albacore tuna, an oily fish that often weighed between 20 and 40 pounds, abounded off the Southern California coast. However, albacore was unfamiliar to most consumers and its oil made it difficult to can.

In 1903, Albert P. Halfhill, co-owner of the California Fish Company, working with his superintendent Wilbur F. Wood, invented a method for steaming albacore that removed the oil. He persuaded grocers in the Los Angeles area to give away cans of tuna when customers purchased coffee. This successful tuna promotional campaign along with generally affordable prices encouraged the public to try the new fish product and opened the way for nationwide marketing (Matson 1945; Queenan 1983). In 1912, Wood opened the California Tunny Canning Company at the head of the Southern Pacific slip on the west side of the Main Channel. Two years later, Frank L. Van Camp bought the company from Wood and renamed it “Van Camp Sea Food Company.” The new business, marketing “Chicken of the Sea,” went on to become the leader in the tuna industry and was instrumental in popularizing tuna on the national market (Queenan 1983).

Throughout the early twentieth century, the fishing and canning industry at the Port continued to grow rapidly. As early as 1893, Southern California fishermen began to use the purse seiner, a type of boat that catches surface fish by encircling them with a net and then drawing the net. The boat enabled fishermen to catch the elusive blue-fin and yellow-fin tuna. Soon purse seiners filled the harbor. In 1917, Martin J. Bogdanovich founded the French Sardine Company, which would become Star-Kist, and eventually, the company became the largest fish cannery in the world. By World War I, the Port led the nation in commercial fishing, harvesting vast quantities of tuna, mackerel, and sardines from the Pacific Ocean (Skogsberg 1925; Queenan 1983).

During the mid-1920s, to enable the various canning companies to expedite the handling of fish and to provide them with railroad distribution connections to the rest of the country, LAHD built a small, protected anchorage known as Fish Harbor. Fish Harbor was completed by 1928 at a cost of \$1.5 million (Queenan 1983; Board of Harbor Commissioners 1925:16–17, 1928:50). By this time, the municipal wholesale fish market operated at Berth 80 on the Main Channel. Just to the south at Berths 77–78, fishermen could moor their boats at a wharf, and they built a cluster of sheds for storage and fish net mending. By 1925, approximately 1,200 tuna fishing boats served the wholesale fish markets and seven canneries at the Port. While at least 80 percent of the sardine pack was exported to markets in Argentina, Manila, India, Belgium, England, and the Dutch East Indies, almost the entire tuna pack was consumed in the United States. Fish byproducts, including fertilizer, supported both the California citrus industry and the rice fields in Japan.

Through the 1920s and 1930s, fishing and canning operations expanded at Fish Harbor, and that area became the focus of the industry at the Port. Twelve canneries leased space at Fish Harbor during this period. Although sardines remained important to the industry, tuna became dominant in volume and value during this period. In 1934, the volume of the tuna pack exceeded the sardine pack for the first time. During the 1930s, fishing and canning was a significant industry at the Port.

In 1936, the value of the Los Angeles fish pack represented half the total for all of California and was twice that of the next largest fishing port. By 1939, the canneries and fishing fleet at the Port employed over 6,000 workers with a combined payroll of \$6.75 million (Board of Harbor Commissioners 1936:55, 1939:25).

To increase the efficiency of the canneries through a ready supply of labor, the Harbor Commissioners leased and developed land adjacent to Fish Harbor for cannery employees. By the early 1930s, more than 600 Japanese-Americans lived at Fish Harbor, manning the fishing boats and working in the canneries. However, during World War II the entire Japanese-American community was relocated as part of Executive Order 9066, signed by President Franklin D. Roosevelt, which brought about the forced internment of nearly 120,000 Japanese-Americans from the West Coast. By the late 1940s, the Port had demolished the remaining buildings (Queenan 1983). The Japanese community never returned to Terminal Island. Following the United States' entry into World War II in December 1941, the Port turned its attention to the war effort. Fishing and canning continued to expand to meet wartime demand. After the war, the Port immediately began restoring its property to pre-war status and resuming normal operations. Projects included completing general maintenance of Fish Harbor and constructing a new municipal fish market at Berth 72 on Fishermen's Wharf (Queenan 1983).

Due to growing demand for tuna and through expansion of fishing and canning operations, the Los Angeles Harbor, led by Fish Harbor, was the homeport to the world's largest fisheries in value and in tonnage of fish by the early 1950s. Some 950 million pounds of fish were landed in the San Pedro district during the 1950–1951 seasons, with a total value of the catch and canning distribution at approximately \$78 million. The Los Angeles Harbor area produced nearly half of the 9.5 million cases of tuna packed in the United States during that season (Board of Harbor Commissioners 1951–1952:47).

The fishing and canning industry remained strong through the 1960s, although the future of the San Pedro facilities became doubtful as Van Camp and Star-Kist, the largest canners, opened new plants overseas, including in American Samoa and Mexico. For a period of 75 years, canneries had expanded their building sites and sold their products all over the world. Tuna canning became a large and thriving industry, but plants and labels were kept within a small community of owners. After 1975, mergers and acquisition with large corporations changed the pattern of the industry.

The effort to identify cultural resources in the study area included records searches of previous cultural resource investigations and recorded sites; background research and a review of literature relevant to the prehistory, ethnography, and history of the study area; and consultation with the NAHC and Native Americans.

### Background Research

An archaeological field survey was conducted for this study; however, aerial imagery from Google Earth was consulted to confirm that no native ground is present on the Project site. The review of aerial imagery indicates that the entire Project site has been previously developed. There is no open ground amenable to traditional archaeological field survey. In addition, background research has indicated that the Project site consists of artificial fill. For example, maps of the Port from 1915 and 2018 show that the Project is occurring on nonnative sediments.

### Records Search

ICF Archaeologist Nara Cox performed a cultural resources records search on May 8, 2019, at the South Central Coastal Information Center, which is at California State University, Fullerton and is part of the California Historical Resources Information System. The records search and literature review provide for the identification of previously documented archaeological, historic, and architectural resources within and near the cultural resources study area, and is useful for developing a context to frame assessments of resource significance. The following is a summary of the records search used in this study.

The records search revealed that a total of seven cultural resources studies have been conducted within a 0.25-mile radius of the Project area (Table 2).

**Table 2. Previous Cultural Resources Studies within 0.25 Mile of the Project Area**

Report No.	Date	Title	Author(s)
LA-02399	1978	Los Angeles-long Beach Harbor Areas Cultural Resource Survey	Weinman, Lois J. and E. Gary Stickel
LA-09467	2008	Final Architectural Survey and Evaluation of the Star-Kist Plant Terminal Island, Port of Los Angeles, Los Angeles, California	Lain, Katy
LA-11977	2012	Berths 302-306 Container Terminal Project, Port of Los Angeles, Los Angeles County, California	Allen, Aaron
LA-10016	2000	Architectural Survey and Evaluation of the Southwest Marine Terminal (Berth 240) of the Port of Los Angeles	Lassell, Susan, E.
LA-10527	1994	Los Angeles-Long Beach Harbor Areas Regional Cultural History, Los Angeles County, California	Weinman, Lois J.
LA-03706	1994	Technical Synthesis Report Underwater Archaeological Relocation and Visual Identification Survey of Four Sonar Features Port of Los Angeles 2020 Plan Pier 400 Dredging and Landfill Project Port of Los Angeles, California	MacFarlane Archaeological Consultants

Report No.	Date	Title	Author(s)
LA-04130	1984	Los Angeles-long Beach Harbors Landfill Development and Channel Improvement Studied Cultural Resources Appendix	No author

Within a 0.25-mile radius of the Project area, the records search revealed the presence of nine previously recorded cultural resources (Table 3). All of these resources are historic-period built environment resources. No prehistoric archaeological resources have been identified from within a 0.25-mile radius of the Project area.

**Table 3. Previously Recorded Cultural Resources within 0.25 Mile of the Project Area**

Site No.	In Area of Potential Effects?	Name/Location
*No number assigned	Yes	Star-Kist Plant No. 4/East Plant
19-167314	Yes	Terminal Island
19-173042	Yes	Ferry Boat <i>Sierra Nevada</i>
19-187658	Yes	Bethlehem Shipyard
19-189483	Yes	Guardhouse
19-189484	Yes	Compressor House
19-189485	Yes	Dry Dock Control House
19-189486	Yes	Dry Dock #1
19-189487	Yes	Clyde Crane

\*The Star-Kist facility was previously recorded and evaluated in 2008; however, a primary or trinomial was never assigned. The facility was re-evaluated in 2019 and found to be ineligible (ICF 2021).

## Native American Consultation

### Sacred Lands File Search

A request for a check of the Sacred Lands File was made to the California NAHC. A response from NAHC was received on May 8, 2019. The results of the Sacred Lands File check conducted through NAHC was negative.

### Assembly Bill 52 Consultation

On May 10, 2019, LAHD provided notification of the Star-Kist Project, pursuant to the provisions of Assembly Bill 52 and PRC Section 21080.3.1(d).

On May 17, 2019, the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe) formally requested Assembly Bill 52 consultation with LAHD based on the Project site's location within the Tribe's ancestral territory.

On June 10, 2019, LAHD initiated consultation with the Tribe via certified mail. The letter included a Project description and information indicating that past identification efforts did not identify the presence of archaeological materials in the Project area and that a Sacred Lands File search prepared for the Project was negative. LAHD included maps of the Port from 1915 and 2018, showing that the Project is occurring on nonnative sediments. Additionally, LAHD provided three proposed dates (June 17, 2019; June 18, 2019; June 19, 2019) to conduct a consultation meeting and



requested a response from the Tribe. On June 24, 2019, LAHD sent a follow-up email to the Tribe, stating that the proposed consultation meeting dates had passed, and requesting a response regarding the availability of the Tribe to participate in consultation. As of preparation of this report, LAHD has not received a response from the Tribe. In light of the foregoing, and in accordance with PRC Section 21080.3.2(b)(2), LAHD, acting in good faith and after reasonable effort, respectfully concluded consultation in a letter to the Tribe dated July 25, 2019. If tribal cultural resources are identified during implementation of the Project, the standard mitigation measures provided in PRC 21084.3 will be considered. The NAHC response letter for search of the Sacred Lands File and available consultation letters are provided in Appendix A.

## Results and Recommendations

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The results of the records search and Native American consultation, and a review of aerial photographs from Google Earth provided negative results for any archaeological resources within the footprint of the proposed Project. The Project site is composed of modern artificial fill or nonnative sediments (i.e., no native ground is present). No known archaeological resources are within 0.25 mile of the Project site. In addition, because the Project site is composed of artificial fill materials, there is little to no potential of encountering buried cultural resources within the Project area.

In the unlikely event that cultural materials (Native American or historic artifacts) are encountered during construction, work should stop in the vicinity of the find until a qualified archaeologist can assess the material. Design of a treatment plan may be required to appropriately mitigate any unanticipated discoveries. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs, such as excavation or detailed documentation, or other mitigation measures, following standard archaeological procedures.

If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC 5097.98. Construction must halt in the area of the discovery of human remains, the area must be protected, and consultation and treatment should occur as prescribed by law. No further archaeological resource management is required beyond the measures specified above for the Project.

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## **Appendix A**

### **Native American Consultation**

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**NATIVE AMERICAN HERITAGE COMMISSION**  
Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691 Phone: (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>



May 8, 2019

Nicole Enciso  
Port of Los Angeles

VIA Email to: [nenciso@portla.org](mailto:nenciso@portla.org)

RE: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Star-Kist Cannery Facility Project, Los Angeles County

Dear Ms. Enciso:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the NAHC was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: [steven.quinn@nahc.ca.gov](mailto:steven.quinn@nahc.ca.gov).

Sincerely,



Steven Quinn  
Associate Governmental Program Analyst

Attachment

**Native American Heritage Commission  
Tribal Consultation List  
Los Angeles County  
5/8/2019**

***Gabrieleno Band of Mission  
Indians - Kizh Nation***

Andrew Salas, Chairperson  
P.O. Box 393  
Covina, CA, 91723  
Phone: (626) 926 - 4131  
admin@gabrielenoindians.org

Gabrieleno

***Gabrieleno/Tongva San Gabriel  
Band of Mission Indians***

Anthony Morales, Chairperson  
P.O. Box 693  
San Gabriel, CA, 91778  
Phone: (626) 483 - 3564  
Fax: (626) 286-1262  
GTTribalcouncil@aol.com

Gabrieleno

***Gabrielino /Tongva Nation***

Sandonne Goad, Chairperson  
106 1/2 Judge John Aiso St.,  
#231  
Los Angeles, CA, 90012  
Phone: (951) 807 - 0479  
sgoad@gabrielino-tongva.com

Gabrielino

***Gabrielino Tongva Indians of  
California Tribal Council***

Robert Dorame, Chairperson  
P.O. Box 490  
Bellflower, CA, 90707  
Phone: (562) 761 - 6417  
Fax: (562) 761-6417  
gtongva@gmail.com

Gabrielino

***Gabrielino-Tongva Tribe***

Charles Alvarez,  
23454 Vanowen Street  
West Hills, CA, 91307  
Phone: (310) 403 - 6048  
roadkingcharles@aol.com

Gabrielino

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Star-Kist Cannery Facility Project, Los Angeles County.





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Post Office Box 151

San Pedro, CA 90733-0151

TEL/TDD 310 SEA-PORT

www.portoflosangeles.org

Eric Garcetti

*Mayor, City of Los Angeles*

Board of Harbor  
Commissioners

Jalme L. Lee  
*President*

Diane L. Middleton  
*Commissioner*

Lucia Moreno-Linares  
*Commissioner*

Anthony Pirozzi, Jr.  
*Commissioner*

Edward R. Renwick  
*Commissioner*

Eugene D. Seroka

*Executive Director*

May 10, 2019

Andrew Salas  
Chairperson, Gabrieleno Band of Mission Indians - Kizh Nation  
P.O. Box 393  
Covina, CA 91723

Dear Mr. Salas:

**SUBJECT: CALIFORNIA ENVIRONMENTAL QUALITY ACT PUBLIC RESOURCES CODE  
SECTION 21080.3.1, CALIFORNIA ASSEMBLY BILL 52, FORMAL NOTIFICATION  
FOR PROPOSED STAR-KIST FACILITY PROJECT**

It is my pleasure to notify you of an opportunity to request consultation pursuant to Public Resources Code (PRC), Section 21080.3.1(d) for the Star-Kist Facility Project (Project). The proposed Project is located on Terminal Island within the Port of Los Angeles (Figure 1), is approximately 9 acres, and bounded by Ways, Barracuda, Bass, and Marina Streets (Figure 2).

The proposed Project would demolish the existing facility to for future use as a marine services support yard at the Project site. Development at this location include grading and paving and fence line modifications. Operations would include container sorting, storage, and transfer operations. The Native American Heritage Commission completed a Sacred Lands file check for the Project site with negative results. The proposed Project would be located on artificial fill dating from approximately 1915-1929 and 1947-1967. The location on an artificially elevated landform of constructed fill reduces the chance of encountering intact prehistoric materials.

Please respond in writing within 30 days if you wish to enter into consultation, pursuant to PRC, Section 21080.3.1(d). The Lead Agency contact information for this Project is Nicole Enciso, City of Los Angeles Harbor Department, Environmental Management Division, 425 S. Palos Verdes Street, San Pedro, CA 90731.

Should you have any questions, please contact Nicole Enciso at (310) 732-3615.

Sincerely,

CHRISTOPHER CANNON  
Director of Environmental Management

CC:LW:NE:mr  
APP No.: 190311-032

Enclosure



Figure 1, Regional Location: Star-Kist



Figure 2 Site Boundary: Star-Kist



## GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Project Name: Star-Kist Facility Project located on Terminal Island within the Port of Los Angeles

Dear Christopher Cannon,

Thank you for your letter May 10, 2019 regarding AB52 consultation. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail .

Please contact us at your earliest convenience. ***Please Note :AB 52, “consultation” shall have the same meaning as provided in SB 18 (Govt. Code Section 65352.4).***

Thank you for your time,

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians@yahoo.com](http://www.gabrielenoindians@yahoo.com)

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)



425 S. Palos Verdes Street Post Office Box 151 San Pedro, CA 90733-0151 TEL/TDD 310 SEA-PORT www.portoflosangeles.org

Eric Garcetti

*Mayor, City of Los Angeles*

Board of Harbor  
Commissioners

Jaime L. Lee  
*President*

Diane L. Middleton  
*Commissioner*

Lucia Moreno-Linares  
*Commissioner*

Anthony Prozzi, Jr.  
*Commissioner*

Edward R. Renwick  
*Commissioner*

Eugene D. Seroka

*Executive Director*

June 4, 2019

Andrew Salas, Chairman  
Gabrieleño Band of Mission Indians – Kizh Nation  
P.O. Box 393  
Covina, CA 91723

**VIA CERTIFIED MAIL AND EMAIL**

Dear Mr. Salas:

**SUBJECT: INITIATION OF AB 52 CONSULTATION FOR THE STAR-KIST FACILITY  
PROJECT LOCATED ON TERMINAL ISLAND WITHIN THE PORT OF  
LOS ANGELES**

On May 10, 2019, the City of Los Angeles Harbor Department (Harbor Department) provided notice of the Star-Kist Facility Project located on Terminal Island within the Port of Los Angeles, pursuant to the provisions of Assembly Bill 52 and Section 21080.3.1(d) of the Public Resources Code. On May 17, 2019, the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe) formally requested AB52 consultation with the Harbor Department based on the project site's location within the Tribe's ancestral tribal territory.

Please consider this letter and preliminary project information as the initiation of AB52 consultation pursuant to Public Resources Code 21080.3.1(e) and Chapter 532 Statutes of 2014 (i.e. AB 52). Please provide a designated lead contact person if you have not provided that information to us already.

The proposed project would demolish the existing Star-Kist facility, neighboring East-Plant, and accessory structures. Development at this site would include grading, paving, lighting, and fence installations. The future intended use would be for a maritime services support facility, with operations including, but not limited to, container and chassis storage, container sorting, and roadability checks.

Our records indicate that there are no recorded archaeological sites within the study area. Past identification efforts were unable to confirm the presence of archaeological material within the Project area. A record search of the sacred lands file by the Native American Heritage Commission was negative.

**FILE COPY**

6/10/19 EAx  
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We have attached a map of the Port of Los Angeles from 1915 and 2018. The project's location can be seen on the 2018 map adjacent to Fish Harbor near Berth 267. Comparisons between the 2018 map and the 1915 map show that this project is occurring on non-native soil.

The Harbor Department is committed to working with your tribe to respectfully account for and manage resources important to the Tribe, especially those meeting the definition of a Tribal Cultural Resource under Public Resources Code Section 21074, which includes sites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe. Your assistance in identifying such resources will allow them to be avoided and protected to the maximum extent possible. We understand that the locations of these resources are sensitive. Resource locations will not be disclosed in public documents and will be kept confidential as provided for under California Government Code 6254.10.

The Harbor Department would like to meet with you to discuss the project and provide you with an opportunity to communicate concerns you might have regarding places within the project area that may be important to your community. Please let us know if you are available to meet on any of the following dates/times:

- Monday, June 17<sup>th</sup> at 1:30 PM
- Tuesday, June 18<sup>th</sup> at 1:30 PM
- Wednesday, June 19<sup>th</sup> at 10:00 AM

If you or any of your tribal members have any questions or concerns regarding this project, please contact Nicole Enciso at (310) 732-3615 or via email at [nenciso@portla.org](mailto:nenciso@portla.org).

Sincerely,



CHRISTOPHER CANNON  
Director of Environmental Management

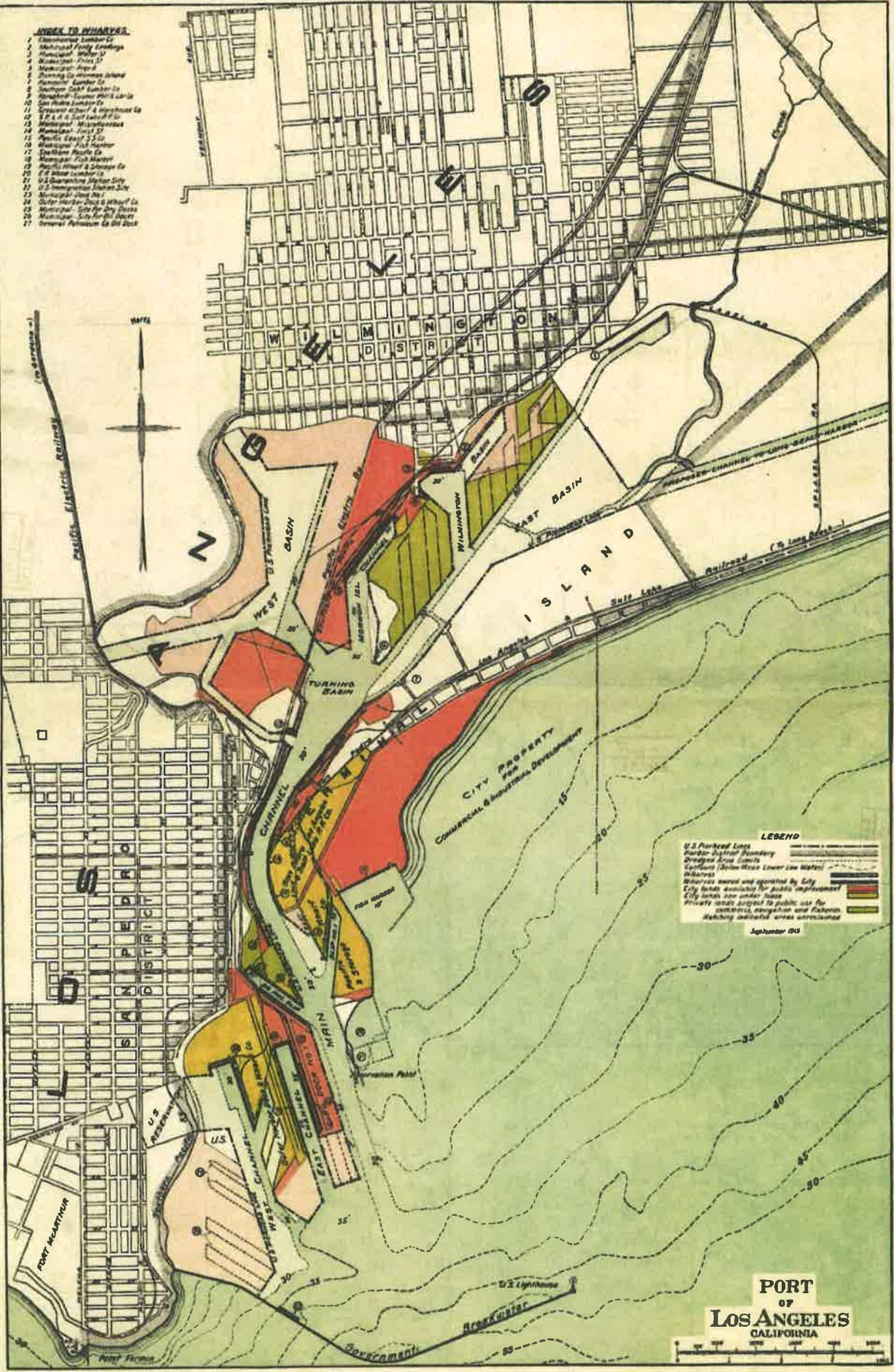
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APP No.: 190311-032

Attachment

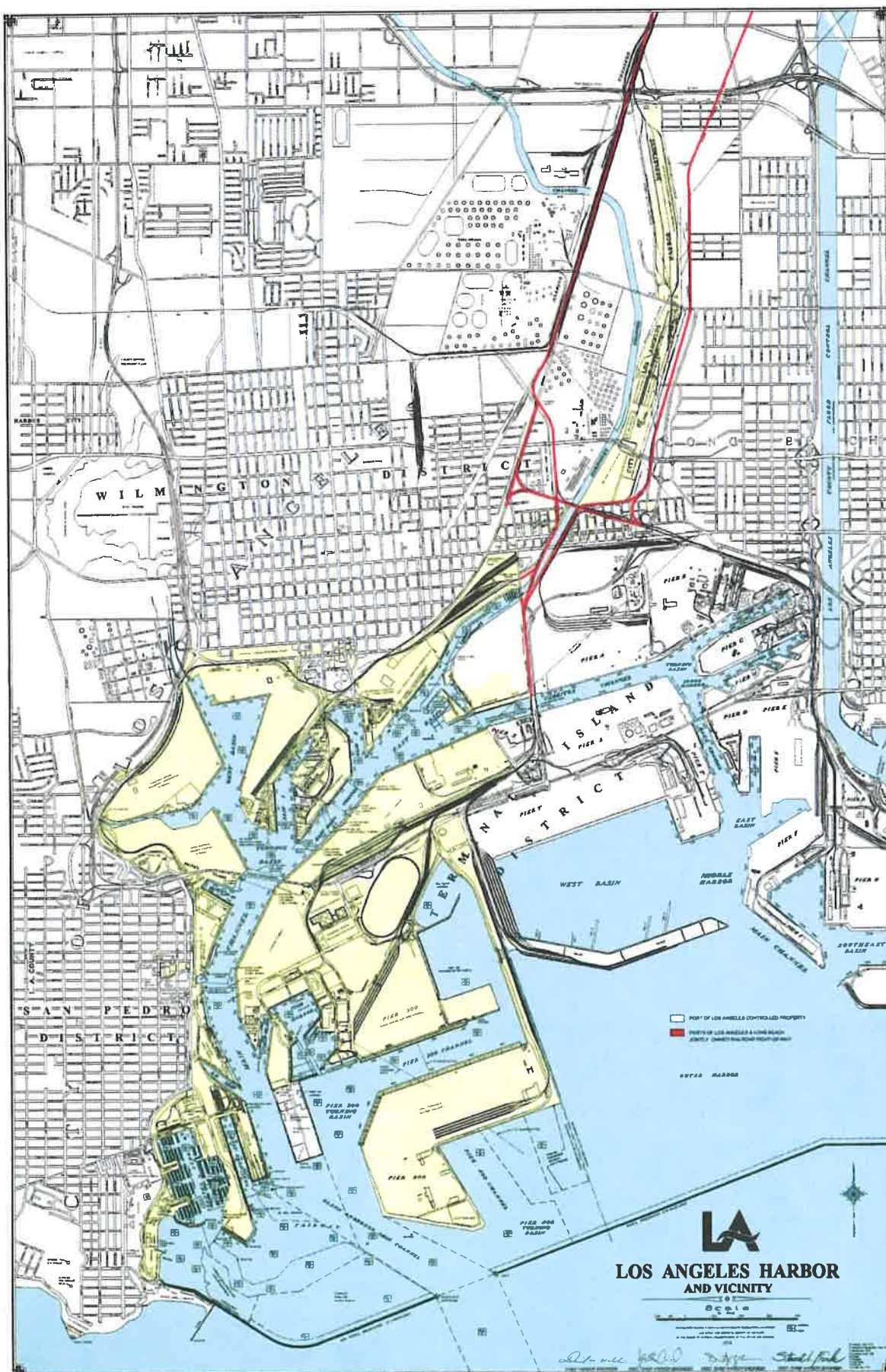
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- INDEX TO WHARVES**
1. Commercial Harbor Co.
  2. Municipal Ferry Landing
  3. Municipal Wharf No. 1
  4. Municipal Wharf No. 2
  5. Municipal Wharf No. 3
  6. Municipal Wharf No. 4
  7. Municipal Wharf No. 5
  8. Municipal Wharf No. 6
  9. Municipal Wharf No. 7
  10. Municipal Wharf No. 8
  11. Municipal Wharf No. 9
  12. Municipal Wharf No. 10
  13. Municipal Wharf No. 11
  14. Municipal Wharf No. 12
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Andrew Salas

Gabrielino-Tongva Band of Mission Indians

P.O. Box 393

Covina, CA 91723

(APP No. 190311-032)

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Gabrielino-Tongva Band of Mission Indians  
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Covina, CA 91723



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*Commissioner*

Edward R. Renwick  
*Commissioner*

Eugene D. Seroka

*Executive Director*

July 25, 2019

Mr. Andrew Salas, Chairman  
Gabrieleño Band of Mission Indians – Kizh Nation  
P.O. Box 393  
Covina, CA 91723

**VIA CERTIFIED MAIL**

**SUBJECT: CONCLUSION OF AB 52 CONSULTATION FOR THE STAR-KIST  
FACILITY PROJECT LOCATED ON TERMINAL ISLAND WITHIN THE  
PORT OF LOS ANGELES**

Dear Mr. Salas:

On May 10, 2019, the City of Los Angeles Harbor Department (Harbor Department) provided notification of the Star-Kist Facility Project, pursuant to the provisions of Assembly Bill 52 and Public Resources Code (PRC) Section 21080.3.1(d). On May 17, 2019, the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe) formally requested AB52 consultation with the Harbor Department based on the Project site's location within the Tribe's ancestral territory.

On June 10, 2019, the Harbor Department initiated consultation with the Tribe via Certified Mail. The letter included a Project description and information indicating that past identification efforts did not identify the presence of archaeological materials in the Project area and that a Native American Heritage Commission Sacred Lands File Search prepared for the Project was negative. The Harbor Department included maps of the Port of Los Angeles from 1915 and 2018, showing that the Project is occurring on non-native sediments. Additionally, the Harbor District provided three proposed dates (June 17, 2019; June 18, 2019; June 19, 2019) to conduct a consultation meeting and requested a response from the Tribe.

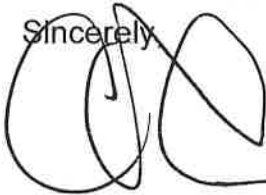
On June 24, 2019, the Harbor Department sent a follow-up email to the Tribe, stating that the proposed consultation meeting dates had passed, and requesting a response regarding the availability of the Tribe to participate in consultation. As of July 25, 2019, we have not received a response from the Tribe.

**FILE COPY**  
7/25/19 EA

In light of the foregoing, and in accordance with Public Resources Code section 21080.3.2(b)(2), the Harbor Department, acting in good faith and after reasonable effort, respectfully concludes consultation. If tribal cultural resources are identified during implementation of the project, the standard mitigation measures provided in PRC 21084.3 will be considered.

If there are any questions regarding this letter please contact Nicole Enciso at (310) 732-3615 or via email at [nenciso@portla.org](mailto:nenciso@portla.org).

Sincerely,





CHRISTOPHER CANNON  
Director of Environmental Management

CC:LW:NE:ea  
APP No.: 190311-032

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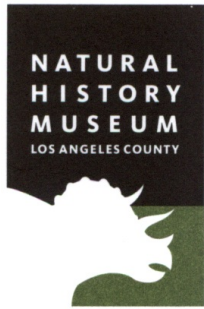
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Mr. Andrew Salas, Chairman Gabrieleno Band of Mission Indians - Kish Nation P.O. Box 393 Covina, CA 91723 APP:190311-032 (NE)	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

<b>SENDER: COMPLETE THIS SECTION</b>  <ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<b>COMPLETE THIS SECTION ON DELIVERY</b>  A. Signature  <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee B. Received by (Printed Name) _____ C. Date of Delivery <u>8-7-15</u> D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
1. Article Addressed to: Mr. Andrew Salas, Chairman Gabrieleno Band of Mission Indians - Kish Nation P.O. Box 393 Covina, CA 91723 APP:190311-032 (NE)	
 9590 9402 3665 7335 4692 74	Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)
2. Article Number (Transfer from service label) 7017 3380 0001 0634 6548	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt

**APPENDIX E**  
**Paleontological Resources Letter**

Natural History Museum  
of Los Angeles County  
900 Exposition Boulevard  
Los Angeles, CA 90007  
tel 213.763.DINO  
www.nhm.org



Vertebrate Paleontology Section  
Telephone: (213) 763-3325

e-mail: [smcleod@nhm.org](mailto:smcleod@nhm.org)

19 September 2019

ICF International  
555 West Fifth Street, Suite 3100  
Los Angeles, CA 90013

Attn: Shane Sparks, Senior Archaeologist

re: Paleontological Resources for the proposed Port of LA - Star-Kist Project, Project # 254.19,  
Task ODC, in the City of Los Angeles, Los Angeles County, project area

Dear Shane:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed Port of LA - Star-Kist Project, Project # 254.19, Task ODC, in the City of Los Angeles, Los Angeles County, project area as outlined on the portion of the San Pedro USGS topographic quadrangle map that you sent to me via e-mail on 5 September 2019. We do not have any vertebrate fossil localities that lie directly within the proposed project area boundaries, but we do have localities nearby from the same sedimentary deposits that occur subsurface in the proposed project area.

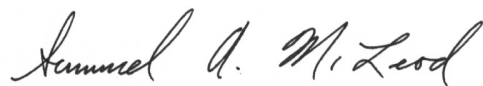
The entire proposed project area has surface material of artificial fill, probably from dredging in the harbor. This material is unlikely to contain significant vertebrate fossils in the uppermost layers, but older Quaternary deposits that occur at modest depth beneath this artificial fill may well contain significant vertebrate fossil remains. Our closest older Quaternary locality from areas now covered with artificial fill is LACM 4587, northwest of the proposed project area on Terminal Island northwest of Fish Harbor but from spoil piles from dredging off the southeastern portion of terminal island that produced fossil specimen of ground sloth, *Xenarthra*, fur seal, *Arctocephalus*, and whale, Cetacea. To the south-southwest of the proposed project area, on what had been Deadman's Island but has now been modified into Reservation Point, our older Quaternary locality LACM 4167 produced a fossil specimen of rockfish, *Sebastes*.

Onshore just west of the proposed project area there are older Quaternary deposit of the terrestrial Palos Verdes Sand and the slightly older marine San Pedro Sand. These Quaternary deposits interfinger and can be difficult to distinguish. Some of our vertebrate fossil localities listed from either rock unit contain a mixture of terrestrial and marine taxa. This is the case with our vertebrate fossil localities LACM (CIT) 187, LACM 1026, 1057-1058, 3248, and 8056, all northwest of the proposed project area around Harbor Boulevard between 3<sup>rd</sup> Street and the Vincent Thomas Bridge. Our locality LACM 1058 produced fossil specimens of eagle ray, *Myliobatis californicus*, puffin, Alcidae, quail, *Lophortyx*, and cottontail rabbit, *Sylvilagus* and locality LACM 3248, produced a specimen of fossil horse, *Equus*. Our locality LACM 1057 produced a mixed marine and terrestrial fauna including undetermined shark, Chondrichthyes, duck, *Chendytes lawi*, booby, Sulidae, mammoth, *Mammuthus*, dog, Canidae, sea lion, *Zalophus*, rabbit, *Lepus*, squirrel, *Spermophilus*, wood rat, *Neotoma*, meadow mouse, *Microtus*, camel, *Camelops*, and deer, *Odocoileus* and locality LACM (CIT) 187, produced fossil specimens of rattlesnake, *Crotalus*, and ground sloth, *Megalonyx*. At very nearly the same place as locality LACM (CIT) 187, our locality LACM 1026 produced a specimen of the fossil duck *Chendytes lawi*. The quail and puffin specimens from locality LACM 1058 were published in the scientific literature by H. Howard (1944. Miscellaneous avian fossil records from California. Bulletin of the Southern California Academy of Sciences, 43(2):74-77) and she also published on the specimens of extinct goose, *Chendytes lawi*, from localities LACM 1026 and 1057 (1949. Avian fossils from the marine Pleistocene of southern California. Condor, 51(1):20-28). Our locality LACM 8056 produced the holotype (a name bearing specimen for a species new to science) of the ground sloth *Megalonyx milleri*, described by G.M. Lyon in 1938 (Transactions of the San Diego Society of Natural History, 9(6):15-30).

Shallow excavations in the artificial fill occurring at the surface in the entire proposed project area are unlikely to uncover significant fossil vertebrate remains. Deeper excavations that extend down into older deposits, however, may well uncover significant vertebrate fossils. Any significant excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding construction. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,



Samuel A. McLeod, Ph.D.  
Vertebrate Paleontology

enclosure: invoice

## **APPENDIX F**

### **Noise Analysis**

**Table 1. Construction Noise Analysis, Comparison of Phase 1 Construction Activities**

Equipment		Typical Level @ 50', dBA <sup>1</sup>	Usage Factor <sup>1,2</sup>	Number of Units	Distance to Receiver, ft.	Hard or Soft Site?	Barrier Attenuation, dB	Leq(h), dBA
Item No.	Description							
Phase 1-Mobilize								
18	Excavator	80.7	0.4	8	50	hard	0	86
29	Loader (Front End Loader)	79.1	0.4	6	50	hard	0	83
70	Forklift (based on Loader)	79.1	0.4	2	50	hard	0	78
								88
Phase 1-Wharf Demolition								
71	Pile-driver (Sonic) (Vibratory Pi	95.8	0.2	1	50	hard	0	89
12	Crane	80.6	0.16	1	50	hard	0	73
20	Generator	80.6	0.5	1	50	hard	0	78
29	Loader (Front End Loader)	79.1	0.4	1	50	hard	0	75
18	Excavator	80.7	0.4	1	50	hard	0	77
								90
Phase 1-Building Demolition								
18	Excavator	80.7	0.4	8	50	hard	0	86
29	Loader (Front End Loader)	79.1	0.4	6	50	hard	0	83
70	Forklift (based on Loader)	79.1	0.4	2	50	hard	0	78
								88
Phase 1-Perimeter Lighting and Fencing								
18	Excavator	80.7	0.4	2	50	hard	0	80
63	Truck, Pickup	75	0.4	1	50	hard	0	71
								80
Phase 1-Grading/Compaction								
29	Loader (Front End Loader)	79.1	0.4	2	50	hard	0	78
9	Compactor	83.2	0.2	2	50	hard	0	79
								82
Phase 1-Install Crushed Misc Base								
9	Compactor	83.2	0.2	2	50	hard	0	79
29	Loader (Front End Loader)	79.1	0.4	2	50	hard	0	78
								82
Phase 1-Demobilize								
18	Excavator	80.7	0.4	8	50	hard	0	86
29	Loader (Front End Loader)	79.1	0.4	6	50	hard	0	83
70	Forklift (based on Loader)	79.1	0.4	2	50	hard	0	78
							0	88
	Worst Case Phase							90

1. Obtained or estimated from:

FHWA Roadway Construction Noise Model (RCNM), Version 1.1, December 8, 2008; and/or

"Airborne Noise Measurements during Vibratory Pile Installation - Technical Memorandum." WSDOT, June 2010

2. Usage Factor = percentage of time equipment is operating in noisiest mode while in use



**Table 2. Construction Noise Analysis, Comparison of Phase 2 Construction Activities**

Equipment		Typical Level @ 50', dBA <sup>1</sup>	Usage Factor <sup>1,2</sup>	Number of Units	Distance to Receiver, ft.	Hard or Soft Site?	Barrier Attenuation, dB	Leq(h), dBA
Item No.	Description							
Phase 2-Mobilize								
18	Excavator	80.7	0.4	4	50	hard	0	83
29	Loader (Front End Loader)	79.1	0.4	3	50	hard	0	80
70	Forklift (based on Loader)	79.1	0.4	1	50	hard	0	75
								<b>85</b>
Phase 2-Building Demolition								
18	Excavator	80.7	0.4	4	50	hard	0	83
29	Loader (Front End Loader)	79.1	0.4	3	50	hard	0	80
70	Forklift (based on Loader)	79.1	0.4	1	50	hard	0	75
								<b>85</b>
Phase 2-Perimeter Lighting and Fencing								
18	Excavator	80.7	0.4	2	50	hard	0	80
63	Truck, Pickup	75	0.4	1	50	hard	1	70
								<b>80</b>
Phase 2-Grading/Compaction								
29	Loader (Front End Loader)	79.1	0.4	2	50	hard	2	76
9	Compactor	83.2	0.2	2	50	hard	3	76
								<b>79</b>
Phase 2-Install Crushed Misc Base								
9	Compactor	83.2	0.2	2	50	hard	4	75
29	Loader (Front End Loader)	79.1	0.4	2	50	hard	5	73
								<b>77</b>
Phase 2-Demobilize								
18	Excavator	80.7	0.4	4	50	hard	6	77
29	Loader (Front End Loader)	79.1	0.4	3	50	hard	7	73
70	Forklift (based on Loader)	79.1	0.4	1	50	hard	8	67
								<b>79</b>
	<b>Worst Case Phase</b>							<b>85</b>

1. Obtained or estimated from:

FHWA Roadway Construction Noise Model (RCNM), Version 1.1, December 8, 2008; and/or

"Airborne Noise Measurements during Vibratory Pile Installation - Technical Memorandum." WSDOT, June 2010

2. Usage Factor = percentage of time equipment is operating in noisiest mode while in use

**Table 3. Construction Noise Analysis, Worst-Case Noise Levels at Nearest Receivers**

Construction Activity/Phase	Reference Leq(h) at 50 ft, dBA	Al Larson Marina		Homes on South Beacon ST		Reservation Point	
		Source/ Receiver Distance	Leq(h), dBA	Source/ Receiver Distance	Leq(h), dBA	Source/ Receiver Distance	Leq(h), dBA
Phase 1 - Wharf Demo (With Vibratory Pile)	90	965	64	4785	50	3850	52
Phase 1 - Bldg Demo	88	1360	59	4785	48	3850	50
Phase 2 - Mobilize	85	1325	57	5220	45	4115	47
Phase 2 - Building Demolition	85	1325	57	5220	45	4115	47

**Table 4. Construction Vibration Analysis - Vibration Perceptibility Versus Distance**

Vibration attenuation constant (n):		1.1				
Equipment Item	Reference PPV at 25 feet, in/s <sup>a</sup>	Perceptibility:	Barely perceptible	Distinctly perceptible	Strongly perceptible	Severe
		Vibration Damage Impact Criteria, PPV, in/s:	0.01	0.04	0.1	0.4
Vibratory Pile Driver	0.65	Distance to Impact Criteria, feet:	1112	316	138	39
Vibratory roller	0.21		399	113	50	14
Large bulldozer <sup>b</sup>	0.089		183	52	23	7
Jackhammer	0.035		79	23	10	3
Small bulldozer <sup>c</sup>	0.003		9	3	2	1

<sup>a</sup> Obtained from "Transportation and Construction Vibration Guidance Manual", Caltrans 2020

<sup>b</sup> Considered representative of other heavy earthmoving equipment such as excavators, graders, backhoes, etc.

<sup>c</sup> Considered representative of smaller equipment such as mini excavators.

**APPENDIX G**  
**Cumulative Projects**

## Appendix G. Cumulative Projects

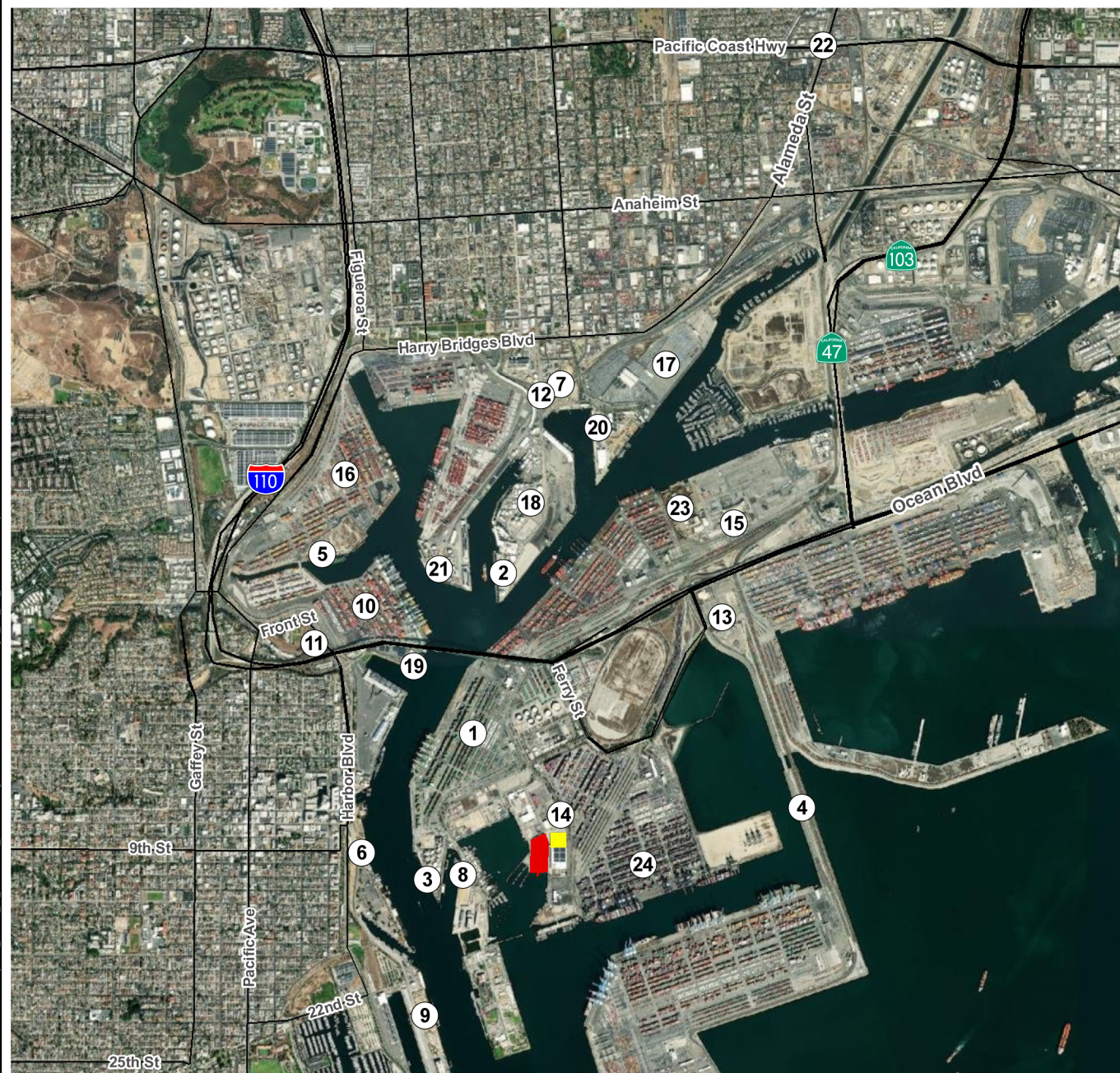
No.	Project	Description	Location	Status
1	Everport Container Terminal Improvements Project	Upgrade terminal infrastructure in, over, and under water and increasing and improving terminal backlands to accommodate the projected throughput and fleet mix of larger container ships (up to 16,000 20-foot equivalent units [TEUs]) that are anticipated to call at the terminal through 2038.	Berths 226–235	Certified and may be under construction during proposed Project
2	Shell Marine Oil Terminal Wharf Improvements Project	Demolish the existing timber wharf (with two berths) and replace it with two new reinforced-concrete loading platforms, access trestles (to the platforms), mooring dolphins, and catwalks, and provide piping and related foundation supports along the landside portions of the terminal at both operating berths.	Berths 167–169	Certified and may be under construction during proposed Project
3	PBF Energy Marine Oil Terminal Wharf Improvements Project	Demolish and remove the existing Berth 238 platform, construct a new marine platform and associated mooring and breasting dolphins at Berth 238, construct a new marine oil terminal platform at Berth 238, construct two new breasting dolphins and four new upland mooring dolphins, install tenant topside improvements, and demolish the concrete platform at Berth 239.	Berths 238–239	Certified and may be under construction during proposed Project
4	Terminal Island (Pier 400) Railyard Enhancement Project	Expand the existing Pier 400 rail storage yard to increase on-dock railyard capacity and improve efficiency of railyard operations, widen the existing concrete rail bridge to fill the gap between the rail bridge and the roadway bridge on Pier 400's Transportation Corridor, and accommodate five new railroad tracks as well as a new access roadway.	Pier 400 Transportation Corridor	Certified and may under construction during proposed Project
5	Kinder Morgan Wharf Repair Project	Design, procure, and install berthing and structural repairs at Berths 118 and 119 consistent with an agreement mandated by the California State Lands Commission in a March 2018 letter. This will allow for the continued operation of the terminal until April 2023 as specified in Second Amendment of the Harbor Department Permit No. 708 (Permit 708).	Berths 118–119	Certified and may be under construction during proposed Project
6	San Pedro Waterfront Project	Enhance and revitalize the existing San Pedro Waterfront area, improve existing pedestrian corridors along the waterfront, increase waterfront access from upland areas, and create more open space.	Ports O'Call, Port of Los Angeles	Certified and may be under construction during proposed Project
7	Wilmington Waterfront Development Project	Increase public access to the waterfront; improve pedestrian connectivity from Wilmington to the waterfront; allow additional visitor-serving commercial and recreational development at the Waterfront District; improve the local economy and economic sustainability of the community by improving the industrial corridor along Harry Bridges and Avalon Boulevards; and enhance automobile, truck, and rail transportation within and around the immediate area of the Port.	Lagoon Avenue to the west, Broad Avenue to the east, C Street to the north, and Slip 5 to the south	Certified and may be under construction during proposed Project

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Location</b>	<b>Status</b>
8	Permit Renewal for So. Cal. Ship Services	Issuance of a 10-year lease, with two 5-year extension options to allow So. Cal. Ship Services to remain within the Port of Los Angeles and continue its maritime support activities.	971 South Seaside Avenue, Port of Los Angeles	Certified and may be under construction during proposed Project
9	City Dock No. 1 Marine Research Center Project	Provide a world-class urban marine research center and support the research needs of the Southern California region's universities, research and education institutions, and government agencies, as well as provide an incubator for marine-related business venues.	Berths 56–60 70–71	Certified and may be under construction during proposed Project
10	China Shipping Container Terminal	Provide a portion of the facilities needed to accommodate the projected growth in the volume of containerized cargo through the Port; comply with the mayor's goal for the Port to increase growth while mitigating the impacts of that growth on the local communities and the Los Angeles region by implementing pollution control measures, including the elements of the CAAP applicable to the proposed Project; and comply with the Port Strategic Plan to maximize the efficiency and capacity of terminals while raising environmental standards through application of all feasible mitigation measures.	Berths 99–109	Certified and may be under construction during proposed Project
11	State Route 47/ Vincent Thomas Bridge and Front Street/Harbor Boulevard Interchange Reconfiguration Project	Improve safety, access, and the efficient operation of the SR-47/Vincent Thomas Bridge and Front Street/Harbor Boulevard interchange; and improve goods movement and traffic circulation in the area in a manner that is sensitive to the needs of the local community.	SR-47 from west of Harker Street to east of North Front Street	Certified and may be under construction during proposed Project
12	Avalon and Fries Street Segments Closure Project	Minimize rail traffic delays/lengthy blockages at existing roadways that will occur due to recent and projected rail operational changes for the West Basin Terminal; includes the closure of segments of Fries Avenue between Water Street at the Union Pacific Railroad Tracks and the intersection with West A Street; and Avalon Boulevard between the Union Pacific Railroad Tracks and the intersection of North Broad Avenue.	E. Harry Bridges Boulevard to the North and West Water Street to the South	Certified and may be under construction during proposed Project
13	Pacific Crane Maintenance Company (PCMC) Chassis Repair and Storage Facility Project	Relocation of the PCMC chassis repair and storage operations from Pier 400 to the Project site. The project would be a more efficient use of the Project site and would result in increased efficiency to PCMC's operations.	800 and 895 Reeves Avenue	Certified and may be under construction during proposed Project

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Location</b>	<b>Status</b>
14	Innovative Barracuda Chassis Depot	6.2-acre expansion of an existing 7-acre property to accommodate expanded chassis storage, maintenance, and repair facility operated by Innovative. Expansion of the site would allow the chassis yard to serve as a chassis depot, which would provide the same existing activities in addition to a new stop/start function.	Parcel F, G, H on Terminal Island, 915 Earle Street, San Pedro	Certified and may be under construction during proposed Project
15	Chassis Depot and Repair Facilities – Berths 206–209	Renovate two buildings for reuse to perform maintenance, repairs, and refurbishment of chassis along with tire storage and maintenance.	849 and 921 E. New Dock Street, Berths 206–209	Certified and may be under construction during proposed Project
16	Yang Ming Container Terminal Project	Improve marine shipping and commerce by upgrading container terminal infrastructure in, over, and under water and on terminal backlands. The improvements are needed to accommodate the increased volumes of cargo that the economic forecasts predict and to accommodate the larger container ships (14,000 TEUs or larger) that are anticipated to call at the terminal in the future.	Berths 121–131	Currently under environmental review
17	Berth 200 Roadway Expansion	Widen approximately 4,000 linear feet of existing roadway to include shoulders on both sides of the roadway and construct approximately 3,000 linear feet of new roadway to extend the Berth 200 roadway to North Henry Ford Avenue. Roadway work includes utilities, street work, grading, paving, striping, lighting, and other street improvements.	Berth 200 Roadway	Certified and may be under construction during proposed Project
18	NuStar/Valero Marine Oil Terminal Wharf Improvements Project	Construct and operate a new, Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS)–compliant wharf at Berth 163, to be used by both NuStar and Valero and decommissioning of Berth 164 as a marine oil transfer facility.	Berths 163 – 164	Certified and may be under construction during proposed Project
19	Avalon Freight Ramp Addendum	Addendum to the Avalon Freight Services IS/ND, which assessed the shift from a former freight transportation contractor to a new freight transportation operation, Avalon Freight Services, which would operate from Berth 94 in San Pedro to transport goods from California mainland to Avalon on Catalina Island. The addendum assessed an upgrade to the barge landing ramp at Berth 95 to fix the ramp design and improve barge access.	Berth 95	Currently under environmental review
20	Vopak MOTEMS and Cement Facility	MOTEMS improvements at Port of Los Angeles Berths 187–190, improvements to Berth 191, and the continued operation of a cement processing facility (which has been inactive since 2008) at Berth 191.	Berths 187–191	Currently under environmental review

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Location</b>	<b>Status</b>
21	P66 MOTEMS	Demolition and reconstruction of the Phillips 66 wharf structures (at Berths 148–151) in compliance with MOTEMS for continued operations as a marine oil terminal. The proposed project also includes shoreline protection improvements and the installation and/or modification of various landside marine oil terminal components to support future operations at the wharf.	Berths 148–151	Currently under environmental review
22	So. Cal. Intern. Gateway (SCIG)	The proposed project, 4 miles north of the Ports of Los Angeles and Long Beach and connected to the Alameda Corridor, is for the construction and operation of a new near-dock intermodal rail facility by BNSF Railway that would handle containerized cargo transported through the Ports of Los Angeles and Long Beach.	Pacific Coast Highway and SR-47 (Terminal Island Freeway)	Currently under environmental review
23	SA Recycling Lease Extension	Five-year extension of the existing lease, Permit No. 750, which expires in 2024. No changes to the scope of the lease, use of the Project site, or new construction or operations are proposed other than routine maintenance or replacement of equipment as contemplated by the original environmental impact report.	Berths 210 and 211, at 901 New Dock Street	Currently under environmental review
24	Berth 302-306 Container Terminal Project Railyard Expansion Project	The proposed project includes expanding the on-dock railyard, expanding the 2012 project boundary by approximately 9 acres, adding a new gate, changing the use of 7 acres of previously assessed land, continuing hydrogen fueling, and demolishing three small warehouses and accessory structures.	Berths 302-306	Addendum considered and project may be under construction during proposed Project





### Legend

Project Footprint

Phase 1

Phase 2

# Related Projects

- 1 - Everport Container Terminal Improvements Project
- 2 - Shell Marine Oil Terminal Wharf Improvements Project
- 3 - PBF Energy Marine Oil Terminal Wharf Improvements Project
- 4 - Terminal Island (Pier 400) Railyard Enhancement Project
- 5 - Kinder Morgan Wharf Repair Project
- 6 - San Pedro Waterfront Project
- 7 - Wilmington Waterfront Development Project
- 8 - Permit Renewal for So. Cal. Ship Services
- 9 - City Dock No. 1 Marine Research Center Project
- 10 - China Shipping Container Terminal
- 11 - State Route 47/Vincent Thomas Bridge and Front Street/Harbor Boulevard Interchange Reconfiguration Project
- 12 - Avalon and Fries Street Segments Closure Project
- 13 - Pacific Crane Maintenance Company (PCMC) Chassis Repair and Storage Facility Project
- 14 - Innovative Barracuda Chassis Depot
- 15 - Chassis Depot and Repair Facilities – Berths 206-209
- 16 - Yang Ming Container Terminal Project
- 17 - Berth 200 Roadway Expansion
- 18 - Valero Marine Oil Terminal Wharf Improvements Project
- 19 - Avalon Freight Ramp Addendum
- 20 - Vopak MOTEMS and Cement Facility
- 21 - P66 MOTEMS
- 22 - So. Cal. Intern. Gateway (SCIG)
- 23 - SA Recycling Lease Extension
- 24 - Berth 302-306 Container Terminal Project Railyard Expansion Project

Source: ESRI Imagery (2017)



0 0.5 1 Miles

## Appendix G Cumulative Projects Star-Kist Project Initial Study/Mitigated Negative Declaration

**APPENDIX H**  
**Peer Review of Historic Resource Assessment for Star-Kist Plant**  
**No. 4 and Associated Star-Kist Facilities**



## MEMORANDUM

August 26, 2021  
Nicole Enciso  
Port of Los Angeles

**Re: Star-Kist Plant No. 4**

The Star-Kist Plant No. 4, built in 1952 on Terminal Island at the Port of Los Angeles, California, has been evaluated as eligible for listing on the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and as a Los Angeles Historic-Cultural Monument (HCM). In 2008, Jones & Stokes concluded that the building was eligible under NRHP/CRHR Criteria A/1, B/2, C/3, and D/4 (Jones & Stokes 2008). The Plant was again evaluated in April 2021 by ICF International (ICF) staff who acknowledge the importance of Star-Kist Plant No. 4 to the rise of the tuna industry and its modest Late Moderne details and tilt-up construction but determined that the plant and ancillary buildings do not retain integrity and are not eligible for listing on state, local, or federal registers (ICF 2021).

Having reviewed both evaluations, and per the discussions provided in the Final Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities (final technical report) prepared by ICF (August 2021), the Star-Kist Plant No. 4 main building has undergone a great deal of change over time. Figure 2-1 from Chapter 2.3.2: Construction History and Alterations of the final cultural resource assessment report illustrates the degree to which the exterior of the building has changed with additions made to nearly all perimeter elevations (ICF 2021:2-4). Table 4-1 of the final report summarizes potentially important dates associated with the Star-Kist Plant. Subsequent chapters (Chapter 6: Historic Context; Chapter 7: Star-Kist History; and Chapter 8: Integrity) clearly review the changes that have been made to the exterior and interior of the Star-Kist No. 4 Plant and other associated facilities.

I have reviewed the Star-Kist final technical report dated August 2021 prepared by ICF and I concur with the report's findings. In summary, I agree with the 2021 report that the Star-Kist Plant No. 4 no longer conveys its significance; therefore, the Star-Kist Plant No. 4 is not a historical resource for the purposes of the California Environmental Quality Act. Per the 2021 final technical report, the Star-Kist Plant No. 4 and associated Star-Kist facilities are not eligible for the NRHP, CRHR, under any of the listed criterion, nor are they eligible as a Los Angeles HCM.

M. Colleen Hamilton, M.A.



Principal Architectural Historian  
Applied EarthWorks, Inc.

**REFERENCES CITED:**

ICF, International. *Final Historic Resource Assessment for Star-Kist Plant No. 4 and Associated Star-Kist Facilities, Port of Los Angeles, Los Angeles, California, APP No.193011-032*: Prepared for Los Angeles Harbor Department, Environmental Management Division, 2021.

Jones & Stokes. *Final Architectural Survey and Evaluation of the Star-Kist Plant, Terminal Island, Port of Los Angeles, Los Angeles, California*. Los Angeles, CA: Los Angeles Harbor Department, 2008.