

Addendum to the Permit Renewal for So. Cal. Ship Services Final Initial Study and Mitigated Negative Declaration

APP No. 161003-143

SCH No. 2018061043

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1. Introduction

The So. Cal. Ship Services Final Initial Study/Mitigated Negative Declaration was adopted by the Los Angeles Board of Harbor Commissioners (Board) on September 6, 2018 (SCH# 2018061043 and APP No. 161003-143). The Board also approved the project itself, including minor improvements and expansion to the existing leasehold. The proposed project would be subject to Coastal Development Permit(s). The overall purpose of the previously approved project is to allow So. Cal. Ship Services to continue to serve both the Port of Los Angeles and the Port of Long Beach with water transport of materials, supplies and personnel, and land-based logistical support of offshore oil platforms and tank vessels. This project included the issuance of a 10-year lease, with two, five-year extension options, expansion to the site boundary, minor construction related activities, and continual maintenance of the site. Additional information on proposed construction activities and maintenance activities can be found in Section 2.1.2. The Final IS/MND was prepared by the City of Los Angeles Harbor Department (LAHD) as Lead Agency under the California Environmental Quality Act (CEQA) to address the potential environmental effects of the proposed project and recommend mitigation measures to avoid or minimize the significant effects. As will be described more fully below, So. Cal. Ship Services has made minor alterations to their proposed lease footprint and development area, as well as clarified the duration of their permit (Revised Proposed Project). Additionally, storm drain connections in the area to better serve the parking lot and adjacent area are also evaluated in this document. Accordingly, this Addendum is being prepared pursuant to the requirements of CEQA and focuses on the incremental changes to the approved project and assesses any new significant impacts or an increase in severity of previously identified impacts that would occur as a result of the Revised Proposed Project pursuant to CEQA Guidelines Section 15162 et seq.

2. Background

2.1.1 Facility Overview

Since 1990, So. Cal. Ship Services has been serving both Ports in the San Pedro Bay Complex with water transport of materials, supplies and personnel, and land-based logistical support to offshore oil platforms and tank vessels. So. Cal. Ship Services is a State and Federal Oil Spill Response Organization, which assists with emergency oil spill containment.

2.1.2 Previously Assessed and Approved Project

The Board adopted the Final MND, adopted a Mitigation Monitoring and Reporting Program and approved the proposed Project. The approved proposed Project contained the following components:

Construction Activities

Upgrades proposed for the site include the following:

- Paving and striping of two new, one-acre parking lots;
- Minor trenching for installation of utilities for the new parking lots;
- Installation of security fencing along the property line;
- Installation of security lighting; and
- Replacement of a utility cover on wharf.

Ongoing maintenance occurring on the site during the duration of the lease may include:

- Installation and repair to fencing;
- Repair of cracks and potholes in asphalt;
- Installation of lighting fixtures; and
- Other maintenance and repair to site as required.

As will be discussed below, So. Cal. Ship Services had requested a minor modification to the footprint and development originally analyzed for the proposed Project. Figures 1 shows the Approved Project, and Figure 2 highlights the Revised Permitted Areas and the Revised Proposed Project.

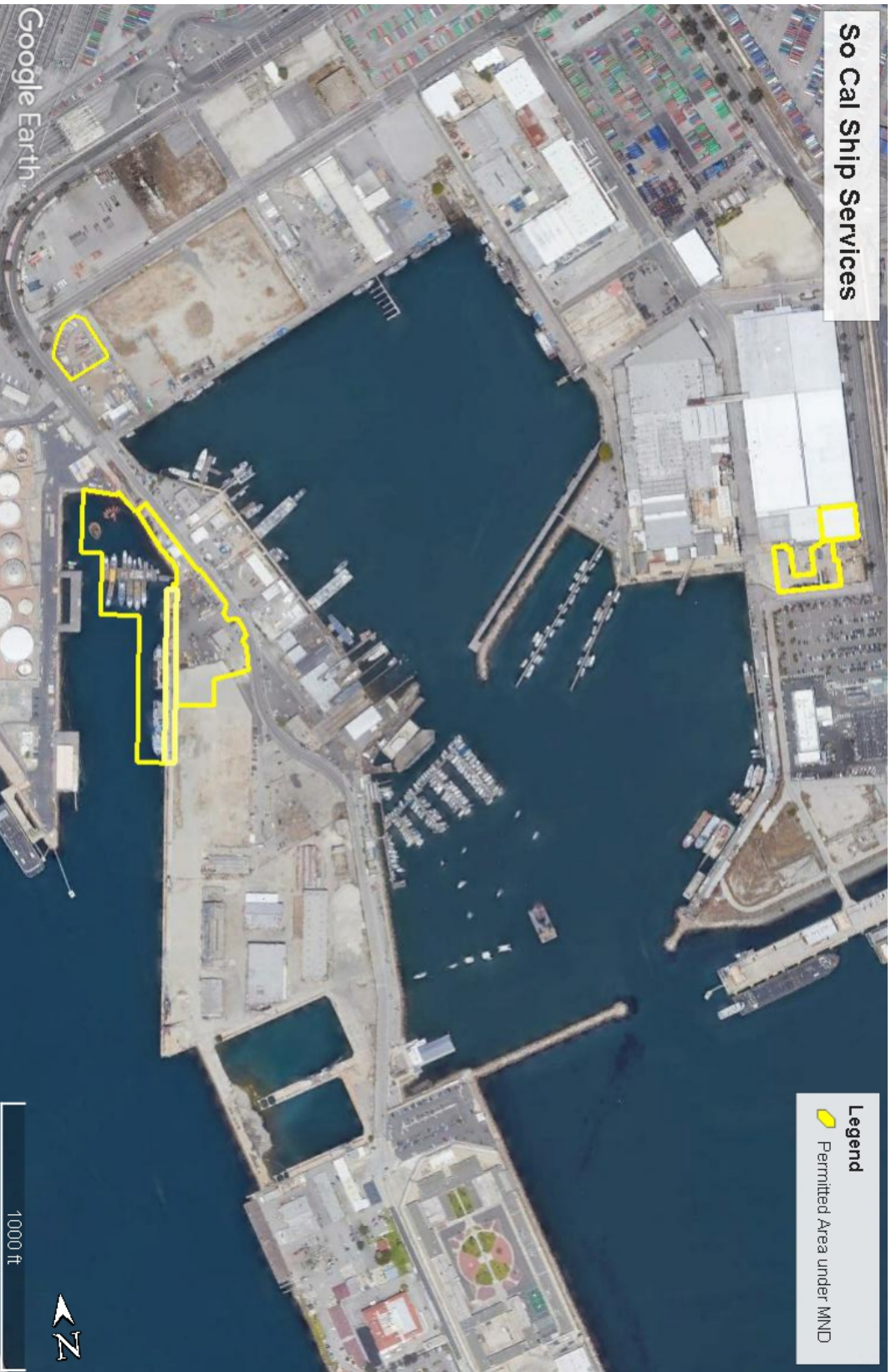


Figure 1 – Approved Project



Figure 2 – Revised Proposed Project

3. Revised Proposed Project

This Addendum serves to make minor alterations to the proposed lease footprint and development area, as well as clarify the duration of the proposed Permit(s). The Final IS/MND assumed a lease extension of ten-years with two, five-year extension options (Figure 1). However, the revised proposed project includes the issuance of a new permit for up to 20 years for their Berth 240 premises and issuance of other entitlements on an as-needed basis for properties near Barracuda Street and South Seaside Avenue. The smaller warehouse and uncovered portion of land off of Barracuda Street and some temporary parking areas near South Seaside Avenue would not be included in the 20 year permit, but would be permitted through separate entitlements, as needed, for up to 20 years. This change serves as a minor clarification and does not change the length of entitlement that was previously analyzed in the Final IS/MND. The revised proposed project would also address the minor modification to the So. Cal. Ship Services entitlements footprint. This would remove the development of a previously assessed approximately 1-acre parcel of unpaved land to be used as a parking lot; add approximately 1.6 acres of predominantly paved land near South Seaside Avenue to be used as employee parking; and add approximately 0.5 acres of paved land at the Barracuda Street location for additional storage of material (Figure 2). Of the additional parcels of land, only 0.4 acres is currently unpaved and would be developed into the continuation of a parking lot for So. Cal. Ship Services staff. Once the property is paved, the use of this land for parking will not have an impact on the environment. The newly developed land would require security lighting and fencing, which would not be greater than what was previously analyzed in the 2018 Final IS/MND.

To allow for adequate drainage of the parking lot and adjacent area, storm drain repairs will also be included as part of the revised proposed project. This would require additional trenching and stockpiling of clean soil, replacing damaged piping, installing a storm drain maintenance hole, and replacing clean soil in the trenched areas. All work in this area would be consistent with the Soil Management Plan of the site and would follow proper procedures regarding agency notification, if required. This work is not anticipated to require additional clean fill to be transported to the site, as all disturbed soil should be reused as work should remain within the clean fill that was imported during previous soil remediation activities.

4. Purpose

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

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

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

Specifically, Section 15162 of the State CEQA Guidelines states that, for a project covered by a certified EIR or adopted negative declaration, no subsequent EIR or negative declaration shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- 1) Substantial changes are proposed in the project that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR, was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

5. Scope and Content

This Addendum describes all of the affected environmental resources and evaluates the changes in the impacts that were previously described in the 2018 Final MND with respect to the changes to the approved project.

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

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

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

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

- Wildfire

6. Previous Environmental Documents Incorporated by Reference

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

- **So. Cal. Ship Services Final Initial Study/Mitigated Negative Declaration** (SCH No. 2018061043 and APP No. 161003-143). This document addressed all potential environmental impact areas from the original project and included the full project description, existing setting, and the environmental checklist. This document determined that all areas were considered less than significant with the incorporation of mitigation measures. This document is incorporated by reference as all environmental analyses contained therein are being utilized for a comparison against the revised proposed project change to ensure that no new impact is created. This document was circulated for a 30-day public review and comment period. This document can be accessed through the Environmental Management Division at 222 West 6th Street, 9th Floor, San Pedro, CA or via the LAHD website under the Environmental Documents tab.

7. Required Permits and Approvals

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

- LAHD Coastal Development Permit;
- LAHD Engineering Permit;
- LAHD Permit(s) – i.e. Permit, Revocable Permit, Space Assignment, etc.;
- United States Army Corps of Engineers;
- Department of Toxic Substances Control;
- U.S. Environmental Protection Agency; and
- Any other permits that would be required from outside agencies.

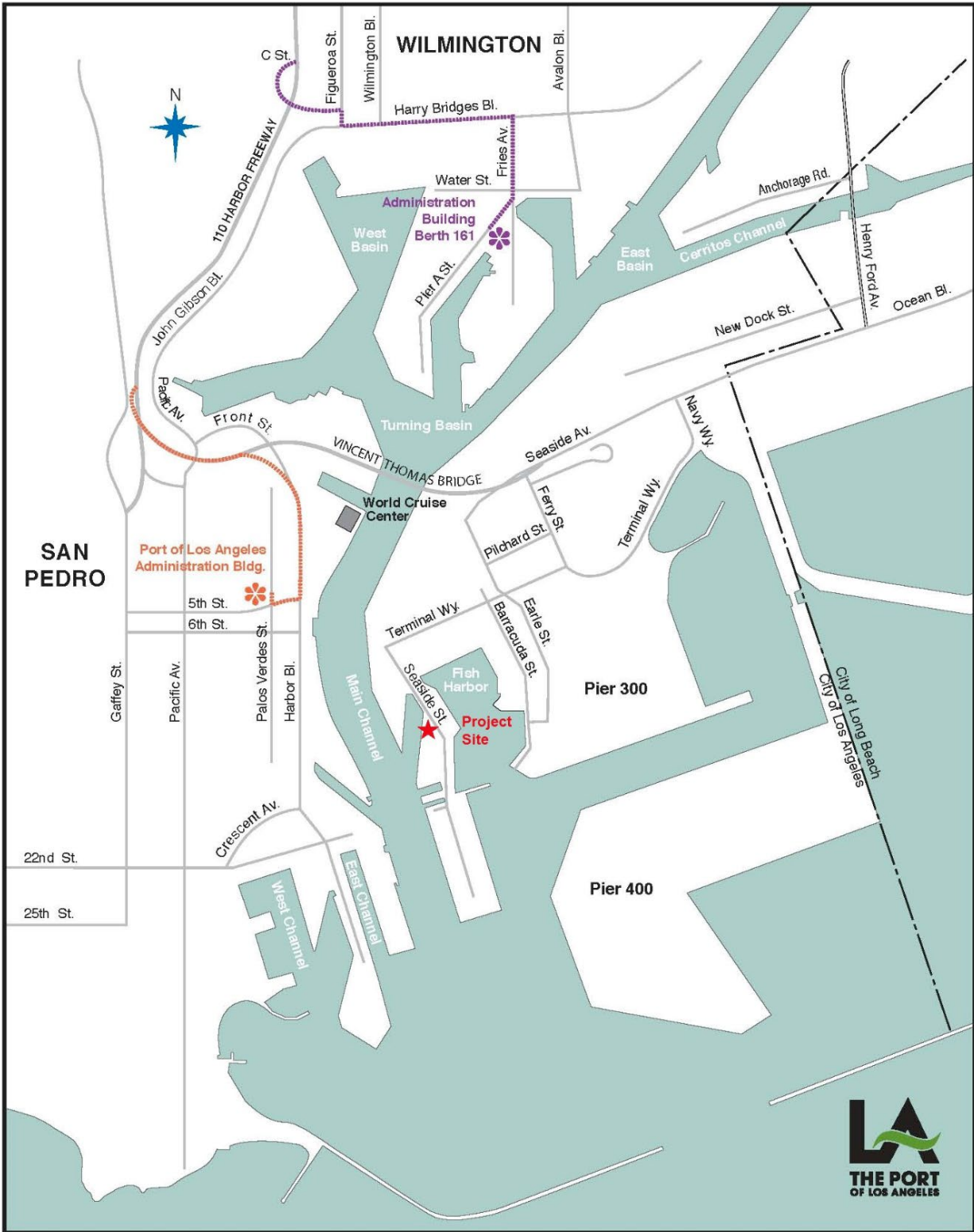


Figure 3 - Regional Location of the Proposed Project

8. Environmental Analysis

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

8.1 Aesthetics

The minor modification in permitted area and installation of lighting, fencing, and security features would not impact or block views. This proposed use remains consistent with the overall aesthetic of maritime support facilities in the area. The project site is not visible from any eligible or designated state scenic highway. The installation of lighting and security measures included in the revised proposed project would not cause substantial light or glare and would not affect daytime or nighttime views.

8.2 Agriculture and Forestry Resources

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

8.3 Air Quality

The Final IS/MND for the So Cal Ship Services Project conservatively assessed two, one-acre parcels of land being developed into parking lots. The two parcels would not be developed simultaneously. The revised proposed project includes the addition of approximately 0.3-acres of unpaved land being developed into parking lots for employees (Figure 4). The additional 1.6 acres of land being added to the entitlement area is comprised of both paved and unpaved land, but only approximately 0.3 acres would require development. The parcel adjacent to this addition, which would be developed at the same time, was conservatively assessed as one acre of new parking as part of the Final IS/MND, but was actually only approximately 0.6 acres of land. Therefore, the original 0.6 acres of land and new 0.3 acres of land would amount to a total development of 0.9 acres of land. This parking lot development is less than the one acre of land that was analyzed in the Final IS/MND. Due to the conservative assumptions included in the original MND, the construction required for the storm drain repair would be minimal and would most-likely generate emissions similar to the calculations prepared for the development of a second, one acre parcel of land into a parking lot. Therefore, the additional construction required for the revised proposed project does not create air emissions greater than what was previously evaluated in the Final IS/MND for the So. Cal. Ship Services Project.



Figure 4 – Revised Proposed Project Parking Lot Development

8.4 Biological Resources

The revised proposed project would not cause any change in impact determinations from the Final So. Cal. Ship Services MND. Interaction with threatened or endangered species as a result of this project is highly unlikely and foraging, resting, and breeding habitat is unlikely to be present at the proposed project site consistent with an informal site survey of the revised project area in May 2019 indicating the lack of supportive habitat. Additionally, the location has undergone recent soil remediation efforts and is covered with clean fill. This recent activity at the site has limited any significant vegetation growth. Therefore, impacts to biological resources are to remain less than significant.

8.5 Cultural Resources

The revised proposed project has only slightly increased the permitted area that was analyzed in the Final MND for the So. Cal. Ships proposed Project. The revised proposed project area was previously disturbed during remediation activities in 2018 and is comprised of non-native soils from four to seven feet above sea level. No archaeological resources were encountered during the remediation activities and imported fill from a quarry in Irwindale was used as backfill. As such, it is unanticipated and highly unlikely that cultural resources would be discovered during construction of this site. Therefore, impacts to cultural resource are to remain less than significant.

8.6 Energy

The minor increase in construction related activities during the development of the revised proposed project would lead to a nominal change in energy consumption analyzed as part of the Final So. Cal. Ship Services MND. As such, this impact area would remain less than significant with the inclusion of the additional development at the site.

8.7 Geology and Soils

The revised proposed project would not result in substantial soil erosion or loss of top soil or exposure of people or structures to substantial adverse effects. The proposed project is not located on a geological unit that is unstable or would become unstable. The approximately 1.25 acres of development is not anticipated to create any additional impacts to those assessed in the Final MND for the So. Cal. Ship Services Project.

8.8 Greenhouse Gas Emissions

Since the revised proposed project's development falls under the same amount of development assessed in the Final IS/MND, the revised proposed project would not result in any major changes to what was previously analyzed in the Final MND for the So. Cal. Ship Services Project. As was explained in Section 8.3 above, the change in construction required for the revised proposed project does not create air emissions greater than what was previously evaluated in the Final IS/MND for the So. Cal. Ship Services Project. Therefore, the greenhouse gas (GHG) emissions generated as a result of the revised proposed project would not create an increase in annual GHG emissions compared to what was previously analyzed. Therefore, there would be no change in impact determination.

8.9 Hazards and Hazardous Materials

The revised proposed project does not change the impacts previously assessed in the Final MND for the So. Cal. Ship Services Project because the proposed development would occur on clean fill of the former Southwest Marine property. All development would comply with the Soil Management Plan for the site. Any soil disturbance and development of the site must go through the Application for Port Permit process and would require Harbor Department Environmental Management Division consultation and oversight. Redevelopment anywhere on the property shall be completed as defined and established in the Department of Toxic Substances Control and United States Environmental Protection Agency approved Southwest Marine Soil Management Plan. All imported soil to be used as backfill in excavated areas shall be sampled to ensure that it is suitable for use as backfill and that the soil meets the requirements of the Harbor Department's Import Fill Standards. As such, no change in impact determinations are anticipated as a result of the revised proposed project.

8.10 Hydrology and Water Quality

While impervious surfaces would increase with the proposed project, with proper Low Impact Development (LID) implementation and site development, hydrology and groundwater impacts would not change from what was previously assessed. LID is a leading stormwater management strategy that prevents impacts of runoff and stormwater pollution as close to the source as possible. LID implementation can effectively reduce pollution from runoff and reduce volume and intensity of stormwater flows. Additionally, storm drain repairs would also occur to ensure adequate drainage of the site during a rain event. Therefore, impacts to hydrology and water quality would remain less than significant.

8.11 Land Use and Planning

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

8.12 Mineral Resources

There are no known mineral resources near the revised proposed project that would be impacted due to this development. Therefore, the revised proposed project would continue to have no impact to mineral resources.

8.13 Noise

The revised proposed project would result in a temporary increase in ambient noise levels due to construction-related activities for the parking lot development, but would not exceed those estimated for the proposed project. Noise generated from the grading and paving of the additional land, as a result of the revised proposed project, are not anticipated to be greater than what was previously evaluated. Therefore, the revised proposed project would have a less than significant impact on noise.

8.14 Population and Housing

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

8.15 Public Services

The revised proposed project would not result in any impacts to the performance of fire protection, police protection, schools, parks, or other public facilities.

8.16 Recreation

The revised proposed project would not increase demand on existing recreational facilities nor require the construction of new recreational facilities. As such, the revised proposed project would have no impact on recreation.

8.17 Transportation

Since the certification of the Final IS/MND, CEQA Guidelines were revised from a Level of Service analysis to a Vehicle Miles Traveled approach. Therefore, the revised proposed project has been analyzed with the new guidelines in mind.

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Based on the 2019 update to the City of Los Angeles Thresholds Guidance Document, the previous question contains three sub-questions that dictate final determination. If the answer is no to all of the following questions, a no impact determination can be made (CEQA Transportation Thresholds, 2019).

- 1) Would the project generate a net increase of 250 or more daily vehicle trips?

Construction for the proposed project would create a maximum of 21 daily vehicle trips during the preparation and paving phases of parking lot construction. The operations of this proposed project would not create any additional trips per day beyond existing employee trips. Therefore, the project would not generate a net increase of 250 or more daily vehicle trips.

- 2) Is the project proposing to, or required to make any voluntary or required modifications to the public right-of-way?

The proposed Project does not include any modifications to existing roadways on Terminal Island that support current or future bike lanes or bus stops, and is not required to make any voluntary or required modifications to the public right-of-way. The Los Angeles Mobility Plan 2035, which is the City's General Plan Transportation Element, includes numerous functional classifications to define standard roadway dimensions. The South Seaside Avenue Project site is bounded by South Seaside Avenue to the east while the Barracuda Street project site is bound by Earle Street to the east, Barracuda Street to the west, and Marina Street to the south. All these adjacent roadways are designated as Private under the Mobility Plan 2035. The project does not propose to, or is required to, include dedications or physical modifications to the public right-of-way.

3) Is the project on a lot that is ½ acre or more in total gross area, or is the project’s frontage along a street classified as an Avenue or Boulevard 250 feet or more, or is the project’s frontage encompassing an entire block along an Avenue or Boulevard?

The South Seaside Avenue Project site is bounded by South Seaside Avenue to the east while the Barracuda Street project site is bound by Earle Street to the east, Barracuda Street to the west, and Marina Street to the south. The Los Angeles Mobility Plan 2035 does not provide classifications for any streets within the Project vicinity. The proposed Project would not require any modifications or closures to the public right-of-way. There would be no in-street construction activities.

The proposed project site is located along a street classified as an Avenue or Boulevard and is located on a lot that is greater than ½ acre in total gross area. However, the proposed project is within an industrialized area and there are no bicycle or pedestrian facilities within Terminal Island. With no bicycle or pedestrian facilities within the area, no effect to such facilities is possible. Additionally, there are no bus stops, transit stations, or transit facilities within a 0.25-mile radius of the Project site. Therefore, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact. The CEQA Guidelines, Section 15064.3, subdivision (b), provide criteria for analyzing transportation impacts. The guidelines state that a significant impact may occur if vehicle miles traveled (VMT) exceed an applicable threshold of significance. The analysis below is based on the screening criteria provided by the Los Angeles Department of Transportation (LADOT) in the Transportation Assessment Guidelines (LADOT 2019). The LADOT Transportation Assessment Guidelines state that if a land use project does not generate a net increase totaling 250 or more daily vehicle trips or does not generate a net increase in daily VMT, then no further analysis for that project is required and no impact would occur if the answer is “no” to the following two questions:

Would the Project or Plan located within one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?

If the project includes retail uses, does a portion of the project that contains retail uses exceed a net 50,000 square feet?

The proposed project is not located within one-half mile of fixed-rail or fixed-guideway transit station, does not replace an existing number of residential units with a smaller number of residential units, and does not include retail uses.

As discussed in 8.17 (a)(1), the proposed project does not generate a net increase totaling 250 or more daily vehicle trips. Therefore, based upon the LADOT Transportation Assessment Guidelines criteria discussed above, no further analysis is required and no impact would occur.

8.18 Tribal Cultural Resources

The revised proposed project would not impact any building eligible for listing on the California Register of Historic Resources. Additionally, development is occurring on clean fill and the potential to encounter tribal cultural resources as a result of the revised proposed project is unlikely. Therefore, there would be no impact to tribal cultural resources.

8.19 Utilities and Service Systems

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

8.20 Wildfire

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

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

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

9. Conclusions

The revised proposed project clarifies the permit duration, addresses the incremental changes in the permit area, and includes additional parking lot construction. None of the conditions as described under Section 15162 of the State CEQA Guidelines requiring a subsequent EIR or negative declaration have occurred under the revised proposed project. No substantial changes to impact areas previously analyzed in the Final IS/MND would occur as a result of the revised proposed project. Furthermore, there are no known mitigation measures or project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the adopted Final IS/MND. For these reasons, the proposed modifications would create no potential adverse impacts nor substantial changes to impact areas previously analyzed in the Final IS/MND.

10. References

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