

Appendix K

Natural Turf Changes

K.1 Environmental Analysis

The analysis contained herein demonstrates and provides substantial evidence that no new potentially significant impacts would occur, nor would the severity of other impact areas be increased by the potential substitution or replacement of artificial turf with natural grass for the 50,000- square-foot Amphitheater lawn area, as compared to the impact determinations made in this Final SEIR.

K.1.1 Aesthetics

The substitution or replacement of artificial turf with natural grass would not present a major change to the aesthetic impact of the Proposed Project because the appearance would be generally the same. Artificial grass is manufactured to recreate the look of natural grass. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.2 Agriculture and Forestry Resources

The substitution or replacement of artificial turf with natural grass would not have any impact on Agriculture and Forestry resources as the Proposed 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 or beyond what was previously analyzed in this Final SEIR.

K.1.3 Air Quality

The substitution or replacement of artificial turf with natural grass would not result in any changes to the proposed operation of the previously approved project that would have new or substantial impacts to air quality as the installation process for artificial turf and natural grass is very similar. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.4 Biological Resources

The substitution or replacement of artificial turf with natural grass would not change the Proposed Project structurally or result in alterations to the natural environment nearest the site. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.5 Cultural Resources

The substitution or replacement of artificial turf with natural grass would not require additional ground-disturbing work beyond what has already been analyzed in this Final SEIR and would not result in any changes to cultural resources compared to the Proposed Project. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.6 Energy

The substitution or replacement of artificial turf with natural grass would not change the construction and operation of the site. The replacement of artificial turf with natural grass is not anticipated to result in wasteful, inefficient, or unnecessary consumption of energy resources nor would it conflict with or obstruct a state or local plan for renewable energy or energy efficiency since it does not require manufacturing. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.7 Geology and Soils

The substitution or replacement of artificial turf with natural grass would not substantially change the installation process in the lawn area and would not result in exposure of people or structures to substantial adverse effects, substantial soil erosion or loss of topsoil, nor is it located on a geological unit that is unstable or would become unstable. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.8 Greenhouse Gas Emissions

The substitution or replacement of artificial turf with natural grass over the 50,000-square-foot amphitheater lawn area would not result in an increase in greenhouse gas emissions. The implementation of natural grass rather than artificial turf also includes a potential reduction in greenhouse gas emissions as a benefit of this Project change. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.9 Hazards and Hazardous Materials

The substitution or replacement of artificial turf with natural grass would not result in any changes to hazards and hazardous materials compared to the previously approved project. Utilizing natural grass would bring natural resources to the site instead of an artificial material. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.10 Hydrology and Water Quality

The substitution or replacement of artificial turf with natural grass would not result in changes to hydrology and water quality, as the infiltration and percolation of water into soils occurring in natural grass is deliberately mimicked by the artificial turf. As discussed on page 3.7-15 of the Draft SEIR, the Proposed Project would be designed and maintained in accordance with the Los Angeles RWQCB water quality requirements, such as the Los Angeles Regional MS4 permit, and would comply with the Construction General Permit post-construction stormwater management measures and the City of Los Angeles LID ordinance. Consequently, potential surface water quality impacts from operation of the Proposed Project would not violate any waste-discharge requirements or otherwise substantially degrade water quality. Because the Proposed Project would continue to be required to comply with the above water quality regulations, the minimal use of pesticides, herbicides, and fertilizers associated with maintaining natural grass instead of artificial turf would not cause any change to the impact determination made in this Final SEIR. As discussed on page 3.6-15 of the Draft SEIR, maintenance of landscaped areas could involve the use of pesticides and/or herbicides. However, these materials would be used in small amounts, intermittently, and with proper care, as directed by their accompanying Safety Data Sheets (SDS). Thus, Proposed Project operations are not expected to create a significant hazard to the public or the environment related to the routine transport, use, or disposal of hazardous materials. Because the Proposed Project would continue to use pesticides, herbicides and fertilizers in small amounts, intermittently, and with proper care, the use of natural grass instead of artificial turf would not cause any change to the impact determination made in this Final SEIR. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.11 Land Use and Planning

The substitution or replacement of artificial turf with natural grass would not cause a physical divide to an established community nor would it conflict with any plan, policy, or regulation as the site is consistent with City zoning and the Port Master Plan's land use. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.12 Mineral Resources

There are no known mineral resources near the lawn area that would be impacted due to this development. As such, the substitution or replacement of artificial turf with natural grass would not cause any change to the impact determination made in this Final SEIR.

K.1.13 Noise

The substitution or replacement of artificial turf with natural grass would not result in any changes to the proposed operation and noise generating activities of the Proposed Project. As such, the

substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.14 Population and Housing

The substitution or replacement of artificial turf with natural grass would not induce population growth, displacement of existing housing or a substantial number of people. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.15 Public Services

The substitution or replacement of artificial turf with natural grass would not result in any impacts to the performance of fire protection, police protection, schools, parks, or other public facilities beyond what has previously been evaluated. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.16 Recreation

The substitution or replacement of artificial turf with natural grass would not increase demand on existing recreational facilities nor require the construction of new recreational facilities. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.17 Transportation

The substitution or replacement of artificial turf with natural grass is not expected to result in an increase to worker and consumer-related trips associated with the Proposed Project. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.18 Tribal Cultural Resources

The substitution or replacement of artificial turf with natural grass would not result in additional ground-disturbing work beyond what has already been analyzed in this Final SEIR. In addition, the substitution or replacement would not result in any changes to the operation and development activities of the Proposed Project. As such, the substitution or replacement would not cause any change to the impact determination made in this Final SEIR.

K.1.19 Utilities and Service Systems

The substitution or replacement of artificial turf with natural grass would not have any impact on the current wastewater treatment facilities nor would it require the construction of an additional wastewater facility. Additionally, water use for maintenance of lawn areas and landscaping was considered as part of the 2009 SPW EIS/EIR and the 2016 Addendum. Additional demands for water supply are anticipated as a result of this change but are not expected to exceed the capacity of the local municipal water supply. Based on a preliminary review of anticipated regional water requirements for a lawn of this size, the area would need between 19-60 minutes of irrigation (spread over 1-3 waterings) weekly, with the exception of weeks with adequate rainfall, and depending on the season. The current estimated use of 23,000 gallons of water per day for restrooms would increase by approximately 3,000 gallons per day to account for an average of 1,056,490 gallons per year required to maintain a 50,000 square foot hybrid Bermuda grass lawn (POLA, 2025). In comparison, the Los Angeles Department of Water and Power (LADWP) supplies an average of 447 million gallons per day (LADWP, 2021-2022). Utilization of efficient watering systems and regular maintenance to prevent leaks and wasted water can further reduce the water requirements of a natural grass lawn. In contrast, while artificial turf does not require water for irrigation purposes, the proposed artificial turf for the lawn venue would also require washing down following events. Additionally, this change to the Proposed Project would not require or result in the relocation or construction of new or expanded water facilities which could cause significant environmental impacts. As such, the substitution or replacement would not cause any change to the impact determination for utilities and service systems made in this Final SEIR.

K.1.20 Wildfire

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 Fire, 2016; Los Angeles Fire Department, 2019). Therefore, this section of the CEQA Guidelines checklist does not apply. However, the substitution or replacement would not impair an adopted emergency response plan or emergency evacuation plan or exacerbate wildfire risks. Therefore, the substitution or replacement would not cause any change to the impact determination for wildfire made in this Final SEIR.

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