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## 2.1 Distribution of the Draft EIR

4 The Draft EIR prepared for the LAHD was distributed to the public and regulatory  
5 agencies on January 20, 2012, for a 45-day review period. Approximately 183 hard  
6 copies and CDs of the Draft EIR were distributed to various government agencies,  
7 organizations, individuals, and Port tenants. LAHD conducted a public hearing regarding  
8 the Draft EIR on February 15, 2012, to provide an overview of the proposed Project and  
9 alternatives and to accept public comments on the proposed Project, alternatives, and  
10 environmental document.

11 The Draft EIR was available for review at the following locations:

- 12     ▪ Los Angeles Harbor Department, 425 South Palos Verdes Street, San Pedro, CA,  
13         90731
- 14     ▪ Los Angeles Public Library - Central Branch, 630 West 5<sup>th</sup> Street, Los Angeles, CA  
15         90071
- 16     ▪ Los Angeles Public Library - San Pedro Branch, 931 South Gaffey Street, San Pedro,  
17         CA 90731
- 18     ▪ Los Angeles Public Library - Wilmington Branch, 1300 North Avalon, Wilmington,  
19         CA 90744

20 In addition to printed copies of the Draft EIR, electronic versions were made available.  
21 Due to the size of the document, the electronic versions have been prepared as a series of  
22 PDF files to facilitate downloading and printing. Members of the public can request a  
23 CD containing the EIR. The Draft EIR was available in its entirety on the LAHD web site  
24 at <http://www.portoflosangeles.org/environmental/publicnotice.htm>. Electronic copies of  
25 the Draft EIR on CD were available free of charge to interested parties.

26

## 2.2 Comments on the Draft EIR

27 The public comment and response component of the CEQA process serves an essential  
28 role. It allows the respective lead agencies to assess the impacts of a project based on the  
29 analysis of other responsible, concerned, or adjacent agencies and interested parties, and  
30 it provides an opportunity to amplify and better explain the analyses that the lead  
31 agencies have undertaken to determine the potential environmental impacts of a project.  
32 To that extent, responses to comments are intended to provide complete and thorough  
33 explanations to commenting agencies and individuals, and to improve the overall  
34 understanding of the Project for the decision-making bodies. The LAHD received seven

comment letters and two comments through the public hearing transcript on the Draft EIR during the public review period. Table 2-1 presents a list of those agencies, organizations, and individuals who commented on the Draft EIR.

**Table 2-1: Public Comments Received on the Draft EIR**

Letter Code	Date	Individual/Organization	Page
<b>State Government</b>			
NAHC	01/23/12	Native American Heritage Commission	2-3 to 2-9
DTSC	03/01/12	Department of Toxic Substances Control	2-10 to 2-19
<b>Regional Government</b>			
SCAQMD	03/02/12	South Coast Air Quality Management District	2-20 to 2-23
SCAG	02/28/12	Southern California Association of Governments	2-24 to 2-30
<b>Local Government</b>			
BOS	02/28/12	City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division	2-31 to 2-34
<b>Organizations</b>			
LAC	03/05/12	Los Angeles Conservancy	2-35 to 2-50
SPBHS	03/05/12	San Pedro Bay Historical Society	2-51 to 2-52
<b>Draft EIR Public Hearing</b>			
ALBSPH	02/15/12	Draft EIR Public Hearing Transcript	2-53 to 2-72

## 2.3 Responses to Comments

In accordance with CEQA (Guidelines Section 15088), the LAHD has evaluated the comments on environmental issues received from agencies and other interested parties and have prepared written responses to each comment pertinent to the adequacy of the environmental analyses contained in the Draft EIR. In implementing specific compliance with CEQA Guidelines Section 15088(b), the written responses address the environmental issues raised. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the proposed Project is provided. In each case, the LAHD has expended a good faith effort, supported by reasoned analysis, to respond to comments. This section includes responses not only to the written comments received during the 45-day public review period of the Draft EIR, but also verbal comments made at the public hearing for the Draft EIR. Some comments have prompted revisions to the text of the Draft EIR, which are referenced and shown in Chapter 3, Modifications to the Draft EIR. A copy of each comment letter is provided, and responses to each comment letter immediately follow.

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
 SACRAMENTO, CA 95814  
 (916) 653-6251  
 Fax (916) 657-5390  
 Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
 ds\_nahc@pacbell.net



January 23, 2012

Mr. Dennis Hagner

**City of Los Angeles Harbor Department**

425 South Palos Verdes Street  
 San Pedro, CA 90731



Re: SCH#2010091041 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Al Larson Boat Shop Improvement Project," located in the Harbor /San Pedro Area; Los Angeles County, California

Dear Mr. Hagner:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect.

The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within the project area identified. This area is known to the NAHC to be very culturally sensitive. Also, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction. The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public

NAHC-1

Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

NAHC-1  
Cont'd

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

NAHC-2

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties pursuant to CA Public Resources Code §5097.95. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

NAHC-3

Consultation with tribes and interested Native American consulting parties, on the NAHC list, if the project is under federal jurisdiction, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

NAHC-4

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

NAHC-5

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be

NAHC-6

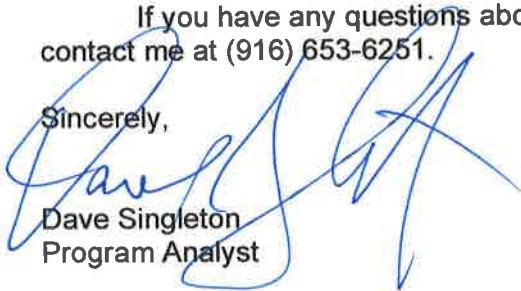
followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

NAHC-6  
Cont'd

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

## California Native American Contacts

Los Angeles County

January 23, 2012

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles , CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Ti'At Society/Inter-Tribal Council of Pimu  
Cindi M. Alvitre, Chairwoman-Manisar  
3098 Mace Avenue, Aapt. D Gabrielino  
Costa Mesa, , CA 92626  
calvitre@yahoo.com  
(714) 504-2468 Cell

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Private Address Gabrielino Tongva  
**tattnlaw@gmail.com**  
310-570-6567

Gabrieleno/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
PO Box 693 Gabrielino Tongva  
San Gabriel , CA 91778  
GTTribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 -FAX

Gabrielino Tongva Nation  
Sam Dunlap, Chairperson  
P.O. Box 86908 Gabrielino Tongva  
Los Angeles , CA 90086  
samdunlap@earthlink.net  
  
(909) 262-9351 - cell

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490 Gabrielino Tongva  
Bellflower , CA 90707  
**gtongva@verizon.net**  
562-761-6417 - voice  
562-761-6417- fax

Gabrielino-Tongva Tribe  
Bernie Acuna  
1875 Century Pk East #1500 Gabrielino  
Los Angeles , CA 90067  
(619) 294-6660-work  
(310) 428-5690 - cell  
(310) 587-0170 - FAX  
bacuna1@gabrieinotribe.org

Gabrielino-Tongva Tribe  
Linda Candelaria, Chairwoman  
1875 Century Park East, Suite 1500  
Los Angeles , CA 90067 Gabrielino  
lcandelaria1@gabrielinoTribe.org  
626-676-1184- cell  
(310) 587-0170 - FAX  
760-904-6533-home

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the 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 applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010091041; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Al Larson Boat Shop Improvement Project; located in the Harbor-San Pedro area; Los Angeles County, California.

**California Native American Contacts**  
Los Angeles County  
January 23, 2012

Gabrieleno Band of Mission Indians  
Andrew Salas, Chairperson  
P.O. Box 393                      Gabirelino  
Covina                      , CA 91723  
(626) 926-4131  
gabrielenoindians@yahoo.  
com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the 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 applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010091041; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Al Larson Boat Shop Improvement Project; located in the Harbor-San Pedro area; Los Angeles County, California.

## 2.3.1 State Government

### Native American Heritage Commission (NAHC)

#### Response to Comment NAHC-1

Thank you for your review and comment on the Draft EIR. As described in Section 3.4.2.4.2 and Appendix D of the Draft EIS/EIR, in October 2009, the Native American Heritage Commission (NAHC) was contacted to request a review of the Sacred Lands File and to obtain a list of Native American groups or individuals listed by the NAHC for Los Angeles County. Consultation under Section 106 of the National Historic Preservation Act was also initiated by the U.S. Army Corps of Engineers as the federal lead agency for compliance with the National Environmental Policy Act. A response was received from the NAHC on October 15, 2009, stating that the search failed to identify the presence of Native American sacred lands or traditional cultural properties within the Project's Area of Potential Effect (APE). Consultation letters to each of the nine NAHC-listed contacts were sent on November 16, 2009. Follow-up phone calls were made on December 16, 2009.

As stated in your response letter, the record search of the Sacred Lands file failed to indicate the presence of Native American cultural resources in the immediate Project area. As you noted, the absence of archaeological resources does not preclude their existence; therefore, as detailed in Section 3.4.4 of the Draft EIR, although the potential for impacts on unknown archaeological resources is remote, the following mitigation measure (**MM CUL-1**) is provided consistent with the guidance of California Code of Regulations, Title 14, Section 15064.5(f) and PRC Section 21083.2(i):

#### **MM CUL-1: Archaeological and Ethnographic Resources**

An archaeological monitor shall be present during all initial grading and excavation activities at the proposed Project site. In the event any cultural resources are encountered during earthmoving activities, the construction contractor shall cease activity in the affected area until the discovery can be evaluated by a qualified archaeologist in accordance with the provisions of CEQA Section 15064.5. The archaeologist shall complete any requirements for the mitigation of adverse effects on any resources determined to be significant and implement appropriate treatment measures. The treatment plan may include methods for: (1) subsurface testing after demolition of existing buildings, (2) data recovery of archaeological or ethnographic deposits, and (3) post-construction documentation. A detailed historic context that clearly demonstrates the themes under which any identified subsurface deposits would be determined significant would be included in the treatment plan, as well as anticipated artifact types, artifact analysis, report writing, repatriation of human remains and associated grave goods, and curation.

A preconstruction information and safety meeting shall be held to make construction personnel aware of archaeological monitoring procedures and the types of archaeological resources that might be encountered. All construction equipment operators shall attend a pre-construction meeting presented by a professional archaeologist retained by LAHD that shall review types of cultural resources and artifacts that would be considered potentially significant, to ensure operator recognition of these materials during construction.

#### Response to Comment NAHC-2

The 2009 letter received from the NAHC contained a list of nine Native American tribes and individual contacts for consulting on development projects. As detailed in Section 3.4.2.4.2 and Appendix D of the



1 Draft EIR, the consultation letters to each of the nine NAHC-listed contacts were sent on November 16,  
2 2009. Follow-up phone calls were made on December 16, 2009. Four responses were received. Of those  
3 contacted, none provided information about known traditional cultural properties in the proposed Project  
4 area, but most suggested caution during ground disturbing activities during construction. In addition,  
5 mitigation measure **MM CUL-1** for the proposed Project (above), would provide a mechanism to ensure  
6 operator recognition of archaeological resources that might be encountered during construction and  
7 procedures to follow should these resources be encountered. In addition, an archaeological monitor shall  
8 be present during all initial grading and excavation activities at the proposed Project site.

### 9 **Response to Comment NAHC-3**

10 As described in Response to Comments NAHC-1 and NADC-2, and detailed in Appendix D of the Draft  
11 EIR, in October 2009, Native American coordination was initiated for the proposed Project in compliance  
12 with Section 106 of the National Historic Preservation Act. Letters were sent to the nine Native  
13 American contacts requesting information regarding potential cultural resources that may be located  
14 within the Project vicinity. The letters included pertinent project information, such as location maps and a  
15 description of the proposed Project and its related Area of Potential Effect. Follow-up phone calls and  
16 emails were sent in December 2009, and subsequent follow-ups via telephone or email, or both, were  
17 made as necessary. Of those contacted, none provided information about known traditional cultural  
18 properties in the proposed Project area, but most suggested caution during ground disturbing activities  
19 during construction. The results of the Native American coordination and the letters describing the  
20 proposed Project are in Attachment A of Appendix D of the Draft EIR. Regarding the recommendation  
21 of avoiding cultural resources, the comment is noted.

### 22 **Response to Comment NAHC-4**

23 Thank you for your comment. As described in Response to Comment NAHC-3 above, consultation with  
24 tribes and interested Native American consulting parties on the NAHC list has occurred in compliance  
25 with the National Environmental Policy Act and Section 106.

### 26 **Response to Comment NAHC-5**

27 The LAHD understands that the confidentiality of “historic properties of religious and cultural  
28 significance” should be considered. Thank you for your comment.

### 29 **Response to Comment NAHC-6**

30 Thank you for your comment. As detailed in Response to Comment NAHC-1 above, the proposed  
31 Project includes a mitigation measure (**MM CUL-1**) that provides for the accidental discovery of  
32 archaeological resources during construction (i.e., surface disturbing activities).  
33



# Department of Toxic Substances Control



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630

**Edmund G. Brown Jr.**  
Governor

March 1, 2012

Mr. Christopher Cannon  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, California 90731



DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR AL LARSON BOAT SHOP IMPROVEMENT PROJECT (SCH# 2010091041)

Dear Mr. Cannon:

The Department of Toxic Substances Control (DTSC) has received your draft Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed project involves redeveloping the existing Al Larson Boat Shop to modernize the facility and to improve its ability to build and repair ships and vessels. Improvements would include maintenance dredging to ensure adequate vessel access to the site, beneficially reuse dredged material by constructing two confined disposal facilities which would result in 1 acre of new land for increased vessel maintenance and repair demolition of some existing buildings, and construction of new office building, constructing new wharves, and installing a new travel lift boat hoist. In addition, the proposed project would improve the site runoff and remediate historical sediment and soil contamination".

DTSC sent you comments on the Notice of Preparation Report for the above-mentioned project on 10/14/2010, which should be addressed. Based on the review of the submitted document DTSC has no further comments.

DTSC-1

If you have any questions regarding this letter, please contact me at [ashami@dtsc.ca.gov](mailto:ashami@dtsc.ca.gov), or by phone at (714) 484-5472.

Sincerely,

Al Shami  
Project Manager  
Brownfields and Environmental Restoration Program

Mr. Christopher Cannon  
March 1, 2012  
Page 2

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
[nritter@dtsc.ca.gov](mailto:nritter@dtsc.ca.gov)

CEQA # 3461



# Department of Toxic Substances Control

Maziar Movassaghi  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor



Linda S. Adams  
Secretary for  
Environmental Protection



October 14, 2010

Ms. Dennis Hagner  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, California 90731

## NOTICE OF PREPARATION (NOP) FOR AL LARSON BOAT SHOP IMPROVEMENT PROJECT (SCH# 2010091041)

Dear Ms. Hagner:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of the Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed project involves redeveloping the existing Al Larson Boat Shop to modernize the facility and to improve its ability to build and repair ships and vessels. Improvements would include maintenance dredging to ensure adequate vessel access to the site, beneficially reuse dredged material by constructing two confined disposal facilities which would result in 1 acre of new land for increased vessel maintenance and repair demolition of some existing buildings, and construction of new office building, constructing new wharves, and installing a new travel lift boat hoist. In addition, the proposed project would improve the site runoff and remediate historical sediment and soil contamination".

Based on the review of the submitted document DTSC has the following comments:

- 1) The EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
  - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

DTSC-1a

- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

DTSC-1a  
cont'd

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

DTSC-1b

3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.

DTSC-1c

- |  |         |
|--|---------|
| 5) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.   | DTSC-1d |
| 6) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.   | DTSC-1e |
| 7) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.  | DTSC-1f |
| 8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. | DTSC-1g |
| 9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see <a href="http://www.dtsc.ca.gov/SiteCleanup/Brownfields">www.dtsc.ca.gov/SiteCleanup/Brownfields</a> , or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.   | DTSC-1h |

Ms. Dennis Hagner  
October 14, 2010  
Page 4

If you have any questions regarding this letter, please contact me at [ashami@dtsc.ca.gov](mailto:ashami@dtsc.ca.gov) or by phone at (714) 484-5472.

Sincerely,



Al Shami  
Project Manager  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
[ADelacr1@dtsc.ca.gov](mailto:ADelacr1@dtsc.ca.gov)

CEQA # 3023

# California Department of Toxic Substances Control (DTSC)

## Response to Comment DTSC-1

Thank you for your comment on the Draft EIR. As stated in your letter, the LAHD did receive your October 14, 2010 comment letter on the Notice of Preparation (NOP) for the proposed Project. Following is a response to the items listed in your NOP comment letter (DTSC-1a through DTSC-1h):

### Response to Comment DTSC-1a

Your NOP comment letter listed several databases that could provide information for the EIR to evaluate whether conditions within the Project area may pose a threat to human health and the environment. Section 3.7.2.2 and Appendix E of the Draft EIR includes the results of the database search conducted by Environmental Data Resources Inc. (EDR) for the Project site and vicinity. The EDR search included approximately 15 standard and 38 additional environmental records associated with federal, state and local databases, including the National Priority List (NPL), Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS), two Resource Conservation and Recovery Act (RCRA) databases, the Cortese list (the DTSC compiled list pursuant to Government Code Section 65962.5), and Formerly Used Defense Sites (FUDS) database. The Solid Waste Information System (SWIS) database is a database that the EDR reviews as part of its records search. No information from the SWIS database was included in the EDR; therefore, no information must have been available or it was not applicable for the proposed Project site or vicinity. In addition, as noted in Section 3.6.2.1 of the Draft EIR, GeoTracker was consulted and provided information on the number and location of groundwater monitoring wells at the adjacent ExxonMobil site.

As described in Section 3.6.4.3 of the Draft EIR, as part of the proposed Project, all contaminated soil or groundwater encountered during construction would be handled, transported, remediated, and/or disposed of in accordance with all applicable federal, state, and local laws and regulations and in accordance with the regulatory lead agency (e.g., DTSC, Los Angeles RWQCB) and following conditions under LAHD leasing requirements (i.e., lease measures - LMs):

**Site Remediation Lease Requirement (LM GW-1).** Unless otherwise authorized by the lead regulatory agency and the LAHD for any given site, the Tenant (i.e., ALBS) shall address all contaminated soils within proposed Project boundaries discovered during demolition and grading activities. Contamination existing at the time of discovery shall be the responsibility of the past and/or current property owner. Contamination as a result of the construction process shall be the responsibility of the Tenant and/or Tenant contractors. Remediation shall occur in compliance with local, state, and federal regulations, as described in Section 3.6.3 (above) and Section 3.7.3 (in Section 3.7, Hazards and Hazardous Materials), and as directed by the lead regulatory agency for the site (such as the Los Angeles RWQCB or DTSC).

Soil removal shall be completed such that remaining contamination levels are below risk-based health screening levels for industrial sites established by OEHHA and site specific cleanup goals established by the lead regulatory agency overseeing the implementation of the RAP at the site. Soil contamination waivers may be acceptable as a result of encapsulation (i.e., paving) and/or risk-based soil assessments for industrial sites, but are subject to the review and approval of the lead regulatory agency and LAHD. Excavated contaminated soil shall be properly disposed of off-site unless use of such material on-site is beneficial to construction and approved by the agency overseeing the environmental investigation and implementation of the RAP. 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 is free of contamination.



1 **Contamination Contingency Plan Lease Requirement (LM GW-2).** The following contingency plan  
2 shall be implemented to address contamination discovered during demolition, grading, and construction.

- 3 a) All trench excavation and filling operations shall be observed for the presence of free  
4 petroleum products, chemicals, or contaminated soil. Soil suspected of contamination  
5 shall be segregated from other soil. In the event soil suspected of contamination is  
6 encountered during construction, the contractor shall notify the LAHD's environmental  
7 representative. The LAHD shall confirm the presence of the suspect material and direct  
8 the contractor to remove, stockpile or contain, and characterize the suspect material.  
9 Continued work at a contaminated site shall require the approval of the LAHD Project  
10 Engineer.
- 11 b) Excavation of VOC-impacted soil may require obtaining and complying with a South  
12 Coast Air Quality Management District Rule 1166 permit.
- 13 c) The remedial option(s) selected shall be dependent upon a suite of criteria (including but  
14 not limited to types of chemical constituents, concentration of the chemicals, health and  
15 safety issues, time constraints, cost, etc.) and shall be determined on a site-specific basis.  
16 Both off-site and on-site remedial options may be evaluated.
- 17 d) The extent of removal actions shall be determined on a site-specific basis. At a  
18 minimum, the impacted area(s) within the boundaries of the construction area shall be  
19 remediated to the satisfaction of the LAHD and the lead regulatory agency for the site.  
20 The LAHD Project Manager overseeing removal actions shall inform the contractor when  
21 the removal action is complete.
- 22 e) Copies of hazardous waste manifests or other documents indicating the amount, nature,  
23 and disposition of such materials shall be submitted to the LAHD Project Manager within  
24 60 days of project completion.
- 25 f) In the event that contaminated soil is encountered, all on-site personnel handling or  
26 working in the vicinity of the contaminated material must be trained in accordance with  
27 USEPA and Occupational Safety and Health and Administration (OSHA) regulations for  
28 hazardous waste operations or demonstrate they have completed the appropriate training.  
29 Training must provide protective measures and practices to reduce or eliminate hazardous  
30 materials/waste hazards at the work place.
- 31 g) When impacted soil must be excavated, air monitoring will be conducted as appropriate  
32 for related emissions adjacent to the excavation.
- 33 h) All excavations shall be backfilled with structurally suitable fill material that is free from  
34 contamination.

35 With compliance with regulations and lease requirements, construction and operation of the proposed  
36 Project would not result in the expansion of contaminated soils and would not cause significant impacts.

## 37 **Response to Comment DTSC-1b**

38 Sections 3.6 and 3.7 of the Draft EIR identify the applicable soil and groundwater contamination and  
39 hazardous materials regulations associated with the proposed Project. In addition, Section 3.6 of the Draft  
40 EIR includes two lease measures that will be required in the lease to address the mechanisms to initiate  
41 remediation and oversight if contamination is present (refer to Response to Comment DTSC-1a above for  
42 detailed description of the lease measure). As described in Section 3.6.4.3 of the Draft EIR, during  
43 proposed Project construction, if potentially hazardous materials are found, any remediation would be  
44 performed in accordance with applicable federal, state and local laws, regulations, and rules.

1  
2 In addition, LM GW-1 specifically requires the handling, treatment, and disposal of contaminated  
3 material in accordance with oversight agency requirements, including but not limited to the Regional  
4 Water Quality Control Board, Department of Toxic Substances Control, and the Office of Environmental  
5 Health Hazard Assessment.

## 6 **Response to Comment DTSC-1c**

7 Section 3.6.2.3 and Section 3.7.2.3 of the Draft EIR summarize the numerous existing soil and  
8 groundwater investigations associated with the Project site and vicinity. In addition, should  
9 contamination be discovered during construction, remediation would be performed in accordance with  
10 applicable federal, state and local laws, regulations, and rules. In addition, lease measure LM GW-2  
11 would reduce potential impacts (refer to Response to Comments DTSC-1 above for detailed description  
12 of the lease measure). It should be noted that an approved workplan, if applicable, is inherent in the  
13 remediation requirements contained in the regulations and LM GW-2.

## 14 **Response to Comment DTSC-1d**

15 As detailed in Section 3.7.4.3 of the Draft EIR, the proposed Project includes demolition of buildings and  
16 structures that may contain regulated building materials including asbestos-containing materials (ACMs)/  
17 asbestos-containing building materials (ACBMs), lead-based paint (LBPs), PCBs, and other chemicals.  
18 In addition, it has also been documented that there are total petroleum hydrocarbon, diesel range organics,  
19 and lead-contaminated soils in the northern portion of the Project site. However, these regulated  
20 materials and chemicals would be managed either prior to demolition or construction or otherwise abated  
21 during construction. Demolition of buildings would be completed in compliance with all standards and  
22 regulations discussed in Section 3.7.3 of the Draft EIR, including the Emergency Planning and  
23 Community Right-to-Know Act, the Los Angeles Fire Department regulations, your organization (DTSC),  
24 South Coast Air Quality Management District, and other state and federal regulations and guidelines)  
25 governing the demolition, remediation of hazardous materials, and release of air contaminants during  
26 demolition activities. Additionally, the proposed Project includes demolition which would include  
27 remediation efforts to remove or contain the known ACMs/ACBMs in the office area, remediation of the  
28 contaminated soil within Project site (particularly in the northern portion of the site) and the spent  
29 sandblast grit near the marine railways (refer to Section 3.7.2.4 of the Draft EIR), and any other suspected  
30 hazardous contamination at the site (i.e., soil, groundwater, building materials). Demolition activities  
31 would be carried out in accordance with federal, state, and local regulations regarding management of  
32 hazardous wastes, including South Coast Air Quality Management District Rule 1403, Title 40, Code of  
33 Federal Regulations (CFR), Title 49, CFR, and California Health and Safety Code Division 20, Chapter  
34 6.5, which govern the removal, transport, and disposal of hazardous wastes to minimize health and  
35 environmental impacts. Known or suspected contaminated substances in structures and soil would be  
36 removed in accordance with federal, state, and local regulations prior to demolition, thereby minimizing the  
37 exposure of construction workers to contaminants, and minimizing the potential for releases of such  
38 substances to the environment. Other than for site remediation, subsurface excavations would be limited to  
39 creating foundational supports for building and other weight-bearing components of the proposed Project,  
40 thereby minimizing the chance that construction personnel would be exposed to on-site soil contamination.

## 41 **Response to Comment DTSC-1e**

42 As detailed in Section 3.6.4.3 of the Draft EIR, although significant impacts related to the potential for  
43 exposure to underlying contaminants would not occur, lease measures LM GW-1 and LM GW-2 would  
44 further reduce potential impacts (refer to Response to Comment DTSC-1a above for detailed description  
45 of the lease measures).

## 1 **Response to Comment DTSC-1f**

2 As discussed in Section 3.7, Hazards and Hazardous Materials, before demolition of structures, any  
3 hazardous materials will be abated in accordance with federal, state, and local regulations. All  
4 contaminated upland soils would be characterized and remediated under the oversight of a regulatory  
5 agency (e.g. RWQCB or DTSC) and in compliance with all federal, state, and local regulations.

6 Further, construction and demolition activities would comply with standard procedures that exist for  
7 protecting workers from exposure to chemicals of potential concern. For example, OSHA and local  
8 regulatory agencies (e.g., SCAQMD and fire departments) mandate controls to limit exposure to workers  
9 and the public, including:

- 10 • Use of warning signs and containment areas
- 11 • Worker training
- 12 • Implementation of work plans and health and safety plans
- 13 • Reduction of dust emissions through the use of wet methods
- 14 • Use of personal protective equipment by workers

15 In addition, lease measure LM GW-2: Contamination Contingency Plan Lease Requirement (detailed in  
16 Section 3.6.4.3 of the Draft EIR and provided in Response to Comment DTSC-1a above) includes  
17 provisions (“f” and “g”) that in the event that contaminated soil is encountered, all on-site personnel  
18 handling or working in the vicinity of the contaminated material must be trained in accordance with  
19 USEPA and OSHA regulations for hazardous waste operations or demonstrate they have completed the  
20 appropriate training. Training must provide protective measures and practices to reduce or eliminate  
21 hazardous materials/waste hazards at the work place. When impacted soil must be excavated, air  
22 monitoring will be conducted as appropriate for related emissions adjacent to the excavation.

## 23 **Response to Comment DTSC-1g**

24 As detailed in Section 3.7.1.1 of the Draft EIR (and specifically in Table 3.7-2), the proposed Project site  
25 uses and stores small amounts of hazardous material and/or hazardous wastes. Section 3.7.3.1 of the  
26 Draft EIR describes in detail the regulations applicable to the proposed Project or alternatives that are  
27 designed to regulate hazardous materials and hazardous wastes. These regulations also are designed to  
28 limit the risk of upset during the use, transport, handling, storage, and disposal of hazardous materials.  
29 Regulations described in the Draft EIR include California Hazardous Waste Control Law (California  
30 Health and Safety Code, Division 20, Chapter 6.5), the Hazardous Waste Control Regulations (California  
31 Code of Regulations, Title 22, Division 4.5), as well as the requirements associated with the local  
32 Certified Unified Program Agency (CUPA).

## 33 **Response to Comment DTSC-1h**

34 Thank you for your comment and information regarding clean-up oversight by DTSC.  
35



## South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

E-MAILED: March 2, 2012

March 2, 2012

Mr. Christopher Cannon, Director  
Environmental Management Division  
[ceqacomment@portla.org](mailto:ceqacomment@portla.org)  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

### **Draft Environmental Impact Report (Draft EIR) for the Proposed Al Larson Boat Shop Improvement Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes improvements that would redevelop the existing facility to modernize and upgrade the existing boat shop to increase the existing annual operational output from 130 to 304 boats refinished per year. Construction would include demolition of existing structures, excavation, dredging, and the re-use of contaminated dredged material from the site to create approximately 0.9 acres of new land at the site in two newly constructed engineered landfills. Contaminated soils would be removed, disposed off-site, and clean soil would be imported. Further construction would include a new 2,400 square foot office building, paving, utility lighting, a new storm drain system and other upgrades. The construction would begin in 2012 and would occur over a three year period. The business would continue to operate during the proposed construction schedule.

### **Permitting**

Based on the lead agency's air quality emission estimates, the AQMD staff notes that the coating air quality emission impacts resulting from the level of projected coating operations would subject the proposed operations to SCAQMD permit review. This review may include requirements under SCAQMD Regulation XIII (New Source Review), Rule 1401 (New Source Review of Toxic Air Contaminants) and Title V permits. The AQMD engineering and compliance staff should be contacted to address these permitting requirements. Questions concerning permit requirements can be directed to AQMD staff at (909) 396-2504.

SCAQMD-1

**VOC's During Operations**

The Draft EIR describes the emissions reported in Tables 3.2-4 and 3.2-16 as peak daily emissions. However, the baseline emission calculations assume average daily levels using Annual Emission Reports, and project emissions simply scale up these levels using the ratio of annual ship visits with and without the project. In other words, it appears that the lead agency assumed that the emissions increase occurs uniformly throughout the year such that there is no difference between an average day and a peak day. Incremental unmitigated VOC emissions are projected to be 54 pounds per day (lbs/day) (Table 3.2-16), just below AQMD's threshold of significance of 55 lbs/day. If operational activities (like coatings) vary day by day, the peak daily emissions may exceed the average 54 lbs/day calculated in the Draft EIR. The lead agency should either recalculate VOC impacts using a peak daily analysis, or it should place limits on the project stating that it cannot exceed the emissions specified in the Draft EIR.

SCAQMD-2

**Health Risk Assessment**

In the lead agency's health risk assessment (HRA), it appears that the HRA determined potential health risks by conservatively assuming that construction would occur over a 70 year period. It is unclear, however, how the operational emissions (including at least 54 pounds per day of VOC's) were incorporated into the HRA, if at all. Further clarification should be provided in the Final CEQA document regarding the impact of operational emissions on the potential health risk. If these operational emissions result in a significant health risk during operations (beyond the short term construction health risk described in the Draft EIR), they should be disclosed and mitigated to the maximum extent feasible.

SCAQMD-3

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

SCAQMD-4

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM

LAC120124-02  
Control Number

## 2.3.2 Regional Government

### South Coast Air Quality Management District (SCAQMD)

#### Response to Comment SCAQMD-1

As described in Chapter 1 (Section 1.4) and Section 3.2.3.3 of the Draft EIR, the analysis for the proposed Project noted that operations include abrasive blasting and vessel coating operations which are regulated by SCAQMD Rule 301 (Permitting and Associated Fees), Rule 1140 (Abrasive Blasting) and Rule 1106 and 1106.1 (Marine Coating Operations and Pleasure Craft Coating Operations). Any changes to the facilities operational permits are the responsibility of the tenant and will be addressed by ALBS with SCAQMD when or if applicable.

#### Response to Comment SCAQMD-2

The comment suggests that the change in peak daily emissions may be underestimated by using a yearly amortization of emissions, and that if the growth rate assumed in the analysis were applied to existing peak daily emission rates, the incremental VOC emissions would exceed the significance threshold. The commenter recommended calculating a daily peak or establishing a daily cap on VOC emissions from coating activity.

Review of the permit documentation on file with ALBS revealed the analysis overestimated VOC emissions by using the gross amounts from the Annual Emission Reports rather than net emissions. VOC emissions from coating operations were developed from gross coating emissions contained in the Annual Emission Inventory reports provided to SCAQMD. The net coating emissions would produce a lower incremental increase than the gross coating emissions because net emissions reported include a credit for a recycling program that ALBS participates in with SCAQMD (as shown in the Project site's annual emission reports). Using the most recent two years of net coating emissions, and applying the same calculation methodology used in the Draft EIR, would produce a project incremental increase of 35 lbs of VOC/day from coating operations. When this result is added to other activity VOC increments, the proposed Project peak daily VOC increment would be 45 lbs/day – noticeably less than the SCAQMD daily threshold of 55 lbs/day for VOC emissions.

We found that the amortization method used in the Draft EIR is more conservative than that suggested by the SCAQMD. If the non-significant increase of 55 lbs/day is added to the baseline maximum daily VOC emission of 802 lbs/day, 857 lbs/day could be released over the 260 day work year by the ALBS operation without triggering a significant impact. If the yearly net average is amortized over 260 workdays and the non-significant increase of 55 lbs/day is added, 81.5 lbs/day results. The 81.5 lbs/day is a much lower significance threshold. Using amortization, the yearly amount of non-significant VOC emissions is 10 times less than the SCAQMD approach of using maximum daily emissions.

Coating activity is a small percentage of the work done at ALBS, and is not a daily occurrence. A review of the 2009 and 2010 coating logs indicates that coating/painting only occurred on approximately 50 days per year (less than 20 percent of the work days). This level of coating days per year continued through 2011 according to the logs. Because coating activity currently occurs over so few days during the year and due to the fixed number of spray equipment the future coating activity per day is not expected to increase substantially, rather the number of days with coating activity will increase.

Currently a number of vessels based within the San Pedro Bay Ports (i.e., the Ports of Los Angeles and Long Beach) go to San Diego or to the north for repairs and maintenance because existing repair facilities

1 in the San Pedro Bay Harbor Complex, such as ALBS, do not have enough capacity to meet the demand  
2 in a timely manner. The project would reduce the number of vessels traveling to other ports, and the  
3 vessel emission reductions associated with these eliminated trips have not been included in the  
4 calculations.

5 Finally, the ALBS VOC emissions from coating are subject to an existing SCAQMD permit, and the  
6 VOC limits in that permit cannot be exceeded. In issuing ALBS' permit for non-mobile spray equipment,  
7 SCAQMD recognized the episodic nature of painting activity choosing to set monthly limits on VOC  
8 emission rather than daily limits.

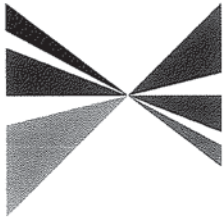
### 9 **Response to Comment SCAQMD-3**

10 In reviewing the construction emission inputs to the HRA it was determined that toxic air contaminant  
11 (TAC) emission rates in pounds per hour (lbs/hr) were treated as tons per year (tpy) when incorporated  
12 into HARP. Thus, the long-term TAC construction emissions in HARP were overestimated by a factor of  
13 approximately 24 when compared to the actual annual emission estimates. In addition, several of the  
14 peak daily TAC emissions (lbs/day) were incorrectly reported as lbs/hr, also overestimating short-term  
15 TAC emissions for several sources. Therefore, the construction HARP results in the Draft EIR grossly  
16 overestimated risk results for cancer and chronic non-cancer risks, and also overestimated the  
17 construction acute risks.

18  
19 The operational emissions had been initially screened out using the SCAQMD's Tier 2 risk assessment  
20 spreadsheet model; therefore, were not included in the HARP runs conducted for the Draft EIR. The  
21 HARP analysis has been revised in the Final EIR (refer to Chapter 3, Modifications to the Draft EIR, of  
22 the Final EIR) to reflect the correction of construction TAC emissions to appropriate units and to include  
23 inclusion of operational TAC emissions. The revised results with combined construction and operational  
24 TAC emissions indicate that health risks for cancer and chronic non-cancer impacts will be less than the  
25 appropriate thresholds for all receptor types. The construction acute risks remain significant, although  
26 less than previously reported. Acute risks associated with operations are less than significant.

### 27 **Response to Comment SCAQMD-4**

28 In regards to notification, the LAHD will notify SCAQMD (and all commenter's to the Draft EIR) no less  
29 than 10 calendar days prior to the Board of Harbor Commissioners hearing for the proposed Project.  
30



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February 28, 2012

Mr. Christopher Cannon  
425 S. Palos Verdes Street  
San Pedro, CA 90733  
[ceqacomment@portla.org](mailto:ceqacomment@portla.org)

**RE: SCAG Comments on the Draft Environmental Impact Report for the Al Larson Boat Shop Improvement Project [I20120035]**

Dear Mr. Cannon:

Thank you for submitting the **Draft Environmental Impact Report for the Al Larson Boat Shop Improvement Project [I20120035]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act (CEQA) Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act Guidelines, Sections 15125 and/or 15206. The purpose of the proposed project is to improve, redevelop, modernize and upgrade the existing Al Larson Boat Shop (ALBS) located within the Port of Los Angeles.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision Principles that may be applicable to your project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: <http://scag.ca.gov/igr>. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895. Thank you.

Sincerely,

JACOB LIEB, Manager  
Environmental and Assessment Services



**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE AL  
LARSON BOAT SHOP IMPROVEMENT PROJECT [I20120035]**

**PROJECT LOCATION**

The project site is located at 1046 Seaside Avenue (Berth 258) on Terminal Island, within an industrial area in the Fish Harbor region of the Port. The ExxonMobil terminal and Southern California Ship Services are to the northwest, fisheries and canning facilities to the north (across Fish Harbor) with the ExxonMobil/General Petroleum facility (a fuel depot) along the northern project site boundary. Fish Harbors is to the east, the Southwest Marine Administration Building and former Southwest Marine Administration Building and former Southwest Marine Shipyard site is to the west, and a boat marina (Al Larson's Marina) and reservation Point/Coast Guard Station Los Angeles/Federal Prison are to the south.

**PROJECT DESCRIPTION**

The proposed project represents the first major upgrade to the facility since 1924 and would redevelop the existing boat shop to modernize the facility, comply with National Pollution Discharge elimination System (NPDES) stormwater requirements, perform maintenance dredging to ensure adequate vessel access to the site, construct two Confined Disposal Facilities (CDFs), renew the ALBS lease for another 30 years (to include the CDFs) , and amend the PMP related to the land created by the two CDFs.

To minimize operational impacts to the facility during construction, the proposed project would be constructed in three phases. In general, the proposed project includes: removal of a 200-foot portion of the creosote-treated timber wharf, piles piers and buildings/ structures; removal of approximately 7,600 cubic yards of legacy contaminated landside soil (from under the buildings); import of approximately 7,600 cubic yards of clean fill, construction of two concrete finger piers to support the installation and operation of two boat hoists; maintenance dredging to a depth of -22 feet mean lower low water plus an additional 2-foot overdredge allowance; construction of two CDFs using legacy contaminated sediment from Fish Harbor; installation of Standard Urban Stormwater Mitigation Plan (SUSMP) devises (such as a new storm drain system and installation of an oil/water separator); new pavement and lighting improvements; and a new 2,400 square foot two-story office building.

The basic purpose of the proposed project is to improve the safety and efficiency of marine ship building and repair, expand the maintenance and repair capabilities of the operation, modernize the site in order to comply with existing and future water quality regulations, update the ALS NPDES and WDR permits, and take advantage of opportunity to remove legacy contaminated soils for disposal off-site and contaminated bottom sediment for use in the CDFs.

**CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN**

**Regional Growth Forecasts**

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

**Adopted SCAG Regionwide Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

SCAG-1

**Adopted County of Los Angeles Forecasts<sup>1</sup>**

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	10,615,732	10,971,598	11,329,832	11,678,549	12,015,885	12,338,619
Households	3,357,798	3,509,580	3,666,631	3,788,732	3,906,851	4,003,501
Employment	4,552,398	4,675,875	4,754,731	4,847,436	4,946,420	5,041,172

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

**SCAG Staff Comments:**

Per page 3.10-4, indicates that the DEIR population, household and employment analyses were based on 2008 RTP Regional Growth Forecasts.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

***Regional Transportation Plan Goals:***

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

**SCAG Staff Comments:**

Where applicable, SCAG staff finds that the proposed project meets consistency with Regional Transportation Plan Goals. The proposed project is not applicable to RTP G7 in that it is not a transportation project.

Per RTP G1, SCAG staff finds the proposed project to meet consistency. The proposed project has regional access provided by a network of freeways and highways including the Harbor Freeway (I-110) and the Long Beach Freeway (I-710). Also, the existing transit routes that serve the general area do not stop within one mile of the proposed project site. No additional demand on local transit a service is anticipated (Page 3.12-16).

SCAG staff finds the proposed project to meet consistency with RTP G2. No potential impacts to the travel safety and reliability of the regional transit system are anticipated due to the proposed project. A temporary increase in construction-related truck and auto traffic could result in decreases in roadway capacity, potential safety hazards and disruption of travel for vehicular, but is not expected to have a significant impact on the regional transportation system (Page 3.12-17).

SCAG staff finds the proposed project to meet consistency with RTP G3. Per page 3.8-13, the proposed project will be constructed under the Port of Los Angeles Sustainable Construction Guidelines used to establish air emission criteria for inclusion in construction bid specifications.

Per page 3.12-14, an increase in travel on the study area roadway system during operation of the

SCAG-1  
Cont'd

proposed project associated with workers' vehicles to and from the site would occur, however significant impacts would not occur.

SCAG staff finds the proposed project to meet consistency with RTP G4. Demolition, dredging and pier construction could affect water-associated birds and marine mammals through temporary increases in noise, vibration and turbidity, as well as the potential for displacements of individuals. With the exception of potential noise impacts during pile driving, other construction disturbances are considered insignificant.

SCAG staff finds the proposed project to meet consistency with RTP G5. Per page 2-2, the proposed project includes redeveloping and modernizing an existing boat shop near existing transportation infrastructure within the Port of Los Angeles.

### **COMPASS GROWTH VISIONING**

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

#### ***Principle 1: Improve mobility for all residents.***

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*

#### **SCAG Staff Comments:**

SCAG staff finds that the proposed project meets consistency with Principle 1.

Per GV P1.1, SCAG staff finds the proposed project meets consistency. Per page 2-2, the proposed project includes redeveloping and modernizing an existing boat shop near existing transportation infrastructure within the Port of Los Angeles.

In regards to GV P1.2, SCAG staff finds the proposed project to meet consistency. Per page 3.10-14, the proposed project is expected to increase by 20-30% thereby increasing 20 to 30 employees. The jobs/housing balance is not anticipated to be affected by the proposed project and would not directly induce population resulting in new housing or employment generation.

The proposed project is not applicable to GV P1.3 and GV P1.4 as it does not an appropriate location for transit and/or multiple modes of travel.

#### ***Principle 2: Foster livability in all communities.***

- GV P2.1** *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2** *Promote developments, which provide a mix of uses.*
- GV P2.3** *Promote "people scaled," walkable communities.*
- GV P2.4** *Support the preservation of stable, single-family neighborhoods.*

SCAG-1  
Cont'd

**SCAG Staff Comments:**

SCAG staff finds that the proposed project is not applicable to Principle 2. The proposed project does not include infill development, nor is appropriate for a mix of uses or pedestrian facilities. The proposed project site location is located in a fully developed, urbanized location and is modernizing and redeveloping the existing boat shop.

SCAG-1  
Cont'd

**Principle 3: Enable prosperity for all people.**

- GV P3.1** *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2** *Support educational opportunities that promote balanced growth.*
- GV P3.3** *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4** *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5** *Encourage civic engagement.*

SCAG-2

**SCAG Staff Comments:**

SCAG staff finds that the proposed project partially meets consistency with Principle 3 where applicable.

The proposed project is not applicable to GV P3.1 and GV P3.2 because it does not include residential development or educational opportunities regarding balanced growth.

Per GV P3.3, the proposed project meets consistency. The proposed project DEIR includes Chapter 4: Environmental Justice which performs an analysis to identify whether there would be any high and adverse effects are a result of the proposed ALBS improvements (Page 4-6).

SCAG staff cannot determine consistency with GV P3.4 and GV P3.5 based on the information provided in in the DEIR.

**Principle 4: Promote sustainability for future generations.**

- GV P4.1** *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2** *Focus development in urban centers and existing cities.*
- GV P4.3** *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4** *Utilize "green" development techniques*

**SCAG Staff Comments:**

Where applicable, SCAG staff finds that the project is partially consistent with Principle 4.

The proposed project is not applicable to GV P4.1 as it is not located near rural, agricultural, recreational or environmentally sensitive areas and is fully developed within an industrial area in the Fish Harbor region of the Port of Los Angeles (Page 1-2).

SCAG staff finds the proposed project to meet consistency with GV P4.2. The proposed project is located within the Port of Los Angeles on Terminal Island, located in the City of Los Angeles (Page 1-2).

Per GV P4.3 and GV P4.4, SCAG staff finds the proposed project to meet consistency. The proposed project includes several strategies aimed at using resources more sustainably including compliance with the Port of Los Angeles Strategic Plan which has a sustainable "grow green philosophy" ensuring that the ports are promoting environmental stewardship (Page 3.8-6).

SCAG-3

**CONCLUSION**

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here:

[http://www.scag.ca.gov/igr/documents/SCAG\\_IGRMMRP\\_2008.pdf](http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf)

When a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).

SCAG-4

# 1 **Southern California Association of Governments** 2 **(SCAG)**

## 3 **Response to Comment SCAG-1**

4 Thank you for your review and comment on the Draft EIR. As indicated in your letter, your review of the  
5 Draft EIR determined that the analysis and proposed Project, where applicable, is consistent with the  
6 SCAG Regional Transportation Plan Goals and with the Compass Growth Visioning Principals 1 and 2.

## 7 **Response to Comment SCAG-2**

8 Your letter indicated that your staff could not determine based on the information in the Draft EIR  
9 consistency of the proposed Project with Compass Growth Visioning Principals GV3.4 and GV3.5.  
10 These principals deal with support of local and state fiscal policies that encourage balanced growth and  
11 encourage civic engagement. The proposed Project is the improvement of an existing boat shop within a  
12 highly industrialized portion of the Port. The boat shop's continued existence within the Port of Los  
13 Angeles would continue to provide valuable jobs and services support balanced growth. As for  
14 encouraging civic engagement, the Al Larson Boat Shop has been an important tenant at the Port, as well  
15 as an important business for the local community, since 1903.

## 16 **Response to Comment SCAG-3**

17 As indicated in your letter, your review of the Draft EIR determined that the analysis and proposed  
18 Project, where applicable, are consistent with Compass Growth Visioning Principal 4.

## 19 **Response to Comment SCAG-4**

20 Thank you for your comment.  
21

# CITY OF LOS ANGELES

CALIFORNIA

DEPARTMENT OF  
PUBLIC WORKS

BOARD OF  
PUBLIC WORKS

COMMISSIONERS

BUREAU OF SANITATION

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COMMISSIONER

February 28, 2012

VALERIE LYNNE SHAW  
COMMISSIONER

WASTEWATER ENGINEERING SERVICES DIV.  
2714 MEDIA CENTER DRIVE  
LOS ANGELES, CA 90065  
FAX: (323) 342-6210 OR 342-6211

Christopher Cannon, Director of Environmental Management  
PORT OF LOS ANGELES  
425 S Palos Verdes Street  
Post Office Box 151  
San Pedro, CA 90733-0151

File: SC.CE.



Dear Mr. Cannon:

## Al Larson Boat Shop Improvement Project – Draft EIR

This is in response to your January 19, 2012 letter requesting a review of your proposed boat shop improvements by replacing facilities, dredging, and construction of maintenance and repair capabilities. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

## WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

### **Projected Wastewater Discharges for the Proposed Project:**

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<b>Proposed</b>			
Office	150 GPD/1000 SQ.FT	2,400 SQ.FT	360
Commercial	80 GPD/1000 SQ.FT	12,411 SQ.FT	993
Employees	24 GPD/CAPITA	130 CAPITA	3,120
<b>Total</b>			<b>4,473</b>

BOS-1



## SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 15-inch line on Seaside Ave. The sewage from the existing 15-inch line feeds into the Terminal Way Pumping Plant before splitting into a 20-inch line and 24-inch line on Terminal Way. The flow from both 20-inch and 24-inch lines join and finally discharge into the Terminal Island Treatment Plant. According to our existing pumping data, the Terminal Way Pumping Plant appears to have sufficient capacity to handle the proposed flow. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 20-inch and 24-inch lines cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
15	Seaside Ave	52	775,319 GPD
20	Terminal Way	*	1.02 MGD
24	Terminal Way	*	678,798 GPD

\* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Terminal Island Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

Sincerely,

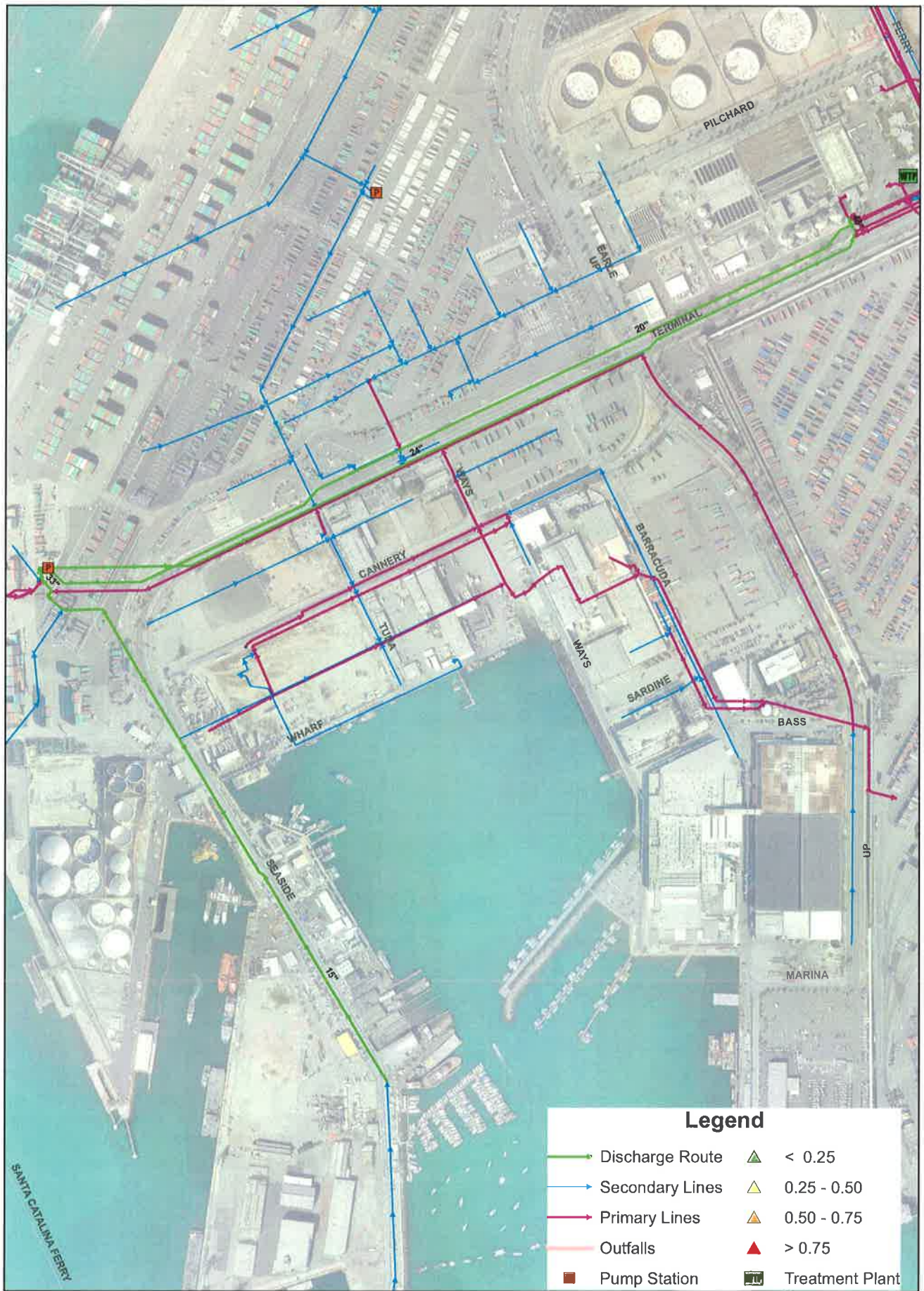


Ali Poosti, Acting Division Manager  
Wastewater Engineering Services Division  
Bureau of Sanitation

Attachments:  
Figure 1 – Sewer Map

cc: Kosta Kaporis, BOS  
Daniel Hackney, BOS  
Rowena Lau, BOS



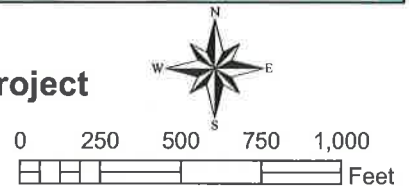


Wastewater Engineering Services Division  
 Bureau of Sanitation  
 City of Los Angeles



Thomas Bros Data reproduced with permission granted by THOMAS BROS MAP

**FIGURE 1**  
**Al Larson Boat Shop Improvement Project**  
**Sewer Map**



### 1    **2.3.3        Local Government**

## 2    **City of Los Angeles, Bureau of Sanitation, Watershed** 3    **Engineering Services Division (BOS)**

### 4    **Response to Comment BOS-1**

5    Thank you for providing information on the flow gauging process and existing sewer capacity. The  
6    existing sewers in Seaside Avenue and Terminal Way do not serve an extensive or overly developed area  
7    and are located near the Terminal Island Water Reclamation Plant (TIWRP). In addition, as the Draft  
8    EIR and your comment letter noted, TIWRP has sufficient capacity to treat the sewage flows. The LAHD  
9    expects the flow gauging exercise to confirm that adequate capacity exists. As the Commenter noted, this  
10    will be confirmed as part of the permit process during which time the specific sewer connection point for  
11    the proposed Project will be identified.



March 5, 2012

**Submitted by email**

Port of Los Angeles  
Chris Cannon  
Director of Environmental Management  
425 S. Palos Verdes Street  
San Pedro, CA 90731  
Email: [ceqacomments@portla.org](mailto:ceqacomments@portla.org)

**Re: Al Larson Boat Shop Improvement Project Draft Environmental Impact Report, ADP #080627-072, SCH #2010091041**

Dear Mr. Cannon:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Al Larson Boat Shop Improvement Project at the Port of Los Angeles. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,500 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County.

The Al Larson Boat Shop (ALBS) is among the longest-running businesses at the Port of Los Angeles, and one of the few related to the tradition of shipbuilding and repair to remain. The proposed demolition of three of the five identified historic resources on the site jeopardizes this link to the industrial trades that served and supported all the maritime activities at the Port. Feasible preservation alternatives and mitigation measures are available that will substantially reduce or eliminate impacts to historic resources while meeting the long-term goals of ALBS.

LAC-1

**I. Historic Resources at the Al Larson Boat Shop**

Established elsewhere at the Port in 1903 to build and repair wooden fishing vessels for local fisherman, ALBS relocated to its current location at Berth 258 near the mouth of Fish Harbor in 1924. Over time, the ALBS site and buildings have been altered to accommodate the demands of its evolving business, but they remain recognizable as part of the Port's shipbuilding and industrial history.

The proposed project identifies a redevelopment area encompassing a portion of the area leased by the ALBS business. Eight of the ten buildings leased by ALBS are in the redevelopment area, as well as most of the land area and some water acreage. Of these eight structures, five have been determined to be historic resources.

As evaluated by SWCA Environmental Consultants in January 2010, Al Larson Boat Shop's original 1924 Office and Workshop Complex, comprised of three separate structures identified as A1, A2 and A3, is eligible for the California Register of Historic Resources for its association with the development of the Los Angeles ship-building and fishing industries between 1924 and 1959.

The Machine Shop Complex, constructed in 1938 as an industrial machine shop for a boat engine business but acquired by ALBS in the late 1960s, is also eligible for the California Register. Consisting of two independent structures as C1 and C2, the Machine Shop Complex is significant for its association with and as an example of maritime industrial heritage, which is becoming increasingly rare at the Port.

## **II. Proposed Demolition of Buildings A2, A3, and C1 is an Unavoidable Significant Impact and Will Have a Cumulative Impact on Historic Resources at the Port**

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>1</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>2</sup>

Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.<sup>3</sup> Based on objective analyses found in the EIR, agencies "shall mitigate or avoid the significant effects on the environment...whenever it is feasible to do so."<sup>4</sup> The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.<sup>5</sup>

The proposed project seeks to demolish Buildings A2 and A3 in the Office and Workshop Complex, as well as Building C1 in the Machine Shop Complex. The removal of these three California Register-eligible buildings would result in significant unavoidable adverse impacts to cultural resources under CEQA, and potentially jeopardize the integrity and historic status of Buildings A1 and C2 that would remain. Additionally, the demolition of these buildings will exacerbate the threat to the Port's industrial heritage that is underway through proposed demolition projects at the Pan-Pacific Fisheries Cannery Buildings, Canner's Steam Company

<sup>1</sup> Public Resources Code §21001 (b), (c).

<sup>2</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

<sup>3</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>4</sup> PRC § 21002.1.

<sup>5</sup> PRC § 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185).

Plant, and Southwest Marine Shipyard. The ALBS project is demonstrates further the pattern and practice of the Port’s needless demolition of its historic properties, and as such, is considered by the Draft EIR to have a cumulatively significant adverse impact.

LAC-2  
Cont'd

### **III. Feasible Preservation Alternatives Exist that Avoid or Significant Lessen Adverse Impacts and Meet Most of the Basic Project Objectives**

Alternative 3: Retention of Historic Buildings avoids destruction of historic resources at ALBS and can substantially lessen the project’s significant adverse environmental effects while meeting many of the project objectives. The underlying purpose of the project is to comply with water quality regulations and modernize the boat shop facilities with new concrete piers for a mobile boat hoist system. Dredging sediment from the harbor and encapsulating the contaminated soil in two CDF cells that creates additional land for ALBS can still be accomplished through this alternative. Retaining the historic buildings additionally would continue to provide encapsulation of legacy contaminants and avoid exposing the contaminants, thus requiring necessary remediation and clean-up.

LAC-3

Despite one of the project objectives impermissibly calling for removing buildings/structures in order to modernize and reconfigure the facility -- which prevents objective consideration of alternatives that avoid demolition -- Alternative 3 has not been shown to be infeasible. Alternative 3 would still allow ALBS to utilize a 100-ton boat hoist to lift vessels onto land for repair, and options should be explored to accommodate the 600-ton hoist, or its functional equivalent, while retaining Buildings A2, A3, and C1 in this alternative. For instance, reconfiguration of the CDF cells, creating more land at the water edge, or utilizing other available nearby land outside the project boundaries may allow the turning radius necessary for the 600-ton hoist or more direct access to the newly-created land area. The use of alternate equipment such as cranes, marine railways or other potentially space-saving machinery should also be considered.

LAC-4

Furthermore, according to the numbers provided in the analysis for Alternative 2: Reduced Project: Limited Demolition, there appears to be sufficient clearance for the 600-ton hoist to avoid demolition of Building C1, and a mere 1-foot difference if Building A3 was retained. The Draft EIR fails to establish the necessity of a 600-ton hoist, based on ALBS’s cliental or the anticipated business demand. The Final EIR should evaluate the market demand for a 600-ton hoist at ALBS, and consider a smaller hoist, such as a 400-ton hoist, that may require less clearance and turning radius while meeting ALBS’s expanded needs. In such an instance, Alternative 2, which limits the demolition of historic buildings at the site, may be the preferred alternative if the historic status of the remaining buildings can be maintained. At a minimum, no historic structures at ALBS should be demolished until the appropriate-size equipment is determined.

LAC-5

### **IV. The Project Boundaries Are Flawed and Fail to Adequately Reflect the Scope of the Proposed Project**

The project boundaries are limited to approximately half of the ALBS leasehold, and appear to exclude the parking lot in which the 600-ton boat hoist will operate. This arbitrary distinction fails to fully consider the area that will be impacted by the proposed project, including construction and operation impact on the Bethlehem Steel (Southwest Marine) Administration

LAC-6

Building, which is a contributor to the Bethlehem Shipyard Historic District, and now within the fence line of the ALBS site. This building has already been isolated from the remainder of its historic district at the Southwest Marine site through a rerouting of Seaside Avenue in 2004 to accommodate a slipway at ALBS. The proposed extension of ALBS's leasehold to include the parking lot already used by ALBS and surrounding the Administration Building in order to operate the 600-ton hoist will have a direct impact on this historic resource. Not only could the hoist physically damage the Administration Building, but the loss of available parking potentially jeopardizes options for its future reuse.

LAC-6  
Cont'd

Regardless of the existing leaseholder, the Final EIR should redefine the project boundaries to reflect the true scope of the project and include the parking lot and the Bethlehem Steel Administration Building as areas impacted by the proposed project. Including the Administration Building in the project boundaries also provides an opportunity to consider the rehabilitation of this historic resource to serve as an office building for ALBS. A new office building is proposed in Phase 3 of the current project but the Draft EIR fails to identify where it would be located within the project boundaries.

## V. Additional Mitigation Measures Should Be Implemented

Proposed mitigation measures in the Draft EIR -- including HABS and photo documentation and a retrospective website -- would not reduce the impact of demolishing Buildings A2, A3, and C2 to a less than significant level. Under CEQA, it is widely recognized that “[a] large historical structure, once demolished, normally cannot be adequately replaced by reports and commemorative markers.”<sup>6</sup>

If the historic buildings are ultimately slated for demolition, the Port should make every effort to dismantle and relocate these structures elsewhere at the Port or to appropriate locations offsite with reasonable financial incentives attached as part of any RFP or bid process. The \$3.5 million to \$12 million estimate for relocation included in the Draft EIR is a wide range and seems out of scale with the simple timber-framing systems of the buildings, similar to barn construction techniques. Further evaluation should be required in the mitigation to establish more precise figures and analysis that will aid in the successful dismantling and relocation. This should assess the feasibility of leaving the buildings intact and/or moving them “in-whole.” Any relocation and reuse should also adhere to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

LAC-7

As mentioned above, no demolition permit should be issued until the size of the boat hoists have been identified based on anticipated market demand and the clearances and turning radius re-evaluated by the Port to determine if any building demolition is necessary. Rehabilitation and reuse, or at minimum, stabilization of the Bethlehem Steel Administration Building should also be included as a mitigation measure. As this building is directly impacted by the project, mitigation which fully secures and stabilizes this building is warranted, and should also fully adhere to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

---

<sup>6</sup> *League for Protection of Oakland's Historic Resources v. City of Oakland* (1997) 52 Cal.App.4<sup>th</sup> 896, 909.

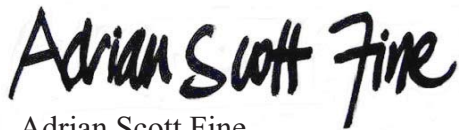
**VI. The Relationship of the Proposed Project to the Port's Terminal Island Master Plan Efforts is Unclear**

In addition to updating its Port Master Plan, the Port of Los Angeles has initiated a master land use planning process for Terminal Island in which ALBS appears to occupy a larger site than the project boundaries or even the current lease area. The Draft EIR fails to consider additional phases and future expansion of the ALBS site as envisioned by the Terminal Island and Port master plans. If expansion of ALBS is proposed, as indicated in the plan recently endorsed by members of the Harbor Commission, the project should be coordinated and re-evaluated to consider the project as a whole, including the cumulative impacts of the master plan(s).

LAC-8

Thank you for the opportunity to comment on the Al Larson Boat Shop Improvement Project Draft EIR. We look forward to working with ALBS and the Port in developing an appropriate solution that preserves the historic qualities of ALBS. Please feel free to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

cc: Councilmember Joe Buscaino, Council District 15  
Office of Historic Resource, City of Los Angeles  
San Pedro Historical Society

## 2.3.4 Organizations

### Los Angeles Conservancy (LAC)

#### Response to Comment LAC-1

As discussed throughout the Draft EIR (in particular Chapter 6, Analysis of Alternatives), any alternative that would not include the removal of Buildings C1, A2 and A3 at the site would only meet some of the Project objectives, notably allowing the site to comply with its WDR and NPDES requirements and includes partial clean up of legacy contaminants (i.e., sediments within Fish Harbor). However, because the existing historic buildings would not be demolished or relocated, implementation of Alternative 3 would not result in the complete modernization of the existing boat yard facilities, provide for the same level of operational efficiency, or meet the long term business goals of ALBS, as would occur under the proposed Project. Further, retention of potentially historic buildings would constrain the opportunities to redesign the site to fully and most effectively comply with NPDES requirements, upgrade the existing infrastructure, and reduce the ability to clean up site legacy contaminants from beneath the existing pavement and buildings. Alternatives have been analyzed and found to not meet project objectives of modernizing, expanding and optimizing the ALBS.

#### Response to Comment LAC-2

Section 21081 of the California Public Resources Code and Section 15091 of CEQA (CEQA Guidelines) require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more written findings for each such impact. According to Section 21081, “no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
  1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
  2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
  3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.”

As indicated in the Draft EIR, the proposed Project would result in the following unavoidable significant adverse impacts after mitigation:

1. Significant localized air quality impacts may occur during the construction of the proposed Project.



- 1
- 2 2. Development of the proposed Project would necessitate the removal of four of six of the
- 3 potentially historic buildings at the site. Therefore, even with implementation of mitigation
- 4 measures, an unavoidable adverse impact to historic resources would remain.
- 5
- 6 3. Temporary significant noise impact associated with the proposed Project during construction.
- 7
- 8 4. Potential cumulative impacts associated with Air Quality, Meteorology and Greenhouse Gases,
- 9 Cultural Resources, and Noise (construction only).

10 Having properly disclosed within the Draft EIR that the proposed Project would result in a significant  
11 impact to existing historic resources, which is the issue of concern raised in this comment, the Draft EIR  
12 recommends all feasible mitigation measures to reduce the impact, consistent with CEQA requirements.  
13 Such mitigation measures are presented in Section 3.4, Cultural Resources, of the Draft EIR (refer to  
14 pages 3.4-2, -3, -31, -33, and -36 for description of mitigation measures) which includes MM CUL-2:  
15 Historic Resource Recordation and MM CUL-3: Recordation Posting. Additionally, Chapter 6, Analysis  
16 of Alternatives, of the Draft EIR addresses potential alternatives that could avoid or substantially reduce  
17 significant impacts to historic resources as follows:

- 18 • Alternative 1 – Reduced Project: Water Quality Improvements
- 19 • Alternative 2 – Reduced Project: Limited Demolition
- 20 • Alternative 3 – Retention of Historic Buildings
- 21 • Alternative 4 – Relocation of Historic Buildings

22 However, as indicated in the Draft EIR, such alternatives were determined to not meet many or most of  
23 the Project objectives. Although Alternatives 2 and 4 would reduce impacts on historic resources,  
24 impacts would not be eliminated and would remain significant and unavoidable.

25 As detailed in Chapter 5, Cumulative Analysis, of the Draft EIR (specifically Section 5.2.4.3), although  
26 demolition of historic structures in the redevelopment area of the Project site is a Project specific impact,  
27 there are other historic structures within the Project vicinity that have similar historical significance (i.e.,  
28 locally significant for its association with the development of the Los Angeles shipbuilding and fishing  
29 industries between 1924 and 1959, such as the Southwest Marine Facility and Chicken of the Sea  
30 Cannery). As a result, the impacts of the proposed Project would make a cumulatively considerable  
31 contribution to a significant cumulative impact under Cumulative Impact CUL-2.

32 The proposed Project would maximize the primary project objectives of meeting the surface water quality  
33 requirements mandated by the Los Angeles RWQCB. Thus, the proposed Project provides long-term  
34 benefits by safely managing surface water runoff, which would protect public health and safety. Another  
35 benefit of the proposed Project is that it provides for the cleanup of legacy contamination on land (under  
36 the buildings proposed for removal), in Fish Harbor (removal of three marine railways from use and  
37 dredging of contaminated sediment and creation of CDF's for disposal/reuse), resulting in the creation of  
38 20 to 30 additional permanent jobs once the facility is modernized.

39 Therefore, the proposed Project's benefits outweigh and override its unavoidable significant impacts for  
40 the reasons stated above. This conclusion has been reached after having done all of the following: (1)  
41 applied all feasible mitigation measures, (2) rejected other Project alternatives, (3) recognized all  
42 significant, unavoidable impacts associated with the proposed Project, and (4) balanced the benefits of the  
43 Project against its determining the impacts that would be significant and unavoidable.

1 As for the Commenter's opinion on the LAHD's treatment of historic properties, the comment is noted.  
2 The LAHD recently completed a historic survey of Terminal Island with the cooperation of the Los  
3 Angeles Conservancy to comprehensively identify potential historic resources within that area of the Port  
4 to support the Port Master Plan Update with which the Los Angeles Conservancy is involved. Since  
5 2000, LAHD has carried out over 38 cultural history surveys involving more than 100 buildings and  
6 structures. Where practicable and within the bounds of the State Tideland Grant, the State Tideland Trust  
7 Doctrine, and the Coastal Act. LAHD prefers the reuse of buildings eligible for, or listed, as federal, state  
8 or local cultural resources. Examples are the College of Oceaneering Building as the Departmental  
9 Archive Annex, Municipal Ferry Building as a Maritime Museum, Fireboat House No. 1 for housing the  
10 Port of Police Dive Team, proposed reuse of Berths 57-60 Transit Sheds in connection with a Marine  
11 Science Center, the proposed use of the Bekins Warehouse as a Museum/Archive and the U.S.  
12 Immigration Station used for offices and until recently a restaurant. There are no current plans to  
13 demolish Pan-Pacific Cannery, Canner's Steam Plant, Southwest Marine Facility, or Southwest Marine  
14 Administration Building. There are ongoing efforts to find a tenant for the adaptive reuse of the Chicken  
15 of the Sea Cannery, some of whose buildings are eligible for listing as a historic resource. In addition,  
16 LAHD successfully listed the Port's Warehouse No. 1 on the National Register of Historic Places.

### 17 **Response to Comment LAC-3**

18 As the Commenter notes, and as detailed in Chapter 6, Analysis of Alternatives, of the Draft EIR,  
19 Alternative 3 would meet some of the Project objectives, notably allowing the site to comply with its  
20 WDR and NPDES requirements and includes partial clean up of legacy contaminants (i.e., sediments  
21 within Fish Harbor). Although impacts to the potentially historic structures would be completely  
22 eliminated under this alternative, implementation of this alternative would neither result in the complete  
23 modernization of the existing boat yard facilities, provide for the same level of operational efficiency nor  
24 allow ALBS to meet market demand that would occur under the proposed Project. Further, retention of a  
25 potentially historic building would constrain the opportunities to redesign the site to fully and most  
26 effectively comply with NPDES requirements, upgrade the existing infrastructure, and would reduce the  
27 ability to clean up site legacy contaminants from beneath the existing pavement and buildings. Currently  
28 ALBS is space constrained, limiting the number of vessels serviced at one time. Compared to the  
29 proposed Project, Alternative 3 with its retention of the three historic buildings would reduce dry docking  
30 space by as much as 10,500 square feet and preclude access of the 600-ton hoist to the land area created  
31 by the construction of the Phase 2 CDF. Building A2 and A3 do not rest on concrete foundations but on  
32 sand, having no foundations other than footing and piles. The contaminants under these buildings are not  
33 completely isolated from the environment as would be the case with a concrete slab foundation. The  
34 restrictive nature of this alternative would not meet the operational needs of ALBS, including access to  
35 the existing and proposed facilities and would not adequately address legacy landside contamination.

36 Alternative 3, which entails retention of Buildings A2, A3 and C1, limits the modernization of the site  
37 and affects the ability of the site to meet the local demands of the boat repair industry by limiting access  
38 to dry docking areas by the 600-ton boat hoist. With only Building D demolished, the length of vessels  
39 that could be moved into the backland for dry docking is limited to 136 feet. With Buildings D and C1  
40 demolished the backland is accessible to vessels up to 196 feet in length (refer to Response to Comment  
41 LAC-4 below and the table in Section 2.5, at the end of this chapter, for a discussion of the need for these  
42 size boats and the trend to service larger vessels). Additionally retention of Buildings A2, A3 and C1  
43 reduces the area available for dry dock by 10,500 square feet. Thus Alternative 3 restricts size of vessels  
44 that can be serviced by ALBS and reduces the area available for dry docking. In addition, the Commenter  
45 incorrectly assumes that leaving the historic buildings in place would provide encapsulation of the legacy  
46 contamination beneath those buildings; this is not the case. Refer to Response to Comment LAC-5 below  
47 for additional information on the maneuvering of vessels around ALBS related to building retention  
48 scenarios.

## 1 **Response to Comment LAC-4**

2 The purpose of the large hoist with its 600-ton capacity is to replace three 350-ton marine railways being  
3 eliminated as part of the Phase 2 CDF to reduce runoff of contaminated water into Fish Harbor and  
4 provide addition land area for ALBS. Without the 600-ton boat hoist ALBS would be limited to dry  
5 docking a maximum of two vessels over 100 tons at once using the floating dry dock and Marine Railway  
6 #4. With the 600-ton boat hoist, the number of vessels over 100 tons that can be dry docked is greater  
7 than two and limited only by available space in which to place the vessels. Utilizing only a 100-ton hoist  
8 would reduce the capacity of the boat yard to service vessels over 100 tons, which would reduce the  
9 future capacity to less than that of current operations. Employing the smaller boat hoist with its 100-ton  
10 capacity would limit the dry docking the of vessels more than 100 tons to Railway #4 or the floating dry  
11 dock; when not otherwise occupied by larger vessels. Thus, use of a 100-ton boat hoist in place of a 600-  
12 ton hoist would limit the facility's ability to service vessels over 100-tons.

13 One way to accommodate the 600-ton boat hoist while retaining Buildings A2, A3 and C1 is to  
14 reconfigure the CDF cells to create more land. The two CDFs were designed to limit the environmental  
15 impacts associated with filling Fish Harbor by minimizing the amount of landfill while meeting the goals  
16 of removal of the three marine railways, and redirecting water runoff away from Fish Harbor and into the  
17 on-site stormwater treatment system. However, if the CDF's were expanded, this would increase the  
18 impact under Impact BIO-2, and also this is not feasible because extension of the CDFs and boat  
19 hoist/travel lift piers further into Fish Harbor would impede and possibly prevent access into Fish Harbor  
20 by larger tugs and barges (Mike Rubino, Chief Port Pilot, June 5, 2012); thereby creating a new  
21 potentially significant safety hazard and new potentially significant impact (see attached Figure LAC-1a  
22 and Figure LAC-1b).

23 The Commenter suggested that modernization and reconfiguration of the facility through utilizing other  
24 available nearby land outside the project boundaries. This is also not feasible because there is no vacant  
25 or available land adjacent to the Project site. The property to the south of the Project boundary is part of  
26 the functioning boat yard and would remain as such, and south of that is a marina. To the north is an  
27 existing fuel depot (ExxonMobil/General Petroleum facility) that is not available and to the west is  
28 Seaside Avenue. Therefore, no contiguous land exists or could be created beyond what is proposed under  
29 the proposed Project that would met the objectives of the Project, while taking into consideration existing  
30 land uses and leases and maintaining safe access to Fish Harbor.

31 As for the Commenter's suggestion that alternate and potentially space-saving equipment/machinery  
32 could be used in lieu of the proposed 600-ton hoist, is noted. There are limited options for replacement of  
33 the 600-ton hoist. Other ship yards on the west coast employ boat hoists (travel lifts), cranes, shiplifts  
34 (syncrolift), marine railways, dry docks or some combination of these methods (see the table at the end of  
35 this chapter, under Section 2.5, for a list of the medium active boat yards along the west coast). Cranes  
36 are restricted to removal of smaller vessels and would not suffice for the target market of barges and tugs.  
37 Movement of the vessel to another location for servicing requires it placement on a chassis for transport.

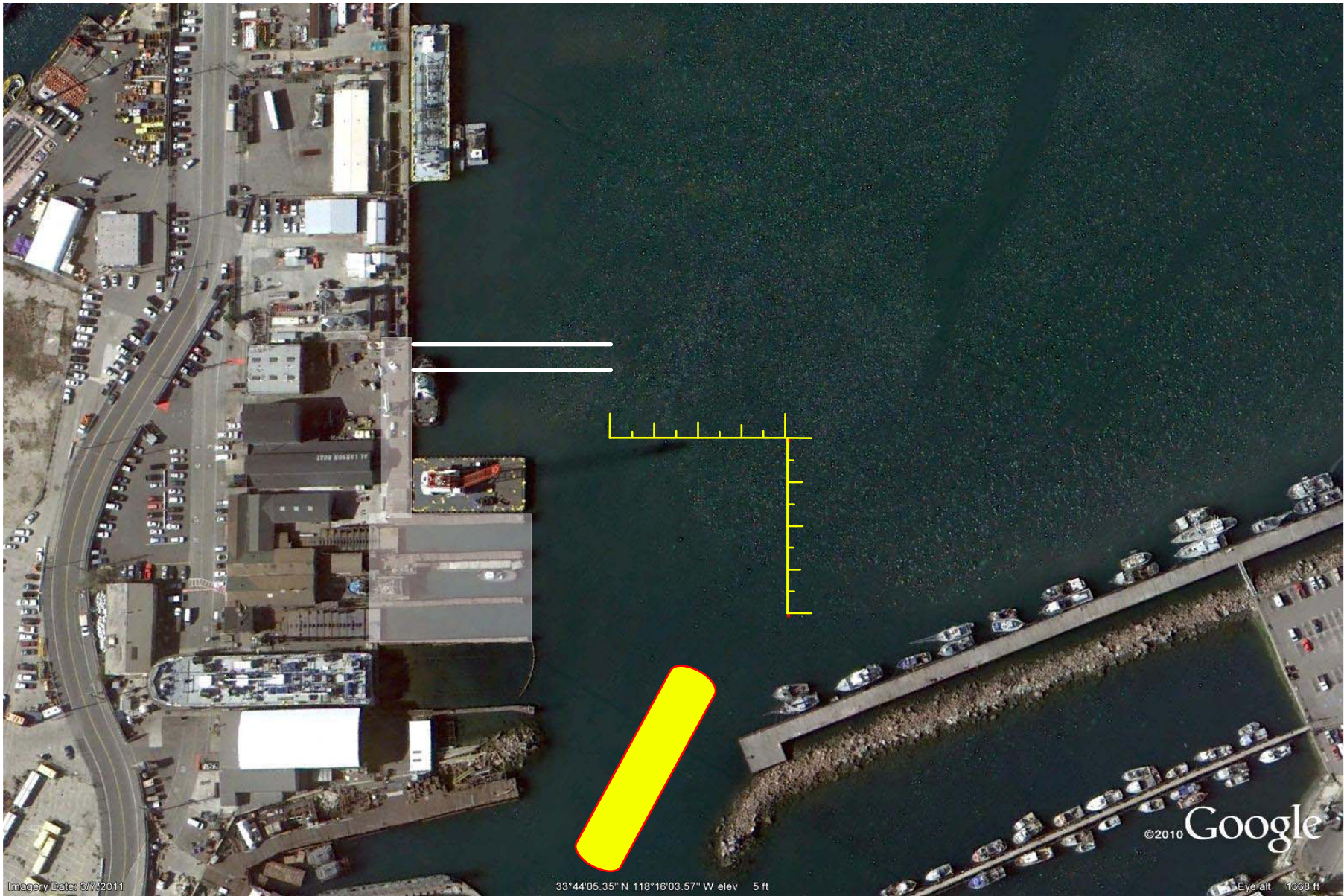


Figure LAC-1a

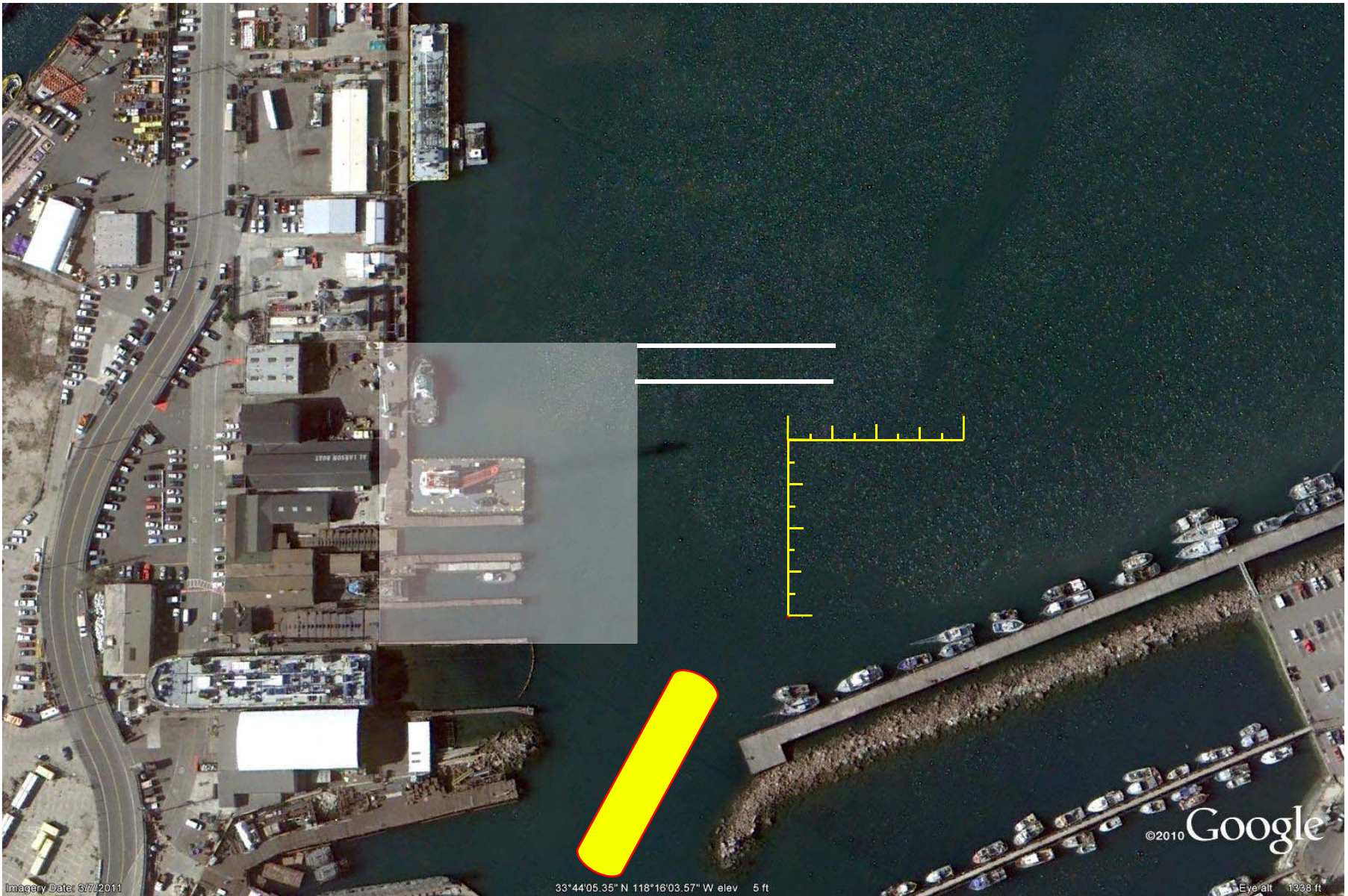


Figure LAC-1b

1 A shiplift system positions a vessel over an underwater platform then lifts both clear of the water. The  
2 vessel is then serviced or moved to another location for service. Movement of the vessel to another  
3 location in the shipyard requires its placement on a chassis, wheeled or rail. The shiplift is very similar to  
4 the boat hoist system, requires similar piers and would not offer any benefit over the boat hoist system at  
5 ALBS. A third option is use of marine railway, such as those currently at ALBS. Floated over a cradle  
6 on the railway the vessel is then hauled out of the water. Again, the vessel must be conveyed into the  
7 boat yard on a chassis or remain on the railway for servicing. Because of the need for the railway to  
8 extend into the water there is continued threat of water pollution from this method. Use of the CDF area  
9 for marine railways would reduce the reduce space available for dry docking and still represent a potential  
10 source of contaminated runoff into harbor waters. Further, marine railway use is tied to the tidal cycles  
11 and does not provide the flexibility of the boat hoist/travel lift system. Either a land based or floating dry  
12 dock would not greatly increase the capacity of ALBS as dry docks usually service one vessel at a time  
13 while the boat hoist/travel lift system allows for servicing of vessel limited only by storage space. The  
14 utilization of space could be maximized if the ships were removed from dry dock and transferred to the  
15 ALBS backland and Phase 2 CDF. However, in all cases, any method including the 600-ton boat hoist  
16 have similar access limitations and additional space needed for storage therefore would necessitate  
17 removal of the Buildings C1, A2, and A3. Also, a boat hoist is more efficiently than the above systems as  
18 it combination both lifting and conveyance within one piece of equipment.

## 19 **Response to Comment LAC-5**

20 Currently the ALBS facility is space constrained. One of the objectives of the proposed Project is to  
21 provide additional space for servicing more vessels simultaneously and/or larger vessels. The proposed  
22 Project will, amongst other things, provide additional space for dry docking and open up an otherwise  
23 cluttered facility. This will increase the number off vessels that may be dry docked at one time.  
24 Alternative 2 would allow for some increased capacity at the ALBS site, although to what extent would  
25 depend on which structures are retained. Retention of Building A2 results in a 36-foot access corridor  
26 between Building A2 and Marine Railway #4, which would preclude access of the 600-ton boat hoist to  
27 the Phase 2 CDF. The space for direct transfer of vessels by the 600-ton boat hoist from Phase 1 CDF to  
28 Phase 2 CDF is not possible given there is only a 40-foot access corridor between the wharf edge and  
29 Building A1.

30 In addition to limitations of access caused by the width of the boat hoist there are also vessel length  
31 limitations on access. LAHD Engineering Division undertook a reexamination of space available for  
32 maneuvering vessels around ALBS with Buildings C1 and A3 both present and absence. Without  
33 Buildings C1 and A3 present, the maximum length of vessel that could be maneuvered into the Phase 2  
34 CDF was 195 feet. With both or either building present, the maximum vessel length drops to 136 feet  
35 (refer to Figure LAC-2).

36 Retention of Building C1 reduces the potential dry docking area by 2,680 square feet and limits the size  
37 of vessels that can access the backland and Phase 2 CDF to 136 feet.

38 In preparing the response to this comment, an error was discovered in the Operational Analysis for  
39 Alternative 2 in Chapter 6 of the Draft EIR. Retention of Building A3 would provide a 76-foot, not a 58-  
40 foot, corridor between Building A3 and Marine Railway #4. The reexamination took this wider corridor  
41 into account, but again access was restricted to vessels 136 feet or less. Also, with retention of Building  
42 A3 the area available for dry docking is reduced by 3,770 square feet.

43 The purpose of the 600-ton hoist is to replace three 350-ton marine railways eliminated as part of the  
44 Phase 2 CDF. The 600-ton boat hoist will increase the facility's capacity to handle vessels in the 350- to  
45 600-ton size range, which is currently limited to two at one time using the floating dry dock and Railway  
46 4. As part of the planning process, the tenant (Al Larson Boat Shop) reviewed other size hoists, such as a  
47 400-ton hoist. A 400-ton boat hoist, with lifting capacity of 400 tons and 50-foot width and 76-foot

1 outside turning radius, could better access the Phase 2 CDF with the retention of Building A3. However,  
2 the 400-ton boat, because it is smaller in size, would be limited in the range of vessels it can transport.

3 In any situation, Alternative 2 would limit the facility's operational capacity by restricting access to  
4 vessels no more than 136 feet in length and reducing the available area for dry docking by 2,700 to 7,800  
5 square feet depending on the mix of buildings retained. Further, retention of a potentially historic  
6 building would constrain the opportunities to redesign the site to fully and most effectively comply with  
7 NPDES requirements upgrade the existing infrastructure, and it would reduce the ability to clean up site  
8 legacy containments from beneath the existing pavement and buildings. This alternative would not be  
9 feasible as the restrictive nature of the improvements would not allow the Project to meet its objectives.

10 Refer to the Figure LAC-2 for a graphic representation of this travel lift ship size analysis described  
11 above.

12 In addition, ALBS is one of the few remaining local medium boat yards in the Ports of Los Angeles and  
13 Long Beach, as well as southern California and the west coast. Refer to the table at the end of this  
14 chapter, Section 2.5, for information on the medium active boat yards along the west coast.

15 The Port currently supports three repair facilities; one that services recreational vessels and another that  
16 can haul out ships up to 100 feet in length with a maximum weight of 150 tons. The third is ALBS, with  
17 three marine railways with a capacity of ships of 112 to 131 feet with a maximum weight of 350 tons, one  
18 marine railway with a capacity for ships 265 feet and a maximum weight of 1,200 tons and a floating dry  
19 dock with a capacity of 250 with a maximum weight of 1,000 tons in addition to servicing vessels in-  
20 water up to 450 feet. The Port of Long Beach has two repair facilities for smaller ships and a facility that  
21 can haul vessels up to 150 feet with a maximum weight of 300 tons and service vessels in-water up to 350  
22 feet. The current ability to haul out vessels above 150 tons and 131 feet is limited to ALBS and the  
23 facility in the Port of Long Beach. When vessels above 300 tons are considered, ALBS is the only option  
24 unless one travels to San Diego Bay or San Francisco Bay or beyond. The capacity for hauling out and  
25 service vessels over 350 tons or 131 feet is limited to two at one time using ALBS's one large marine  
26 railway and its floating dry dock. After modernization and replacement of the three 350-ton marine  
27 railways by the 600-ton boat hoist, ALBS will be able to remove vessels in the 350 to 600 tons range,  
28 with a length up to 195 feet and position them in various configurations, limited only by the available  
29 backland.

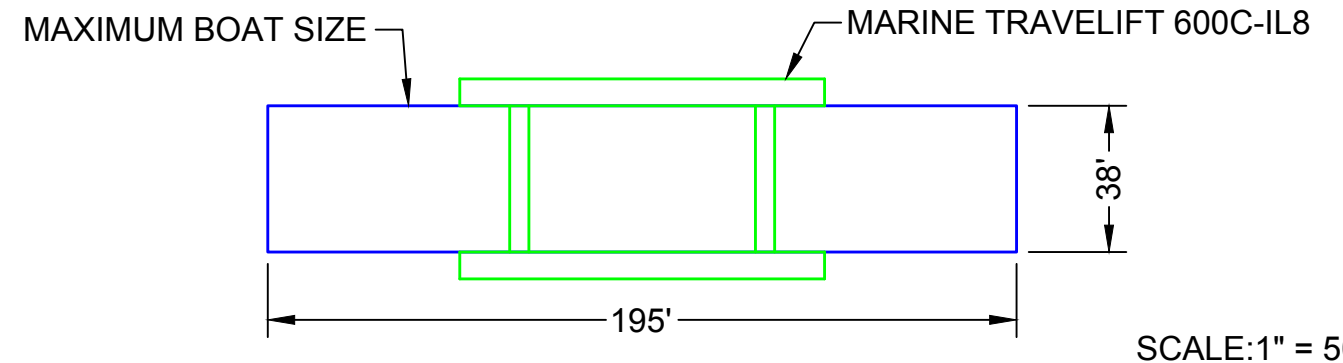
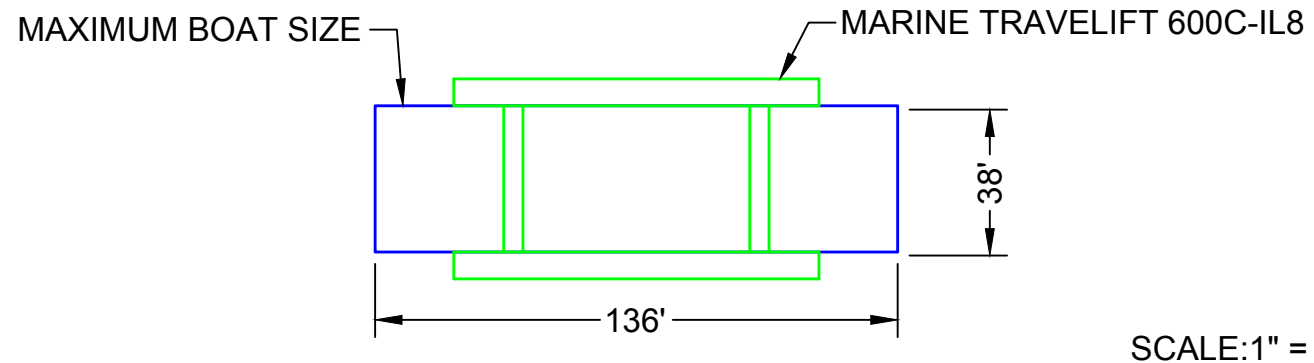
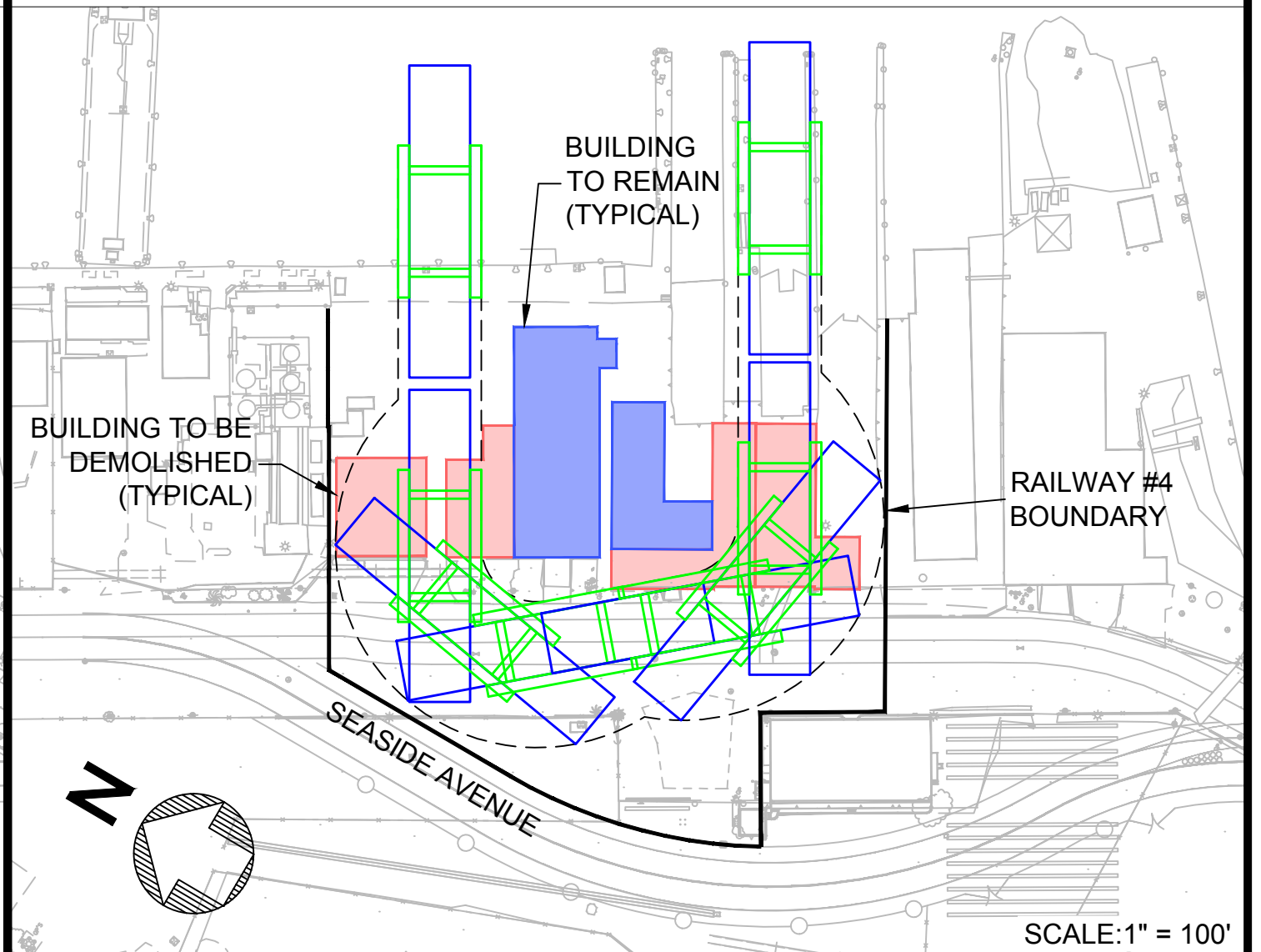
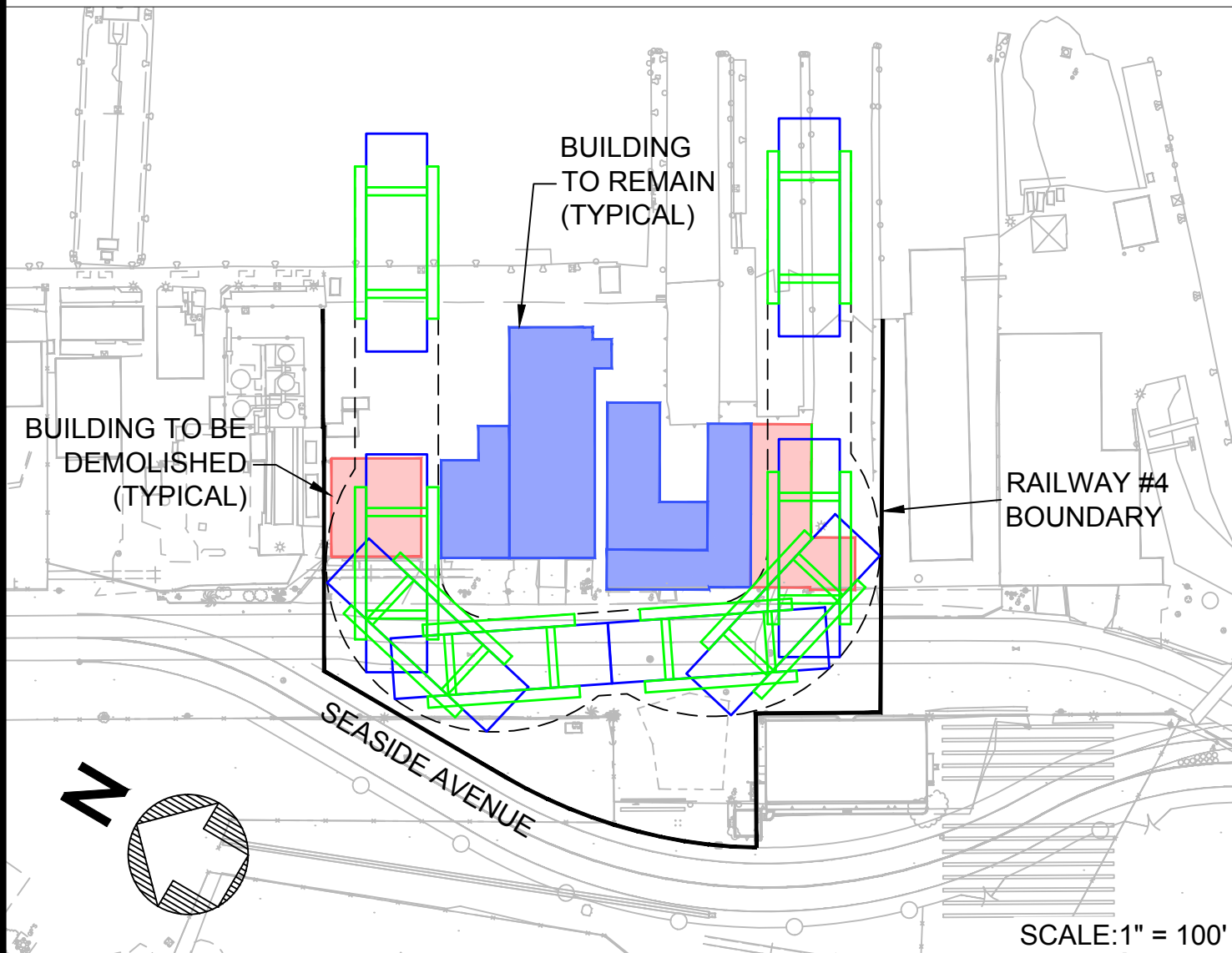
30  
31 In a market analysis, LAHD identified the only market for growth in boatyard services for commercial  
32 vessels appears to be barges and tugs. Such sized vessels could be serviced in-water or at the redeveloped  
33 Al Larson facility" (Boatyard Analysis: A Review of Boatyard Market Demand Data - January, 2012).

34 A survey of vessels that have used or could use ALBS finds 34 percent are of the length and weight that  
35 require a 600-ton boat hoist. In order to service this growing market, the proposed Project estimates that  
36 with the improvement to ALBS it will enable the facility to service more than two such vessels at a time.  
37 This 34 percent does not take into account the barges, crew boats, naval vessels, yachts and dinner  
38 cruisers larger than 136 feet. Thus, retention on any of the historic buildings would limit the capacity of  
39 ALBS to service vessels in the size range of 136 to 195 feet.

40  
41

ALTERNATIVE 2 - TWO BUILDINGS (D AND A2) DEMOLISHED

PROPOSED PROJECT - FOUR BUILDINGS (D, C1, A3, A2) DEMOLISHED



NO.	DATE	DRAWN	REVISIONS -	CH'KD	APP'D	SCALE: AS SHOWN	RECOMMENDED FOR APPROVAL	AL LARSON BOAT SHOP IMPROVEMENTS PROJECT	
						DRAWN: J. C. BROWN	CHIEF OF DESIGN	<b>TRAVELIFT SHIP SIZE ANALYSIS</b>	
						CHECKED:	ASSISTANT CHIEF HARBOR ENGINEER		
						DESIGNED: J. C. BROWN	CHIEF HARBOR ENGINEER	CHIEF HARBOR ENGINEER	THE PORT OF LOS ANGELES <b>ENGINEERING DIVISION</b> 425 S. PALOS VERDES STREET SAN PEDRO CA 90731-3309
						ENGR/ARCH			

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## 1 **Response to Comment LAC-6**

2 Figure 2-3 from Chapter 2 of the Draft EIR has been revised to clarify and better illustrate the boundary  
3 of the proposed Project (refer to Chapter 3, Modifications to the Draft EIR, of the Final EIR for the  
4 revised figure). The portion of ALBS and Fish Harbor where proposed improvements will occur are  
5 bounded by the dashed line in Figure 2-3), the existing ALBS leasehold proposed for renewal are  
6 highlighted in yellow and additional land and water areas for the proposed ALBS leasehold are  
7 highlighted in green.

8 The Draft EIR describes the Southwest Marine Administration Building's relationship to the site and the  
9 proposed Project. The boundary of the proposed Project is appropriately defined. Although located next  
10 to ALBS, the Southwest Marine Administrative Building is owned by the BAE Systems and has never  
11 been part of the ALBS lease area and not part of the project. The proposed Project was designed, and the  
12 environmental impacts analyzed, considering the modernization and increased efficiency of the facility  
13 with the Southwest Marine Administration Building at its current location. The building is vacant, there  
14 is currently no proposed use for the building and hence the issue of parking is speculative. Also, this  
15 space is necessary and identified for ALBS expansion. However, should an application concerning the  
16 building by its owner be submitted to the LAHD for review, which could include restoration and reuse of  
17 the building; it will be subject to the CEQA review process. The size of the new office, which if built,  
18 would be a maximum of 2,400 square feet. Instead of a permanent office building, ALBS is also  
19 examining using temporary trailers on an as-needed basis based on operational need. Potential locations  
20 for either building or trailers include, east of Building A1 or the far northern segment of the lease hold.

## 21 **Response to Comment LAC-7**

22 The comment is noted and has been incorporated into the Final EIR for review and consideration by the  
23 decision-makers prior to any action on the proposed Project. Chapter 6, Analysis of Alternatives, of the  
24 Draft EIR analyzed Alternative 4, Relocation of Historic Buildings. This alternative would be the same as  
25 the proposed Project; however, all of the potentially historic buildings slated for demolition would be  
26 moved to another location within the Port. The relocation site would be one of two redevelopment project  
27 sites within the Port: the San Pedro Waterfront project or the Wilmington Waterfront project (see Figure  
28 6-2 in Chapter 6 of the Draft EIR). Relocation to either of the redevelopment project sites would be  
29 consistent with the LAHD's "Procedures to Implement the Real Estate Leasing Policy," which  
30 incorporates long-range facility planning and objectives in the two redevelopment project areas.  
31 Relocation to either of the two redevelopment project areas would not guarantee that the buildings would  
32 be located on the waterfront, which would result in a loss in the integrity of the structures. In addition,  
33 the relocated buildings would be removed from the other portions of the historic buildings, which would  
34 further result in a loss in the integrity of the complexes. If relocated to either of the two redevelopment  
35 project areas, the structures would need to comply with the Design Criteria associated with the  
36 redevelopment areas (e.g. installation of windows and minimal use of blank wall) that would further  
37 compromise the integrity of the buildings and improvements to meet building code requirements, which  
38 could include alterations to the structures that could result in a loss in the integrity of the structures.  
39 Although all of the potentially historic structures slated for demolition would be relocated, the actual  
40 relocation process would result in a loss in the integrity of the structures. Thus, under this alternative,  
41 impacts on historic resources would be reduced, but not eliminated.

42 This alternative would not be ideal because of the complexity and resulting high cost to relocate the  
43 potentially historic structures. The buildings have a frame structure and would need to be disassembled to  
44 be moved. The reassembly of the buildings would likely require improvements to meet current building  
45 standards and correct any damage that occurring during disassembly. The new site would require  
46 reinforced concrete foundations, reinforced concrete slab on grade and site development documents  
47 similar to what a new building would require (geotechnical report, design documents, permitting

1 documents, building site permitting documents) and structural drawings. It is estimated that the  
2 approximate cost for disassembly and re-assembly at another site of Buildings C1, A2 and A3 could be as  
3 much as \$12 million (refer to Appendix D3 – Structural Assessment Memorandum, of the Draft EIR).  
4 The total cost for the proposed Project is estimated at \$13 to \$16 million; therefore, relocation would  
5 increase total cost of this alternative by as much as approximately 75 percent.

6 In conclusion, the relocation of the potentially historic structures would reduce the impacts of demolition  
7 but it would result in a loss of integrity of the structures due to relocation away from the waterfront,  
8 removal from the other portions of the complexes, possible alteration due to Design Criteria and/or  
9 building code required alterations or damage from relocation, all which have the potential to compromise  
10 the structure's historic significance.

11 As for the Commenter's request to add additional mitigation related to the rehabilitation, reuse and  
12 protection of the Southwest Marine Administration Building (referred to by the Commenter as the  
13 Bethlehem Steel Administrative Building) , the proposed Project would not impact the building. As noted  
14 above in Response to Comment LAC-6, there is currently no proposed use for the building. Also, the  
15 Southwest Marine Administration building is owned by neither LAHD nor ALBS which precludes its  
16 rehabilitation, reuse or stabilization unilaterally by the LAHD or ALBS.

17 However, should an application for future use of the building be submitted to the LAHD for review,  
18 which could include restoration and reuse of the building; it will be subject to a separate CEQA review  
19 process.

## 20 **Response to Comment LAC-8**

21 As the Commenter noted, the LAHD has prepared a Terminal Island Land Use Plan to determine long-  
22 term land use and facility improvements for Terminal Island, including boat yard uses. Given that a  
23 higher level planning process is underway, it is speculative to know the outcome. The LAHD will be  
24 preparing a comprehensive Port Master Plan Update (related-project #31 in Chapter 5, Cumulative  
25 Analysis of the Draft EIR), which includes redevelopment of Terminal Island. While the amendments  
26 addressed changes relating to specific projects, a comprehensive review and update of the PMP is being  
27 completed. This effort is a work in progress and a completion date has not been set.

28  
29

**From:** FBMJET@aol.com [mailto:FBMJET@aol.com]  
**Sent:** Monday, March 05, 2012 7:47 PM  
**To:** Ceqacommments  
**Subject:** Al Larson Boat Shop Improvement Project EIR comments

**The San Pedro Bay Historical Society requests that the potentially historic buildings (A2, A3, C1) at the Al Larson Boat Shop be relocated to another site within the Port of Los Angeles as described in ES.4.2.4 ("Alternative 4--Relocation of Historic Buildings") of the Boat Shop EIR. Demolition of these structures would permanently destroy an important part of what little remains of an integral and significant part of our Port's and community's history: shipyards, ship building and ship repair. These potentially historic buildings should be relocated to a site where their historical importance can be seen and appreciated by all who seek not only to enjoy our history but also who desire to understand our rich maritime history within the context of our community's history. Other historical maritime realia, e.g. photos, tools, etc., will mean little if the buildings that represent them are destroyed. Further, our community, in its wisdom, is preserving its historical houses through overlay zones (e.g. Vinegar Hill HPOZ) and through the adapted reuse of historical structures (e.g. Warehouses 9 and 10). The Boat Shop building are no less worthy of preservation.**

**Members of the Historical Society have toured the Boat Shop site and have talked extensively with its President, Jack Wall. We have no desire to impede the necessary expansion and growth of the business because his business represents an integral part of our maritime history. This expansion and growth can only benefit our community. However, as custodians of San Pedro's history, the Historical Society would be remiss if we did not call for preservation of the three historical buildings at the site, for they stand as a testament to a past era that greatly influenced our community's growth and the Port's development and preeminence.**

**Finally, the Historical Society wishes to see these historical buildings relocated to the San Pedro Waterfront Project (ES.4.2.4) since the relocation to that site would be consistent with the community plan. Additionally, the Historical Society concurs with and endorses the key points raised by the Los Angeles Conservancy in the comments that it made in the Boat Shop Notice of Preparation, particularly with respect to the rationale behind the proposed demolition, and the necessity of developing steps to rehabilitate the historical structures.**

**Sincerely,  
Frank B. Anderson  
President, San Pedro Bay Historical Society  
[fbmjet@aol.com](mailto:fbmjet@aol.com)  
515 North Meyler St.  
San Pedro, California 90731-1840  
H. 310 8339113 C. 310 3875665**

SPBHS-1

# 1 **San Pedro Bay Historical Society (SPBHS)**

## 2 **Response to Comment SPBHS-1**

3 Thank you for your review and comment on the Draft EIR. The comments are noted and have been  
4 incorporated into the Final EIR for review and consideration by the decision-makers prior to any action  
5 on the Project.

6  
7 Please refer to Response to Comments LAC-3 to LAC-7 regarding your concurrence and endorsement of  
8 the Los Angeles Conservancy's key points regarding the rationale behind proposed demolition and the  
9 necessity of developing steps to rehabilitate the historical structures.

10

IN RE THE MATTER OF THE AL LARSON )  
BOAT SHOP IMPROVEMENT PROJECT, )  
PORT OF LOS ANGELES, SAN PEDRO, )  
CALIFORNIA. )  
\_\_\_\_\_ )

Transcript of the  
Draft Environmental Impact Report  
for the Al Larson Boat Shop  
Improvement Project Public Meeting  
Wednesday, February 15, 2012  
San Pedro, California

**SNYDER HEATHCOTE INC.**

REPORTED BY Jamie L. Apodaca, CSR #10990

OUR FILE NO.

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IN RE THE MATTER OF THE AL LARSON )  
BOAT SHOP IMPROVEMENT PROJECT, )  
PORT OF LOS ANGELES, SAN PEDRO, )  
CALIFORNIA. )  
\_\_\_\_\_ )

Transcript of the Draft Environmental Impact  
Report for the Al Larson Boat Shop Improvement  
Project Public Meeting for the Port of Los Angeles,  
held at 6:02 P.M. on Wednesday, February 15, 2012,  
at 425 South Palos Verdes Street, San Pedro,  
California, transcribed by Jamie L. Apodaca,  
CSR #10990.

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APPEARANCES:

Christopher Cannon

Dorothy Meyer

Elizabeth Warren

Frank B. Anderson

1 MR. CANNON: Good evening and welcome to the public  
2 hearing for the Al Larson Boat Shop Project environmental  
3 impact report.

4 CEQA doesn't require public hearings, but the law  
5 allows the lead agency to call a hearing if it facilitates  
6 the purpose and the goals of CEQA. The Port of Los Angeles  
7 always has hearings for environmental documents because we  
8 want to be able to facilitate a public dialogue.

9 The environmental process is best, we believe, when  
10 it is iterative, which is to say we hear from you and we  
11 respond, and then that way we learn about your needs and  
12 we're able to best address those concerns. And we don't know  
13 about them until we hear about them.

14 So we ask that you focus your comments tonight on  
15 the sufficiency of the document in identifying and addressing  
16 possible impacts on the environment. If you have ways to  
17 suggest that these impacts could be avoided or different ways  
18 in which they can be reduced, we'd like to hear about them.  
19 If there's alternative mitigation measures, we'd like to hear  
20 about them, but any mitigation measures that you propose must  
21 be feasible and therefore are things that can actually be  
22 accomplished.

23 Please give us at least some idea of the basis of  
24 your comments if for no other reason that it helps us track  
25 down whatever it is that you want us to do. But keep in mind



1 that we're ultimately here to listen, which is to say we're  
2 not going to respond to comments or questions tonight from  
3 the ideas here. We're just going to listen to what you have  
4 to say. We have a court reporter here who is recording your  
5 comments, and so we look forward to hearing from you.

6 We have not a large crowd, obviously, so we're going  
7 to try and be very brief with our presentation. We're going  
8 to have Dorothy Meyer here, who is the consultant project  
9 manager and worked closely with us, who is going to go over  
10 the CEQA process and the description of the project. And  
11 then we'll take comments -- I have two speaker cards here --  
12 and then we'll end this.

13 So without any further ado, I turn this over to  
14 Dorothy for a brief presentation.

15 MS. MEYER: Thank you.

16 The main objective of CEQA is to disclose potential  
17 environmental effects, identify ways to reduce or avoid  
18 impacts through mitigation or alternatives that would reduce  
19 and avoid those impacts, disclose reasons for the project  
20 approval where significant impacts occur, and enhance public  
21 participation and agency coordination.

22 The E.I.R. process is made up of several steps.  
23 Step one is the notice of preparation and scoping meeting,  
24 which for this project occurred in September, 2010.

25 The second step is the draft E.I.R., which is what

1 we're currently discussing today. This was released in  
2 January and is currently out for public review. And the  
3 environmental document analyzes the potential impacts of the  
4 proposed project and the alternatives to the proposed  
5 project.

6 Step three is the final E.I.R. Once we receive all  
7 the comments on the draft E.I.R., which will include  
8 tonight's comments as well as those that reach us by the  
9 March 5th deadline, all the comments will be addressed and  
10 any changes made to the document, and then the final E.I.R.  
11 will be given to the Board of Harbor Commissioners for  
12 decision-making and possible approval and certification of  
13 the document and the project.

14 Here's a view of the E.I.R. process. The yellow  
15 circles are the areas where public participation is  
16 encouraged, and we are right here at the public meeting for  
17 the draft E.I.R.

18 The Al Larson boat shop is located at 1049 Seaside  
19 Avenue, west side of the Fish Harbor in the Port of Los  
20 Angeles at Berth 258. The existing facility consists of 7.7  
21 acres, 2.35 of which is land and 5.35 of water. The proposed  
22 project would change that to 7.3 acres, or 4.1 land, 3.2  
23 water. The project site is in the red-circled area in Fish  
24 Harbor.

25 The Al Larson facility consists of several

1 structures, as you can see here, and here they are on the  
2 screen. There are -- the portion of the project that is part  
3 of the facility is from that "E" on up. The "E," "B," and  
4 the marina are not part of this project.

5           The Al Larson boat shop has been in its present  
6 location since 1920. The historic -- there has been a  
7 historic-resources survey done of the project site, and it  
8 currently has approximately two building complexes as  
9 potentially historic. Here is a figure of those buildings.  
10 The ones that are designated "A" are the office and workshop  
11 complex, and the ones designated "C" are considered the  
12 marine -- the machine shop complex.

13           The objectives of the proposed project are to  
14 improve the project site drainage to comply with current and  
15 future environmental permits and regulations; also to  
16 optimize the facility by increasing the land available in  
17 order to better use the site for ship-building and vessel  
18 maintenance and repair; and then thirdly is to modernize the  
19 boatyard facilities. The facility was built in the 1920s,  
20 and several of the structures, particularly the ones that are  
21 potentially historic, are close to 90 years old and in need  
22 of repair as well as modern equipment.

23           Also part of the project is the return of the area  
24 leading to the facility to its designed depth of minus  
25 22 feet below low mean low low waters. So in order to do

1 that, we would need to dredge, and as part of the dredging,  
2 we'll have an opportunity to clean up the sediment and the  
3 soil contaminants that have been at the site for a long  
4 time.

5 Here is an overall plan of what is proposed. There  
6 are three phases that would occur in sequence. In green is  
7 Phase I; orange is Phase II; and three, which is pink, is  
8 Phase III. As you can see, in Phase I and II, there are  
9 dredging and confined disposal facilities that are part of  
10 the project.

11 The Phase I includes demolition of existing wharves  
12 and piles within the Phase I area. We're going to construct  
13 a CDF, also as part of the Phase I, and dredge as part of the  
14 project. Also, there will be two finger piers built to  
15 support travel lifts that would function to lift vehicles out  
16 of the water and take them to the land side in order that  
17 repairs can be made.

18 Finally as part of this, buildings D, C-1, and a  
19 shed will be demolished. Pavement will be removed,  
20 contaminated soil also removed, and the site graded and --  
21 the site graded. Here is a graphic vision of what that is.  
22 There's the demolition, and here's the creation of the CDF as  
23 well as the demolition of the buildings -- there we go --  
24 demolition of the buildings under Phase I.

25 Okay. The orange box actually represents the area

1 where dredged material will be taken by barge to that area.  
2 Cement mixers will be put into those scows, or the barges,  
3 and it will be mixed and the soil will be stabilized. That  
4 stabilized soil will then be brought back to the area where  
5 the CDF is going to be created, and it will be used to create  
6 land and stabilize the contaminated soils.

7 Phase II includes the demolition of the finger piers  
8 for the three existing marine railways. It will construct a  
9 CDF and demolish building H-2, which is also another little  
10 shed. The dredge from the area in Phase II will again go  
11 through the same process as the dredge in Phase I, and the  
12 CDF will also be created in the same manner as the CDF in  
13 Phase I, except for the CDF in Phase II is much bigger.  
14 Again, this will allow contaminated dredge to come out of  
15 Fish Harbor and be put in a CDF.

16 This will -- also at this time, there will be  
17 re-engineering of the site's drainage system, and an  
18 oil-water separator will be put on the site to treat  
19 discharge before going into Fish Harbor.

20 And here's a view of Phase II where the three piers  
21 will be removed. There's the shed. It's that little  
22 building. There's the creation of the CDF, and there's the  
23 dredge area.

24 All right. Phase III -- this will include the  
25 demolition of two buildings. These are a part of the office

1 and workshop complex, A-2 and A-3, and this will also include  
2 paving of the area, additional storm-drain systems, and also  
3 some yard lighting, and if they need it, they will construct  
4 a new office building. There's a visual of it.

5 Here it summarizes the buildings that will remain  
6 versus those that are being proposed to go. The red are the  
7 buildings that are going to be demolished as part of the  
8 proposed project. The blue buildings would be retained. The  
9 green area is the area added to the lease, which is going to  
10 be extended as part of the proposed project. And then the  
11 building that's orange that says "Not part of the project" --  
12 that's the Southwest Maritime Administration building, and  
13 even though it looks like it's part of the project area, it  
14 is not, and it's not part of the project and won't be touched  
15 as part of this project.

16 Project operation -- currently the space is  
17 available to do repairs, ship-building, and maintenance, but  
18 it's limited based on the size and the equipment itself.  
19 Part of the changes would include removing three old marine  
20 railway systems and installing two travel lifts, therefore  
21 freeing up more of the back land, or the dry dock, to be able  
22 to be used for the operation and the repair of ships.

23 Here is a graphic that shows the turn radius of  
24 those lifts, and as you can see, the lifts are actually  
25 limited if the buildings remain in place. And you can see

1 how the turning radius is necessary for the ships to be  
2 pulled out of the water and then repaired on land.

3           The environmental impact report looked at all these  
4 different environmental areas. Of those, we did have  
5 significant impacts in air quality, bio, cultural,  
6 green-house gas emissions, health risk, and noise. As you  
7 can see, most of them were from construction, although in air  
8 quality and greenhouse gas, it was operation as well.

9           For biological resources, because we were taking out  
10 areas of where the water was and creating these two CDF, we  
11 did have -- and we're going to fill 0.9 acres in Fish Harbor,  
12 we did have to mitigate for that using existing mitigation  
13 credits.

14           Even with mitigation, there was still a significant  
15 impact in air quality during construction. The largest  
16 contributor to the air quality impact is dredging equipment  
17 and creation of the CDFs.

18           For operation, we also still have a significant  
19 impact after mitigation. The main source of emissions was  
20 from air compressors, and the facility uses these air  
21 compressors throughout the port and not just at this  
22 facility, and there is no feasible way of turning those into  
23 electric devices that would have reduced some of the diesel  
24 impacts. So that remained a significant impact.

25           Also with cultural resources, we do have these three

1 potentially historic buildings which are part of potentially  
2 historic complexes. So once you demolish those, then they're  
3 no longer -- they no longer exist. So that was a significant  
4 impact we could not avoid, although we did have mitigation  
5 for doing recordation.

6           Greenhouse impact for construction and operation, we  
7 would be over the significance threshold even with  
8 mitigation.

9           Health risks -- health risks, same thing. For  
10 construction, we would be over the significance threshold of  
11 1.0 for cancer and acute. And -- but it's mostly because of  
12 the marina, which is just south of the project. Although not  
13 part of the project site, they are live-aboards. There are  
14 two live-aboards there, and so they count as residential  
15 receptors.

16           Noise -- we do have several mitigation measures like  
17 attenuation barriers and also some things that we're going to  
18 do with the pile-driving equipment as part of the CDF and the  
19 dredge. And even with those mitigations, during construction  
20 we still would have a potential impact, particularly to the  
21 Al Larson marina, because there are receptors there, and also  
22 Reservation Point.

23           There are seven alternatives to the proposed  
24 project. The first one involves a reduced project that would  
25 just take care of water-quality improvements -- and that



1 would be the minimum -- as part of this.

2           The second one is limited demolition. We would just  
3 take out one of the historic structures and not all of them  
4 that we were proposing as part of the proposed project.

5           Number three is the alternative where the proposed  
6 project would have no impacts on historic buildings. So we  
7 would still do the CDFs. We would still do dredging and  
8 clean up that contamination there, but we couldn't clean up  
9 the contamination that's under these historic buildings --  
10 potential historic buildings, and we wouldn't be able to use  
11 the travel lifts because, as you can see by that turn radius,  
12 you need all that space to be able to bring the boats out  
13 onto the dry dock.

14           Proposal four would be relocating the historical  
15 buildings to another part of the port. And actually these  
16 were the sites in yellow that we looked at in the  
17 environmental document as possible locations to relocate.

18           And actually -- excuse me -- this is the relocation  
19 of -- this is five. Take Al Larson and actually put it  
20 somewhere else in the port and what would that look like in  
21 terms of we'd have to clean up the site as well as we would  
22 have impact somewhere else in the port; and that's where this  
23 figure comes in. These would be the possible places that we  
24 would locate the Al Larson boat shop under alternative five.

25           Alternative six is the no-project. Now, the

1 no-project means that there would be no action and no way of  
2 correcting or cleaning up the contamination either in the  
3 ground water or -- I mean in the water or the sediments out  
4 in Fish Harbor.

5 And then seven is the no federal action. This  
6 basically would allow for all the project elements that are  
7 actually on the land but nothing that would impact the water.  
8 So the CDFs, the dredging -- all of that -- the finger -- the  
9 new piers and the travel lifts on those piers would not  
10 occur, but all the land-side activities would still happen.

11 Of all the alternatives, alternative one was the  
12 environmentally superior alternative, and that's because it  
13 reduced some water quality impacts, but it did not meet all  
14 the objectives.

15 As you can see here, we have until March 5th to give  
16 us comments, plus you can always give us comments tonight.  
17 So with that I'd like to open it up for public comments, and  
18 Christopher has the cards. Thank you.

19 MR. CANNON: Thank you very much.

20 We have two comment cards here, one from Miss  
21 Elizabeth Warren and also from Mr. Frank Anderson.

22 Elizabeth, you were first, and so we look forward to  
23 hearing from you.

24 MS. WARREN: Good evening. Thank you, Christopher and  
25 Dorothy, for the opportunity to provide some comments this

1 evening.

2 For the record, my name is Elizabeth Warren. I'm  
3 the executive director at Future Ports. We appreciate the  
4 opportunity to provide our comments in support of the Al  
5 Larson Boat Shop Improvements D.E.I.R.

6 The project is environmentally beneficial, allows  
7 for the modernization of the facility that is over 100 years  
8 old, and will continue to provide services to many commercial  
9 industries in the San Pedro Bay that would otherwise have to  
10 use facilities elsewhere.

11 Our members represent a broad range of businesses  
12 that support the continued growth of the San Pedro Bay ports  
13 as a vital economic engine and those in the goods-movement  
14 supply chain that benefit from the port's continued success.  
15 As such, we support this project as it will provide critical  
16 services to the industry. We'd like to emphasize and  
17 highlight some of the benefits of the project that reflect  
18 the basis of our support for this project.

19 One, the modernization of the boat shop will  
20 consistently provide the industry in the Los Angeles region  
21 with reliable, cost-effective, high-quality services and boat  
22 repair services.

23 Two, the plan will clean up historical dredge  
24 contaminants and sequester them in a confined disposal  
25 facility, or CDF, while expanding an area that can be used

**ALSBPH-1  
Cont.**

1 for boat-shop operations in an environmentally superior  
2 manner.

3 Three, the project will improve water quality in  
4 Fish Harbor.

5 Four, the project will clean up legacy upland  
6 contaminants.

7 Five, we support the project's beneficial use of  
8 contaminated dredge material to create additional land.

9 Six, the majority of impacts are short-term and  
10 construction-related.

11 Seven, the project will provide both construction  
12 jobs as well as long-term jobs during the new operations.

13 And lastly, without the proposed improvement, the  
14 lack of capacity within the facility will create backlogs and  
15 scheduling issues with their existing customers. Most of the  
16 Al Larson boat shop customers are inspected vessels, either  
17 being inspected by the U.S. Coast Guard or the American  
18 Bureau of Shipping. The only other similar boatyards that  
19 can handle that similar vessel size are in San Diego or  
20 San Francisco. This effectively forces their customers to  
21 transport their vessels elsewhere, adding more cost,  
22 additional air emissions, and negatively affecting the local  
23 work force as work is exported to other regions. The  
24 proposed improvements will all but ensure the work stays here  
25 in the Los Angeles region.

**ALBSPH-1  
Cont.**

1           So in closing, we ask that the port expedite the  
2 clean-up in the adjacent parcel north of the proposed project  
3 to ensure there are no delays to Al Larson boat shop  
4 construction.

5           So thank you again very much for the opportunity to  
6 comment this evening.

7           MR. CANNON: Thank you, Elizabeth.

8           Frank?

9           MR. ANDERSON: Good evening. My name is Frank B.  
10 Anderson. I am the president of the San Pedro Bay Historical  
11 Society. We don't oppose the project, but we do have deep  
12 concerns about the demolition of those three buildings that  
13 have historical status. And they're reflective of a past,  
14 the past that we had here in this town of ship-building,  
15 ship-repair.

16           These three buildings -- E-2, E-3, and C-1 -- may  
17 not be on the National Site for Historical Registry but do  
18 have historical importance, and just videographing them,  
19 filming them after the fact really isn't preservation. So  
20 we're very concerned about this, not the other parts of the  
21 project. I think it's a very sound project in general, and I  
22 know that it would be difficult to build a lift around it,  
23 but I think you have to look at maybe alternative 3 where the  
24 buildings are retained.

25           So again, we don't oppose the project as such, but

**ALBSPH-1  
Cont.**

**ALBSPH-2**

1 we're going to weigh in on the historical buildings. Thank  
2 you.

3 MR. CANNON: Okay. That's the last of the comments that  
4 I have. Anybody else here want to have something to say? If  
5 so, speak now or forever hold your peace, as goes the  
6 expression.

7 Hearing none, then I will declare this hearing  
8 closed and thank you all for coming.

9 MS. MEYER: And if you haven't already, please sign the  
10 sign-in sheets because that way we'll get additional  
11 information to you and keep you informed of the project.

12 (Whereupon the meeting was

13 adjourned at 6:19 P.M.)  
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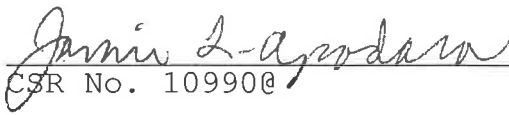
I, Jamie L. Apodaca, Certified Shorthand Reporter  
qualified in and for the State of California, do hereby  
certify:

That the foregoing transcript is a true and correct  
transcription of my original stenographic notes and that  
dismantling, unsealing, or unbinding of this transcript will  
render this certificate null and void.

I further certify that I am neither attorney or  
counsel for, nor related to or employed by any of the parties  
to the action in which this proceeding was taken; and  
furthermore, that I am not a relative or employee of any  
attorney or counsel employed by the parties hereto or  
financially interested in the action.

I further certify that I am not interested in the  
event of the action.

IN WITNESS WHEREOF, I have hereunto set my hand this  
24th day of January, 2012.

  
\_\_\_\_\_  
CSR No. 109900

1    **2.3.5       Draft EIR Public Hearing**

2    **Al Larson Boat Shop Public Hearing Transcript**  
3    **(ALBSPH)**

4    **Response to Comment ALBSPH-1**

5    Thank you for your review and comment on the Draft EIR.

6    **Response to Comment ALBSPH-2**

7    Thank you for your review and comment on the Draft EIR. Please refer to Response to Comment  
8    SPBHS-1.

9  
10



1    **2.4       References**

2    **2.4.1     Printed References**

3                   Port of Los Angeles. *Boatyard Analysis - A Review of Boatyard Market Demand Data*,  
4                   January 2012.

5    **2.4.2     Personal Communications**

6                   Mike Rubino, June 5, 2012

7

1 **2.5 Table**

2 **MEDIUM ACTIVE BOAT YARDS ALONG THE WEST COAST**

3

FACILITY	EQUIPMENT	LENGTH (feet) and/or LIFT CAPACITY
<b>Washington</b>		
All American Marine - Bellingham, WA	Shipbuilding	
Dakota Creek Industries - Anacortes, WA	Floating Dry dock	314 (95,000 ton)
	Syncolift	306 (5,000 ton)
Duwamish Shipyard - Seattle, WA	Closed	
Fishing Vessel Owners Marine Ways - Seattle, WA	Marine Railway #1	600 ton
	Marine Railway #2	600 ton
Foss Maritime - Seattle, WA	Floating Dry dock #1	194
	Floating Dry dock #2	220 (2,000 ton)
Hansen Boat - Everett, WA	Dry dock	140
J.M. Martinac Shipbuilding - Tacoma, WA	Shipbuilding	
Kvichak Marine Industries - Seattle, WA	Shipbuilding	
Lake Union Dry dock - Seattle, WA	Floating Dry dock #1	420 (6,000 ton)
	Floating Dry dock #2	200 (1,200 ton)
LeClercq Marine Construction - Seattle, WA	Shipbuilding	
Little Hoquiam Shipyard - Hoquiam, WA	Shipbuilding	
MARCO - Seattle, WA	Closed	
Modutech Marine - Tacoma, WA	Marine Railway	85 ton

	Three (3) Travel Lifts	Max 85 ton
Nichols Brothers Boat Builders - Freeland, WA	Shipbuilding	
Northlake Shipyard - Seattle, WA	Floating Dry dock #2	200 (1,000 ton)
	Floating Dry dock #9	288 (1,900 ton)
Pacific Fishermen - Seattle, WA	Marine Railway	70 (150 ton)
	Marine Railway	146 (600 ton)
	Syncolift	144 (600 ton)
	Sidetrack	160 (600 ton)
Pacific Ship Repair & Fabrication - Bremerton, WA	No haul out	
Puglia (Fairhaven Shipyard) - Bellingham, WA	Floating Dry dock	400 (3,200 ton)
	Marine Railway	121 (400 ton)
Puglia Engineering - Tacoma, WA	No haul out	
Rozema Boat Works - Mt. Vernon, WA	Shipbuilding	
Seaview West - Bellingham, WA	Travel Lift #1	135 ton
	Travel Lift #2	35 ton
Seaview Fairhaven - Bellingham, WA	No haul out	
Seaview North - Seattle, WA	Travel Lift	55 ton
Straits Marine and Industrial - Port Angeles, WA	Travel Lift	300 tons
	Dry dock	1,900 tons
	Sealift	50 ton
Vigor Industrial - Everett, WA	Dry dock #3	200 x 60 (1,000 ton)

Vigor Industrial - Tacoma, WA	Marine Railway	180 x 50 (500)
	Floating Dry dock	398 x 57 (2,800)
Vigor Industrial (Todd Shipyard) - Seattle, WA	Dry dock #1	528 x 87 (17,500 ton)
	Dry dock #3	500 x 134 (12,500 ton)
	Dry dock #10	552 x 93 (18,000 ton)
Walashek Industrial & Marine - Seattle, WA	Boilers only	
Westport Shipyard - Westport, WA	Shipbuilding	
William E. Munson - Mt. Vernon, WA	Boat building	
<b>Oregon</b>		
Diversified Marine - Portland, OR	Floating Dry dock #1	60 x 30 (100 ton)
	Floating Dry dock #2	101 x 62 (700 ton)
	Floating Dry dock #3	160
Charleston Shipyard - Charleston, OR	Travel Lift	60 ton
	Marine way	200 ton
Foss Maritime - Rainier, OR	Shipway #1	120 (500 short tons)
	Shipway #2	120 (500 short tons)
Giddings Boat Works - Charleston, OR	Shipbuilding	
Gunderson - Portland, OR	Barge Builder	
Southern Oregon Marine - Coos Bay, OR	Shipway	351
	For use by company vessels	200
Sundial Marine Tug & Barge Works - Troutdale, OR	Shipway	298

	Floating Dry dock	298
Vigor Industrial (Cascade General) - Portland, OR	Dry dock #1	598 x 88 (15,000 ton)
	Dry dock #2	661 x 114 (27,000 ton)
	Dry dock #3	246 x 140 (30,000 ton)
Zidell Marine - Portland, OR	Construction	340
<b>California</b>		
Al Larson	Shipway #1	112 (350 ton max)
	Shipway #2	121 (350 ton max)
	Shipway #3	131 (350 ton max)
	Shipway #4	265
	Floating Dry dock	249
Anacapa Marine Service - Oxnard, CA	Travel Lift	50 x 15 (30 ton)
BAE Systems - San Diego, CA	Floating Dry dock	20,000 ton
BAE Systems - San Francisco, CA	Floating Dry dock #1	14,500 ton
	Floating Dry dock #2	56,600 ton
Balboa Boatyard - Newport Beach, CA	Marine Railway	70 (80 ton)
	Crane	2 ton
Basin Marine - Newport Beach, CA	Travel Lift	35 ton
Bay Ship & Yacht Company - Alameda, CA	Floating Dry dock	390 (3,000 ton)
	Syncrolift	200 (1,200 ton)
BellPort Newport Harbor Shipyard - Newport Beach, CA	Crane	115 (90 tons)
Cabrillo Boat Shop - Long Beach, CA		15
Channel Islands Boat Yard - Oxnard, CA	Closed	
Continental Maritime of San Diego - San Diego, CA	Leases Floating Dry dock and Graving Dry dock from Navy	

Coastal Boatworks - Morro Bay, CA	Closed	
Dana Point Shipyard - Dana Point, CA	Travel Lift	40 ton
Depth Perceptions - Newport Beach, CA	Travel Lift	60 (30 ton)
Dockside Machine & Ship Repair - Wilmington, CA	No water access	
Driscoll Boat Works - San Diego, CA	Syncrolift	150 ton
	Travel Lift #1	150 ton
	Travel Lift #2	88 ton
	Travel Lift #3	50 ton
	Travel Lift #4	10 ton
Fashion Blacksmith - Crescent City, CA	Construction & repair	
Fonteneau Yacht Repair - San Diego, CA	Specializes in the service and repair of stabilizers, water makers and bow thrusters.	
Gambol Shipyard - Long Beach, CA	Fast Lift	150 x 40 (300 ton)
	Crane	30 ton
General Dynamics NASSCO (National Steel and Shipbuilding Company) - San Diego, CA	Building way #1	950
	Building way #2	950
	Graving Dry dock	1000 (30,000 ton)
	Floating Dry dock	820 (44,000 ton)
Harbor Marineworks - Santa Barbara, CA	Travel Lift	70 (40 ton)
	Crane	15 ton
Kettenberg - San Diego, CA	Lift	150 tons maximum
King Harbor Marine Center - Redondo Beach, CA	Travel Lift	60 ton

Knight and Caver Yacht Center- San Diego, CA	Dry Dock	4,000 ton
	Travel Lift	330 ton
	Floating Dry dock #1	400 ton
Keohler Kraft - San Diego, CA	Marine Railway	70
Marine Group Boat - Chula Vista, CA - Same address as South Bay Boatyard	Travel Lift #1	220 (665 ton)
Nielsen Beaumont Marine - San Diego, CA	Marine Railway	70 ton
Newport Harbor Shipyard - Newport Beach, CA	Travel Lift	110 (90 ton)
Oceanside Marine Center - Oceanside, CA	Travel Lift w/Crane	Small (14' 11" beam max) 3,300 lb(lift); 2,500 lb (crane)
Pacific Ship Repair & Fabrication - San Diego, CA	No haul out	
Pedigree Marine - Newport Beach, CA	Travel Lift	35 ton
Puglia Engineering - Alameda, CA	No haul out	
Seamark Boatyard - Marina del Ray, CA		26 (3 ton)
Shelter Island Boatyard - San Diego, CA	Travel Lift #1	30 ton
	Travel Lift #2	80 ton
South Coast Shipyard - Newport Beach, CA	Syncrolift	70 (70 tons)
South Bay Boatyard - Chula Vista, CA	Travel Lift #1	25 ton
	Travel Lift #2	58 x 22 (70 ton)
Stone Boat Yard - Alameda, CA	Travel Lift	69
	Marine Railway	164
Sunset Aquatic Shipyard - Huntington Beach, CA	Travel Lift	70 ton
The Boat Yard - Marina del Ray. CA	Travel Lift #1	35 ton
	Travel Lift #2	65 ton
Van Peer Boatworks- Ft. Bragg, CA	Ship building	

Ventura Harbor Boatyard - Ventura, CA	Travel Lift #1	56 (35 ton)
	Travel Lift #2	131 (150 ton)
Wilmington Marine Service - Wilmington, CA	Marine Railway	100 (150 ton)
Windward Yacht Center - Marina del Ray, CA	Travel Lift #1	34 ton
	Travel Lift #2	70 ton
	Travel Lift #3	100 ton

Source: Boatyard Guide.com, last accessed April 2012

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