

# **Addendum to the Avalon Freight Services Final Initial Study and Negative Declaration**

**APP No. 201019-163**

---

**SCH No. 2014101049**

**Prepared By:**

City of Los Angeles Harbor Department  
Environmental Management Division  
425 S. Palos Verdes St.  
San Pedro, CA 90731

November 2021



# Table of Contents

- Introduction .....1
- Background.....2
  - Facility Overview .....2
  - Previously Assessed and Approved Project.....2
- Figures .....3
  - Previously Assessed Lease Parcels.....3
  - Revised Proposed Project Area.....4
  - Regional Location of the Revised Proposed Project .....5
- Revised Proposed Project .....6
- Purpose.....8
- Scope and Content .....9
- Previous Environmental Documents Incorporated by Reference .....10
- Required Permits and Approvals .....10
- Environmental Analysis.....11
  - Aesthetics .....11
  - Agriculture and Forestry Resources .....11
  - Air Quality .....11
  - Biological Resources .....12
  - Cultural Resources .....13
  - Energy.....13
  - Geology and Soils.....14
  - Greenhouse Gas Emissions .....14
  - Hazards and Hazardous Materials .....14
  - Hydrology and Water Quality .....14
  - Land Use and Planning.....15
  - Mineral Resources .....15
  - Noise .....15
  - Population and Housing.....15
  - Public Services .....15
  - Recreation.....16
  - Transportation.....16
  - Tribal Cultural Resources .....16
  - Utilities and Service Systems .....17
  - Wildfire .....17
- Conclusions .....17
- References.....19

## 1. Introduction

The Avalon Freight Services Initial Study/Negative Declaration (Final IS/ND) was adopted by the Los Angeles Board of Harbor Commissioners (Board) on January 22, 2015 (SCH# 2014101049 and APP No. 140307-025). This project included the shift from a former freight transport contractor operating from Berth 184 in Wilmington to a new freight transportation operator, Avalon Freight Services (Avalon Freight), operating from Berth 95 in San Pedro, following the Santa Catalina Island Company's awarding Avalon Freight the exclusive freight transportation contract to transport goods from the California mainland to Avalon on Catalina Island. As part of the project, construction included a 20,000 square foot warehouse/office for administrative staff, waterside improvements for the addition of three new marine vessels, new landside operational equipment, security fencing at Reagan Avenue, and parking lot/crosswalk striping. Waterside improvements consisted of removing six-inch side curbs from the existing concrete ramp, installation of approximately 22 new pilings, and replacement/installation of three fiberglass floats. These waterside improvements were reviewed by the United States Army Corps of (USACE) for potential impacts to marine life. Permits issued by the USACE included provisions mandatory to ensure that any identified marine plant and animal life experience minimal impacts as a result of the waterside improvements. The Los Angeles Harbor Department (LAHD), USACE Letter of Permission, and the Section 401 Water Quality Certification by the Los Angeles Regional Water Quality Control Board (LARWQCB) required mandatory provisions which included the presence of a Marine Mammal Monitor during piling installation, an eelgrass study, and a Caulerpa study. Entitlement for the project included a Lease Amendment with Catalina Channel Express, Inc. (Catalina Express), a joint venture partner in Avalon Freight, to add three parcels of land at Berth 95 totaling approximately 52,555 square feet for construction of the warehouse.

In October 2020, the LAHD Engineering Division requested an upgrade to the barge landing ramp at Berth 95 to fix the ramp design and improve barge access. The ramp at Berth 95 is used by Avalon Freight's barges to bring supplies to Catalina Island and return with refuse. Currently, the angle of the barge landing ramp is not optimal and it cannot be utilized by Avalon Freight during low or high tides. Improvements to the ramp would allow Avalon Freight to utilize the ramp with the same frequency, but on a preferred schedule not dependent on tides. The barge landing ramp upgrades include demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing approximately 850 cubic yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot approach concrete slab. Dredging would require a Section 404 permit from the USACE and Waste Discharge Requirements issued by the LARWQCB. While the original Project did not include dredging, similar mandatory provisions to those included in the original in-water work would be included as a result of required permits issued by the USACE and the LARWQCB. These mandatory provisions are not considered mitigation measures under the California Environmental Quality Act (CEQA), but further the purpose of ensuring compliance with regulatory requirements.

No additional vessels or equipment would be needed for operations. Additionally, no new entitlement would be needed for the Revised Proposed Project since LAHD is the property owner and existing permitted uses and operations would continue under both the current Permit No. 897 with Catalina Express and current freight transportation contract between Avalon Freight and Santa Catalina Island Company.

Due to minor alteration of the existing barge landing ramp involving no expansion of use beyond that evaluated in the Final IS/ND and mandatory compliance with regulatory requirements, no new significant impacts are anticipated for this Revised Proposed Project.

The Final IS/ND was prepared by LAHD as Lead Agency under the CEQA to address the potential

environmental effects of the Revised Proposed Project. Accordingly, this Addendum is being prepared pursuant to the requirements of CEQA Guidelines Section 15164 and confirms that no new significant impacts or increases in severity of previously- identified impacts would occur as a result of the Revised Proposed Project.

## **2. Background**

### **2.1.1 Facility Overview**

The Avalon Freight barge landing ramp is in San Pedro at Berth 95, located in the northern portion of the Main Channel of the Port of Los Angeles in San Pedro, and immediately south of the Vincent Thomas Bridge/SR-47 Freeway. The site is bounded by the China Shipping Container Terminal facility, Harbor Boulevard, the Los Angeles World Cruise Center, and the Main Channel. Other surrounding landside and waterside infrastructure include the Vincent Thomas Bridge/I-47 Freeway, which spans above the Project site, and the Everport Container Terminal across the Main Channel (Figures 1-3). This site has been operated by Avalon Freight since 2016 and operations include delivery of supplies and returning with refuse from Catalina Island (either Pebbly Beach or one of Catalina Island's campgrounds). Vessel trips occur approximately once per day and utilize either the barge and tugboat or the landing craft depending upon where the vessel is docking (i.e., Pebbly Beach or the campgrounds). Freight is loaded into the associated warehouse using two electric forklifts. Freight is loaded onto the barge or landing craft using a utility tractor rig (UTR). Freight operational employees typically consist of five office/warehouse employees and five crew members on the vessel. The facility serves Avalon Freight which has a contract with Santa Catalina Island Company. Avalon Freight Services, LLC is a joint venture between Catalina Channel Express, Inc. and Harley Marine Services. Catalina Express is the tenant under Permit No. 897 with LAHD, which entitles barge operations at Berth 95, and Avalon Freight is an LAHD-approved subtenant.

### **2.1.2 Previously Assessed and Approved Project**

The Board adopted the Final IS/ND and certified the proposed Project on January 22, 2015 (SCH# 2014101049 and APP No. 140307-025). The approved proposed Project evaluated the following components at Berth 95:

- Lease Amendment: Between Catalina Express and LAHD to add three parcels of land at Berth 95 totaling approximately 52,555 square feet and allow for construction of the warehouse/office.
- Shift of freight operations from Berth 184 in Wilmington to Berth 95 in San Pedro.
- Construction of a two-story 20,000 square foot warehouse/office space at Berth 95.
- The installation of approximately 22 pilings and four dolphins on the waterside.
- Improvements to the existing boat launch ramp which included removing the 6" side curbs that prevented wider vessels from safe mooring.
- Replacement of a wood float with a fiberglass float and installation of two additional floats.
- Three new operational marine vessels: A landing craft, barge, and tugboat added to the fleet at Berth 95 to accommodate the freight operations.
- Two electric forklifts and one UTR for freight operations.
- Minor improvements to Reagan Avenue: installation of security fencing.
- Existing parking lot restriping of a two-lane roadway and pedestrian crosswalks.

As described above, the Final IS/ND evaluated waterside improvements. These improvements were reviewed by the USACE for potential impacts to marine life. Permits issued by the USACE included provisions mandatory to ensure that any identified marine plant and animal life experience minimal impacts as a result of the waterside improvements. LAHD, the USACE Letter of Permission, and the





Figure 2 –Revised Proposed Project Area



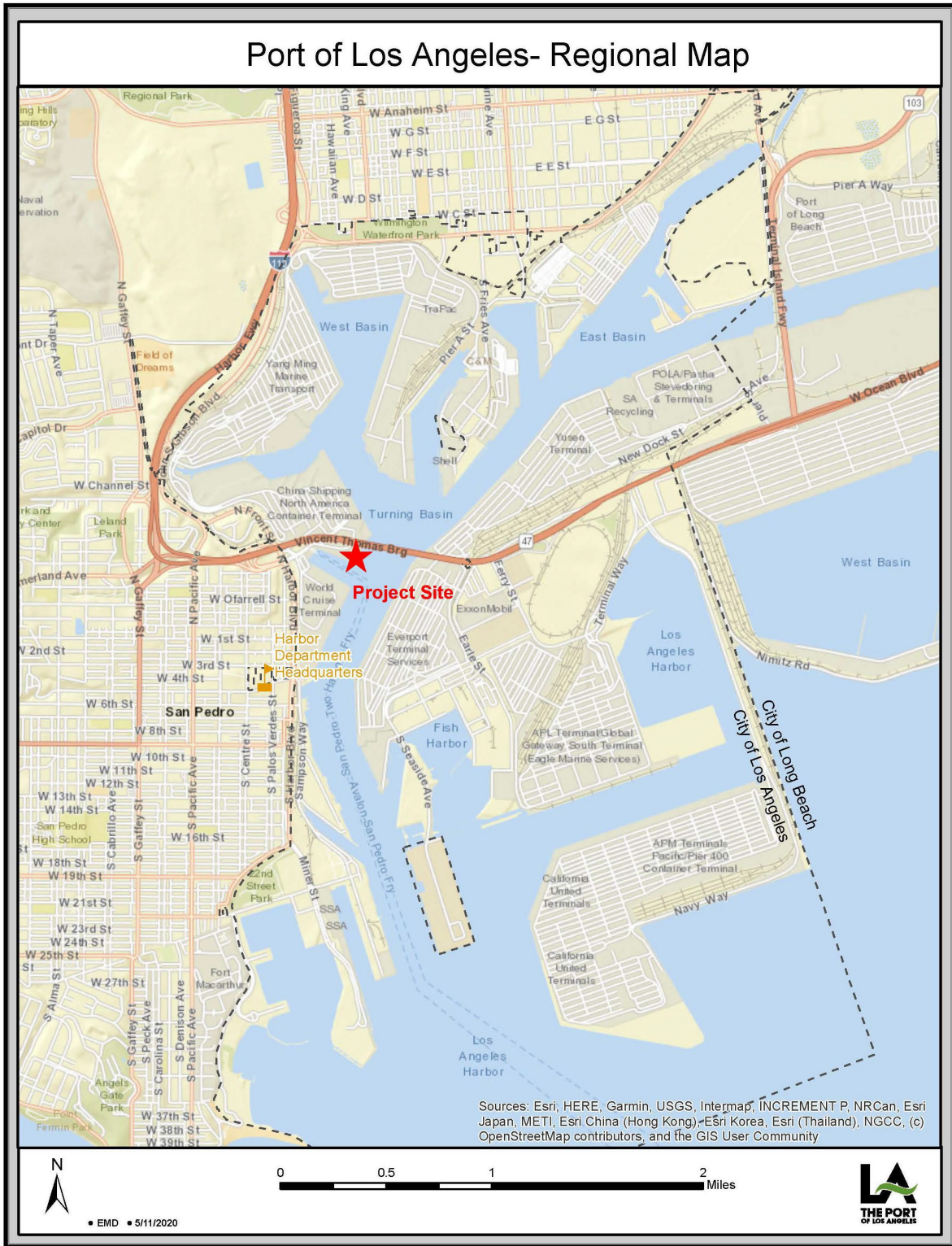


Figure 3 - Regional Location of the Revised Proposed Project

### **3. Revised Proposed Project**

The Final IS/ND assessed the shift of freight movement and operations from Berth 184 in Wilmington to Berth 95 in San Pedro. As part of the Project, construction included a 20,000 square foot warehouse/office, waterside improvements for three new marine vessels, new landside operational equipment, security fencing at Reagan Avenue, and parking lot/crosswalk striping. Waterside improvements consisted of removing six-inch side curbs from the existing concrete ramp, installation of approximately 22 new pilings, and replacement/installation of three fiberglass floats. These waterside improvements were reviewed by the USACE for potential impacts to marine life. Permits issued by the USACE included mandatory provisions to ensure minimal impacts to marine life due to waterside improvements. LAHD, the USACE Letter of Permission, and the 401 Certification by the LARWQCB required mandatory provisions which included the presence of a Marine Mammal Monitor during piling installation, an eelgrass study, and a Caulerpa study. Entitlement for the Project included a Lease Amendment with Catalina Express to add three parcels of land at Berth 95 totaling approximately 52,555 square feet for construction of the warehouse (Figure 1).

In October 2020, the LAHD Engineering Division requested an upgrade to the barge landing ramp at Berth 95 to fix the ramp design and improve barge access to address the operating issues described below. The ramp at Berth 95 is used by Avalon Freight's barges which bring supplies to Catalina Island and return with refuse. Currently, the angle of the barge landing ramp is not optimal and it cannot be utilized by Avalon Freight during low or high tides. Improvements to the ramp would allow Avalon Freight to utilize the ramp with the same frequency, but on a preferred schedule not dependent on tides. The barge landing upgrades include demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing of approximately 850 cubic yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot concrete approach slab. Dredging would require a Section 404 permit from the USACE and Waste Discharge requirements issued by the LARWQCB. While the original Project did not evaluate dredging, similar mandatory provisions to those included in the original in-water work would be included as a result of required permits issued by the USACE and the LARWQCB. These mandatory provisions are not considered mitigation measures under CEQA, but further the purpose of ensuring compliance with regulatory requirements.

The objective of this Revised Proposed Project is to improve the barge landing ramp design at Berth 95, which would allow Avalon Freight to utilize the ramp on a schedule better meeting the tenant's operating needs (and not dictated by tides) and increase the efficiency of supply and refuse transportation from Catalina Island.

The Revised Proposed Project would continue current operations of Avalon Freight which include delivery of supplies to Catalina Island and returning with refuse. No additional vessels or equipment would be needed for operations. Additionally, no new entitlement would be needed for the Revised Proposed Project since LAHD is the property owner and operations would continue under both the current Permit 897 with Catalina Express and current freight transportation contract between Avalon Freight and Santa Catalina Island Company.

All of the dredged material would be disposed of at the Berth 243-245 confined disposal facility (CDF). The dredging would resuspend some bottom sediments, create localized and temporary turbidity plumes, and resuspend sediments over a relatively small area. Suspension of sediments during clamshell dredging occurs during bucket impact, penetration, and removal of the bucket from the sediment, as well as during bucket retrieval through the water column. Sediments would be tested per standard US Environmental Protection Agency (USEPA)/USACE protocols to determine their suitability to be placed at the local CDF and to evaluate potential water quality impacts during dredging and disposal



activities. This standard protocol is a requirement of the USEPA/USACE permitting. If sediment testing indicates that any chemical constituents in the sediments exceed California Title 22 criteria for hazardous waste determination, the sediment would be disposed of appropriately at an off-site hazardous materials disposal facility.

Due to minor alteration of the existing barge landing ramp involving no expansion of use beyond that evaluated in the Final IS/ND and mandatory compliance with regulatory requirements, no new significant impacts are anticipated for this Revised Proposed Project.

## 4. Purpose

This Addendum has been prepared in accordance with the requirements of the CEQA (Public Resources Code [PRC] 21000 et seq.), and the State CEQA Guidelines (California Code of Regulation Title 14, Section 15000 et seq.), and focuses on changes to the original project description with the January 2015 Final IS/ND and any impacts that would occur as a result of the Revised Proposed Project. The scope of analysis contained within this Addendum addresses all environmental resource areas.

Pursuant to State CEQA Guidelines Section 15164, this analysis has determined that none of the conditions set forth in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. There are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects as a result of the Revised Proposed Project. Therefore, neither a subsequent EIR nor subsequent negative declaration, as defined under CEQA Section 15162, is required. An Addendum to the Final IS/ND, as permitted under Section 15164, is appropriate.

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

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

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

## **5. Scope and Content**

This Addendum describes all of the affected environmental resources and evaluates the changes in the impacts that were previously described in the January 2015 Final IS/ND.

For purposes of determining whether new or substantially more severe “significant effects” would occur under CEQA Guidelines Section 15162, the criteria for determining whether environmental effects would be significant in this analysis are the same as the significance thresholds contained within the adopted ND.

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

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

The following resource topic areas have been recently added to the CEQA Guidelines Checklist and were not evaluated in the preparation of the Final IS/ND. As such, the following resource areas have been evaluated as part of this Addendum:

- Energy
- Tribal Cultural Resources
- Wildfire

## 6. Previous Environmental Documents Incorporated by Reference

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

- **Avalon Freight Services Final Initial Study/Negative Declaration** (SCH No. 2014101049 and APP No. 140307-025). This document addressed all potential environmental impact areas from the original Project and included the full project description, existing setting, and the environmental checklist. This document determined that all areas were considered less than significant. This document is incorporated by reference as all environmental analyses contained therein are being utilized for a comparison against the Revised Proposed Project change to ensure that no new impact is created. This document was circulated for a 30-day public review and comment period. This document can be accessed via the LAHD website (<https://www.portoflosangeles.org>) under the Environmental Documents tab.

## 7. Required Permits and Approvals

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

- LAHD Harbor Engineer Permit
- LAHD Coastal Development Permit
- USACE Section 404 Permit
- LARWQCB Waste Discharge Requirements

## 8. Environmental Analysis

The Final IS/ND assessed a previous construction project (see Section 2.1.2, Previously Assessed and Approved Project) and this Addendum is assessing new construction enhancements (see Section 3, Revised Proposed Project), which includes some air emissions, noise, and other outputs over a temporary construction period, described below. The analysis contained herein demonstrates and provides substantial evidence that no significant impacts are present or added by the Revised Proposed Project. Below is a discussion of all resource areas analyzed in the Final IS/ND and a discussion of why the impact determinations made in the Final IS/ND would not be affected by the Revised Proposed Project.

### 8.1 Aesthetics

The modifications to the existing barge landing ramp would not impact nor block views. The overall character of the surrounding area is mixed with public access to waterfront as well as a large container terminal. Additionally, the Vincent Thomas Bridge/I-47 Freeway spans above the Revised Proposed Project Site. Modification to the existing barge landing ramp would be similar in nature to the existing visual landscape and would visually blend into the panorama of the working Port uses and activities. This proposed use remains consistent with the overall aesthetic in the area. Also, the Revised Proposed Project site is not visible from any eligible or designated state scenic highway. Therefore, impacts to the existing visual character and quality of the site would be less than significant.

### 8.2 Agriculture and Forestry Resources

The Revised Proposed Project would not have any impact on Agriculture and Forestry resources as the Project area is not located in any area zoned for agricultural use and does not change the existing use of the surrounding area in any way. Therefore, there would be no impact to agriculture and forestry resources.

### 8.3 Air Quality

The barge landing upgrades include demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing of approximately 850 cubic-yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot concrete approach slab. Equipment needed for construction include a wheel cutter, two jack hammers, a clamshell bucket, a dredge barge, and a derrick barge.

The Revised Proposed Project would generate a negligible increase in air emissions over a temporary construction period from what was previously evaluated in the Final IS/ND. Table 1 presents estimated emissions based on a similar project’s localized construction impacts from similar construction equipment and assist tugs<sup>1</sup>. Using these emissions as reference, there is no exceedance of the South Coast Air Quality Management District’s (SCAQMD) Air Quality Significance Thresholds for Construction. Therefore, there would continue to be a less-than-significant impact to air quality.

<b>Construction Categories</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Estimated Construction Equipment/Assist Tugs	2	2	53	0	45	7
Estimated Construction Vehicles	0.01	0.01	0.96	0.01	1.97	0.04
Final IS/ND Peak Daily Operational Emissions	1.7	0.5	2.6	0.0	2.8	.2
<b>Total</b>	<b>3.71</b>	<b>2.51</b>	<b>56.56</b>	<b>0.01</b>	<b>49.77</b>	<b>7.24</b>
Final IS/ND Peak Daily Construction Emissions	22.9	5.7	58.1	0.1	48.7	2.9

<sup>1</sup> Draft Initial Study/Mitigated Negative Declaration (IS/MND) for Berth 163-164 [NuStar-Valero] Marine Oil Terminal Wharf Improvements Project (Link: <https://kentico.portoflosangeles.org/getmedia/d2ea2caf-a0bc-4acc-b8f4-620c60c63d14/Valero-NuStar-Draft-IS-MND>)



SCAQMD Significance Threshold	150	55	100	150	550	75
Significant?	No	No	No	No	No	No

SCAQMD CEQA Handbook (SCAQMD 1993).

Air Quality calculation from dredging operations of 2021 Draft NuStar Valero IS/MND and 2015 Final IS/ND

#### 8.4 Biological Resources

The Revised Proposed Project involves in-water construction activities. The barge landing upgrades include demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing of approximately 850 cubic yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot concrete approach slab.

Turbidity caused by in-water construction would be temporary and localized and would not substantially reduce foraging by marine mammals (i.e., sea lions) in the vicinity of the construction zone. Also, there would be no effects to underwater noise since there is no pile driving included as a part of the Revised Proposed Project. The barge landing ramp demolition and construction activities would have temporary adverse effects on marine biota through resuspension of sediments and disturbance of benthic communities. However, the impact would be limited in extent and duration (i.e., the period of construction). The majority of the dredge footprint is currently under a concrete ramp and therefore removal of these sediments will have no direct impact on the soft benthic community. The project will return approximately 3,200 square feet of this concrete surface to soft bottom habitat. The soft-bottom benthic community would re-establish itself both in areas currently covered and uncovered by the concrete ramp. Furthermore, the USACE permit conditions would require a pre-construction eelgrass survey of the Project area. If eelgrass is found, a post-construction survey is required and any net loss would be replaced in accordance with USACE regulations and the National Oceanic and Atmospheric Administration Fisheries policy. Per Waste Discharge Requirements issued by LARWQCB, water quality would be monitored during dredging to reduce the extent of any impacts from the sediment plume. Given the limited area that would be affected by dredging activities and the controls in place to minimize adverse effects on water quality, dredging would not cause significant impacts to biological or water quality resources.

Construction activities have the potential to redistribute non-native species locally within the Port through disturbance of the bottom sediments and removal of pilings. However, in general, existing non-native species are widely distributed in the Harbor, so that redistribution from the Project site during construction would not adversely affect the natural community throughout the Harbor and elsewhere in Southern California. The invasive algae *Caulerpa (C. taxifolia)* is listed as a federal noxious weed under the U.S. Plant Protection Act. In areas outside its native range, it can grow very rapidly, causing ecological devastation by overwhelming local seaweed species and altering fish distributions. Although this species has never been observed in the Port Complex, it is a threat in Southern California. This has prompted regulatory control measures described in the *Caulerpa* Control Protocol prior to specific underwater construction activities such as bulkhead repair, dredging, and pile driving. As required by the USACE permit requirements and the *Caulerpa* Control Protocol, a *Caulerpa* survey would be conducted at the Project site prior to the start of construction activities.

The potential for the introduction of non-native species during operation would not be increased from the previously evaluated conditions because vessel operations would remain the same. Accordingly, impacts of construction and operation on other sensitive habitats or natural communities would be less than significant.

Due to the localized and temporary nature of the construction activities, compliance with regulatory requirements requiring biological surveys, and no change in operations; there would be a less-than-significant impact on biological resources.

## 8.5 Cultural Resources

There are no historic resources being altered, demolished, or modified as a result of the Revised Proposed Project. Also, there have been no sensitive paleontological resources recorded within the marine portion of the Project area. The majority of the West Basin area was dredged in the early 1980s and then during the 2010-2011 period again for the Port's Main Channel Deepening Project. These activities included maintenance dredging assessed in the 2009 Joint Final Supplemental Environmental Impact Statement/ Environmental Impact Report with USACE.<sup>2</sup> Additionally, extensive artificial fill has been placed over marine deposits within much of the West Basin area. Thus, there is very little potential for the barge landing upgrade construction activities to encounter paleontological resources in the Main Channel or West Basin area. While highly unlikely to occur, and as mentioned in the Final IS/ND, construction would halt and proper notification requirements would be adhered to if any discoveries occur. Therefore, there would be a less-than-significant impact to cultural resources.

## 8.6 Energy

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

**Less-than-Significant Impact.** The Revised Proposed Project would require the use of non-renewable energy resources in the form of fossil fuels used to operate equipment during construction. Equipment needed for construction include a wheel cutter, two jack hammers, a clamshell bucket, a dredge barge, and a derrick barge. Although there would be an additional equipment needed for construction, these would only create a negligible increase in energy due to a small amount of fuel usage over a temporary period of time (i.e. the construction period). The Revised Proposed Project would not include any change in operations that was not already evaluated in the Final IS/ND.

The Revised Proposed Project would not use non-renewable energy resources in a wasteful or inefficient manner during construction. The construction energy use does not constitute wasteful, inefficient, or unnecessary consumption. Therefore, impacts would be less-than-significant and no mitigation is required.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**Less-than-Significant Impact.** The Revised Proposed Project would not conflict with adopted state or local renewable energy or energy plans. Additionally, the Revised Proposed Project would not conflict with any Port's energy plans, including the Energy Management Action Plan. The Revised Proposed Project would not require the removal of any existing renewable energy infrastructure, such as solar panels or wind turbines. The Revised Proposed Project does not propose the construction of new or modified buildings or the addition of new or modified equipment, so energy efficiency requirements under the California Green Building Code and Appliance Efficiency Regulations (Title 24 and Title 20 of the California Code of Regulations, respectively) would not apply. The POLA Development Bureau (Construction and Engineering Divisions) is responsible for design, inspection, management, and oversight of construction projects to ensure projects comply with energy efficiency requirements. Energy consumption during construction activities would be used efficiently and would represent a negligible portion of state-wide energy consumption. Therefore, these uses do not conflict with energy plans and impact would be less than significant, and no mitigation is required.

---

<sup>2</sup> 2009 Joint Final Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report with USACE for the Port of Los Angeles Channel Deepening Project (Available at: <https://www.portoflosangeles.org/environment/environmental-documents>)

### **8.7 Geology and Soils**

The Project area has been routinely dredged and filled in the 20th century to create shipping channels and increase or maintain the design depth at the berths, thereby destroying any stratigraphy of the Project area, any unique paleontological resources, and any unique geologic features. The Revised Proposed Project's construction activities would occur primarily in and over harbor waters. Therefore, there would be no impact to unique paleontological resources or unique geologic features and there would be a less-than-significant impact to geology and soils.

### **8.8 Greenhouse Gas Emissions**

As discussed in Section 8.3 above, the Revised Proposed Project would generate a negligible increase in air emissions over the temporary construction period. For construction activities, the Revised Proposed Project would require a wheel cutter, two jack hammers, a clamshell bucket, a dredge barge, and a derrick barge over a temporary construction period. This equipment would create a negligible increase to greenhouse gas (GHG) due to a de minimis amount of emissions. Also, there is no change in operations from what was previously evaluated in the Final IS/ND. Therefore, there would be a less-than-significant impact to GHG.

### **8.9 Hazards and Hazardous Materials**

The Revised Proposed Project does not change the impacts previously assessed in the Final IS/ND since construction would comply with applicable laws and regulations governing hazardous materials. Due to compliance with regulations, construction would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Accordingly, there would be a less-than-significant impact to hazards and hazardous materials.

### **8.10 Hydrology and Water Quality**

The Revised Proposed Project involves in-water construction activities. The barge landing upgrades include demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing of approximately 850 cubic yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot concrete approach slab.

All of the dredged material would be disposed of at the Berth 243-245 CDF. The dredging would resuspend some bottom sediments, create localized and temporary turbidity plumes, and resuspend sediments over a relatively small area. Suspension of sediments during clamshell dredging occurs during bucket impact, penetration, and removal of the bucket from the sediment, as well as during bucket retrieval through the water column. Sediments would be tested per standard USEPA/USACE protocols to determine their suitability to be placed at the Berth 243-245 CDF and to evaluate potential water quality impacts during dredging and disposal activities. This standard protocol is a requirement of the USEPA/USACE permitting. If sediment testing indicates that any chemical constituents in the sediments exceed California Title 22 criteria for hazardous waste determination, the sediment would be disposed of appropriately at an off-site hazardous materials disposal facility. Per Waste Discharge Requirements issued by LARWQCB, water quality would be monitored during dredging to reduce the extent of any impacts from the sediment plume. Given the limited area that would be affected by dredging activities, the controls in place to minimize adverse effects on water quality, and compliance with all permitting requirements, impacts to hydrology and water quality would be less than significant.

### **8.11 Land Use and Planning**

The Revised Proposed Project would not cause a physical divide to an established community, as there are no changes to operations, only construction. Additionally, the Revised Proposed Project would not conflict with any plan, policy, or regulation as the site is consistent with City zoning and the Port Master Plan's land use designation of Cruise Operations use. The original Catalina Express operations were permitted as an ancillary use to the passenger cruise operations under Coastal Development Permit No. 15-02. Catalina Express will continue to provide passenger transport services as their main operation. The proposed development under this amendment would not increase the barge berthing or footprint, nor the intensity of operations. Therefore, it would remain in conformity as ancillary. Furthermore, this area is not located within any habitat conservation plan or natural community conservation plan. Therefore, the Revised Proposed Project would have no impact to land use and planning.

### **8.12 Mineral Resources**

There are no known mineral resources near the Revised Proposed Project that would be impacted by construction activities. Therefore, the Revised Proposed Project would have no impact to mineral resources.

### **8.13 Noise**

The Revised Proposed Project includes demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing of approximately 850 cubic yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot concrete approach slab. Equipment needed for construction include a wheel cutter, two jack hammers, a clamshell bucket, a dredge barge, and a derrick barge. Although the Revised Proposed Project would include some noise due to the use of construction equipment over a temporary period for the barge landing ramp upgrades, it is not anticipated to create new significant impacts to noise. The construction noise evaluated in the Final IS/ND was far more extensive due to the installation of 22 pilings, which included pile driving, but was concluded to be less than significant. Compared with the previously evaluated construction noise, the construction for the Revised Proposed Project would generate a reduced level of noise than the past ramp construction event due to no pile driving, and would not result in any new significant impacts to noise. The nearest potential residential receptors are located approximately 2,000 feet west of the Project site, with many intervening structures between the residential receptor and the Project site. Accordingly, no new significant impacts would occur to sensitive receptors since construction noise during the Revised Proposed Project would be negligible due to distance from the nearest sensitive receptor, which exceeds the 500 foot threshold for construction noise impacts in Chapter 11 of the Los Angeles Municipal Code. Additionally, since there is no change in operations included in the Revised Proposed Project, any noise would be temporary and limited to the construction duration. Therefore, noise impacts would be less than significant.

### **8.14 Population and Housing**

The Revised Proposed Project would not induce population growth, displacement of existing housing, or displacement of a substantial number of people. Therefore, the Revised Proposed Project would have no impact to population and housing.

### **8.15 Public Services**

The Revised Proposed Project would not result in any new impacts to the performance of fire protection, police protection, schools, parks, or other public facilities. Therefore, the Revised Proposed Project would have no impact to public services.

### 8.16 Recreation

The Revised Proposed Project would not increase demand on existing recreational facilities nor require the construction of new recreational facilities. Accordingly, the Revised Proposed Project would have no impact to recreation.

### 8.17 Transportation

The Revised Proposed Project would require a nominal amount of increased employees during construction of the barge landing upgrades. The Los Angeles Department of Transportation's (LADOT's) guidelines state that a Vehicle Miles Travelled analysis is not required if a project generates less than 250 daily trips. The maximum number of daily construction employees needed for the Revised Proposed Project is 20 employees. These 20 employees would create a maximum of 40 daily vehicle trips to the Project site. This temporary increase in passenger vehicles to the Project site would not cause trips in excess of the 250 or more daily vehicle trips threshold specified by the LADOT Guidelines. Accordingly, the Revised Proposed Project would be less than significant.

### 8.18 Tribal Cultural Resources

California Assembly Bill (AB) 52 was enacted on July 1, 2015 and required an update to Appendix G (Initial Study Checklist) of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. Since the Final IS/ND was certified prior to these dates (January 2015), AB 52 was not required at the time of the Final IS/ND. AB 52 requires that tribal cultural resources be evaluated under CEQA. The Revised Proposed Project was evaluated in the Final IS/ND for cultural resources; however, the AB 52 consultation requirement does not apply to this Addendum under CEQA's statute, Public Resources Code Section 21080.3.1, which only applies to a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report.

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

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

**Less-than-Significant Impact.** As discussed in Section 4.5, Cultural Resources, there are no historic resources being altered, demolished, or modified as a result of the proposed Project. The potential to discover an unknown tribal cultural resource within the Project site is very low since the Project area has been routinely dredged over the history of the Port to create shipping channels and increase or maintain the design depth at the berths. Given the absence of known tribal resources in the Project area, the potential to encounter tribal cultural resources as a result of the Revised Proposed Project is unlikely. Accordingly, the Revised Proposed Project would have less-than-significant impact and no mitigation is required.

(ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

**Less-than-Significant Impact.** As discussed previously, the Revised Proposed Project would have low potential to discover an unknown or buried tribal resource because the Project area is routinely dredged over the history of the Port. Furthermore, there are no known tribal cultural resources within the Project area. Therefore, the Revised Proposed Project would have a less-than-significant impact on tribal cultural resources and no mitigation is required.



### **8.19 Utilities and Service Systems**

The Revised Proposed Project would not have any impact on the current wastewater treatment facilities and no demands on water supply are anticipated. The barge landing upgrades would include dredging and disposal of 3,000 cubic yards of sediment as well as minimal solid waste from demolition that would be recycled and disposed of. Dredged material would be disposed of at the Berth 243-245 CDF. There are a number of operations within Los Angeles County that recycle construction and demolition material, and the Port, as standard conditions of permit approval, requires recycling of construction materials and use of materials with recycled content where feasible to minimize impacts to solid waste. Demolition debris would not exceed landfill capacity. By being disposed of in the CDF, dredged material would not affect landfill capacity and would therefore not affect solid waste disposal facilities. In summary, construction is anticipated to generate minimal amounts of waste requiring disposal in a landfill, and construction would comply with applicable waste reduction requirements. There would also be no change in operations as a part of the Revised Proposed Project. Therefore, utilities and service systems impacts would be less than significant.

### **8.20 Wildfire**

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

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

**No Impact.** PRC Sections 4201-4204 direct the California Department of Forestry and Fire Protection to map fire hazard based on relevant factors such as fuels, terrain, and weather. The Port is not located in or near a state responsibility area or lands classified as a Very High Fire Severity Zone within its Local Responsibility Area (California Department of Forestry and Fire Protection, 2021; LAFD, 2021). Therefore, the Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones, no impacts would occur, and no mitigation is required.

## **9. Conclusions**

The Revised Proposed Project would upgrade the barge landing ramp at Berth 95 to fix the ramp design and improve barge access. The ramp at Berth 95 is used by Avalon Freight's barges which bring supplies to Catalina Island and return with refuse. Currently, the angle of the barge landing ramp is not optimal and it cannot be utilized by Avalon Freight during low or high tides. Improvements to the ramp would allow Avalon Freight to utilize the ramp with the same frequency, but on a preferred schedule not dependent on the tides. The barge landing upgrades include demolition and removal of approximately 5,000 square feet of in-water concrete ramp, dredging and disposal of approximately 3,000 cubic yards of sediment, furnishing and placing of approximately 850 cubic yards of quarry run and rip rap, and casting in place of an approximately 400 square-foot concrete approach slab. Dredging would require a 404 permit from the USACE and Waste Discharge requirements issued by the LARWQCB. While the original Project did not include dredging, similar mandatory provisions to those included in the original in-water work would be included as a result of required permits issued by the USACE and the LARWQCB. These are mandatory federal and state regulatory agency requirements and not mitigation measures under CEQA.

The Revised Proposed Project would continue Avalon Freight's current operations. No additional vessels or equipment would be needed for operations. Additionally, no new entitlement would be needed for the Revised Proposed Project since LAHD is the property owner and operations would continue under both the current Permit 897 with Catalina Express and current contract between Avalon Freight and Santa Catalina Island Company.

Due to minor alteration of the existing barge landing ramp over a temporary construction period, involving no expansion of operations use beyond that evaluated in the Final IS/ND and mandatory compliance with regulatory requirements, no new significant impacts are assessed for this Revised Proposed Project. Therefore, an addendum is appropriate, with none of the conditions of Section 15162 of the State CEQA Guidelines present.

## 10. References

- California Department of Forestry and Fire Protection. 2021. California State Responsibility Areas for Fire Protection. [Online].  
<https://www.arcgis.com/home/item.html?id=5ac1dae3cb2544629a845d9a19e83991>. Accessed October 20, 2021.
- LAFD (Los Angeles Fire Department). 2021. Fire Zone Map. [Online]  
<https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>. Accessed October 20, 2021.
- LAHD. 2009. Joint Final Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report with USACE for the Port of Los Angeles Channel Deepening Project, Los Angeles District. April. <https://www.portoflosangeles.org/environment/environmental-documents>
- LAHD. 2015. Final Initial Study/Negative Declaration for Avalon Freight Services. January.  
[https://kentico.portoflosangeles.org/getmedia/110a0561-b3f6-4764-9a5f-20e13773e443/Final\\_IS\\_Avalon\\_Freight](https://kentico.portoflosangeles.org/getmedia/110a0561-b3f6-4764-9a5f-20e13773e443/Final_IS_Avalon_Freight)
- LAHD. 2021. Draft Initial Study/Mitigated Negative Declaration for Berth 163-164 [NuStar-Valero] Marine Oil Terminal Wharf Improvements Project  
<https://kentico.portoflosangeles.org/getmedia/d2ea2caf-a0bc-4acc-b8f4-620c60c63d14/Valero-NuStar-Draft-IS-MND>