2.1 Introduction and Project Overview

2.1.1 Cabrillo Way Marina Development

This chapter provides an overview of the proposed 86-acre Cabrillo Way Marina development project. The LAHD has received an application from Westrec Marinas to redevelop approximately 49 acres of land and 37 acres of water in the West Channel area of the Port. The main project components involve the redevelopment of the site to replace deteriorated marina facilities with high-value marine and visitor-oriented retail facilities, a vessel stack storage facility, restaurants, tour/charter/rental activities, yacht sales display areas, marina facilities catering to larger recreational vessels, and special events.

As indicated in Chapter 1, “Introduction,” the Board of Harbor Commissioners originally certified a Final EIR in 1980 for the West Channel/Cabrillo Beach Recreational Complex (LAHD 1980a). That document assessed the West Channel/Cabrillo Marina Phase I Development Project (now called Cabrillo Marina Phase I), which was subsequently constructed and has been in operation since 1986. The document also included the Phase II Development at a programmatic level. In 1998, the Phase II Development component changed substantially from that which was described in the 1980 Final EIR. Consequently, a Draft SEIR was prepared and circulated for public review in November 1998 (LAHD 1998). That Draft SEIR evaluated the changes between the 1980 EIR project and the 1998 Cabrillo Way Marina development plans. However, for various reasons, the project was placed on hold and the Final EIR was not completed.

Since 1998, the proposed Cabrillo Way Marina project has undergone several minor site plan and marina slip layout revisions, as well as the introduction of the two Miner Street/22nd Street intersection configuration options, the extension of Miner Street south of 22nd Street, and the inclusion of a boat launch siting study. Therefore, all components of the revised project description described in this chapter are the subject of the current Recirculated Draft SEIR.
2.1.2 Boat Launch Facility Options

In addition to the proposed project components discussed above, the proposed project also includes the establishment of a new public boat launch facility within the Port, as well as operational changes at the existing Cabrillo Beach boat launch.

Boat Launch Study

As part of the proposed project, the LAHD considered the feasibility of nine possible locations for the establishment of a public boat launch facility within the Port. Those sites include:

- Alternative Site A (Berth 56)
- Alternative Site B (Southern Pacific [SP] Boat Slip)
- Alternative Site C (Berth 95 Area)
- Alternative Site D (Berth 161 Area)
- Alternative Site E (Berth 183-184 Area)
- Alternative Site F (Berth 200 G-H)
- Alternative Site G (Berth 200Z Area)
- Alternative Site H (Berth 204 Colonial Boat Works)
- Alternative Site I (Berth 193-194 Area)

The objective of providing such a facility is to expand the capacity of public boat launching opportunities within the Port beyond the existing facility at Cabrillo Beach. The establishment of a boat launch facility is a separate element of the larger Cabrillo Way Marina project, and is addressed as a “standalone” project component that is analyzed separately in Chapter 5 of this Recirculated Draft SEIR.

Although each alternative site requires differing site-specific design considerations, the new boat launch at any location would contain the following basic elements:

- launch attendant/fee station,
- multi-lane launch ramp (typically two to four lanes at 12–15% slope) with adequate turning radius to permit maneuvering boat and trailer at the top of the ramp,
- boarding float/dock,
- boat wash rack (typically a 30-foot-wide by 50-foot-long concrete pad and hose bib),
restroom facility (typically 200–500 square feet), and

parking lot designed to be consistent with the California Department of Boating and Waterways, including stalls that are 10–12 feet wide by 40–50 feet long and minimum 25-foot drive aisles.

To allow the Board of Harbor Commissioners flexibility in evaluating and directing further study of a boat launch facility, this Recirculated Draft SEIR provides a general operational and environmental feasibility analysis of each of the nine alternative boat launch facilities. None of the nine alternative locations have undergone detailed physical site planning study; therefore, the boat launch components at the alternative sites are evaluated at a conceptual level in this Recirculated Draft SEIR. The locations and settings of each of the alternative boat launch sites are briefly described in Chapter 5, along with a brief overview of boat ramp versus lift/crane launch technologies in order to provide the Board of Harbor Commissioners with a broader range of project options.

**Cabrillo Beach Boat Launch Operations**

Providing additional launch capacity elsewhere in the Port will not likely reduce the demand for recreational boat launching at the existing Cabrillo Beach boat launch. To address the local traffic congestion issues voiced by the community, the LAHD will work with the Department of Recreation and Parks to modify the existing operations at the Cabrillo Beach launch site by opening Shoshonean Road (southbound only at the existing boat launch parking lot) to incoming boat trailers and/or by instituting a reservation system to manage vehicle arrivals throughout the peak usage hours.

**Vehicular Access Modifications**

The project segment of Shoshonean Road is a 24-foot wide road that extends about 1,700 feet south from Via Cabrillo Marina to a locked gate at the northern edge of the existing Cabrillo Beach boat launch parking area. Shoshonean Drive has one 12-foot travel lane in each direction, but is currently closed to southbound through traffic. Shoshonean Road primarily provides vehicular access to the Cabrillo Beach Youth Facility, as well as pedestrian access from the existing Cabrillo Marina Phase I to Cabrillo Beach. Shoshonean Road was never opened as a public throughway, but does serve as a secondary emergency access road to Cabrillo Beach. Preliminary discussions with the LAFD indicate that the Fire Department favors unlocking the gates at the southern terminus, and that limited one-way boater traffic would not interfere with emergency access. With two 12-foot travel lanes, the road can accommodate most fire apparatus, even with a full queue of boater vehicles.
Boat Launch Reservation System

The LAHD will work with the Department of Recreation and Parks to institute a boat launch reservation system at the existing Cabrillo Beach Launch Ramp. The purpose of instituting a boat launch reservation system will be to reduce boat traffic congestion during the peak morning and weekend launch times. As preliminarily defined, a telephone reservation system will direct calls to an operator who will assign a launch time and confirmation number to the launch user. Upon arrival at the corner of Shoshonean Road and Via Cabrillo Marina, an attendant will meet launch users with the day’s reservations numbers. If the launch users have a launch confirmation number and are within their allotted time, they will then be permitted to proceed to the Cabrillo Beach boat launch ramp. Launch users without confirmation numbers, or who have missed their allotted time, will be allowed to enter on a “space available” basis. If no space is available, launch users will then have to return on a “space available” basis or proceed to an alternate launch ramp.

2.2 Project Location

The Cabrillo Way Marina project site is located at the southern end of the City of Los Angeles (Figure 2-1). The project site is located in the southwestern portion of the Port in the San Pedro District (Port Master Plan [PMP] Planning Area [PA] 1 and four smaller, adjacent parcels in PMP PA 2). The boundaries that constitute the Cabrillo Way Marina Development Project are shown in Figure 2-2.

Each potential boat launch site location is described separately in Chapter 5, “Boat Launch Analysis.”

2.3 Existing Conditions

2.3.1 Regional Context

The Port is composed of a diverse group of land uses. The primary land use throughout the Port is industrial, although there is a substantial recreational component present in the form of a cruise liner terminal, small boat marinas, and a small recreational beach area. There are approximately 300 berths that accommodate uses ranging from individual fish stalls and retail tourist shops to larger than 200-acre container terminals. Activities at the Port include recreation, tourism, the transfer of containerized goods, the shipping of liquid bulk items such as petroleum products and industrial chemicals, and the shipping of dry bulk items such as foodstuffs and coal. Although the project site is currently underutilized, the existing uses include marinas, boat yards, recreational vessel dry storage yards, warehousing, and related activities.
2.3.2 Project Site and Surrounding Uses

The proposed Cabrillo Way Marina site is currently occupied by existing marina boat slips, parking areas, and warehouses for storage, cargo handling, and transshipment activities, and is adjacent to San Pedro Boat Works. Figure 2-3 shows the existing uses on the project site and surrounding areas. Marina boat slips located at the Watchorn Basin area, in particular, do not have sufficient parking capacity available or parking facilities conveniently located for waterside dependent uses. About 530 boat slips presently exist on the east side of the West Channel within the project site. As of 1998, when the previous Draft SEIR was prepared, approximately 760 boat slips were in use. Many have since been removed due to their poor conditions, and this Recirculated Draft SEIR reflects the current baseline count of 530 slips in all relevant discussions.

There are a number of commercial and residential uses in the vicinity of the project area. There are commercial uses at 22nd Street Landing Sportfishing and across the West Channel at Cabrillo Marina Phase I. The nearest residential uses are located along Crescent Avenue to the north and at Fort MacArthur to the west. It should be noted that there are also non-permanent residential uses by “liveaboards” (boat occupants), on the project site.

2.4 Project Objectives

A statement of the objectives sought by the proposed project is required by State CEQA Guidelines (Section 15124[b]). In general, an objective can be defined as something that is worked toward or striven for, or as some type of goal. The definition of the project objectives is important in that it aids in the lead agency formulation of a reasonable range of alternatives to the proposed project that can also meet, at least in part, project objectives.

The following are the objectives of the project at the Cabrillo Way Marina site:

- replace deteriorated marina facilities with higher-value marine and visitor-oriented uses;
- provide waterfront access and use for the public;
- provide a vibrant public/private marina land and water community;
- provide a village of recreational marine and boating activities that draws together the boater, tourist, local, and regional residents and the Port-oriented business community;
- improve the area’s visual characteristics through the elimination of deteriorated facilities and the upgrading of existing marina facilities;
- create a new destination waterfront amenity;
- provide a vessel stack storage facility to accommodate increased public boat use and greater convenience and efficiency for boaters;
provide restaurants, tour/charter/rental opportunities, and other uses to accommodate visitors and boaters;

provide facilities that cater to larger recreational vessels; and

effectively compete with other waterfront facilities located in Long Beach and other nearby jurisdictions to retain businesses and expenditures that might otherwise be lost.

The following are the objectives of the project at one or more of several potential boat launch sites in the Port, but outside of the Cabrillo Way Marina project area:

provide a boat launch facility to accommodate increased public boat use and greater convenience and efficiency for boaters, and

reduce local traffic congestion at the entrance to Cabrillo Beach.

2.5 Proposed Project

The proposed project involves the second phase of improvements within the West Channel/Cabrillo Beach Recreational Complex to provide a unified continuous waterfront within the West Channel Development Area (WCDA). Cabrillo Marina Phase I has 13 acres of land and 41 acres of water, opened in 1986, and is currently operated by California Yacht Marina and Holiday Harbor/Fleitz Brothers.

The proposed Phase II project, the Cabrillo Way Marina, has a total of 49 acres of land and 37 acres of water located within PAs 1 and 2. The proposed project design is consistent with Cabrillo Marina Phase I (i.e., architecture and pedestrian promenade linkage). If approved, the proposed project will be developed and operated by Westrec Marinas. Westrec was selected by the LAHD from a Request for Proposals to enter into a Memorandum of Understanding (MOU) for the exclusive rights to planned development of the project. The proposed elements are a result of that process.

The proposed project is conceptualized to include a variety of commercial and recreational land uses. Figures 2-4, 2-5, and 2-6 show the conceptual site plan for the land and water improvements. Figure 2-7 shows an aerial perspective view in the vicinity of the dry stack boat storage building. The various components of the project are described below, and are summarized in Table 2-1. Although the site plan includes “future development” Parcels 2A and 2C north of 22nd Street, those parcels are not currently proposed for development by Westrec and are not discussed further in this Recirculated Draft SEIR.
<table>
<thead>
<tr>
<th>Area (acres)</th>
<th>Land Use</th>
<th>New Building Square Footage</th>
<th>Assumed Parking Ratio</th>
<th>New Parking Spaces Required</th>
<th>New Parking Spaces Provided</th>
<th>No. of New Slips</th>
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<tr>
<td>17.03</td>
<td>Slips (Channel &amp; Staging Area)</td>
<td>—</td>
<td>0.6/slip</td>
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<td>254</td>
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<td>8.06</td>
<td>Slips (South Side)</td>
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<tr>
<td>12.16</td>
<td>Slips (Middle)</td>
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<td>280</td>
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<td>9.01</td>
<td>Dry Stack Boat Storage (includes Restroom)</td>
<td>200,000</td>
<td>0.33/boat</td>
<td>330</td>
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<td>3.40</td>
<td>Marine Retail</td>
<td>42,000</td>
<td>5/1,000</td>
<td>210</td>
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<tr>
<td></td>
<td>Yacht Brokers</td>
<td>25,000</td>
<td>4/1,000</td>
<td>100</td>
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</tr>
<tr>
<td></td>
<td>Restaurant</td>
<td>5,000</td>
<td>10/1,000</td>
<td>50</td>
<td></td>
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<td>0.50</td>
<td>Restaurant</td>
<td>10,000</td>
<td>10/1,000</td>
<td>100</td>
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<td></td>
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<tr>
<td>1.08</td>
<td>Marina Club/Activity Center</td>
<td>10,000</td>
<td>5/1,000</td>
<td>50</td>
<td></td>
<td></td>
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<tr>
<td>3.54</td>
<td>Boat Mall (includes Parking &amp; Trailer Storage)</td>
<td>20,000</td>
<td>5/1,000</td>
<td>100</td>
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<td>0.47</td>
<td>Market Delicatessen</td>
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<td>5/1,000</td>
<td>25</td>
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<tr>
<td>4.84</td>
<td>Boat Storage (land-side)</td>
<td>335 spaces</td>
<td>0.25/boat</td>
<td>84</td>
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<td>335</td>
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<tr>
<td>0.57</td>
<td>Storage Building</td>
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<td>1/1,000</td>
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<td>1.34</td>
<td>Youth Center and Storage Area</td>
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<td>4/1,000</td>
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<td>0.42</td>
<td>Boat Launch Area</td>
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<td>1.48</td>
<td>22nd Street Landing</td>
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<tr>
<td>2.20</td>
<td>Parking for 22nd Street Landing</td>
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<td>150</td>
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<td>0.72</td>
<td>Plaza</td>
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<tr>
<td>66.82</td>
<td>Subtotal</td>
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</table>

**Common Areas**

<table>
<thead>
<tr>
<th>Area (acres)</th>
<th>Parking Lot 1 (Retail/Dry Stack)</th>
<th>Parking Lot 2 (22nd Street) Parcel 2B</th>
<th>Parking Area 3 (Watchorn Basin)</th>
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<tbody>
<tr>
<td></td>
<td>8.28</td>
<td>2.66</td>
<td>8.28</td>
</tr>
</tbody>
</table>

**Subtotal Common Areas** | 19.22 | 1,544 |

| Total Project Area | 86.04 | 1,664 | 1,696 | 675 |
|                   |       |       |       | (waterside) |
2.5.1 Demolition and Remediation

Existing buildings, paving, substructure, docks, berths, and piers will be partially or wholly demolished and removed to accommodate the construction of the new facilities. Major structural features affected by the various development components include the following.

- Warehouse 6 (southeast of Miner and 22nd Street): The warehouse will be demolished and replaced by parking for the major landside development components (i.e., dry stack boat storage, retail, a restaurant, and an office building).

- Crescent Warehouse at Berths 54–55: Although not on the Cabrillo Way Marina site, the warehouse would be removed as part of the easterly realignment/widening of Miner Street, the easterly relocation of the Miner Street/22nd Street intersection, and the southeasterly relocation of the Red Car Line station (south of 22nd Street).

- Former Shelter Point Yachting Service building: This 1930s two-story wood-frame building at the corner inlet of the Berth 41A area would be demolished and replaced by proposed boat slips.

- Warehouses 9 and 10 (north of 22nd Street): These warehouses will remain until development of Parcel 2C (future development), at which time they will be demolished. The proposed boat mall on Parcel 2B will not require removal of Warehouses 9 and 10.

- Various boat repair and service buildings along the Watchorn Basin waterfront: These buildings will be demolished and replaced with parking areas serving the future boat slips and yacht club facilities in the southern portion of the landside improvements.

Railroad Track Removal/Relocation

The realignment of Miner Street and the reconfiguration of the Miner/22nd Street intersection is described fully in Section 2.5.3, “Site Access and Circulation Elements.” The effects on existing railroad facilities (i.e., Red Car Line station and temporary maintenance facility, at-grade crossings, warning devices, and track) are described as follows.

- With the realignment of the Miner/22nd Street intersection, the Red Car Line track north of 22nd Street would be relocated east of the realigned segment of Miner Street, thereby precluding the need for an at-grade crossing at Miner Street. The relocation of the Red Car Line station to a site just southeast of the new intersection would require an at-grade crossing on 22nd Street. Though a precise location has not been identified, the station could be accessed by using existing rail crossings in 22nd Street, yet with new warning device upgrades, including installation of automatic flashing light signals and gates.
The existing at-grade crossing at the Miner/22nd Street intersection would likewise remain unaffected by the project.

Under both intersection options, the existing yard tracks paralleling Miner Street south of 22nd Street will be removed as necessary to accommodate Miner Street improvements and parking. It is anticipated that up to 4,500 track feet of rail would be removed to accommodate the proposed project.

Contaminant Remediation

The existing and historical land uses have resulted in contamination of portions of the project site. As detailed in Chapter 3.8, “Groundwater, Soils, and Sediments,” the necessary investigations have been completed, and known contaminants found have been removed or remediated, as necessary, to accommodate the proposed Cabrillo Way Marina development. This includes surface, below grade, and groundwater investigations and remediation. However, the Red Car Line track realignment eastward will require additional subsurface investigation and testing prior to construction. Unforeseen contamination encountered during construction would be conducted in accordance with applicable regulations.

2.5.2 Infrastructure Plan

Landside Infrastructure Improvements

Landside infrastructure improvements generally include street and intersection improvements, landscaping, utilities, and signage improvements. The project-specific street improvements are an integral part of the proposed development and are described separately under “Site Access and Circulation Elements” below. The conceptual engineering aspects focused on the identification of the existing infrastructure and project requirements, and an assessment of the existing infrastructure to serve the project requirements. The civil engineering investigations included utility systems, railway impacts, roadway improvements, traffic impacts, grading, and various geotechnical issues.

The site will be improved as necessary to accommodate the proposed development. All improvements will be designed and constructed to all applicable local, state, and federal code requirements. The site improvements are envisioned to include, but are not limited to

- grading,
- storm drains,
- utility systems,
- site landscaping and irrigation,
- fencing,
- retaining walls (if needed), and
- soil stabilization (if needed).

**Waterside Infrastructure Improvements**

Several waterside infrastructure improvements would be required to accommodate the proposed project. Waterside infrastructure will include dredging, excavation, and landfilling, and construction of bank riprap revetment along the West Channel and the perimeter of the revised Watchorn Basin. The proposed cut, fill, and dredge areas are illustrated on Figure 2-8. The major infrastructure and facility improvements for the project are described below.

**Dredging**

Dredging activities are required to create the appropriate marina basin shape and depth to accommodate the proposed development. The general area of the Watchorn Basin is going to be dredged up to -15 feet MLLW. In addition, the existing channel (approximately -20 to -25 feet MLLW) will remain to provide access for larger vessels at the fuel dock. The total area to be dredged is estimated at 6.9 acres, with an estimated total volume of 75,000 cubic yards of sediment material.

**Excavation/Cuts**

In order to obtain a waterside configuration that would allow more capacity for marina slips, some land areas are going to be removed. Two land areas will be excavated (0.66 and 0.46 acres at or near Berths 40 and 41a, respectively) for a total of 1.12 acres. The total cut volume is estimated at 40,000 cubic yards of material.

**Landfills**

To create an efficient basin perimeter and to create needed land areas adjacent to the marina basin, landfills are proposed. There will be three landfill areas, as described in Table 2-2 below, for a total landfill area of 3.53 acres (or a 2.41 acre net landfill area) and a total estimated fill volume of 120,000 cubic yards of material. The 1998 Draft SEIR identified the use of the Inner Harbor Mitigation Bank as replacement for water area lost during project construction. As an alternative, during the permitting process, the LAHD may elect to utilize excess credits present in the Bolsa Chica Mitigation Bank in accordance with Master Plan Amendment 15. Factoring in the proposed 1.12 acres of excavation, the project will result in a 2.41-acre net landfill area.
Table 2-2. Proposed Cuts and Fills

<table>
<thead>
<tr>
<th>Cut/Fill Site Locations*</th>
<th>Area (acres)</th>
<th>Fill Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Berth 40</td>
<td>0.66</td>
<td>NA</td>
</tr>
<tr>
<td>2. Berth 40a</td>
<td>0.46</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Total Cut</strong></td>
<td><strong>1.12</strong></td>
<td></td>
</tr>
<tr>
<td>3. Berth 41 area</td>
<td>0.94</td>
<td>Dry stack launch</td>
</tr>
<tr>
<td>4. Watchorn Basin – eastern shoreline (between sites 3 and 4)</td>
<td>0.66</td>
<td>Slope protection and parking</td>
</tr>
<tr>
<td>5. Watchorn Basin – southeast portion (west of Berths 51 &amp; 52)</td>
<td>1.93</td>
<td>Yacht Club facilities, parking, boater drop-off area, slope protection</td>
</tr>
<tr>
<td><strong>Total Fill</strong></td>
<td><strong>3.53</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Net Fill</strong></td>
<td><strong>2.41</strong></td>
<td></td>
</tr>
</tbody>
</table>

*Location numbers correspond to site designations on Figure 2-8.

It should be noted that the materials from excavation and dredge areas are planned to be used in the landfill portion of the site, as long as the materials meet engineering conditions and the respective regulatory disposal criteria. Based on the fill volume needed, more than 5,000 cubic yards of material will need to be imported; the excavation and dredge materials from the land areas will not be of sufficient quantity to construct the fill areas.

Revetments

Revetted slopes are required to protect the marina perimeter and the slope along the main channel and in the reconfigured marina basin. During the conceptual engineering work completed to date, it has been considered as the most cost-effective solution for perimeter protection/slope protection.

Vertical Bulkheads

Vertical bulkheads are required for the effective launch and retrieval of boats handled in the dry stack storage operation. Also, a vertical bulkhead wall is required in the south end of the marina basin to accommodate the launch and retrieval of boats for the storage activities in this area. The south end launch area will include four small boat lifts/hoists that will be mounted on the vertical bulkhead.

2.5.3 Site Access and Circulation Elements

The West Channel Development Area Access and Circulation structure consist of three interdependent systems, composed of vehicular, pedestrian, and watercraft
components. These circulation and access systems have been optimized to provide clear and efficient direction and flow. The circulation and site access components are described in detail below.

**Vehicular Access/Circulation**

A network of major surface streets provides access to the project site. In keeping with the overall PMP intent of developing the western areas of the Main Channel frontage to the SP Slip and West Channel area for visitor/tourism-serving and recreational uses, Harbor Boulevard will be promoted as the primary entry corridor to the project site. The major vehicular circulation design themes intended to enhance access throughout the project include the following.

- Primary access to the site is proposed at the north end of the project via Miner Street, south of 22nd Street. The key arrival and access intersection occurs where the Cabrillo Way Marina meets 22nd Street. This intersection’s design, signage, and landscape will serve as the project gateway. Cabrillo Way Village will function as the primary entrance to retail, dry stack parking, and the waterfront restaurant area.

- The widening and realignment of Miner Street is intended to enhance the functional and aesthetic access to the new marine uses and the entire Cabrillo Way Marina. Key functions include boat delivery and public access to the dry stack facility, marina parking, slip access, marina complex operator Administration Building, personal boat storage, launching, and yacht club facilities.

- 22nd Street will receive enhanced landscaping on both the sides and the shoulders.

- In addition to accommodating passenger vehicles, the circulation system is designed to allow functional access and circulation for commercial trucks, boat deliveries, and private boat trailers.

- Parking throughout the project is located for convenience in proportion to the specific and mixed uses being served. Parking aisle and search patterns are easily understood and, in conjunction with the grove landscape, provide logical and safe access to each destination.

Detailed descriptions of the project’s vehicular circulation and access components are provided below.

**Roadway Improvements**

To accommodate public and emergency access to the proposed project, various roadway improvements will be designed and constructed. From north to south through the project area, the key circulation improvements are described below, with the Miner Street/22nd Street intersection reconfiguration presented first:
Miner/22\textsuperscript{nd} Intersection Realignment:

- Realignment of Miner Street north of 22\textsuperscript{nd} Street: Beginning at approximately 630 feet south of Crescent Avenue, Miner Street would be realigned gradually eastward to create the new configuration of the Miner Street/22\textsuperscript{nd} Street intersection. The realigned section will extend south approximately 650 feet, ultimately intersecting 22\textsuperscript{nd} Street at a point approximately 160 feet east of the existing intersection. Consistent with the existing roadway section, the realigned section will accommodate two travel lanes in each direction within a 60-foot right-of-way. Miner Street will be vacated from the existing intersection to a point approximately 450 feet north. As proposed, the road alignment would require relocating the existing Red Car Line tracks about 120–190 feet eastward, and moving the existing station southeast of the proposed new Miner/22\textsuperscript{nd} intersection. A new at-grade crossing would be necessary to permit the continued operation of the Red Car Line across 22\textsuperscript{nd} Street.

- Intersection reconfiguration at Miner Street and 22\textsuperscript{nd} Street: The proposed reconfiguration of the Miner Street/22\textsuperscript{nd} Street intersection will require the removal and relocation of signalization; new directional and thematic signage; and appropriate roadway lighting, striping, and markings.

- Realignment and widening of Miner Street south of 22\textsuperscript{nd} Street: Miner Street south of 22\textsuperscript{nd} Street would be aligned with the new intersection described above. Miner Street south of 22\textsuperscript{nd} Street will undergo a realignment, widening, and southerly extension along the eastern limits of the project area. As with the northern section of Miner Street, the southern section will intersect 22\textsuperscript{nd} Street at a point approximately 160 feet east of the existing intersection. Within a proposed 110-foot right-of-way, the 60-foot wide roadway will extend about 3,200 feet, generally between the proposed project site and the wharf along Berths 50–55. Three curb cuts along Miner Street will provide ingress/egress at the proposed Parking Area 3 (Watchorn Basin) and the dry stand boat storage area.

For the first 1,500 feet south of 22\textsuperscript{nd} Street, the alignment will generally follow the existing Miner Street road section and will require discontinuation of the operations at the warehouse at Berths 54–55. To accommodate this realignment, the warehouse will be demolished and approximately 5 acres of land east of Miner Street will be subject to future development, though not as part of this project. The southerly 1,700 feet of Miner Street will be gradually shifted east of its present alignment in order to accommodate proposed parking and boat storage areas. The roadway’s location along the wharf would preclude future operations at Berths 50–53.
Parking and Access Improvements

Parking needs for existing and future commercial uses were calculated based on City of Los Angeles parking code requirements. The marina is designed consistent with the California Department of Boating and Waterways parking standards for boat slips. This is to optimize available parking spaces for the marina while maintaining a minimum walking distance between the parking lot and any given slip. The project proposes approximately 19 acres of parking among three primary parking lots. An estimated 1,664 parking spaces will be required based on relevant City of Los Angeles and California Department of Boating and Waterways standards, including the full replacement of the existing parking on the site that now serves 22nd Street Landing. The project proposes 1,696 spaces distributed among the various lots. Parking and access improvements will be constructed as shown in the conceptual site plan (Figure 2-4), and as appropriate for the land uses developed.

Landside project circulation addresses the commercial and private truck or trailer needs to move pleasure watercraft of all types to and from the water launching, storage, and staging areas. This includes the dry stack use, boat maintenance buildings, and boat yard. The ability to launch and retrieve many boats from the dry stack storage facility during peak demand times has been carefully studied and addressed in the site planning process. Internal roadways will be included to accommodate internal circulation and emergency access.

Vessel Access/Circulation

Equal attention has been given to both the land and water components of the proposed marina operations. Building placement, land/water maneuvering areas, and access control for safe circulation of the vessels and boaters are designed to optimize operations.

Primary land and water considerations incorporated in the design of the vessel access and circulation system include

- the location of large recreational/commercial boating activities with direct West Channel access;
- large “mega-yacht” slips fronting on the West Channel;
- direct fairway channel access from the sheltered dry stack launch/retrieval staging area to the West Channel;
- Cabrillo Way Marina Fairways connecting slips to the West Channel; and
- strategically located dinghy docks proposed at locations such as the channel retail and Marina Club to encourage and facilitate boater usage of the water as an alternative to vehicle access to the project’s activities and services.
Pedestrian Access/Circulation

Pedestrian circulation will consist of the following three major elements.

- Perimeter pedestrian access and circulation will occur primarily along Miner and 22nd Streets. The established character of landscaped pedestrian pathways found in Cabrillo Marina Phase I will be continued with enhancements at key locations that afford opportunities for viewing the Cabrillo Way Marina.

- Major pedestrian gateways into the Cabrillo Way Marina will occur at the crosswalk on 22nd Street, at the new plaza area.

- The waterside pedestrian promenade system is proposed as the functional backbone to the project. As described below, the waterfront pedestrian promenade will include various passive and active uses along its path on both the water and land sides. Handicapped access will be provided in accordance with the Americans with Disabilities Act (ADA) and other access requirements.

Pedestrian Promenade

Approximately 6,500 linear feet of pedestrian promenade will be constructed to accommodate pedestrian access around the development. The promenade is envisioned to include special pavement treatments, handrails (where appropriate), and miscellaneous site furnishings, such as benches and landscaping, so as to complement the pedestrian promenade in the existing Cabrillo Marina Phase I.

Retail and visitor tourist-serving uses will be established around the promenade. The Cabrillo Way Village center, with its marine retail and restaurants, in addition to the existing 22nd Street Landing, will provide a gathering place for boaters, slip tenants, and visitors. The plaza will be the hub connecting the existing Cabrillo Marina Phase I and future Cabrillo Way Marina waterfront promenades. The new promenade will connect to the existing 22nd Street Landing, continue along the westerly side of the project site to the village retail/waterfront restaurant and Marina Club site, and connect to the point restaurant. From there, the promenade will proceed between the parkway area and the dry stack building toward 22nd Street. Then it will extend along the realigned Miner Street and the water’s edge to its termination at the Yacht Club facilities. The promenade is envisioned as the central feature of the small retail plaza. Decorative paving, lighting, benches, trellises, and landscape features are proposed along the walkways, which will provide access and linkage to the project’s amenities and services.
2.5.4 Cabrillo Way Marina Improvements

The Cabrillo Way Marina will be the primary focus for development. The existing marina facilities will be demolished and replaced with new, modern floating dock systems. The marina will be designed and constructed to conform to applicable local, state, federal, and acceptable industry standards. The proposed project will revitalize the historic Watchorn Basin into a state-of-the-art marina. Major components include

- slips and shoreside support accessible from the south end of the peninsula point,
- dry stack staging and overnight slips,
- slips and shoreside support accessible from Miner Street, and
- pedestrian linkages and waterfront promenade.

Marina Slips

The marina is envisioned to accommodate approximately 675 boat slips, ranging in size from 28–130 feet. However, the goal is to focus approximately 60% of the boat slips in the 40–49 foot range, in accordance with project objectives. Table 2-3 includes an estimate of the proposed slip distribution by boat slip size, quantity, and percent distribution. The proposed slip distribution is in response to forecast market conditions. Recreational boats are getting longer and wider. Therefore, the longer slip-size distribution will not only complement the dry stack storage for smaller boats in the modern marina but will also complement the existing slip mix at the developed Cabrillo Marina Phase I area.

Table 2-3. Existing and Proposed Boat Slip Distribution

<table>
<thead>
<tr>
<th>Length (feet)</th>
<th>1998 Quantity</th>
<th>1998 Distribution</th>
<th>Existing Qty. Distribution</th>
<th>Proposed Qty. Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;30</td>
<td>105</td>
<td>14%</td>
<td>84</td>
<td>59</td>
</tr>
<tr>
<td>30–39</td>
<td>438</td>
<td>58%</td>
<td>368</td>
<td>83</td>
</tr>
<tr>
<td>40–49</td>
<td>162</td>
<td>21%</td>
<td>72</td>
<td>432</td>
</tr>
<tr>
<td>50–74</td>
<td>51</td>
<td>7%</td>
<td>6</td>
<td>90</td>
</tr>
<tr>
<td>75–99</td>
<td>0</td>
<td>0%</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>100–125</td>
<td>0</td>
<td>0%</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>&gt;125</td>
<td>0</td>
<td>0%</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>756</td>
<td>100%</td>
<td>530</td>
<td>675</td>
</tr>
</tbody>
</table>
Dry Stack Boat Storage

A dry stack boat storage building will be situated on 9 acres at the east side of the project, at the southwest corner of Miner and 22nd Streets. The enclosed 200,000-square foot dry stack structure will provide a compatible use of the water marina slips and a maintenance-free, full-service approach for the power boater. Related dry stack facilities will incorporate state-of-the-art amenities and services, including

- ample and convenient parking,
- pre-arranged launch schedules,
- overnight in-the-water slips,
- fuel and provisions options,
- large in-the-water staging area, and
- storage for boat mall dealer inventory.

The dry stack development will include a large storage building (about 65 feet high) and staging area for stacked storage of approximately 1,000 boats in its ultimate configuration. The building will be completed in the early stages of construction, and the internal storage facilities will be placed in use as market demand dictates. Upon opening, the initial configuration will provide storage for 300 boats, with expansion to 600 boats in the intermediate configuration 2–5 years after opening. The remainder will be constructed to accommodate market demands.

The mass and scale of the structure are intended to blend with the size and character of the existing east and main channel warehouses. The architectural character, however, will have a nautical festive theme through the use of color, graphics, and form.

Travel-Lift Pier

To facilitate the marine repair activities, a marine travel-lift facility may be installed to haul and launch boats for repair activities. The travel-lift will require two reinforced concrete piers for access to the boats being repaired. The travel-lift access will work in conjunction with the dry stack storage operation.

Fuel Dock and Sewage Pumpout Facility

Fuel dock and sewage pumpout facilities and other boater service-related amenities will be located adjacent to the bulkhead wall at the dry stack area and the travel lift pier. The fuel dock will have related infrastructure, such as pipelines, pumps, and aboveground fuel (gasoline and diesel) storage tanks. The
sewage pumpout facility will receive the contents of holding tanks on-board boats designed to hold sewage, and which must be emptied from time to time.

**Marina Club/Activity Center**

A Marina Club will be constructed along the waterfront adjacent to the village center for those slip tenants interested in a shoreside gathering place. Amenities and activities will include a clubhouse with lockers, showers, restrooms, fitness facilities, and snack bar. Outdoor facilities will include a swimming pool, barbecue area, and garden patio for club members’ festivities or private parties. With a dinghy dock at its front door overlooking the main channel, this facility is strategically located for access by boat, foot, and automobile.

**Yacht Club and Other Boater Services**

The southern portion of the site will be occupied by a yacht club and various storage and boater service facilities. These uses will encompass approximately 7 acres adjacent to the existing San Pedro Boat Works. Inclusive on the site will be yacht club facilities, dry stack boat storage for year round operation, a launch area, and other boater-related services. A 20,000-square foot marine self-storage facility will provide boaters with secure and convenient storage for miscellaneous items.

### 2.5.5 Future Retail Components

**Boat Mall**

Located at the project entrance from Miner and 22nd Streets, this component of the project includes:

- a 3.5-acre boat mall for approximately eight dealership pavilions and boat display,
- dry stack facilities utilized by boat dealers for additional boat inventory,
- an area set aside to the south of the boat mall for parking and trailer storage,
- relocated parking for 22nd Street Landing, and
- a market/delicatessen or other boater retail on about 0.5 acre.

**Marina Village Retail Center**

Opposite the dry stack facilities and fronting on the west channel, the project proposes a mixture of interactive water and land uses. The new retail
commercial complex will be anchored on the north by 42,000 square feet of retail space. The village retail component will also include small shops and 25,000 square feet of office space, clustered around a pedestrian-oriented plaza. This plaza will also serve as a connection to the waterfront promenade and to a 10,000-square foot theme restaurant. The makeup of the office and retail facilities will be determined after consultation with community focus groups. Additional features include the following.

- Dinner cruise and excursion boat docks are proposed in a strategic location to attract visitors at a point midway between the 22nd Street retail and channel retail/restaurants. Offices for the dinner cruise boats are anticipated to be located in the proposed retail area.
- Large “mega-yacht” slips extend in front of the office space. State-of-the-art dockside amenities such as individual transformers for shore power will be provided. The water depth and direct West Channel access is suited for large yachts, including the 100-foot plus class.
- The slip size transitions to the 30 to 55-foot range in front of the restaurant site.
- Short-term docking and a long dock are provided for the Marina Club.

### 2.5.6 Project Design Elements

#### Streetscape

The streets entering and connecting points with the marina will be lined with tall accent trees compatible with the seaside climate. The tree parkways along with the medians will be planted with long-lived shrubs to create garden boulevards. Sidewalks will provide pedestrian access along the boat mall to the marine retail/restaurant areas and marina gangways along the water’s edge.

#### Architecture

The buildings and architectural elements are designed to enhance the existing California Mission Revival style buildings found in Cabrillo Marina Phase I, expand on the lightness of marine architecture, and tie into southern California seaside and maritime themes.

The retail and office buildings along the Cabrillo Way promenades will feature open galleries and colonnades at grade level and a series of canvas and trellis draped decks and balconies on the second level of the office space area. New buildings will take cues from the hundreds of boats by the use of railing and canvas awnings.
Parking Groves

All plantings and site elements will be selected for compatibility with the existing Cabrillo Marina Phase I, and with the climate and maintenance requirements of the ocean environment.

Construction Phasing

To describe the construction processes, the development of the project is divided into three basic phases. The construction sequencing has been developed with special attention to existing users and facilities. The construction sequencing is also intended to minimize construction duration to get the development on-line as soon as possible. With construction projects of this magnitude, the primary infrastructure must be placed early on and quickly, to provide access, services, and foundations for the new development areas.

It is important to note that with significant overlap between phases, the overall construction process can be further expedited. Due to the interrelationships of the construction elements, it is assumed that the overall construction process will be managed to optimize the construction contract controls.

Construction will be conducted in three phases. There will be three phases of infrastructure improvements, which will be followed by the corresponding facility improvements. The construction and phasing schedule is shown on Figure 2-9.

Of all the existing landside operations at the project site, only the San Pedro Boat Works and Fire Station No. 110 will remain. All other landside tenants and lessees will be vacated or relocated to prepare the site for development. Any relocation will be subject to subsequent CEQA analysis. A program will be developed for working with existing lessees to coordinate the continued operation, maintenance, security, and access of these uses during the transition of operations.

Construction Phase I

The first construction phase consists of infrastructure improvements to prepare the site for the proposed facility improvements. These infrastructure improvement elements consist of:

- removing railroad tracks,
- Miner Street and 22nd Street intersection improvements (south side only),
- 22nd Street improvements (south side only),
- West Channel slope protection,
The Construction Phase I facility improvements will follow the first construction phase infrastructure improvements. These facility improvement elements consist of:

- marine retail buildings and parking,
- dry stack building,
- boat dealers’ parking and facilities (south),
- Main Channel slips,
- dry stack staging/launch area, and
- sportfishing fleet and excursion slips.

**Construction Phase II**

The Construction Phase II infrastructure improvements consist of the following elements:

- 22\textsuperscript{nd} Street improvements (north side only),
- Miner Street and 22\textsuperscript{nd} Street intersection improvements (north side only),
- site preparation for boat mall (north), marina self-storage building, boat storage, and market delicatessen,
- dredge/fill Watchorn Basin area (south), and
- Watchorn Basin perimeter improvements/bulkhead wall.

The Construction Phase II facility improvements will follow the second construction phase infrastructure improvements. These facility improvement elements consist of

- marine retail building,
- travel lift/fuel dock,
- South Basin slips (including long dock),
- boat dealer parking and facilities (north),
- outdoor pedestrian plaza,
- promenade, and
- Parking Lot 2 and 22\textsuperscript{nd} Street Landing parking.
Construction Phase III

Construction Phase III infrastructure improvements consist of the following elements:

- Miner Street realignment and widening,
- dredge/fill Watchorn Basin area, and
- Watchorn Basin perimeter improvements.

Construction Phase III facility improvements will follow the third construction phase infrastructure improvements. These facility improvement elements consist of

- Marina Club building,
- market delicatessen and village retail buildings (to be determined after consultation with community focus groups),
- boater storage building,
- Parking Lot 3,
- Watchorn basin slips,
- promenade, and
- mast-up boat storage and other boater-related services.

2.5.7 Employment

Upon completion of all phases of development, the proposed project will generate approximately 419 full-time positions and an additional 191 seasonal jobs, for a full-time equivalent employment of approximately 514 full-time jobs.

2.6 Relationship to Existing Plans

A primary objective of the planning process for the proposed project is ensuring that the criteria and guidelines of relevant plans and policies are defined and met. The following discussion addresses how the proposed project will comply with these plans.

2.6.1 Port of Los Angeles Master Plan

The PMP provides for the development, expansion, and alteration of the Port, in both short-term and long-term periods, for commerce, navigation, fisheries, port-dependent activities, and general public recreation. Those objectives are
consistent with the provisions of the California Coastal Act (1976), the Charter of the City of Los Angeles, and applicable federal, state, and municipal laws and regulations. The majority of the proposed project is located within PA 1, and a smaller portion of the project is located in PA 2. Long-range preferred uses in PA 1 will continue to be given to public recreation and recreational boating facilities. PA 2 is designated for commercial uses, recreation, commercial fishing, and non-hazardous cargo operations and industrial uses. The proposed land uses within PA 1 would consist of restaurants, boat slips, shopping opportunities, boat storage, and related facilities. The proposed land uses within PA 2 would consist of a boat mall and parking facilities. Therefore, land uses within each respective planning area would be consistent with those prescribed by the PMP. The proposed project fills will require preparation of an amendment to the PMP.

### 2.6.2 California Coastal Plan

The PMP has been approved by the Los Angeles Board of Harbor Commissioners and certified by the CCC. Under provisions of the California Coastal Act of 1976, the PMP is incorporated into the local coastal program of the City of Los Angeles. The proposed project has been included in the PMP. Therefore, the LAHD currently has coastal development permit authority over the proposed project.

### 2.6.3 Risk Management Plan

The Risk Management Plan, an element of the PMP, was adopted in 1983, per CCC requirements. The purpose of the Risk Management Plan is to provide siting criteria relative to vulnerable resources and the handling and storage of potentially hazardous cargo such as crude oil, petroleum products, and chemicals. The Risk Management Plan provides guidance for future development of the Port to minimize or eliminate the hazards to vulnerable resources from accidental releases. The project is designed consistent with the Risk Management Plan. This is to be achieved through physical separation, as well as facility design factors, fire protection, and other risk mitigation measures.

### 2.6.4 City of Los Angeles – Port of Los Angeles Plan

The Plan is part of the General Plan for the City of Los Angeles (General Plan) (City of Los Angeles 1982b). This plan provides a 20-year official guide to the continued development and operation of the Port. It is designed to be consistent with the PMP discussed above. The long-range preferred water and land uses for the Port include non-hazardous liquid and non-hazardous dry bulk cargo, general cargo, commercial fishing operations, and Port-related commercial and industrial uses. However, these preferred goals are subject to the following criteria: changes in economic conditions that affect the types of commodities traded in
waterborne commerce; the economic life of existing facilities handling or storing hazardous cargoes; and precautions deemed necessary to maintain national security.

2.6.5 City of Los Angeles – San Pedro Community Plan

As part of the General Plan, the San Pedro Community Plan serves as the basis for future development of the community (City of Los Angeles 1982a). It also constitutes the land use plan portion of the City’s Local Coastal Program for San Pedro. Although it is contiguous to San Pedro, the Port is not part of the San Pedro Community Plan area. However, the San Pedro Community Plan does make recommendations regarding the Port, particularly for areas adjacent to commercial and residential areas of San Pedro. These areas include Cabrillo Beach, East and West Channels, and the West Bank of the Main Channel south of the Vincent Thomas Bridge. The proposed project area is located in the West Channel area.

An objective of the San Pedro Community Plan, related to the proposed project, is to promote the orderly and continued development of the Port to meet the needs of recreational users, as well as transporting and handling passengers and cargo. The proposed project is consistent with the City’s policy to develop the area for public recreation, commercial sportfishing, and recreational boating facilities.

2.6.6 City of Los Angeles – Wilmington-Harbor City District Plan

The Wilmington-Harbor City District Plan is a part of the General Plan (City of Los Angeles 1990). It provides an official guide to future development of the district. The proposed project is located in an area south of, and adjacent to, the Wilmington-Harbor City District. Although the District Plan does not include the project area, the plan recommends integrating future development of the Port with the Wilmington community, including changes to transportation and circulation systems, and Port land acquisitions. The plan also recommends interagency coordination in the planning and implementation of Port projects to facilitate efficiency in Port operations, and to serve the interests of the adjacent communities. The proposed project is consistent with these recommendations.
2.6.7 City of Los Angeles General Plan – Air Quality Element

The General Plan has an Air Quality Element that contains general goals, objectives, and policies related to improving air quality in the region (City of Los Angeles 1992). Policy 5.1.1 relates directly to the Port and requires improvements in harbor operations and facilities in order to reduce emissions. The LAHD is actively planning for and pursuing such improvements.

2.6.8 Water Quality Control Plan – Los Angeles River Basin

The Water Quality Control Plan for the Los Angeles River Basin (Region 4) (Basin Plan) was adopted by the LARWQCB in 1978 and updated in 1994 (LARWQCB 1994). The Basin Plan designates beneficial uses of the basin’s water resources. The Basin Plan describes water quality objectives, implementation plans, and surveillance programs to protect or restore designated beneficial uses. The proposed project would be operated in conformance with objectives of the Water Quality Control Policy.

2.6.9 Water Quality Control Policy – Enclosed Bays and Estuaries of California

In 1974, the SWRCB adopted a water quality control policy that provides principles and guidelines to prevent degradation, and to protect the beneficial uses of waters of enclosed bays and estuaries (SWRCB 1974). The Los Angeles Harbor is considered an enclosed bay under this policy. Activities such as the discharge of effluent, thermal wastes, radiological waste, dredge materials, and other materials that adversely affect beneficial uses of the bay and estuarine waters are addressed. Waste discharge requirements developed by the RWQCB, among other requirements, must be consistent with this policy. The LAHD will work closely with the RWQCB to obtain approvals and necessary permits for implementation of the proposed project.

2.6.10 Air Quality Management Plan

The EPA, under the provisions of the Clean Air Act, requires each state that has not attained the National Ambient Air Quality Standards (NAAQS) to prepare a separate local plan detailing how these standards will be met in each local area. These plans will be prepared by local agencies designated by the governor of each state and will be incorporated into a State Implementation Plan (SIP). The Lewis Air Quality Act of 1976 established the four-county SCAQMD and mandated a planning process requiring preparation of an AQMP. The plan is
reviewed every two years and revised as necessary. The SCAQMD and SCAG jointly prepared an AQMP, which was adopted by the two agencies on July 12, 1991. The 1991 AQMP was subsequently revised in 1994 and adopted by the SCAQMD Governing Board on September 16, 1994. The 1994 AQMP is designed to meet California Clean Air Act and Federal Clean Air Act requirements. The 1994 AQMP was approved by CARB and submitted to the EPA in November 1994. Proposed projects in the Basin will be evaluated for conformity with the provisions of the 1994 Plan. Conformity findings are based on the most recently EPA-approved SIP. The EPA approved the 1994 SIP in September 1996. Consistency findings are based on the recently approved AQMP. The 1997 AQMP was approved by the CARB and forwarded to the EPA on February 5, 1997.

2.6.11 Southern California Association of Governments Regional Plans

SCAG is responsible for developing regional plans for transportation management, growth, and land use, as well as developing the growth factors used in forecasting air emissions within the South Coast Air Basin. SCAG has developed a Regional Comprehensive Plan and Guide (RCPG), the 1998 Regional Transportation Plan (RTP), and, in cooperation with the SCAQMD, the AQMP.

Since the proposed project would not generate population migration into the area or create a demand for new housing units, it is consistent with the RCPG and the Regional Housing Needs Assessment.

The proposed project is consistent with the RTP.

2.6.12 Tidelands Trust

The Tidelands Trust granted submerged tidelands within the Port; these are impressed with the Common Law Public Trust to the City of Los Angeles. The Port jurisdictional properties are held in trust by the City, and administered by the LAHD to promote and develop maritime-related commerce, navigation, and fisheries.

2.6.13 Congestion Management Program

The Congestion Management Program (CMP) is a state-mandated program intended as the analytical basis for transportation decisions made through the State Transportation Improvement Program process. As mandated by state Assembly Bill 471 (1989), and amended by state Assembly Bills 1791 (1990), 1435 (1992), and 3093 (1992), LACMTA has prepared a CMP for the county.
The CMP was developed to: link land use, transportation, and air quality decisions; develop a partnership among transportation decision makers on devising appropriate transportation solutions that include all modes of travel; and propose transportation projects which are eligible to compete for state gas tax funds.

The CMP includes a Land Use Analysis Program that requires local jurisdictions to analyze the impacts of land use decisions on the regional transportation system. Development projects required to prepare an EIR based on local determination must incorporate a Transportation Impact Analysis into the EIR. This Recirculated Draft EIR includes a Transportation Impact Analysis, and is therefore consistent with the CMP.