Department of Public Works

Bureau of Engineering
Report No. 2

October 6, 2017
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ADOPTED BY THE BOARD
PUBLIC WORKS OF THE CITY
of Los Angeles California
AND REFERRED TO THE CITY COUNCIL
OCT 6 2017

BPW-2017-0949

Executive Officer
Board of Public Works

LOS ANGELES TRANS-PACIFIC TELECOMMUNICATIONS CABLE HUB (PROJECT) - CERTIFICATION OF ENVIRONMENTAL IMPACT REPORT (EIR) (STATE CLEARINGHOUSE [SCH] NO. 2016101050) AND PROJECT APPROVAL BY THE LOS ANGELES CITY COUNCIL

RECOMMENDATIONS

In accordance with the California Environmental Quality Act (CEQA), review and consider the final Project EIR, adopt and forward this report and transmittals to the City Council (Council) with the recommendations that it:

1. Certify that the EIR (Transmittal Nos. 1 and 2) was completed in compliance with CEQA; that the EIR was presented to the Council, as the decision-making body of the City of Los Angeles (City), and that the Council reviewed and considered the information contained in the EIR; and that the EIR reflects and expresses the City's independent judgment and analysis.

2. Adopt the Findings and Statement of Overriding Considerations (Transmittal No. 3).

3. Adopt the Mitigation Monitoring and Reporting Program (Transmittal No. 4).

4. Specify that the documents constituting the record of proceedings in this matter are in the custody of the City Clerk located at 200 North Spring Street, Los Angeles, CA 90012 and in the files of the Department of Public Works (DPW) Bureau of Engineering (BOE) located at 1149 South Broadway, Suite 600, Los Angeles, CA 90015.

5. Approve the Project as described in the Final EIR.

TRANSMITTALS

1. Draft EIR, dated May 2017.

2. Final EIR, dated August 2017.

3. Findings and Statement of Overriding Considerations, dated August 2017.

4. Mitigation Monitoring and Reporting Program, dated August 2017.

DISCUSSION

Background

Tyco Electronics Subsea Communications LLC (TE SubCom) proposes to install and

operate infrastructure for subsea fiber-optic telecommunications cable systems connecting the United States and the Asia Pacific region, referred to as the Project.

The Project would add direct telecommunications links, increase telecommunications reliability, increase diversity in telecommunication pathways, increase data transmission capacity and speeds to satisfy the burgeoning demands of the Trans-Pacific region, and respond to the increasing demand for connectivity between Asia and the Los Angeles region.

Project Description

The Project landing site is located within the northeast corner of a parking lot at Dockweiler State Beach immediately west of South Marine Avenue, and approximately 70 meters (230 feet) west of Vista Del Mar Boulevard abutting the western boundary of Los Angeles International Airport (LAX). A subsurface terrestrial duct system would be constructed from the Project-installed beach maintenance holes (BMHs) at the Dockweiler State Beach parking lot to an existing data center, requiring conveyance through public street rights-of-way within the cities of Los Angeles and El Segundo. Phase I of the Project also includes the installation of two subsea cables within the City's submerged lands. The Pacific Light Cable Network (PLCN) cable would also pass through the United States territorial waters.

The Project consists of the installation and operation of subsurface telecommunication infrastructure with capacity for up to four submarine fiber optic cable systems which would connect the United States with various locations across the Pacific Ocean, in order to enhance telecommunications capacity between the Asia-Pacific region and mainland United States Phase I of the Project would include installation of the Telecommunication Cable Hub infrastructure, including horizontal directionally drilled (HDD) submarine and subsurface bore pipes, underground BMHs, ocean ground beds, and the terrestrial conduit route connecting the BMHs to an existing data center. All permanent Project components would be installed below ground. Phase I also includes installation of the PLCN subsea telecommunication cable system, and a second marine cable "segment," referred to here as the Trans-Pacific Cable Segment. Phases II, III, and IV of the Project include installation and operation of a subsea cable system to complete the Trans-Pacific Cable Segment (Phase II) and installation of two additional cable systems (Phases III and IV, respectively). These future cable systems are unidentified at this time, and would be analyzed in more detail and permitted separately once proposed.

The Project area falls within the Dual Jurisdiction Coastal Zone and therefore is subject to the California Coastal Development Program and Local Coastal Program under the jurisdiction of the California Coastal Commission (CCC) and the City, respectively. The area of the Project within Dockweiler State Beach is managed by Los Angeles County Beaches and Harbors, on behalf of the City, that leases the area from the land owner, California Department of Parks and Recreation. The submarine conduit route is owned by the City and the terrestrial conduit route traverses public rights-of-ways in the cities of Los Angeles and El Segundo and Sepulveda Boulevard, a state highway. The Project will require entitlements for construction and long-term occupancy from various departments in the City, Los Angeles County Beaches and Harbors, the City of El Segundo, and the California Department of Transportation (Caltrans).

Environmental Review

Scoping

A Notice of Preparation/Initial Study was released for the proposed Project on October 13, 2016 and circulated for 30 days for public and agency comments. Comments were received from two reviewing agencies and two Native American Heritage Commission tribes. These comments are included in the Draft EIR. A public scoping meeting was held on October 25, 2016; no public participants attended.

Draft EIR

The Draft EIR (Transmittal No. 1) was released on May 19, 2017 and was circulated for 45 days for public and agency review and comment. A Notice of Availability (NOA) and Notice of Completion for the Draft EIR was mailed to interested parties and posted with the County of Los Angeles Clerk's Office and the Governor's Office of Planning and Research, State Clearinghouse on May 19, 2017. A notice regarding the public review period and time and location for a public meeting on the Draft EIR was published in the *Los Angeles Times*. The Draft EIR was posted on the BOE website and hard copies were made available for review at several local public facilities (i.e., BOE offices, the El Segundo Public Library, Playa Vista Branch Library, Westchester-Loyola Village Branch Public Library, and the offices of Council District No. 11), as well as at a public hearing.

A public hearing was held on June 6, 2017, to solicit comments on the Draft EIR. In addition to the comments received at the public hearing, a total of four comment letters and one phone comment on the Draft EIR were received from agencies and individuals. Responses to comments are documented in the Final EIR.

Final EIR and Findings

The Final EIR (Transmittal No. 2) states that the proposed Project would result in certain adverse environmental impacts; however, the majority of these impacts would not be significant. The potentially significant impacts identified in the analysis include effects on air quality, terrestrial and marine biological resources, cultural resources, hydrology and water quality, land use and recreation, noise, and traffic and transportation during construction of the Project. With the exception of air quality and noise, the remainder of Project impacts can be reduced to a less than significant level with the implementation of mitigation measures. The Final EIR finds that even with the implementation of all feasible mitigation measures, the proposed Project would result in temporary unavoidable significant impacts on air quality (during construction only), and noise and vibration (during construction only). As such, a Statement of Overriding Considerations (Transmittal No. 3) must be adopted by the Council to approve the proposed Project.

The Findings are based on information contained in the Draft EIR and the Final EIR for the proposed Project, as well as information contained within the administrative record. The administrative record includes, but is not limited to, the public hearing records, public notices, written comments on the proposed Project and responses to those comments,

proposed decisions and the findings on the proposed Project, and other documents relating to the agency decision on the proposed Project.

Project Alternatives

In accordance with the requirements of CEQA, the EIR described a range of reasonable alternatives to the proposed Project that could feasibly attain most of the objectives of the proposed Project but would avoid or substantially lessen any significant environmental impacts. The analysis detailed in Section 4.1 of the EIR identifies a number of alternatives for the landing site, data center destination, terrestrial conduit route, and technical options for installation. The EIR also discussed several alternatives that were considered but not carried forward for analysis. These alternatives were eliminated from analysis because they would not be feasible, they would not achieve most of the Project objectives, or they would not reduce or avoid significant impacts of the proposed Project.

Four location and/or technical alternatives as well as the No Project Alternative were analyzed in detail in Section 4.1 of the Draft EIR. The relative impacts of each alternative were compared to the proposed Project. The following discussion is a brief summary of each of the alternatives.

No Project Alternative

Under this alternative, the Project would not be implemented and a Trans-Pacific Telecommunications Cable Hub would not be installed. Therefore, impacts associated with construction and operation of the Project would not occur. Consequently, existing conditions would remain and change over time with local and regional growth, including other projects planned for development and those that will occur in the future.

Beach Landing Location Alternative 2 (a): 11th Street in City of Hermosa Beach

The 11th Street site between Hermosa Avenue and Beach Drive in the City of Hermosa Beach is a public parking lot in the commercial district of the City of Hermosa Beach and a viable landing site for a cable hub.

This alternative would involve new construction of Power Feed Equipment (PFE), which introduces construction and maintenance related air emissions not required for the proposed Project. Impacts associated with noise and transportation and traffic would be similar, if not greater than the proposed Project, given the densely populated area of the City of Hermosa Beach, through which the terrestrial conduit route would be constructed. The alternative site is closer to other existing seabed uses, such as several fiber-optic cables (three different owners); the Hermosa Beach Pier; and the AES Redondo Beach Generating Plant, all of which would require coordination during marine installation. Similar to the proposed Project, the alternative location would temporarily preclude off-shore commercial and recreational fishing, recreational boating, anchored vessels, and other marine sports. Furthermore, although the landing location would be separate from the MC Global sites and other existing landing sites in the City of Hermosa Beach, the geographical diversity, and therefore potential reliability, may be lower than that provided by the proposed Project, which is located farther away from existing cables. Therefore, this alternative may not fully satisfy one of the Project objectives (increased diversity and reliability).

Data Center Destination Alternative 1: Equinix LA4

The proposed Project currently terminates at the Equinix data center located at 1920 East Maple Avenue, El Segundo (LA3). A viable data center alternative exists in the same immediate industrial area within El Segundo: the Equinix data center located at 445 North Douglas Street (LA4). This alternative considers bypassing LA3 to connect all systems to LA4 or connecting one or more systems to LA3 and extending others to LA4 (i.e., a combined LA3+LA4 alternative).

This alternative would have a minor increase in air emissions and extend the time over which they may be concurrent with marine installation-related emissions (a source of significance threshold exceedance). It would also extend temporary increases in ambient noise levels for an additional 10 to 12 days over a length of approximately 0.9 mile, including 1 to 2 days adjacent to the outdoor athletic facility of El Segundo High School along East Mariposa Avenue. Impacts on traffic congestion and transportation facilities would extend across the route between LA3 and LA4. Other impacts would be similar to impacts under the proposed Project.

Route Alternative 2: Route along Imperial Highway

An alternative to install the terrestrial conduit route down Imperial Highway for a majority of the eastward route was considered given the directness of the route and distance from noise sensitive receptors. Imperial Highway is a four-lane major arterial, State Route (SR-90), that runs 41 miles through the Los Angeles metropolitan area. The highway contains intersections with other arterials and collectors and provides access to the cargo functions at LAX.

This route alternative would increase potentially significant impacts associated with traffic capacity, congestion, and transportation facilities along Imperial Highway, as compared to the proposed Project route (i.e., Imperial Avenue). The alternative would also require increased coordination with LAX and transit authorities. Other impacts would be similar to impacts under the proposed Project.

Technical Options Alternative 2: Touchdown Monitoring

A proposed alternative method for installation of the marine cables includes the addition of "touchdown monitoring" during the main cable lay portions of the PLCN cable and Trans-Pacific Cable Segment. This method would require the use of a second cable ship or survey vessel, equipped with a Remotely Operated Vehicle (ROV). The second vessel would follow behind the main lay vessel and deploy the ROV along surface-laid portions of the cable to provide real-time video feed of the status of the cable installation. If the ROV identifies a cable suspension along the route that can be eliminated or minimized by repositioning or introducing additional cable slack, the cable ship would recover the cable and reinstall it along that portion of the route.

The touchdown monitoring installation method alternative could reduce the likelihood of cable suspensions along the marine cable route. This would potentially reduce impacts on fishermen and marine species. However, no cases of wildlife entanglement or fishing gear

entanglement have been reported for cables installed in the area or elsewhere in the state with or without touchdown monitoring, since 2000. There would be no change in impact significance with implementation of this Project alternative. However, impacts on air quality, already significant and unavoidable under the proposed Project, would be greater with the addition of touchdown monitoring.

Alternatives Considered But Rejected As Infeasible

The following alternatives were considered but rejected as infeasible in the Draft EIR because they would not fulfill Project objectives and do not reduce the significant and unavoidable impacts from air emissions and construction noise to less than significant:

- *Beach Landing Location Alternative 1:* City of Los Angeles Alternate Locations
- *Beach Landing Location Alternative 2 (b):* MC Global Landings in City of Hermosa Beach
- *Beach Landing Location Alternative 3:* City of Manhattan Beach
- *Data Center Destination 2:* Digital Realty Data Center
- *Data Center Destination 3:* One Wilshire Data Center
- *Route Alternative 1:* Terrestrial Route along Vista del Mar
- *Route Alternative 3:* Marine Route Alternatives
- *Technical Options Alternative 1:* Shore Crossing by Trench
- *Technical Options Alternative 3:* HDD Along Imperial Highway and/or Imperial Avenue
- *Technical Options Alternative 4:* Satellite Technology
- *Project Phasing Alternative 1:* Separate System Installation
- *Project Phasing Alternative 2:* Deferred Cable Segment Installation

Environmentally Superior Alternative

For this Project, the No Project Alternative is the Environmentally Superior Alternative because it is the only alternative that avoids significant and unavoidable impacts from short-term air emissions and temporary construction noise. However, *Section 15126.6, Subdivision (e)(2)* of the *State CEQA Guidelines* states, in part, "*If the environmentally superior alternative is the 'no project' alternative*, the EIR shall also identify an environmentally superior alternative among the other alternatives" (emphasis added). All alternatives other than the No Project Alternative maintain or increase the overall severity of less than significant with mitigation impacts.

Based on the above, the Data Center Destination Alternative 1 (connection to LA4) was determined to be the Environmentally Superior Alternative because the data center would fulfill the Project objectives without introducing other potentially significant impacts, as is the case for the other alternatives proposed.

Project Schedule

Upon obtaining all required permits and planning entitlements, construction is anticipated to begin in January 2018 and be completed in approximately 5 months.

FISCAL IMPACT STATEMENT

This is a privately financed project; therefore, this section is not applicable.

(MEM MDP RMK TA ALM)

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Respectfully submitted,

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