

## 2. Introduction

This Environmental Impact Report (EIR) is an informational document that evaluates the potential environmental effects that may result from the planning, construction, and operation of the proposed John S. Gibson Truck & Chassis Parking Lot Project (Project), which includes approval of a Port of Los Angeles Master Plan (POLA PMP) Amendment and Coastal Development Permit(s). The term “Project” and “Proposed Project” includes all discretionary and administrative approvals and permits required for its implementation.

### 2.1 PURPOSE OF CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (State CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (State CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency’s decision-making process.

### 2.2 LEGAL AUTHORITY

This EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.).

Pursuant to CEQA Section 21067 and State CEQA Guidelines Article 4 and Section 15367, the Los Angeles Harbor Department (LAHD) is the Lead Agency under whose authority this EIR has been prepared. “Lead Agency” refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action on any approvals for the Project, the LAHD has the obligations to: (1) ensure that this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects the LAHD’s independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the Proposed

Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090 through 15093).

Pursuant to State CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the LAHD will have the legal authority to do any of the following:

- Approve the Proposed Project;
- Require feasible changes in any or all activities involved in the Proposed Project in order to substantially lessen or avoid significant effects on the environment;
- Disapprove the Proposed Project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the Proposed Project were approved as proposed; or
- Approve the Project even if the Project would cause a significant effect on the environment if the LAHD makes a fully informed and publicly disclosed decision that: (1) there is no feasible way to lessen the effect or avoid the significant effect; and (2) expected benefits from the Proposed Project outweigh the significant environmental impacts of the Proposed Project.

## 2.3 ENVIRONMENTAL IMPACT REPORT PROCESS

A project-level analysis has been provided pursuant to State CEQA Guidelines Section 15161. This EIR meets the content requirements discussed in State CEQA Guidelines Article 9, beginning with State CEQA Guidelines Section 15120.

### Notice of Preparation

Pursuant to the requirements of CEQA, the LAHD issued a Notice of Preparation/Initial Study (NOP/IS) for the Proposed Project, which was distributed from October 26, 2023, through December 11, 2023, for a 45-day public review period. The purpose of the NOP/IS was to inform the public about the Proposed Project and its potential environmental impacts, solicit comments from public agencies with expertise in subjects that are discussed in this EIR, and to solicit comments from the public regarding potential Project environmental impacts. As provided in the NOP/IS, the LAHD determined through the initial review process that impacts related to the following topics shown on Table 2-1 are potentially significant and required a detailed level of analysis in this EIR. All other issue areas were determined to have either no impact or less-than-significant impacts and are discussed in Section 6, *Other CEQA Considerations*.

**Table 2-1: Environmental Topics Identified in the IS/NOP for Further Evaluation in the EIR**

<ul style="list-style-type: none"> <li>• Aesthetics</li> <li>• Air Quality</li> <li>• Biological Resources</li> <li>• Cultural Resources</li> <li>• Energy</li> <li>• Geology and Soils</li> </ul>	<ul style="list-style-type: none"> <li>• Greenhouse Gas Emissions</li> <li>• Hazards and Hazardous Materials</li> <li>• Land Use and Planning</li> <li>• Noise</li> <li>• Transportation</li> </ul>
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The NOP/IS requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP/IS are included in Appendix A and summarized in Table 2-2, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed.

**Table 2-2: Summary of NOP/IS Comment Letters**

<b>Comment Letter and Comment</b>	<b>Relevant EIR Section</b>
<b>State Agencies</b>	
<b>California Native American Heritage Commission, October 26, 2023</b>	
This letter provides details regarding the mission of the Native American Heritage Commission (NAHC), a background of Assembly Bill (AB) 52 and Senate Bill (SB) 18, and NAHC's interest in the Project's cultural and historical impacts. The letter also details the requirements for CEQA compliance with AB 52 and SB 18, as well as the NAHC Recommendations for Cultural Resources Assessments.	5.4 Cultural Resources
<b>California Department of Transportation, December 7, 2023</b>	
This letter provides a summary of the Proposed Project and the mission of the California Department of Transportation (Caltrans). The comment provides a summary of the proposed trip generation and requests that a queuing analysis is prepared for I-110 off-ramps to address truck traffic safety concerns. The comments states that Caltrans encourages Lead Agencies to prepare traffic safety analysis within the CEQA process. The letter also discusses that the Proposed Project will require an Encroachment Permit from Caltrans.	5.11 Transportation
<b>California Department of Toxic Substances Control, December 11, 2023</b>	
This comment provides a summary of the Proposed Project and the California Department of Toxic Substances Control's (DTSC) review of the NOP/IS. The letter states that the Proposed Project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has oversight that may be impacted, which could restrict what construction activities are permissible. The letter states that the EIR should discuss the potential for historic and future activities on or near the Project site to result in a release of hazardous wastes/substances on the site, and studies should be conducted to delineate the nature and extent of contamination. The letter recommends a soils sampling plan to assess volatile organic compounds, petroleum hydrocarbons, and metals in the soils, and contaminated soils should be handled as recommended by DTSC and disposed of offsite, if necessary. The letter recommends that all imported soil and fill material should be tested to ensure any contaminants are within approved screening level. The letter provides contact information for DTSC should there be any questions.	3.0 Project Description 5.8 Hazards and Hazardous Materials
<b>Local Agencies</b>	
<b>LA Sanitation and Environment, November 20, 2023</b>	
This letter provides a response from LA Sanitation, Wastewater Engineering Services Division, and states that upon review, the Project is unrelated to sewers and does not require any hydraulic analysis. The letter provides contact information for any questions.	6.0 Other CEQA Considerations
<b>Central San Pedro Neighborhood Council, December 11, 2023</b>	
This letter discusses that the NOP determined that an EIR was necessary for the Proposed Project and identified 11 areas where there may be significant impacts. The letter summarizes the project and discusses that there are no control mechanisms to assure container storage does not occur on site. The letter discusses that the Proposed Project would result in 1,794 truck trips per day, which is four times the original estimated traffic volumes when the Project was previously proposed as a mitigated negative declaration. This letter	3.0 Project Description 5.11 Transportation

Comment Letter and Comment	Relevant EIR Section
<p>states that the NOP asserts that the POLA is only required to evaluate passenger vehicle traffic impacts only. The letter provides questions on whether trucks will back up on to John S. Gibson Boulevard or result in other traffic impacts on the truck route, and whether light improvements would be necessary. The letter also discusses whether there will be impacts to adjacent uses. The letter provides suggested mitigation measures such as providing new paving on John S. Gibson Boulevard with a new sub-base and undergrounding utilities.</p>	
<p><b>Northwest San Pedro Neighborhood Council, December 11, 2023</b></p>	
<p>This letter discusses that the NOP determined that an EIR was necessary for the Proposed Project and identified 11 areas where there may be significant impacts. The letter summarizes the project and discusses that there are no control mechanisms to assure container storage does not occur on site. The letter discusses that the Proposed Project would result in 1,794 truck trips per day, which is four times the original estimated traffic volumes when the Project was previously proposed as a mitigated negative declaration. This letter states that the NOP asserts that the POLA is only required to evaluate passenger vehicle traffic impacts only. The letter provides questions on whether trucks will back up on to John S. Gibson Boulevard or result in other traffic impacts on the truck route, and whether light improvements would be necessary. The letter also discusses whether there will be impacts to adjacent uses. The letter provides suggested mitigation measures such as providing new paving on John S. Gibson Boulevard with a new sub-base and undergrounding utilities.</p>	<p>3.0 Project Description 5.11 Transportation</p>
<p><b>Wilmington Neighborhood Council, December 11, 2023</b></p>	
<p>This letter discusses that the NOP determined that an EIR was necessary for the Proposed Project and identified 11 areas where there may be significant impacts. The letter summarizes the project and discusses that there are no control mechanisms to assure container storage does not occur onsite. The letter discusses that the Proposed Project would result in 1,794 truck trips per day which is four times the original traffic when the Project was previously proposed as a mitigated negative declaration. This letter states that the NOP asserts that the POLA is only required to evaluate passenger vehicle traffic impacts only. The letter provides questions on whether trucks will back up on to John S. Gibson Boulevard or result in other traffic impacts on the truck route, and whether light improvements would be necessary. The letter also discusses whether there will be impacts to adjacent uses. The letter provides suggested mitigation measures such as providing new paving on John S. Gibson Boulevard with a new sub-base and undergrounding utilities. This letter states that Wilmington is overburdened with container storage, chassis yards, and other trucking and Port-related activities and that the Project will not benefit the community. The comment states that the Project will impact emergency services and is concerned about access at Harbor Community Police Station. The letter also states that the Project would result in a traffic hazard and Harry Bridges will be impacted and that the Waterfront Park was supposed to provide a buffer between Port activity and residences. The letter states that truck idling will result in pollution and will add to extremely high cancer and asthma rates given the amount of Port projects. The comment states that there are a lot of container and chassis yards operating illegally with little enforcement of regulations. The letter states that the Board of Harbor Commissioners should not approve the Project. The letter also states that there</p>	<p>3.0 Project Description 5.2 Air Quality 5.11 Transportation</p>

Comment Letter and Comment	Relevant EIR Section
<p>is no mention that the Project would use union labor and that the Wilmington Neighborhood Council opposes the Project.</p>	
<p><b>Los Angeles Unified School District, Office of Environmental Health and Safety, December 11, 2023</b></p>	
<p>This letter provides comments from the Los Angeles Unified School District (LAUSD) on the Project and states that there are multiple LAUSD schools near the Project site and that LAUSD has concerns over the potential negative environmental impacts of the Project on students and staff. LAUSD requests that schools be recognized as sensitive receptors in the EIR and that the EIR address impacts related to Air Quality, Hazards and Hazardous Materials, Noise, and Transportation/Traffic. The letter requests that LAUSD's Office of Environmental Health and Safety be added to the interested parties list and receive all notices related to the Project. The letter provides a map of nearby schools.</p>	<p>3.0 Project Description                      5.2 Air Quality                      5.8 Hazards and Hazardous Materials                      5.10 Noise                      5.11 Transportation</p>
<p><b>Organization Comments</b></p>	
<p><b>Citizens Coalition for A Safe Community, December 11, 2023</b></p>	
<p>This letter discusses that the Project description, NOP, and IS are inadequate for compliance with requirements of CEQA and NEPA. This comment provides a discussion of transportation thresholds set forth by Los Angeles Department of Transportation and states that more discussion is needed in the Initial Study. The letter discusses that there is no discussion of the Community Plan, and the proposed uses do not conform with the current General Plan and CEQA review must be conducted by the Los Angeles City Planning Department. The comment states an analysis of transportation analyses zones (TAZs) is needed and the Project should have a full comparison of diesel exhausts and fumes from truck engines. The letter discusses that continuation of trucking operations will continue to lead to noncompliance with federal and state air quality requirements and the Initial Study does not provide most likely truck routes for use by Project trucks. The letter discusses that no EIR alternatives or goals/objectives are provided in the EIR and provides suggested goals. The letter discusses that the Initial Study must compare the Project's land uses with those of the City's community and district plans. The letter discusses the fault that runs through the site and mentions that additional discussion of the fault is needed. The letter says that no archaeological or paleontological resource inventories have been conducted for the site and additional analysis is needed. The letter discusses that the Initial Study does not mention tsunami threats, runoff, or groundwater, and runoff should be used for irrigation. The letter states that the Initial Study does not consider air quality a significant impact and there should be mitigation measures for reducing truck emissions and provides suggested mitigation measures. The letter discusses that an alternative for a four-floor development should be considered within the EIR and there is no discussion of Southern California Association of Governments projections for employment on the parcels.</p>	<p>3.0 Project Description                      5.2 Air Quality                      5.9 Land Use                      5.11 Transportation                      6.0 Other CEQA Considerations                      7.0 Alternatives</p>
<p><b>Coalition for a Safe Environment et. al., December 11, 2023</b></p>	
<p>This letter provides comments from the Coalition for a Safe Environment (CFASE) and Community Dreams, EMERGE, Wilmington Improvement Network, Organización de Servicios Comunitarios Familiares, Citizens For A Better Wilmington, San Pedro Peninsula Homeowners United, NAACP San Pedro-Wilmington-Palos Verde Branch # 1069, West Long Beach Association,</p>	<p>3.0 Project Description                      5.2 Air Quality                      5.7 Greenhouse Gas Emissions</p>

Comment Letter and Comment	Relevant EIR Section
<p>Latinos In Action, Friends of the Air, Earth and Water, California Kids IAQ, California Communities Against Toxics, St. Philomena Church Social Justice Committee, Del Amo Action Committee, and California Safe Schools Action Now. The letter states that the commenters oppose the Project because of the following reasons and violations of CEQA requirements. The letter states that the Project should be rejected because it is not a POLA development to be built on POLA land for a new tenant and would not be used by an existing tenant. The letter discusses why there is no public benefit from the Project. The letter provides other comments regarding existing POLA trucking operations. The letter states that the Port fails to conduct offsite environmental impact assessments which results in underestimating air pollution, GHG emissions, traffic congestion, public health and public safety issues. The letter states that the Project will not sufficiently offer off-terminal maritime support as there is no assessment of current and anticipated goods movement in the POLA and there are no penalties for not increasing efficiency. The letter states the public does not want another POLA off-terminal maritime support project. The letter also provides comments on the TraPac terminal project and other concerns related to POLA operations. This letter also provides comments about the proposed operations and that the Project would not result in increased efficiencies. The letter states that the Project is only designed to accommodate trucks with a 20-foot chassis and container. The comment states there is no traffic congestion on John S. Gibson Boulevard to mitigate or illegal truck parking and that truck congestion will actually occur from the Project. This comment states that alternative projects were not considered. The comment states that it is difficult to understand how many trucks could queue in the driveway and that trucks will back up onto John S. Gibson Boulevard. The comment states that more employees will be needed for operations. The letter states that the increase in truck trips will create response delays for fire and police response and there is no secondary emergency exit. CFASE also provided a list of zero emission transportation vehicles, cargo handling equipment, and boat commercial availability.</p>	<p>5.8 Hazards and Hazardous Materials 5.9 Land Use 5.11 Transportation 7.0 Alternatives</p>
<b>Individuals</b>	
<b>Albert Cervantes, October 26, 2023</b>	
<p>The commenter is a resident of Wilmington and has concerns about the noise from trailers hitching and unhitching. The comment states that there is already excessive noise from the Port and asks if the Project site is going to be on the east side of John S. Gibson Boulevard. The commenter has concerns about excessive noise, traffic, and fumes.</p>	<p>3.0 Project Description 5.2 Air Quality 5.10 Noise 5.11 Transportation</p>
<b>Tony Martinovich, October 29, 2023</b>	
<p>The comment states that Wilmington does not need additional air contaminants and the commenter had to power wash the exterior of their home from all of the soot and contaminants from the Port. The comment recommends building something in the vacant land in Rolling Hills.</p>	<p>5.2 Air Quality</p>
<b>Pat Nave, November 17, 2023</b>	
<p>The commenter was not able to attend the scoping meeting but asks about the height of the parking area. The comment asks if the parking area will be built up high with fill or if it will be street level with excavation.</p>	<p>3.0 Project Description 5.1 Aesthetics</p>
<b>Dean Pentcheff, November 30, 2023</b>	
<p>This comment states that the monthly meeting schedule of neighborhood councils makes it nearly impossible to collect public comment and formulate</p>	<p>2.0 Introduction</p>

Comment Letter and Comment	Relevant EIR Section
<p>comments to a CEQA document in a few weeks. This comment requests the extension of the NOP/IS review period to 90 days rather than 45 days in order to allow the Coastal San Pedro Neighborhood Council to consider the Project at the January Board meeting.</p>	
<p><b>Pat Nave, December 11, 2023</b></p>	
<p>The commenter adopts comments of the Wilmington, Northwest, Central, and Coastal San Pedro Neighborhood Councils on the Project, but has several additional comments. The comment states that there is a rumor that the owners plan to operate a non-union truck chassis repair and maintenance facility on the site, which would result in significant impacts related to traffic. The comment states that there is another project for a 40-acre chassis storage and servicing facility on Terminal Island and asks if the Project is necessary since it is the same use. The comment states that there should be an alternative that discusses use of the site for temporary housing for terminal executives.</p>	<p>3.0 Project Description 5.11 Transportation 7.0 Alternatives</p>

### Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the State CEQA Guidelines, the LAHD held a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the EIR for the Project. The virtual scoping meeting was held on November 14, 2023, at 4:00 p.m. via Zoom. No comments were received during the Scoping Meeting.

### Draft EIR

Topics requiring a detailed level of analysis that are evaluated in this Draft EIR have been identified based upon the responses to both the NOP and a review of the Project by the LAHD within the Initial Study. Pursuant to State CEQA Guidelines Section 15126.2(a) which states, “[a]n EIR shall identify and focus on the significant effects on the environment,” the LAHD determined that Project impacts on the topics identified below would not to be significant. Consequently, these topics are not analyzed in detail within this Draft EIR, but are briefly discussed in Section 6, Other CEQA Considerations.

- Agricultural and Forestry Resources
- Hydrology and Water Quality
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Draft EIR analyzes the remaining topics, as listed in Table 2-1.

The LAHD filed a Notice of Completion and Notice of Availability with the Governor’s Office of Planning and Research, State Clearinghouse and the Los Angeles County Clerk, indicating that the Draft EIR has been completed and is available for review and comment. A Notice of Availability of the Draft EIR was published concurrently with distribution of this document. The Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for at least 45 days in accordance with State CEQA Guidelines Sections 15087 and 15105. During the review period from Friday, November 15, 2024 to Friday, January 10, 2025, the Draft EIR is available for public review digitally on the Port of Los

Angeles' website ([www.portoflosangeles.org/ceqa](http://www.portoflosangeles.org/ceqa)) or physically by appointment request to [ceqacomment@portla.org](mailto:ceqacomment@portla.org) at the following location:

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

Written comments related to environmental issues in the Draft EIR should be addressed to:

Director of Environmental Management  
Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731

Or sent by e-mail to: [ceqacomment@portla.org](mailto:ceqacomment@portla.org), with the subject line titled "John S. Gibson Truck & Chassis Parking Lot Parking".

## Final EIR

Upon completion of the Draft EIR public review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final EIR. The written responses to comments to agency comments will be made available at least 10 days prior to the public hearing at which the certification of the Final EIR will be considered by the Board of Harbor Commissioners. These comments, and their responses, will be included in the Final EIR for consideration by the Board of Harbor Commissioners, as well as other responsible and trustee agencies per CEQA. The Final EIR may also contain corrections and additions to the Draft EIR, and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to its certification by the Board of Harbor Commissioners. Notice of the availability of the Final EIR will be sent to all commenters on the Draft EIR.

## 2.4 ORGANIZATION OF THE EIR

To help the reader locate information of interest, a brief summary of the contents of each section of the EIR is provided.

- **Section 1, Executive Summary:** This section provides a brief summary of the Project area, the Project, and alternatives. The section also provides a summary of environmental impacts and mitigation measures, applicable Project design features, applicable regulations and regulatory requirements, and the level of significance after implementation of the mitigation measure(s). The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either less than significant or significant and unavoidable.
- **Section 2, Introduction:** This section provides an overview of the purpose and use of the EIR, the scope of this EIR, a summary of the legal authority for the EIR, a summary of the environmental review process, and the general format of the document.
- **Section 3, Project Description:** This section provides a detailed description of the Proposed Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4, Environmental Setting:** This section provides a discussion of the existing conditions within the Project area and applicable local and regional plans and policies.
- **Section 5, Environmental Impact Analysis:** This section includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect impacts on the environment, including potential cumulative impacts



that could result from the Project; any applicable Project design features; standard conditions and plans, policies, and programs that could reduce potential impacts; and the feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable.

- **Section 6, Other CEQA Considerations:** This section summarizes the significant and unavoidable impacts that would occur from implementation of the Project and provides a summary of the environmental effects of the Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the Project. In addition, this section provides a discussion of impacts found not to be significant.
- **Section 7, Alternatives:** This section describes and analyzes a reasonable range of alternatives to the Proposed Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more significant effects of the Proposed Project. As required by the State CEQA Guidelines, the environmentally superior alternative is also identified, which is the alternative found to have an overall environmental advantage compared to the other alternatives.
- **Section 8, EIR Preparers and Persons Contacted:** This section lists authors of the EIR and LAHD staff that assisted with the preparation and review of this document. This section also lists other people that were contacted for information included in the EIR document.
- **Appendices:** This section provides information and technical studies in support of the environmental analysis contained in the Draft EIR.

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