Addendum to the Innovative New Dock Chassis Depot Final Initial Study and Negative Declaration

APP No. 201207-190

SCH No. 2020090061

Prepared By:

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

March 2021



Table of Contents

Introduction	
Background	2
Facility Overview	2
Previously Assessed and Approved Project Footprint	2
Figures	3
Previously Assessed Parcel Areas	
Proposed Entitlement Area	
Regional Location of the Revised Proposed Project	
Revised Proposed Project	6
Purpose	
Scope and Content	
·	
Previous Environmental Documents Incorporated by Reference	
Required Permits and Approvals	10
Environmental Analysis	11
Aesthetics	11
Agriculture and Forestry Resources	11
Air Quality	11
Biological Resources	12
Cultural Resources	
Energy	
Geology and Soils	
Greenhouse Gas Emissions	
Hazards and Hazardous Materials	
Hydrology and Water Quality	
Land Use and Planning	
Mineral Resources	
Noise	
Population and Housing	
Public Services	
Recreation	
Transportation	
Tribal Cultural Resources	
Utilities and Service Systems	
Wildfire	15
Conclusions	15
References	16
Appendix A (Air Quality Calculations)	17

1. Introduction

The Innovative New Dock Final Initial Study/Negative Declaration (Final IS/ND) was adopted by the Los Angeles Board of Harbor Commissioners (Board) on November 5, 2020 (SCH# 2020090061 and APP No. 190222-020). This Project included permitting and expanding property operated as a chassis depot that provides storage, maintenance, repair of chassis, and stop/start hire of chassis (i.e., rental and return operations). Expansion of the property entailed the minimal construction activities to move existing K-rail fencing to create the new northern boundary. The Project included issuance of a Term Permit for the operations of the proposed chassis maintenance yard and depot for up to 10 years.

The Final IS/ND evaluated use of the premises for storage, maintenance, repair, and stop/start functions of chassis. In December 2020, however, Innovative Terminal Services (Innovative) requested new entitlement(s) for cargo handling support, which includes the previously proposed use as a chassis depot facility and adds the storage and handling of shipping containers. This new use is being added to the previously proposed use as a chassis depot yard for the entire approximately 15.3 acre site, and an additional approximately 5.2 acres (total of approximately 20.5 acres). The new activities would operate in conjunction with the chassis depot operations evaluated in the Final IS/ND. All current entitlements (a Revocable Permit [RP] and Space Assignments [SAs]) would be terminated upon execution of the new proposed entitlement(s). Similar to the Final IS/ND, the Revised Proposed Project is assessing the new cargo handling support use for entitlement of up to ten years.

In addition to the new use, Innovative has requested an additional approximately 5.2 acres which extends the northern portion of the parcel. This new expansion area is fully paved and is expected to increase truck trips per day by approximately 138 round trips. Although there would be increased activities at the site, nominal increases to some impact areas, including air quality, energy, greenhouse gas, and noise, due to increased associated truck trips and chassis/container storage, no new significant impacts would occur due to the acreage increase.

As a part of this Revised Proposed Project, one additional top pick would be needed for the storage and handling of containers. The addition of a single top pick is considered a negligible increase and would not create a substantial increase to impacts previously disclosed in the Final IS/ND. There would be no new employees beyond the number evaluated in the Final IS/ND. It is anticipated that no new truck trips would occur from the new cargo handling support use since containers would arrive on top of chassis already scheduled to be rented or returned as a part of the chassis depot portion of the operation. For these reasons, no new significant impacts are anticipated for this Revised Proposed Project.

The Final IS/ND was prepared by the City of Los Angeles Harbor Department (LAHD) as Lead Agency under the CEQA to address the potential environmental effects of the Revised Proposed Project. Accordingly, this Addendum is being prepared pursuant to the requirements of CEQA Guidelines Section 15164 and confirms that no new significant impacts or increases in severity of previously-identified impacts would occur as a result of the Revised Proposed Project.

2. Background

2.1.1 Facility Overview

The Innovative New Dock Chassis Depot Facility is located at 960 New Dock Street in the northern portion of Terminal Island, bounded by Cerritos Channel to the north, Pier S Avenue to the east, New Dock Street to the south, and SA Recycling (Berths 210-211) to the west (Figures 1-3). Innovative has been operating at this chassis depot on Terminal Island since 2016. The Project site is currently entitled under two SAs, SA 19-07 and SA 21-12 (approximately 10.0 acres), and RP 16-40 (approximately 5.3 acres) (Figure 1). Both parcels are currently operated as a chassis depot that provides storage, maintenance, repairs, and stop/start functions of chassis. Other ancillary uses on the property include a portable office trailer, storage container, and weatherproof portable canopy to perform services as permitted. The evaluated expansion parcels are approximately 5.3 acres and includes an approximately 5.0 acre parcel to the north and an expansion area within RP 16-40 that is approximately 0.3 acres. Chassis depot operations currently occur from Monday through Friday, 7:00 AM to 3:00 AM.

2.1.2 Previously Assessed and Approved Project Footprint

The Board adopted the Final IS/ND and certified the proposed Project on November 5, 2020 (SCH# 2020090061 and APP No. 190222-020). The approved proposed Project evaluated the following components at 960 New Dock Street:

- Expansion of the existing approximately 10.0-acre property by an additional approximately 5.3 acres, to a total of approximately 15.3 acres.
- An increase in truck traffic by an estimated 138 truck trips per day (round trips) and an increase in storage of approximately 2,120 additional chassis.
- Issuance of a Term Permit for up to 10 years, combining all Innovative-operated parcels.
- Movement and installation of a K-rail fence north of the existing permit area to enclose the additional five-acre site.

As of March 2021, an SA was issued to Innovative Terminal Services for chassis storage in the approximately 5.0 northern expansion area and associated K-rail installation that was evaluated in the Final IS/ND (Figure 1). This SA would be terminated upon execution of the new entitlement(s). Additionally, entitlement of the 0.3 acre southern expansion area was completed through the execution of the 10 Percent Clause, which was mentioned in the Final IS/ND (Figure 1).

The Final IS/ND evaluated the use of the premises for storage, maintenance, repair, and stop/start functions of chassis. Innovative is now requesting the expansion of approximately 5.2 acres and the proposed use of cargo handling support, which would add the storage and handling of shipping containers to the chassis depot operation evaluated in the Final IS/ND.

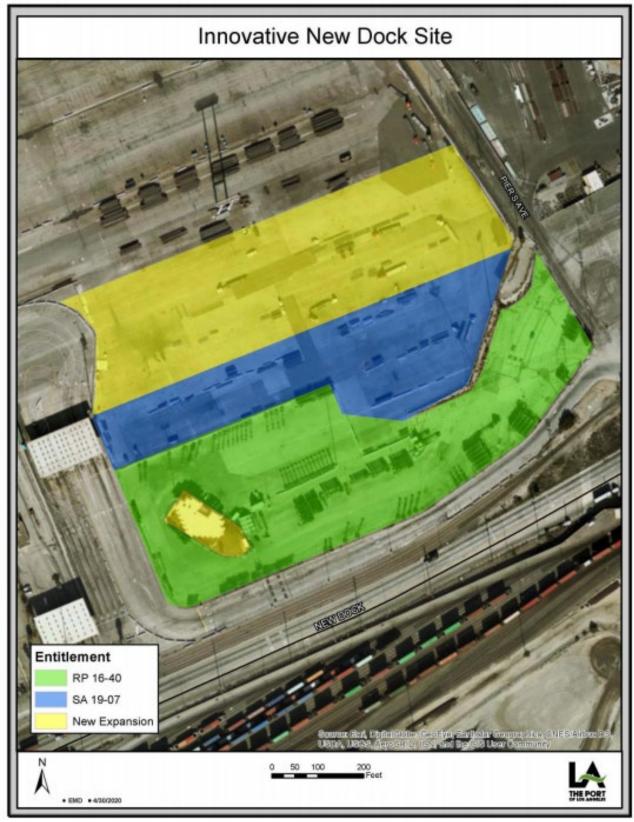


Figure 1 – Previously Assessed Parcel Areas

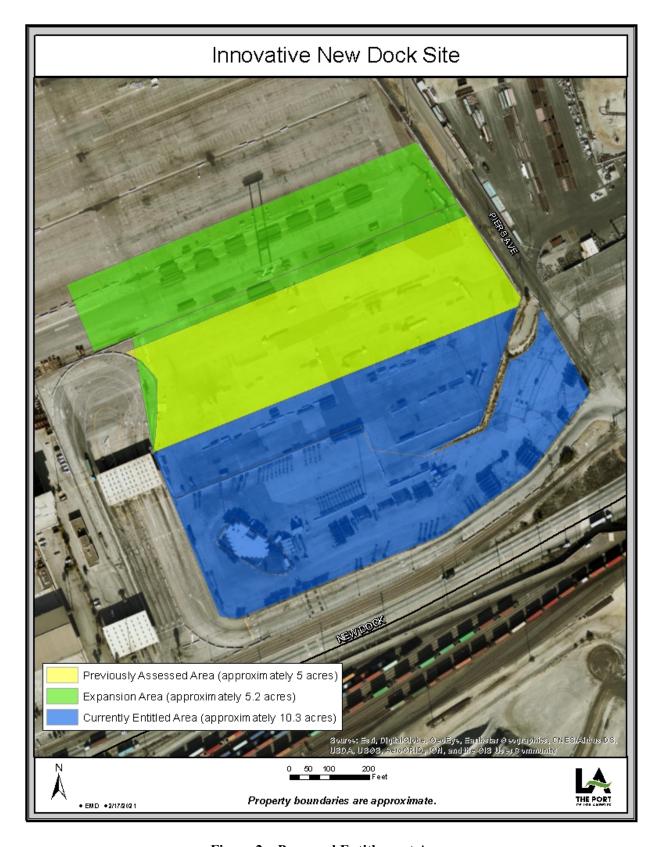


Figure 2 – Proposed Entitlement Area

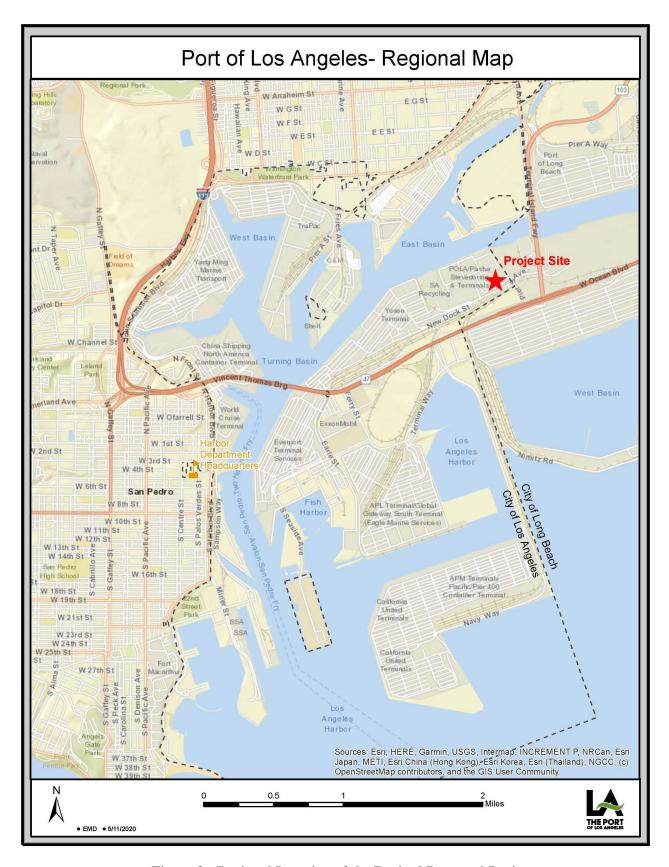


Figure 3 - Regional Location of the Revised Proposed Project

3. Revised Proposed Project

The Final IS/ND assessed a Project footprint totaling approximately 15.3 acres at 960 New Dock Street entitled under a Term Permit for up to 10 years, combining all Innovative-operated parcels and two expansion areas (Figure 1). Innovative currently occupies approximately 15.3 acres of the premises under RP 16-40 (approximately 5.3 acres) and SAs 19-07 and 21-12 (approximately 10.0 acres) (Figure 1). As of March 2021, expansion of the site through entitlement has occurred for the 0.3 acre southern expansion area through the execution of the 10.0 Percent Clause, which was assessed in the Final IS/ND [Figure 1]). Additionally, SA 21-12 was issued for chassis storage for the approximately 5.0 acre northern expansion and associated K-rail installation assessed in the Final IS/ND (Figure 1). Innovative has requested new entitlement(s) for cargo handling support, which includes the previously proposed use as a chassis depot yard and adds the storage and handling of shipping containers. This new use is being added to the previously proposed use as a chassis depot yard for the entire approximately 15.3 acre site assessed in the Final IS/ND. Additionally, an approximately 5.2 acre expansion is requested for both chassis depot yard and cargo handling support uses, for a new total of approximately 20.5 acres (Figure 2). All current entitlements (RP 16-40, SA 19-07, and SA 21-12) would be terminated upon execution of the new proposed entitlement(s) (Figure 1). Similar to the Final IS/ND, the Revised Proposed Project is the new cargo handling support use for entitlement of up to ten years.

For the new cargo handling support use, both empty and full shipping containers would be stored at the site, and handling of the containers would consist of mounting/dismounting from chassis for transport. These activities would operate in conjunction with the chassis depot operations evaluated in the Final IS/ND.

The objectives of this Revised Proposed Project is to provide a full-service depot that would increase the efficiency of terminal operations by providing cargo handling support in the form of storage, maintenance, repair, and stop/start functions of chassis in combination with storage and handling of shipping containers, which would increase the efficiency of goods movement in the Port by providing off-terminal maritime support.

The new shipping container handling and storage activities would occur as follows: a chassis with a loaded empty container would arrive at the depot. The container would be dismounted and placed in a storage pile organized by customer and size (20', 40', etc.). The empty chassis would then be removed from the power unit, stacked, and, if needed, repaired and maintained. The reverse order would occur when a shipping container is picked up from the yard. While containers will generally be removed from chassis and stacked, there will be various times throughout operations during which containers will remain temporarily on chassis waiting to be mounted, dismounted, stacked, or moved out of the facility.

In addition to the new use, Innovative has requested an additional approximately 5.2 acres which extends the northern portion of the parcel (Figure 2). This new expansion area is fully paved and is expected to increase truck trips per day by approximately 138 round trips. This area is for both chassis depot and cargo handling support uses. Although there would be increased activities at the site, nominal increases to some impact areas, including air quality, energy, greenhouse gas, and noise, due to increased truck trips and chassis/container storage, no new significant impacts would occur due to the acreage increase. These impact areas are discussed in detail under Section 8.

The Revised Proposed Project would require one additional Hyster top pick. The addition of a single top pick is considered a negligible increase and would not create substantial increase to impacts previously disclosed in the Final IS/ND. There would be no additional employees beyond those evaluated in the Final IS/ND. It is anticipated that no new truck trips would occur as part of the new cargo handling support use since containers would be secured to a chassis that was already scheduled to be rented or returned. Due to a negligible increase in equipment, no new employees beyond those previously

Addendum to the Innovative New Dock Chassis Depot Final Initial Study and Negative Declaration

March 2021

evaluated, and a negligible increase in truck trips due to the acreage expansion; no new significant impacts are anticipated for this Revised Proposed Project.

4. Purpose

This Addendum has been prepared in accordance with the requirements of the CEQA (Public Resources Code [PRC] 21000 et seq.), and the State CEQA Guidelines (California Code of Regulation Title 14, Section 15000 et seq.) and focuses on changes to the original project description with the November 2020 Final IS/ND and any impacts that would occur as a result of the Revised Proposed Project. The scope of analysis contained within this Addendum addresses all environmental resource areas.

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

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

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

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

5. Scope and Content

This Addendum describes all of the affected environmental resources and evaluates the changes in the impacts that were previously described in the November 2020 Final IS/ND.

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

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

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

6. Previous Environmental Documents Incorporated by Reference

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

• Innovative New Dock Chassis Depot Final Initial Study/Negative Declaration (SCH No. 2020090061 and APP No. 190222-020). This document addressed all potential environmental impact areas from the original project and included the full project description, existing setting, and the environmental checklist. This document determined that all areas were considered less than significant. This document is incorporated by reference, as all environmental analyses contained therein are being utilized for a comparison against the Revised Proposed Project change to ensure that no new impact is created. This document was circulated for a 30-day public review and comment period. This document can be accessed via the LAHD website (https://www.portoflosangeles.org) under the Environmental Documents tab.

7. Required Permits and Approvals

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

- LAHD Entitlement (examples include: Term Permit, Revocable Permit, Space Assignment, etc.)
- LAHD Harbor Engineer Permit
- LAHD Coastal Development Permit
- State Water Resources Control Board (SWRCB) Industrial General Permit Order No. 2014-0057-DWQ – Coverage Expansion

8. Environmental Analysis

The analysis contained herein demonstrates and provides substantial evidence that no significant impacts are present, nor would the severity of other impact areas be increased by the Revised Proposed Project. Below is a discussion of all resource areas analyzed in the Final IS/ND and a discussion of why the impact determinations made in the Final IS/ND would not be affected by the Revised Proposed Project.

8.1 Aesthetics

The Revised Proposed Project would not modify the existing structures in any way. The Project site is located on Terminal Island within the working Port environment, which is highly developed and characterized by industrial and cargo uses. Shipping container storage would be similar in nature to the existing visual landscape and would visually blend into the panorama of the working Port uses and activities. This proposed use remains consistent with the overall aesthetic of maritime support facilities in the area, there are no significant impacts related to the existing visual character and quality of the site. Therefore, there would continue to be no impacts related to the existing visual character and quality of the site.

8.2 Agriculture and Forestry Resources

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

8.3 Air Quality

The Final IS/ND assessed an increase in facility size for a chassis depot yard, for an approximately 15.3 acre premises. The Revised Proposed Project includes the additional use of cargo handling support and an approximately 5.2 acreage expansion (for a total of approximately 20.5 acres). To support the new use, the Revised Proposed Project would require one additional Hyster top pick. This single piece of equipment would create a negligible effect on air quality due to a de minimus amount of emissions. Additionally, it is anticipated that no new truck trips would occur as part of the container handling/storage use since containers would be secured to chassis already scheduled to be rented or returned.

Due to the additional approximately 5.2 acre expansion at the northern portion of the parcel, there would be a negligible increase in emissions due to an increase in truck trips related to chassis depot operations (see Table 1). The Final IS/ND assessed a total of 397 daily truck trips (round trip). The Revised Proposed Project would increase this value to 138 daily round trips to an estimated total of 535 round-trip daily truck trips. The average distance associated with the diverted truck trips, which consists of a short detour for the trucks on their way to and from the container terminals, is 0.67 miles per one-way trip. Due to the 5.2 acre increase, an additional 276 daily-diverted truck trips (one-way trips) would generate approximately 185 additional vehicle-miles travelled per day. This increase in emissions would be minor and would not exceed the South Coast Air Quality Management District (SCAQMD) Air Quality Significance Thresholds for Operation.

Table 2 provides the estimated Revised Proposed Project operation emissions. The operation emission calculations are provided in Appendix A. The table shows that all pollutant emissions would be below the significance thresholds. Therefore, operation activities would not result in a cumulatively considerable contribution to the existing pollution burden in the South Coast Air Basin. Also, no additional construction would be needed as part of the Revised Proposed Project. Due to a negligible increase in equipment and truck trips emissions, and no additional construction activities, the Revised Proposed Project would continue to have a less-than-significant impact to air quality.

Table 1. Operation Emissions (Pounds per Day) **Criteria Air Pollutants** NOx**PM10** PM2.5 VOC CO SO_XApproved Proposed Project from Final IS/ND 10.02 1.09 0.42 1.96 27.24 0.06 **Revised Proposed Project Emissions** 13.57 1.31 0.52 2.46 33.90 0.09 Revised Proposed Project Minus Approved Proposed Project 3.55 0.22 0.10 0.50 6.66 0.03 SCAQMD Significance Threshold 55 150 55 55 550 150 Significant? NO NO NO NO NO NO

Source: Appendix A; SCAQMD, 2019

Table 2. Localized Operation Emissions (Pounds per Day)					
	NO _X	PM10	PM2.5	CO	
Revised Proposed Project Minus Approved Proposed Project	3.55	0.22	0.10	6.66	
Sensitive Receptor SCAQMD Localized Significance Threshold ¹	141	22	10	4,184	
Worker SCAQMD Localized Significance Threshold ²	126	14	5	2,613	
Significant?	NO	NO	NO	NO	

Source: SCAQMD, 2009

8.4 Biological Resources

The Revised Proposed Project would not cause any change in impact determinations from the Final IS/ND. Interaction with threatened or endangered species as a result of this project is highly unlikely, and foraging, resting, and breeding habitat is unlikely to be present at the project site due to lack of dirt, trees, and brush. Therefore, there would continue to be no impact to biological resources.

8.5 Cultural Resources

No eligible or listed historic resources have been recorded within the Revised Proposed Project area. Additionally, the premises is highly disturbed and located on the northern portion of Terminal Island, which is an artificial landform composed of construction fill. Because the site is comprised of fill and is extensively disturbed, there is low potential for discovering archaeological or ethnographic cultural resources. Further, the Revised Proposed Project would not involve additional construction or physical alteration of the facility not previously assessed in the Final IS/ND and would occur on fully paved land. Due to ineligibility, no additional construction, and operations occurring on paved land, there would continue to be no impact to cultural resources.

8.6 Energy

The Revised Proposed Project would not include additional construction on the premises that was not evaluated in the Final IS/ND. The approximately 5.2-acre Project site expansion is forecasted to increase daily truck trips to the Project site, increase on-site equipment use due to increased storage capacity, and increase diesel usage from one additional diesel-powered top pick needed for container handling operations. However, the incremental increase of fuel use due the additional truck trips and additional chassis storage operations would only create a negligible increase in energy. Therefore, there would continue to be a less-than-significant impact to energy.

8.7 Geology and Soils

The Revised Proposed Project would not result in any additional construction or ground disturbance not already evaluated in the Final IS/ND. As such, there would be no additional exposure of people or structures to substantial adverse effects, substantial soil erosion or loss of topsoil. Nor would the Revised Proposed Project be located on a geological unit that is unstable or would become unstable. The premises

^{1 –} Determined for a 5-acre site located 200 meters from the nearest sensitive receptor

^{2 -} Determined for a 5-acre site located 100 meters from the nearest off-site worker.

is already fully paved and would not undergo development activities. Therefore, there would continue to be a less-than-significant impact to geology and soils.

8.8 Greenhouse Gas Emissions

As discussed in Section 8.3, the Revised Proposed Project would generate a negligible increase in air emissions due to the additional top pick and minor increase in truck trips. The Revised Proposed Project would not include additional construction on the premises that was not evaluated in the Final IS/ND. To support container storage, the Revised Proposed Project would require one additional Hyster top pick. This single piece of equipment would create a negligible increase to greenhouse gas (GHG) due to a de minimus amount of emissions. Additionally, the approximately 5.2 acre expansion would create a negligible increase in GHG emissions due to a minor increase in truck trips. Table 3 shows the Revised Proposed Project's estimated GHG emissions. The table shows that total estimated annual GHG emissions increase would be 513.03 MT/yr CO2e, which is well below the SCAQMD significance threshold of 10,000 MT/yr CO2e. Therefore, there would be continue to be a less-than-significant impact to GHG.

Table 3. Operations GHG Emissions	
Emissions Source	MT/yr CO2e
Approved Proposed Project from Final IS/ND	732.17
Revised Proposed Project Emissions	1,245.20
Revised Proposed Project Minus Approved Proposed Project	513.03
SCAQMD Significance Threshold MTCO ₂ e/yr	10,000
Significant?	NO

Source: Appendix A, SCAQMD, 2019

8.9 Hazards and Hazardous Materials

The Revised Proposed Project does not change the impacts previously assessed in the Final IS/ND because there is no additional development, and shipping container handling/storage operations would occur on fully paved parcels. Accordingly, there would continue to be a less-than-significant impact to hazards and hazardous materials.

8.10 Hydrology and Water Quality

The Revised Proposed Project would not violate any water quality standards or waste discharge requirements because the there is no additional construction needed and operations would occur on fully paved parcels. Therefore, impacts to hydrology and water quality would continue to be less than significant.

8.11 Land Use and Planning

The Revised Proposed Project would not cause a physical divide to an established community, as the operation of container use on this land would not cause a disruption of access between land use types. Additionally, the Revised Proposed Project would not conflict with any plan, policy, or regulation, as the site is consistent with City zoning and the Port Master Plan's land use designation of Container, Dry Bulk, and Breakbulk use. Furthermore, this area is not located within any habitat conservation plan or natural community conservation plan. Therefore, the Revised Proposed Project would continue to have no impact to land use and planning.

8.12 Mineral Resources

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

^{1 –} The construction emissions are amortized over the 30-year project life.

8.13 Noise

The Revised Proposed Project involves both the new use of cargo handling support and an approximately 5.2 acre expansion. The Revised Proposed Project would include the addition of a single top pick for cargo handling support and there would be minor increase in the frequency of on-site equipment to stack additional chassis or containers within the expanded approximately 5.2 acres. These components are not anticipated to create impacts to noise since the environmental setting includes sources of noise typical of an industrialized port environment. Also, there is equipment currently on-site, including four forklifts and a mobile fuel service truck. Within this context, the addition of a single top pick is consistent with the existing noise portfolio and would not result in any new impacts to noise that were not previously disclosed in the Final IS/ND. The nearest potential residential receptors are located approximately 1,115 feet north of the Project site, with many intervening structures between the residential receptor and the project site. Accordingly, no new significant impacts would occur to sensitive receptors since any noise related to the Revised Proposed Project would be negligible due to distance from the nearest sensitive receptor, which exceeds the 500 foot threshold for construction noise impacts in Chapter 11 of the Los Angeles Municipal Code. Additionally, since no new development is included in the Revised Proposed Project, there would be no additional construction noise not already evaluated in the Final IS/ND. Therefore, noise generated as a result of the Revised Proposed Project would continue to be less than significant.

8.14 Population and Housing

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

8.15 Public Services

The Revised Proposed Project would not result in any additional impacts to the performance of fire protection, police protection, schools, parks, or other public facilities. Therefore, the Revised Proposed Project would continue to have a less-than-significant impact on public services.

8.16 Recreation

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

8.17 Transportation

The Revised Proposed Project would not require any additional employees than previously analyzed in the Final IS/ND. The Los Angeles Department of Transportation's (LADOT's) guidelines state that a Vehicle Miles Travelled (VMT) analysis is not required if a project generates less than 250 daily trips. The LADOT threshold is proposed for automobiles (as CEQA does not require VMT analysis of commercial trucks) and due to OPR oral guidance, heavy duty truck trips were not included in the Final IS/ND's transportation analysis and were analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, and Noise. Accordingly, the Revised Proposed Project would continue to be less than significant.

8.18 Tribal Cultural Resources

See discussion under Section 8.5, Cultural Resources. No additional development is proposed that was not previously evaluated in the Final IS/ND. Therefore, the potential to encounter tribal cultural resources as a result of the Revised Proposed Project is unlikely, and there would continue to be no impact to tribal cultural resources.

8.19 Utilities and Service Systems

The Revised Proposed Project would not have any impact on the current wastewater treatment facilities nor would it require the construction of an additional wastewater facility. No new demands on water supply are anticipated. Additionally, no additional development is proposed for the Revised Proposed Project that was not already evaluated in the Final IS/ND. Therefore, utilities and service systems impacts would continue to be less than significant.

8.20 Wildfire

The Revised Proposed Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. Therefore, the Revised Proposed Project would continue to have no impact on wildfire.

9. Conclusions

The Revised Proposed Project would modify entitlement(s), add one additional top pick, add the proposed use of cargo handling support to the previously evaluated approximately 15.3 acre chassis depot yard, and expand the total property by approximately 5.2 acres for both chassis depot yard and container handling support uses (for a total of approximately 20.5 acres). Due to a negligible increase in equipment, no increase in employees, and a negligible increase in truck trips, no new significant impacts are anticipated for this Revised Proposed Project. None of the conditions as described under Section 15162 of the State CEQA Guidelines requiring a subsequent EIR or ND have occurred under the Revised Proposed Project. No substantial changes to impact areas previously analyzed in the Final IS/ND would occur as a result of the Revised Proposed Project. For these reasons, the proposed modifications would create no potential adverse impacts or substantial changes to impact areas previously analyzed in the Final IS/ND.

10. References

LAHD. 2020. Final Initial Study/Negative Declaration Innovative New Dock Chassis Depot. November. https://kentico.portoflosangeles.org/getmedia/0b63ff34-a5c6-4b09-8c04-c5736c580e8e/New-Dock-Final-IS-ND Nov-2020

SCAQMD. 2009. Appendix C – Mass Rate LST Look-up Table. [Online]: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-

thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2. Accessed March 2021.

. 2019. South Coast AQMD Air Quality Significance Thresholds. [Online]: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. Accessed March 2021.

March 2021

Appendix A Air Quality Calculations

Innovative New Dock Chassis Depot

Operations Criteria Air Pollutant Emissions Summary

	Daily Emissions lbs/day					
CEQA Baseline from Final IS/ND	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	4.91	0.76	0.23	0.34	2.19	0.02
Off-Road Emissions	1.38	0.07	0.07	0.80	12.97	0.02
Total	6.28	0.83	0.29	1.14	15.16	0.04

	Daily Emissions lbs/day					
Approved Proposed Project from Final IS/ND	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	7.41	0.96	0.30	0.44	2.65	0.02
Off-Road Emissions	2.61	0.13	0.12	1.52	24.59	0.04
Total	10.02	1.09	0.42	1.96	27.24	0.06

	Daily Emissions lbs/day					
Revised Proposed Project Emissions	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	9.90	1.14	0.36	0.53	3.03	0.03
Off-Road Emissions	3.68	0.17	0.16	1.93	30.86	0.06
Total	13.57	1.31	0.52	2.46	33.90	0.09

	Daily Emissions lbs/day					
Incremental Increase	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	2.49	0.18	0.06	0.09	0.38	0.01
Off-Road Emissions	1.07	0.04	0.04	0.41	6.27	0.02
Total	3.55	0.22	0.10	0.50	6.66	0.03

Operations GHG Emissions Summary

CEQA Baseline from Final IS/ND		CO2e MT
Onroad Emissions		214.55
Off-Road Emissions		224.75
	Total	439.30

Approved Proposed Project from Final IS/ND	CO2e MT
Onroad Emissions	306.01
Off-Road Emissions	426.12
Amortized Construction Emissions (30-years)	0.04
Total	732.17

Revised Proposed Project Emissions	CO2e MT
Onroad Emissions	395.01
Off-Road Emissions	850.19
Total	1.245.20

Incremental Increase		CO2e MT
Onroad Emissions		89.00
Off-Road Emissions		424.07
	Total	513.03