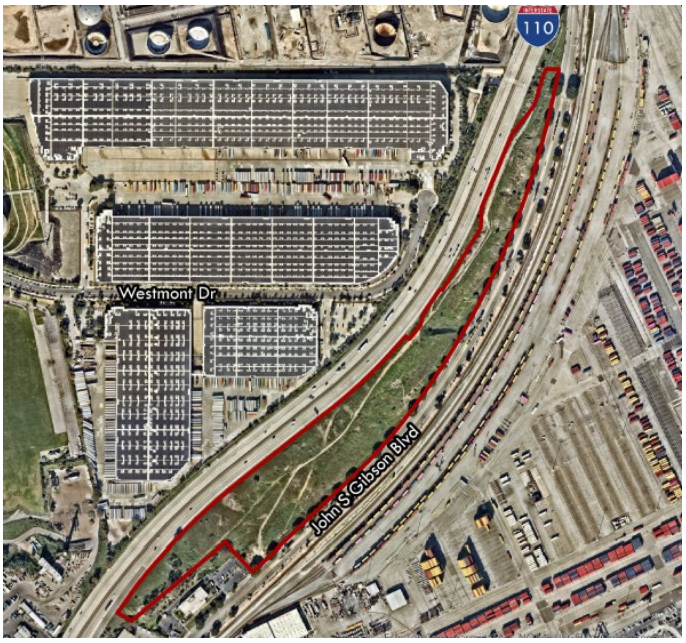
FINDINGS OF FACT

John S. Gibson Truck & Chassis Parking Lot Project

Environmental Impact Report

APP#: 230315-056, SCH# 2023100743



May 2026

Prepared for:

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EPD SOLUTIONS, INC

THE PORT OF LOS ANGELES

TRANSMITTAL 2

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Chapter 1
Introduction

These Findings of Fact have been prepared by the Los Angeles Harbor Department (LAHD or Port) as the Lead Agency pursuant to Section 21081 of the Public Resources Code (PRC) and Section 15091 of the California Environmental Quality Act (CEQA) Guidelines (14 Cal. Code of Regs. [CCR], Section 15000 et. seq.), to support a decision to adopt the John S. Gibson Truck and Chassis Parking Lot Project (proposed Project) considered in the Environmental Impact Report (EIR). Section 21081 of the PRC and Section 15091 of the State CEQA Guidelines provide that no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effects as identified in the Final EIR.
2. Such changes or alterations are the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provisions of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The Findings of Fact are based on substantial evidence, including the evaluations and impact determinations made in the EIR prepared pursuant to CEQA. The Lead Agency must not approve a project that will have a significant effect on the environment unless it finds that specific overriding economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project outweigh the unavoidable adverse environmental effects, thereby rendering them “acceptable” to the decisionmaker. (PRC Section 21081(b); State CEQA Guidelines Section 15093). As the proposed Project did not have any significant and unavoidable impacts, the Board of Harbor Commissioners (Board) would not be required to adopt a Statement of Overriding Considerations.

Chapter 2
Project Overview

This section describes the proposed Project, which staff is recommending for adoption and as analyzed in the John S. Gibson Truck and Chassis Parking Lot Project EIR. The EIR analyzes the environmental impacts of construction and operation of the proposed Project.

2.1 Background

The LAHD operates the Port under the legal mandates of the Port of Los Angeles Tidelands Trust (Los Angeles City Charter, Article VI, Section 601) and the California Coastal Act (PRC Division 20 Section 30700 et seq.), which identify the Port and its facilities as a primary economic and coastal resource of the State of California and an essential element of the national maritime industry for the promotion of commerce, navigation, fisheries, and Harbor operations. Activities should be water dependent and the LAHD must give highest priority to navigation, shipping, and necessary support and access facilities to accommodate the demands of foreign and domestic waterborne commerce. The LAHD is chartered to develop and operate the Port to benefit maritime uses, and it functions as a landlord by leasing Port properties to more than 200 tenants.

2.2 Project Purpose

State CEQA Guidelines Section 15124(b) requires that an EIR's project description contain a statement of objectives, including the underlying purpose of a proposed project. As explained in the EIR, the purpose of the proposed Project is to alleviate truck traffic congestion and reduce the distance required for trucks to access shipping containers within the Port of Los Angeles (POLA). To meet that purpose, the proposed Project would construct a short-term truck and chassis parking facility with 393 truck and chassis stalls and related site improvements.

2.3 Project Objectives

To achieve its purpose, the proposed Project has the following objectives:

- Increase the efficiency of goods movement by providing off-terminal maritime support to help meet the demands of current and anticipated containerized cargo from the various San Pedro Bay port marine terminals;
- Provide a facility that will increase the efficiency of terminal operations by providing storage and staging of trucks and chassis;

- Provide a facility that alleviates truck traffic congestion and illegal parking in the area by providing truck and chassis parking; and
- To develop an underutilized property that is conveniently located in vicinity to the I-110 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement facilities within Southern California.

2.4 Project Description

The Project site is located at 1599 John S. Gibson Boulevard in the community of San Pedro in the southwestern portion of the City of Los Angeles partially within the POLA Master Plan planning area. The proposed Project would develop the 18.41~~63~~-acre site with a short-term truck and chassis parking facility and related site improvements. The proposed Project would alleviate truck traffic congestion and reduce the distance required for trucks to access shipping containers. The proposed Project would also implement an entrance gate at the driveway to provide adequate queueing capacity for Project operations as a truck and chassis parking lot. Further, if the Project site were to be operated with chassis only or chassis with wheeled containers in the future, then two more gate lanes would be needed at the guard booth.

The proposed Project includes grading and paving of the site and striping of 393 truck and chassis stalls. The proposed Project would also require a Coastal Development Permit (CDP) and a Port Master Plan (PMP) Amendment from LAHD to change the designation of three parcels of the Project site from Open Space to Maritime Support. In addition, the Project would require a CDP from the City of Los Angeles.

The proposed Project would be constructed over a period of approximately 8 months. Construction of the proposed Project would remove and relocate existing abandoned structures, including the existing cell phone towers and abandoned pipeline materials; construct an access road and driveway from John S. Gibson Boulevard; grade and pave the site; install slab-on-grade foundations; install retaining walls and lights; and install landscaping. The maximum anticipated excavation depth would be approximately 15 feet below the existing grade. As part of the construction activities, approximately 12,000 cubic feet of soils contaminated with total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs) located within the northern portion of the site near the oil and gas pipeline infrastructure would be removed and disposed of pursuant to existing California Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), and Los Angeles Regional Water Quality Control Board (RWQCB) regulations.

During construction of the proposed retaining walls, the contractor would control stormwater drainage near the walls by collecting and discharging stormwater away from the wall and reinforced backfill. Staging for equipment and materials and parking for workers would be located in the southwest portion of the proposed Project site adjacent to John S. Gibson Boulevard. Temporary lane closure may be required on John S. Gibson Boulevard during construction of the proposed Project driveway, during signal installation, and median reconstruction; however, full roadway closure is not anticipated.

Proposed Project operations would involve a to-be-determined company that would operate the site as a parking lot for the parking of trucks and loaded and unloaded chassis. The parking lot would have approximately 393 spaces accommodating chassis

with shipping containers up to 40 feet long. During proposed Project operations, trucks would travel to and from the Project site to pick up or drop off chassis, and shipping containers would be "parked" on top of the chassis. The proposed Project is anticipated to be used for short-term parking, as chassis and containers are not anticipated to be parked on site for longer than 24 hours. No fueling, maintenance, or other industrial activity would occur on the Project site. However, charging for electric on-site equipment would occur during proposed Project operations.

Chapter 3
CEQA Findings

3.1 Environmental Impacts of the Proposed Project

The Findings of Fact are based on information contained in the Draft EIR and the May 2026 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 proposed Project application, project staff reports, reports and studies referenced in the Initial Study (IS), Draft EIR and Final EIR, Project public hearing records, public notices, written comments on the proposed Project and responses to those comments, proposed decisions and findings on the proposed Project, and other documents relating to the agency decision on the proposed Project. When making CEQA findings required by PRC Section 21081(a), a public agency shall specify the location and custodian of the documents or other materials, which constitute the record of proceedings upon which its decision is based. These records are in the care of the Director of Environmental Management, Los Angeles Harbor Department, 425 South Palos Verdes Street, San Pedro, California 90731.

The Draft EIR addresses the proposed Project's potential effects on the environment and was circulated for public review and comment pursuant to the State CEQA Guidelines for a period of 60 days. Comments were received from a variety of public agencies, organizations, and Individuals. The Final EIR contains copies of all comments and recommendations received on the Draft EIR, a list of persons, organizations, and public agencies commenting on the Draft EIR, responses to comments received during the public review, and changes to the Draft EIR. A summary of the public comments, the responses to those comments, and the resultant revisions to the Final EIR are summarized in Chapter 7. This section provides a summary of the environmental impacts of the proposed Project that are discussed in the EIR and provides written findings for each of the significant impacts which are accompanied by a brief explanation of the rationale for each finding.

3.1.1 Environmental Impacts Found to Be Significant and Unavoidable

The EIR concludes that the proposed Project would not result in significant and unavoidable impacts to any environmental resource.

3.1.2 Environmental Impacts Found to Be Less Than Significant after Mitigation

The EIR concludes that significant impacts of the proposed Project to the following environmental resource would be less than significant after mitigation:

- Biological Resources
- Cultural Resources
- Geology and Soils

The Board hereby finds that the following environmental impacts of the proposed Project would be less than significant after implementation of mitigation measures, as summarized in Table 1, which also lists the mitigation measures applied and the impacts after mitigation.

Table 1: Significant Environmental Impacts that Can be Mitigated for the Proposed Project

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
Biological Resources			
BIO-1: The proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS) (Draft EIR at p. 5.3-17 –- 5.3-19).	Potentially Significant	MM BIO-1: Pre-Construction Survey and Biological Monitoring	Less than Significant
BIO-4: The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites (Draft EIR at p. 5.3-20).	Potentially Significant	MM BIO-2: Pre-Nesting Bird Survey	Less than Significant
Cultural Resources			
CUL-2: The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5 (Draft EIR at p. 5.4-11).	Potentially Significant	MM CUL-1: Cultural Resources Monitoring Plan	Less than Significant
Geology and Soils			
GEO-6: The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (Draft EIR at p. 5.6-4).	Potentially Significant	PAL-1: Paleontological Monitoring	Less than Significant

3.1.3 Environmental Impacts Found to Be Less Than Significant

An IS was prepared that determined that potentially significant environmental effects could occur and that an EIR should be prepared for the proposed Project. The scope of the EIR was determined based upon the IS. Based upon the IS (included as Appendix A to the Draft EIR), it was determined that the proposed Project would have *no impact* or a *less than significant impact without mitigation* related to the following environmental resource areas and that no further analysis of these topics was required in the EIR:

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

Further, the proposed Project EIR determined that all impacts to the following environmental resource areas would result in no impact or a less than significant impact without mitigation:

- Aesthetics
- Air Quality
- Energy
- Greenhouse Gases
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Transportation

The proposed Project EIR also determined that some, but not all impacts to the following environmental resources would be less than significant:

- Biological Resources
- Cultural Resources
- Geology and Soils

The Board finds that the following environmental impacts of the proposed Project would be less than significant or that there would be no impact, and hereby makes the same determination based on the conclusions in the Final EIR, as summarized in Table

2. No mitigation measures are required for impacts that are less than significant (State CEQA Guidelines Section 15126.4(3)(a)).

1 **Table 2: No Impact and Less than Significant Impacts for the Proposed Project**

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
AE-1: The Project would not have a substantial adverse effect on a scenic vista (IS at p. 57)**.**	Less than Significant	Mitigation not required	Less than Significant
AE-2: The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (IS at p. 57)**.**	No Impact	Mitigation not required	No Impact
AE-3: The Project would not conflict with applicable zoning and other regulations governing scenic quality (Draft EIR at p. 5.1-3).	Less than Significant	Mitigation not required	Less than Significant
AE-4: The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (IS at p. 57).	Less than Significant	Mitigation not required	Less than Significant
AG-1: The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agriculture use (IS at p. 58).	No Impact	Mitigation not required	No Impact
AG-2: The Project would not conflict with existing zoning for agriculture use or a Williamson Act contract (IS at p. 59).	No Impact	Mitigation not required	No Impact
AG-3: The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526),	No Impact	Mitigation not required	No Impact

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) (IS at p. 59).			
AG-4: The Project would not result in the loss of forest land or conversion of forest land to non-forest use (IS at p. 59).	No Impact	Mitigation not required	No Impact
AG-5: The Project site does not support forest land, nor is any forest land located in the vicinity. Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use (IS at p. 59).	No Impact	Mitigation not required	No Impact
AQ-1: The Project would not conflict with or obstruct implementation of an applicable air quality plan (Draft EIR at p. 5.2-22).	Less than Significant	Mitigation not required	Less than Significant
AQ-2: The Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (Draft EIR at p. 5.2-24).	Less than Significant	Mitigation not required	Less than Significant
AQ-3: The Project would not expose sensitive receptors to substantial pollutant concentrations (Draft EIR at pp. 5.2-25 –– 5.2-30).	Less than Significant	Mitigation not required	Less than Significant
AQ-4: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (IS at p. 61).	Less than Significant	Mitigation not required	Less than Significant
BIO-2: The Project would not have an adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the	No Impact	Mitigation not required	No Impact

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
California Department of Fish and Game or US Fish and Wildlife Service (Draft EIR at p. 5.3-19).			
BIO-3: The Project would not have substantial adverse effects on state or federally protected wetlands (including but not limited to, marsh, vernal, pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Draft EIR at p. 5.3-19).	No Impact	Mitigation not required	No Impact
BIO-5: The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Draft EIR at p. 5.3-20).	Less than Significant	Mitigation not required	Less than Significant
BIO-6: The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (IS at p. 63).	No Impact	Mitigation not required	No Impact
CUL-1: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5 (Draft EIR at pp. 5.4-10 – 5.4-11).	Less than Significant	Mitigation not required	Less than Significant
CUL-3: The Project would not disturb any human remains, including those interred outside of formal cemeteries (Draft EIR at p.5.4-12).	Less than Significant	Mitigation not required	Less than Significant
E-1: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation (Draft EIR at pp. 5.5-5 – 5.5-7).	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
E-2: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Draft EIR at p. 5.5-7).	Less than Significant	Mitigation not required	Less than Significant
GEO-1i: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (IS at p. 65).	Less than Significant	Mitigation not required	Less than Significant
GEO-1ii: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking (IS at pp. 65-66).	Less than Significant	Mitigation not required	Less than Significant
GEO-1iii: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction (IS at p. 66).	Less than Significant	Mitigation not required	Less than Significant
GEO-1iv: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides (IS at p. 66).	Less than Significant	Mitigation not required	Less than Significant
GEO-2: The Project would not result in soil erosion or the loss of topsoil (IS at pp. 66-67).	Less than Significant	Mitigation not required	Less than Significant
GEO-3: The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse (IS at pp. 67-68).			
GEO-4: The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (IS at p. 68).	Less than Significant	Mitigation not required	Less than Significant
GEO-5: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (IS at pp. 68-69).	No Impact	Mitigation not required	No Impact
GHG-1: The Project would not generate greenhouse gas (GHG) emissions, either directly or indirectly, in a way that would have a significant impact on the environment (Draft EIR at pp. 5.7-10 – 5.7-12).	Less than Significant	Mitigation not required	Less than Significant
GHG-2: The Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (Draft EIR at pp. 5.7-12 – 5.7-15).	Less than Significant	Mitigation not required	Less than Significant
HAZ-1: The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Draft EIR at pp. 5.8-11 –5.8-13).	Less than Significant	Mitigation not required	Less than Significant
HAZ-2: The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
hazardous materials into the environment (Draft EIR at pp. 5.8-13 – 5.8-15).			
HAZ-3: The Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (IS at p. 71).	No Impact	Mitigation not required	No Impact
HAZ-4: The Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment (Draft EIR at p. 5.8-15).	No Impact	Mitigation not required	No Impact
HAZ-5: The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport (IS at p. 72).	No Impact	Mitigation not required	No Impact
HAZ-6: The Project would not impair implementation of an adopted emergency response plan or emergency evacuation plan (IS at p. 72).	Less than Significant	Mitigation not required	Less than Significant
HAZ-7: The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (IS at p. 73).	No Impact	Mitigation not required	No Impact
HYD-1: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
ground water quality (IS at p. 73).			
HYD-2: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin (IS at p. 74).	Less than Significant	Mitigation not required	Less than Significant
HYD-3: The Project would not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site (IS at p. 74).	Less than Significant	Mitigation not required	Less than Significant
HYD-4: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site (IS at p. 75).	Less than Significant	Mitigation not required	Less than Significant
HYD-5: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (IS at p. 76).	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
HYD-6: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows (IS at p. 77).	No Impact	Mitigation not required	No Impact
HYD-7: The Project would not risk release of pollutants due to Project inundation within a flood hazard, tsunami, or seiche zone (IS at p. 77).	Less than Significant	Mitigation not required	Less than Significant
HYD-8: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (IS at p. 77).	Less than Significant	Mitigation not required	Less than Significant
LU-1: The Project would not physically divide an established community (IS at p. 78).	No Impact	Mitigation not required	No Impact
LU-2: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Draft EIR at pp. 5.9-6 – 5.9-31).	Less than Significant	Mitigation not required	Less than Significant
MIN-1: The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state (IS at p. 78).	No Impact	Mitigation not required	No Impact
MIN-2: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the General Plan, specific plan or other land use plan (IS at p. 78).	No Impact	Mitigation not required	No Impact

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
NOI-1: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies (Draft EIR at p. 5.10-13).	Less than Significant	Mitigation not required	Less than Significant
NOI-2: The Project would not result in the generation of excessive groundborne vibration or groundborne noise levels (Draft EIR at p. 5.10-16).	Less than Significant	Mitigation not required	Less than Significant
NOI-3: The Project would not expose people residing or working in the Project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport (IS at p. 79).	No Impact	Mitigation not required	No Impact
POP-1: The Project would not induce substantial unplanned population growth in an area, either directly or indirectly (IS at pp. 79-80).	No Impact	Mitigation not required	No Impact
POP-2: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (IS at p. 80).	No Impact	Mitigation not required	No Impact
PS-1: The Project would not result in substantial adverse physical impacts associated with fire protection services or the provision of new or physically altered fire station facilities (IS at p. 80).	Less than Significant	Mitigation not required	Less than Significant
PS-2: The Project would not result in substantial adverse physical impacts associated with police services or the provision of new or physically altered	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
police facilities (IS at pp. 80-81).			
PS-3: The Project would not result in substantial adverse physical impacts associated with schools (IS at p. 81).	No Impact	Mitigation not required	No Impact
PS-4: The Project would not result in substantial adverse physical impacts associated with parks (IS at p. 81).	No Impact	Mitigation not required	No Impact
PS-5: The Project would not result in substantial adverse physical impacts associated with other public facilities. (IS at p. 81-82).	No Impact	Mitigation not required	No Impact
REC-1: The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated (IS at p. 82).	No Impact	Mitigation not required	No Impact
REC-2: The Project does not include employee recreational facilities and would not require the construction or expansion of recreational facilities in a manner which might have an adverse physical effect on the environment (IS at p. 82).	No Impact	Mitigation not required	No Impact
TR-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (Draft EIR at p. 5.11-6)	Less than Significant	Mitigation not required	Less than Significant
TR-2: The Project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (B) regarding vehicle miles traveled (VMT) (IS at p. 83).	Less than Significant	Mitigation not required	Less than Significant
TR-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Draft EIR at pp. 5.11-18 – 5.11-20).			
TR-4: The Project would not result in inadequate emergency access (IS at p. 84).	Less than Significant	Mitigation not required	Less than Significant
TCR-1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource (TCR), defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in Public Resource Code Section 5020.1(K) (IS at p. 85).	Less than Significant	Mitigation not required	Less than Significant
TCR-2: The Project would not cause a substantial adverse change in the significance of a TCR, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1(IS at p. 85).	Less than Significant	Mitigation not required	Less than Significant
UT-1: The Project would not require or	Less than Significant	Mitigation not required	Less than Significant

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
result in the relocation or construction of new water or wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects (IS at p. 86).			
UT-2: Sufficient water supplies are available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years (IS at p. 87).	Less than Significant	Mitigation not required	Less than Significant
UT-3: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the providers existing commitments (IS at p. 88).	Less than Significant	Mitigation not required	Less than Significant
UT-4: The Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals (IS at p. 88).	Less than Significant	Mitigation not required	Less than Significant
UT-5: The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (IS at p. 89).	No Impact	Mitigation not required	No Impact
WF-1: The Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones (VHFHSZ) and would not substantially impair an adopted emergency response plan or emergency evacuation plan (IS at p. 90).	No Impact	Mitigation not required	No Impact

Environmental Impact	Impact Determination	Mitigation Measures	Impacts After Mitigation
WF-2: The Project is not located in or near state responsibility areas or lands classified as VHFHSZs and would not involve slope, prevailing winds, and other factors, that could exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (IS at p. 90).	No Impact	Mitigation not required	No Impact
WF-3: The Project is not located in or near state responsibility areas or lands classified as VHFHSZs and would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (IS at p. 90).	No Impact	Mitigation not required	No Impact
WF-4: The Project is not located in or near state responsibility areas or lands classified as VHFHSZs and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (IS at p. 90).	No Impact	Mitigation not required	No Impact

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3.2 Findings Regarding Environmental Impacts Found to Be Less Than Significant after Mitigation

The Final EIR concludes that less than significant impacts would occur after mitigation on the following environmental resources if the proposed Project was implemented.

- Biological Resources
- Cultural Resources
- Geology and Soils

The following Findings pertain to environmental impacts of the proposed Project for which mitigation measures have been identified in the Final EIR that would avoid or substantially lessen the significant environmental effects to less than significant.

3.2.1 Biological Resources

As discussed in Section 5.3 of the Draft EIR, there would be two significant impacts to Biological Resources that would be mitigated to less than significant levels as a result of mitigation measures incorporated into the proposed Project. The impacts and the mitigation measures are discussed below.

Impact BIO-1: The proposed Project has the potential to result in the loss of individuals or the reduction of habitat of a state- or federally listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or the loss of federally listed critical habitat.

As shown in Draft EIR Table 5.3-1, a total of 17 rare plant species are listed as State and/or federally Threatened, Endangered, or Candidate species, or 1B.1 listed plants, and have potential to exist on the Project site. As described in Draft EIR Table 5.3-3, no special-status plants were detected on the Project site during the field survey and no special-status plant species are expected to occur on the Project site due to the absence of suitable habitat. As a result, proposed Project development and operation would not result in a substantial adverse effect either directly or indirectly, or through habitat modification, on any plant species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). Therefore, impacts to special-status plant species would be less than significant. However, a total of 15 sensitive animal species, as shown on Table 5.3-2 of the Draft EIR, are listed as Threatened, Endangered, or Candidate Species under State and federal endangered species laws and have the potential to exist in the vicinity of the Project site. None of these animal species were observed during the general biological surveys, and no suitable habitat exists for all species with the exception of Southern California legless lizard and monarch, which have a

low potential to be present. No animal species listed as State and/or federal Threatened, Endangered, or Candidate were detected on the Project site during the reconnaissance surveys. Southern California legless lizard and California overwintering populations of monarch have a low potential to occur onsite. Therefore, construction of the proposed Project has the potential to impact these species.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen the environmental effect identified in the Final EIR. The implementation of mitigation measure MM BIO-1, shown below, would reduce potential impacts to sensitive animal species or their habitat during construction to less than significant.

MM BIO-1: Pre-Construction Survey and Biological Monitoring. To avoid impacts to special-status animal species, the Applicant must conduct pre-construction biological surveys prior to initiating vegetation removal/clearing. Surveys shall be conducted by a qualified biologist within three days of vegetation removal. Should the qualified biologist find any special-status species, they shall be relocated to nearby open space (i.e., Palos Verdes peninsula) or shall be allowed to leave the site on their own, pursuant to the qualified biologist's recommendations. In addition, the qualified biologist shall be present for initial site preparation and grading to ensure that special-status animal species do not repopulate the site.

Rationale for Finding

Mitigation Measure BIO-1 would require a pre-construction survey and biological monitoring during initial site preparation and grading. Therefore, with implementation of Mitigation Measure BIO-1, construction and operation of the proposed Project would not result in a substantial adverse effect, either directly or through habitat modification, on any animal species identified as a threatened, endangered, or candidate species in local or regional plans, policies, regulation or by CDFW or USFWS. Hence, potential impacts to sensitive animal species or their habitat would be less than significant with mitigation.

Impact BIO-4: The proposed Project has the potential to substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

The Project site is within an urban and developed area and is surrounded by developed areas that include roadways and port-related uses. No wildlife corridors are located on or adjacent to the Project site. Therefore, impacts related to wildlife corridors would not occur. However, the Project site contains shrubs and trees that can support nesting birds and raptors protected under the Federal

Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code during the nesting season.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen the environmental effect identified in the Final EIR. The implementation of mitigation measure MM BIO-2, shown below, would reduce potential impacts to migratory nesting birds and raptors during construction to less than significant.

MM BIO-2: Nesting Bird Survey. Vegetation removal shall occur outside of the nesting bird season (generally between February 1 and September 15). If vegetation removal is required during the nesting bird season, the Applicant must conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys shall be conducted by a qualified biologist(s) within three days of vegetation removal. If active nests are observed for one or more species protected under the federal Endangered Species Act (ESA), the California Endangered Species Act (CESA) or the Migratory Bird Treaty Act, the Applicant and contractor shall maintain a minimum 300-foot buffer around the active nests. For raptor species, the buffer is to be expanded to 500 feet. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist verifies that the nests are no longer occupied and the juvenile birds can survive independently from the nests. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur.

Rationale for Finding

Mitigation Measure BIO-2 would reduce potentially significant impacts to migratory nesting birds and raptors during construction, as it would require a nesting bird survey to be conducted three days prior to initiating vegetation clearing. With the implementation of Mitigation Measure BIO-2, impacts related to nesting birds and any other migratory wildlife would be reduced to a less than significant level.

3.2.2 Cultural Resources

As discussed in Section 5.4 of the Draft EIR, there would be one significant impact to Cultural Resources that would be mitigated to a less than significant level as a result of a mitigation measure incorporated into the proposed Project. The impact and the mitigation measure are discussed below.

Impact CUL-2: The proposed Project has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

The Project site is an undeveloped, vacant site that has been previously disturbed by development and land modifications over time. The Phase I and Phase II Cultural Resources Assessment prepared for the proposed Project included an

archaeological records search that was completed at the South Central Coastal Information Center at California State University, Fullerton which included a standard review of the National Register of Historic Places and the Office of Historic Preservation Built Environment Resources Directory. The records search indicated that 16 cultural resources have been recorded within 0.5-mile of the Project site. One of the prehistoric shell middens was found adjacent to the east of the site. The Phase I and II Cultural Resources Assessment also identified marine shell fragments during the pedestrian survey which included, one Monterey Chert flake tool, seven debitage, and fragments of faunal bone that are likely related to the general prehistoric occupation of what was once Wilmington Lagoon. However, no archaeological soil/midden was observed during the Phase II testing, and noted disturbances included rodent activity as well as intermixed construction debris. The Phase I and II Cultural Resources Assessment determined that although artifacts were identified, there are no intact subsurface components.

The proposed Project includes excavation and grading of the Project site to depths of approximately 15 feet below the ground surface. Although the Phase I and II Cultural Resources Assessment determined that no significant subsurface intact resources exist, there is a potential for previously unknown archaeological resources to be below the soil surface. The potential exists that grading of the site could encounter archaeologic deposits not encountered during testing.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen the environmental effect identified in the Final EIR. The implementation of mitigation measure MM CUL-1, shown below, would reduce potential impacts to archaeological resources during construction to less than significant.

MM CUL-1: Cultural Resources Monitoring Plan. Prior to the issuance of a grading permit, a Cultural Resources Monitoring Plan shall be prepared by a qualified archaeologist and reviewed and approved by the City of Los Angeles Planning Department. This plan shall include, but not be limited to, the following actions:

- Prior to issuance of a grading permit, the Applicant shall provide written verification to the City of Los Angeles Planning Department in the form of a letter from the qualified archaeologist to the lead agency stating that a qualified archaeologist has been retained to implement the monitoring program.
- The certified archaeologist shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.
- During ground disturbing activity of previously undisturbed deposits, the archaeological monitor(s) shall be on-site to perform full-time inspections of the excavations. The frequency of inspections shall depend upon the rate of

excavation, the materials excavated, and the presence and abundance of artifacts and features.

- Isolates and clearly non-significant deposits shall be minimally documented in the field and collected, as determined by the qualified archaeologist, so the monitored grading can proceed.
- In the event that previously unidentified intact cultural resources are discovered, the qualified archaeologist shall have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow for the evaluation of potentially significant cultural resources. The qualified archaeologist shall contact the lead agency at the time of discovery. The qualified archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities would be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the qualified archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the most likely descendant, as identified by the Native American Heritage Commission (NAHC), shall be contacted in order to determine proper treatment and disposition of the remains.
- In the event of an unanticipated discovery, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered, and features recorded using professional archaeological methods. The qualified archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
- All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.
- A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report shall include Department of Parks and Recreation Primary and Archaeological Site Forms.
- A monitoring report shall be prepared by the qualified archaeologist upon completion of grading and submitted prior to the issuance of any building permit(s).

Rationale for Finding

Mitigation Measure CUL-1 would reduce potentially significant impacts to archaeological resources as it would require monitoring during ground-disturbing activities, such as grading or trenching, by a qualified archaeologist and if buried

archaeologic deposits are unearthed, they shall be handled in a timely and proper manner. With implementation of Mitigation Measure CUL-1, potential impacts to archaeological resources from development of the proposed Project would be less than significant.

3.2.3 Geology and Soils

As discussed in Section 5.6 of the Draft EIR, there would be one significant impact to Geology and Soils that would be mitigated to a less than significant level as a result of a mitigation measure incorporated into the proposed Project. The impact and the mitigation measure are discussed below.

Impact GEO-6: The proposed Project has the potential directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed Project would construct a truck and chassis parking lot on a currently vacant site that has been previously disturbed by urban agricultural and development activities. Project-related earthmoving activities, including grading and trenching activities, are anticipated to extend to approximately 15 feet below the existing ground surface and would have the potential to disturb previously unknown paleontological resources. The majority of the Project site is overlain by non-marine terrace deposits which have a low to unknown paleontological sensitivity. However, the Paleontological Assessment states that paleontological resources have been previously found on site and within the Project vicinity and that the Project site is underlain by late to middle Pleistocene-aged shallow marine deposits, which have been recorded to be fossiliferous. Therefore, the Palos Verdes Sands onsite have a high potential to yield paleontological resources.

Finding

The Board hereby finds that changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen the environmental effect identified in the Final EIR. The implementation of mitigation measure MM PAL-1, shown below, would reduce potential impacts to archaeological resources during construction to less than significant.

MM PAL-1: Paleontological Monitoring. Prior to the issuance of grading permits, the Applicant shall provide a letter to the City of Los Angeles Planning Department, or designee, from a professional paleontologist, stating that a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist) has been retained to provide services for the Project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP), consistent with the provisions of CEQA and Society of Vertebrate Paleontology's Guidelines, to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite. The PRIMP shall be provided to the City for review and approval. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource

surveillance and provide worker training regarding paleontological monitoring. The PRIMP shall also require full-time paleontological monitoring by a qualified paleontological monitor starting at the ground surface (below any disturbed/artificial fill deposits) during grading, excavation, or utility trenching activities.

In the event paleontological resources are encountered, ground disturbing activity within 50 feet of the area shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010).

Criteria for discarding specific fossil specimens shall be made explicit in the PRIMP. If the qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project construction, then recovery techniques may be applied as identified within the PRIMP. Actions include recovering a sample of the fossiliferous material prior to construction, monitoring construction activities and halting construction if a significant fossil needs to be recovered, and/or cleaning, identifying, and cataloging fossil specimens for curation and research purposes. Recovery, salvage, and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource. If no institution accepts the fossil(s), they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils, shall be prepared and submitted to the City of Los Angeles Planning Department, or designee.

Prior to commencement of grading activities, the City of Los Angeles Planning Department, or designee, shall verify that all Project grading and construction plans specify the requirements herein related to the PRIMP and the unanticipated discovery of paleontological resources.

Rationale for Finding

Mitigation Measure PAL-1 would reduce potentially significant impacts to paleontological resources with the preparation of a PRIMP and the requirement of ground disturbing activities to be monitored by a qualified paleontologist to identify, salvage, and recover any potential paleontological resources, such as significant fossil remains. With implementation of Mitigation Measure PAL-1, potential impacts to paleontological resources from implementation of the proposed Project would be less than significant.

3.3 Cumulative Impacts

Cumulative impacts include "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (State CEQA Guidelines, Section 15355). According to State CEQA Guidelines Section 15130(b): "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness..." The information presented in Chapter 5 ("Cumulative Impacts") of the Draft EIR meets this criterion.

As shown on Draft EIR Figure 5-1 and detailed in Draft EIR Table 5-1, a total of 40 current or reasonably foreseeable future projects (approved or proposed) were identified in the Ports of Los Angeles and Long Beach as well as the communities of San Pedro and Wilmington that have the potential to contribute to cumulative impacts.

The discussion below identifies cumulatively significant impacts that are either less than significant or can be mitigated to less than significant. All feasible mitigation measures to reduce or avoid the cumulatively considerable contribution of the proposed Project to these impacts have been required in, or incorporated into, the proposed Project. The Draft EIR determined that the proposed Project would not make a cumulatively considerable contribution to a cumulative impact in any environmental resource areas (Draft EIR Table 1-1). A summary analysis of the cumulative impacts of resource areas for which the IS/NOP determined that the proposed Project's potential impacts would be less than significant is included in Section 3.3.1, below.

3.3.1 Other Cumulative Impacts

The IS for the proposed Project evaluated the environmental issues in accordance with State CEQA Guidelines Appendix G and concluded that the proposed Project's impacts in a number of resource areas would be less than significant and eliminated those areas from further analysis in the Draft EIR. LAHD has determined that it is appropriate to consider the potential for those less than significant impacts to make cumulatively considerable contributions to existing cumulative impacts. The analysis for the proposed Project determined that none of the impacts identified as less than significant in the IS would result in making a cumulatively considerable contribution to a cumulative impact in any environmental resource areas as described in Table 3.

Additionally, as shown in Table 2, some environmental resource areas would result in no impact, therefore the lack of impact would preclude the possibility of the proposed Project to make a considerable contribution to any cumulative impact.

338 **Table 3: Findings Regarding Cumulative Environmental Impacts Found to Be Less**
339 **than Significant**

Appendix G Checklist Question	Would the Project:	Basis For Finding
Aesthetics-1a	Have a substantial adverse effect on a scenic vista?	The Project site is currently undeveloped and surrounded by industrial and cargo uses. Panoramic views of the Port and Pacific Ocean are available from distant public and private vantages, including panoramic views from public roads in hillside residential areas of San Pedro. However, there are no sensitive public viewpoints in the immediate vicinity of the Project site. The public roads on the hillsides of San Pedro that have views of the Pacific Ocean at the Port are at least 2 miles from the coastline and the Project site. At these distances, during long-term Project operations, the proposed Project would not substantially interrupt views of the Pacific Ocean, as it would alter a minor part of the overall landscape. Therefore, implementation of the proposed Project would not significantly affect designated scenic views of the Pacific Ocean and Port and impacts would not be cumulatively considerable.
Aesthetics-1d	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	The proposed Project would install pole mounted LED fixtures in the parking lot and driveway to provide illumination during evening and overnight operations but would be designed to face downward directly onto the parking lot and driveway, minimizing spillover and avoiding glare to surrounding area. The proposed light fixtures would not cause substantial light or glare to nearby receptors such as motorists. Therefore, impacts would not be cumulatively considerable.
Air Quality-3d	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	During construction, emissions from construction equipment and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and not expected to affect a substantial number of people. During operations, trucks and vehicles operating on site may emit odor. The nearest sensitive receptors are residences located on the southwest corner of Gatun Street and N. Gaffey Street, approximately 1,400 feet north of the Project site. Thus, there are no sensitive receptors within 300 feet of the proposed parking stalls. By the time any diesel exhaust emissions reach the nearest receptor, they would be diluted and not generate an objectionable odor. In addition, all solid waste generated would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable

		odors. Therefore, impacts would not be cumulatively considerable.
Geology-7a	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: fault rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides?	The Project site is located in a seismically active region with several nearby active faults, with the nearest being the Palos Verdes Fault Zone. The proposed Project would construct structures including an occupiable prefabricated guard booth and restrooms onsite. However, retaining walls and foundations for the guard booth and restrooms constructed on the site would be designed and constructed per recommendations from the required geotechnical studies and pursuant to the California Building Code (CBC) and City of Los Angeles grading requirements. Therefore, impacts would not be cumulatively considerable.
Geology-7b	Result in substantial soil erosion or the loss of topsoil?	Grading activities would expose and loosen topsoil, which could be eroded by wind or water. To reduce the potential for soil erosion and the loss of topsoil, construction activities would require a Storm Water Pollution Prevention Plan (SWPPP), which is mandated by the National Pollution Discharge Elimination System (NPDES) General Construction Permit and enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). In addition, the proposed Project includes installation of Portland concrete cement pavement and landscaping throughout the Project site, which would protect the underlying soil on the site from wind and water erosion during proposed Project operation. Implementation of the Project requires City approval of a Low Impact Development (LID) plan, which would ensure that LARWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. Therefore, impacts would not be cumulatively considerable.
Geology-7c	Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse	The Geotechnical Investigation concluded that the slope stability has adequate static and seismic factors for safety and that potential impacts related to landslides would be reduced through the proposed grading and addition of retaining walls; that the potential for lateral spreading on the Project site is considered very low; and that the recommended remedial grading would remove all undocumented fill soils, including collapsible/compressible soils, to replace these soils as compacted structural fill. The proposed Project would also comply with CBC requirements, as ensured through the City's permitting process. The proposed Project would not include the extraction of oil, gas, or groundwater and would not

		contribute to or cause subsidence. Therefore, impacts would not be cumulatively considerable.
Geology-7d	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Soil testing during the Geotechnical Investigation indicated very low expansion potential. Therefore, impacts would not be cumulatively considerable.
Hazards-9f	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. In addition, the proposed Project would implement a construction traffic control plan, pursuant to standard City of Los Angeles requirements. The proposed Project would be required to design and construct internal access and provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with the California Fire Code. The Los Angeles Fire Department (LAFD) would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in the International Fire Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, impacts would not be cumulatively considerable.
Hydrology & Water Quality-10a	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Construction equipment may accidentally leak or spill fluids such as lubricants, oil, and fuel that can contaminate stormwater runoff. A SWPPP would be prepared to comply with the latest Construction General Permit issued by the State Water Resources Control Board . All vehicle maintenance and fueling operations would be conducted at least 50 feet away from inlets and drainage facilities on a level graded area. During construction of the mechanically stabilized earth (MSE) walls, the contractor would control stormwater drainage near the walls by collecting and discharging stormwater away from the wall and reinforced backfill. During operation, no fueling, maintenance, or other industrial activity would occur on site. However, the proposed Project would comply with the regulations and requirements under the LAFD, DTSC, U.S. Department of Transportation, California Environmental Protection Agency (EPA), and City of Los Angeles LID Ordinance to minimize contaminants entering stormwater runoff. Additionally, the proposed Project would implement

		a Project-specific WQMP including BMPs to be used in Project design and operation as required by the City's LID Ordinance. Therefore, impacts would not be cumulatively considerable.
Hydrology & Water Quality-10b	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	The proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Groundwater beneath the Project site is located south of the Dominguez Gap Barrier. The Project site is also not used or designated for groundwater recharge. No substantial additional water use is anticipated during operations. Therefore, impacts would not be cumulatively considerable.
Hydrology & Water Quality-10c(i-iii)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	The site would be graded prior to paving, which could cause erosion and siltation. However, construction activities would comply with the requirements of the most recent Construction General Permit by implementing a SWPPP, inclusive of BMPs. The proposed Project would increase the amount of impervious surface at the site. Because more than 500 SF of paving would occur, the development would comply with the City of Los Angeles LID Ordinance requirements that would minimize off-site erosion and siltation. During operations, the paved portion of the Project site would not cause erosion or siltation, as there would be no exposed soil. Further, the proposed Project would maintain the existing drainage pattern on the site, and the on-site storm drain system would be sized to adequately accommodate the stormwater flows on the Project site. The proposed Project would also grade the existing slope and install MSE walls to reduce the overall slope of the site to 2:1 (horizontal: vertical) and any areas with a 3:1 slope would have jute netting, which would reduce erosion on site. Therefore, impacts would not be cumulatively considerable.
Hydrology & Water Quality-10d	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	The site is currently 100 percent pervious and the site in the post-Project condition would be ~~38~~ 39 percent pervious. Construction of the site's new impervious surface would increase the rate of surface runoff. However, the proposed Project would collect all developed on-site runoff within an on-site storm drain system which would collect stormwater and direct it to ten belowground capture and use cisterns. During construction, a SWPPP would be implemented to control drainage and maintain drainage patterns across the Project site. While the proposed Project would modify the

		existing drainage infrastructure on site, it would maintain the existing on-site drainage pattern and the on-site storm drain system would be sized to adequately accommodate the stormwater flows on the Project site. Further, the Project would comply with the City of Los Angeles LID Ordinance requirements, which would minimize surface runoff and reduce impacts. Off-site flooding would not occur during the 85th percentile 24-hour storm event, as stormwater would be transported using existing drainage facilities into an existing storm drain network that eventually discharges to the harbor. Therefore, impacts would not be cumulatively considerable.
Hydrology & Water Quality-10e	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	During construction, a portion of the Project site would be graded and paved, which could increase the likelihood of polluted runoff from sedimentation and contaminants from motorized construction equipment and disturbed soil. Construction of the proposed Project would require a Construction General Permit and would comply with NPDES and City of Los Angeles LID Ordinance requirements as part of its management of stormwater runoff during construction and operations. The proposed Project would implement SWPPP BMPs to reduce or eliminate sediment pollutants in runoff by providing erosion and sediment control. With implementation of SWPPP BMPs, construction would not provide substantial additional sources of polluted runoff. Therefore, construction of the proposed Project would not exceed the capacity of the stormwater drainage system. The operation of the proposed Project would not result in a substantial source of runoff or source of polluted runoff. The parking lot would increase the amount of impervious surface at the Project site; however, the proposed Project would not cause a substantial increase in runoff because existing drainages would be utilized, and new rain cisterns and storm drains would be constructed to capture, filter, and reuse runoff and direct any overflow runoff to existing storm drains off site. During the operation of the proposed Project, , on-site employees would be trained to handle and clean up incidental leaks as applicable pursuant to U.S. Occupational Safety and Health Administration (OSHA). Compliance with the regulations and requirements under LAFD, DTSC, U.S. Department of Transportation, EPA, City of Los Angeles LID Ordinance, through implementation of a SWPPP during construction and LID plan during operation, would minimize substantial amounts of

		hazardous pollution in runoff. Therefore, impacts would not be cumulatively considerable.
Public Services-15a	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?	LAFD provides fire protection and paramedic services within the City of Los Angeles. LAFD has a required response time of 9 minutes by land and 14 minutes by water. According to the LAFD Fire Station map, the Project site is within the service area of Station 36, located approximately 0.7 roadway miles southwest of the site. The operational response times for Station 36 in 2022 were within the required thresholds, as shown in Draft EIR Table PS-1. The proposed Project would not develop any flammable habitable structures, and a maximum of two employees would be required to operate the proposed truck and chassis parking lot at a given time. Therefore, impacts would not be cumulatively considerable.
Public Services-15b	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?	Crime and safety issues during proposed Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. Further, during temporary construction of the proposed Project, construction of the new driveway and utility connections may result in temporary closure of travel lanes, but full roadway closure and traffic detours which could result in impacts to the operations of the Harbor Community Police Station are not expected to be necessary. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the safe passage of persons and vehicles through/around any required temporary road restrictions in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which requires that prior to any activity encroaching into a right-of-way, the area be safeguarded through the installation of safety devices as specified by the City's Department Building and Safety during the construction permitting process. As such, construction activities would not physically interfere with the operations of the Harbor Community Police Station. Operation of the parking lot may generate a typical range of police service calls, such as burglaries, thefts, and employee disturbances. However, with security surveillance from on-site employees and use of security lighting, demand for police services

		would not substantially increase. Therefore, impacts would not be cumulatively considerable.
Transportation-17b	Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?	As discussed in detail in the VMT Screening Memo prepared for the proposed Project, a preliminary trip generation analysis run by the LAHD Goods Movement Division determined that the proposed Project would generate 10 daily one-way passenger vehicle trips and 4 daily one-way vendor trips, which would be fewer than 250 daily trips. While the proposed Project would generate 1,794 daily one-way truck trips at peak operations, the screening thresholds do not apply to these heavy-duty truck trips. Therefore, the proposed Project would be screened out of a VMT analysis based on the first threshold. State CEQA Guidelines Section 15064.3(a) states that VMT refers to the amount and distance of automobile travel generated by a proposed Project, in which automobile travel refers to passenger cars and light trucks. The Los Angeles Department of Transportation (LADOT) VMT screening thresholds do not apply to heavy-duty trucks. Therefore, impacts would not be cumulatively considerable.
Transportation-17d	Result in inadequate emergency access?	The proposed construction activities, including equipment and supply staging and storage would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. Temporary lane closure may be required on John S. Gibson Boulevard during construction; however, full roadway closure is not anticipated. In addition, a traffic control plan would be prepared by the Applicant and reviewed by the LADOT to ensure adequate levels of safety and access during construction. Operation of the proposed Project would not result in inadequate emergency access. The proposed Project would include a 40-foot-wide driveway connecting to John S. Gibson Boulevard, and the design would be reviewed and approved by LAFD. Therefore, impacts would not be cumulatively considerable.
Tribal Cultural Resources-18a	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape,	Pursuant to AB 52, the LAHD contacted the NAHC regarding the proposed Project to identify tribes traditionally and culturally affiliated with the geographic area of the proposed Project. On August 18, 2021, the NAHC provided a list of tribes affiliated with the area. Additionally, the NAHC determined that a Sacred Lands File search yielded negative results for known TCRs or sacred lands within a one-mile radius of the Project site. On August 24, 2021, LAHD sent notices of request for consultation to seven California Native

	sacred place, or object with cultural value to a California Native American tribe, and that is (i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or (ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?	American tribes as described in Initial Study Section 4.18, Tribal Cultural Resources. The LAHD did not receive any requests for consultation on the proposed Project as of September 2023. In addition, the Project site is vacant and undeveloped, with the surrounding vicinity fully developed. Therefore, impacts would not be cumulatively considerable.
Utilities and Service Systems-19a	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	The proposed Project would connect to the existing water and sewer infrastructure in John S. Gibson Boulevard. The proposed Project would also collect all developed on-site runoff within an on-site storm drain system and ten belowground capture and use cisterns. Stormwater captured within the drainage system would be utilized for landscaping irrigation and would not connect to any existing stormwater drainage infrastructure. The proposed Project would not use natural gas during operation and would not require connections to any natural gas facilities. The proposed Project would connect to the existing electric utility poles on John S. Gibson Boulevard. The proposed Project would not require the construction of new public utilities or expansion of existing public facilities. Development of water, stormwater drainage, sewer, and electric infrastructure would be limited to supporting on-site operations. Therefore, impacts would not be cumulatively considerable.
Utilities and Service Systems-19b	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during	As concluded in the2020 LADWP Urban Water Management Plan (UWMP) Section ES.6, water supplies are anticipated to meet demands under all hydrologic scenarios.

	normal, dry and multiple dry years?	Water demand forecasts are based on major sectors of land use designations. Since the proposed Project proposes an amendment to the PMP, its water use demand would not be accounted for in the 2020 UWMP. However, water use from the proposed parking lot is anticipated to result in an increase in demand due to the restroom buildings on-site. The restroom buildings would require approximately 16,235 gallons of water per day based on the wastewater generation factor from the City of Los Angeles Bureau of Engineering. Water infrastructure would connect to the existing water line in John S. Gibson Boulevard. The proposed landscaping would use native and drought-tolerant plants, and the irrigation system would primarily rely on reclaimed water when available therefore would not result in a substantial increase in water use. Therefore, impacts would not be cumulatively considerable.
Utilities and Service Systems-19c	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Based on the City of Los Angeles Bureau of Engineering's (LABOE) wastewater generation rates for parking lots, the proposed Project would result in approximately 16,235 gallons of wastewater per day from primarily restroom uses. Due to the existing average additional capacity of 15 mgd, the existing facilities at the Terminal Island Water Reclamation Plant would be able to accommodate the additional 16,235 gallons of wastewater per day from operation of the proposed Project. As a result, implementation of the proposed Project would not result in inadequate capacity of the wastewater treatment plant to serve the proposed Project's demand in addition to existing service commitments. Therefore, impacts would not be cumulatively considerable.
Utilities and Service Systems-19d	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Construction of the proposed Project would include demolition of the existing abandoned structures, and excavation of soil which would be reused for fill. In addition, the proposed Project would be required to comply with Section 5.408.1 of the existing California Green Building Standards Code, therefore construction of the proposed Project would not result in an excess of solid waste related to State or local standards. An estimated 503.6 tons of solid waste would be generated by the proposed Project annually during operations. Pursuant to AB 341, the volume of landfilled solid waste would be reduced to 125.9 tons per year, or approximately 0.34 tons per day. The two landfills (Chiquita Canyon Sanitary Landfill and Sunshine Canyon Landfill) have a combined available capacity of approximately 9,846 tons per

		day and would be able to accommodate the volume of solid waste generated by the proposed Project. Therefore, impacts would not be cumulatively considerable.

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Chapter 4
The Proposed Project and Alternatives

Three alternatives were considered during the preparation of the Draft EIR; (1) The No Project/No Development Alternative (Alternative 1), which is required under CEQA; (2) the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative (Alternative 2) that consists of the proposed Project not being approved and the Project site being fully developed based on the existing underlying POLA PMP Land Use designation of Open Space for APNs 7440-016-002 and 7440-016-003; and (3) the Reduced Project Alternative (Alternative 3), which consists of development of the Project site in a manner similar to the proposed Project, but with a substantial reduction in square footage of the parking lot and operational intensity. Chapter 7 of the Draft EIR contains an analysis of these alternatives because they were found to achieve some of the Project's objectives and may reduce environmental impacts associated with the proposed Project. Specific economic, legal, social, technological, or other considerations, including provisions of employment opportunities for highly trained workers, make project alternatives identified in the Final EIR infeasible.

4.1 Reasonable Range of Alternatives

Lead agencies are required to evaluate a "reasonable range" of alternatives but are not required to evaluate every possible alternative: "an EIR need not consider every conceivable alternative to a project" (State CEQA Guidelines Section 15126.6(a)). The "range of alternatives required in an EIR is governed by a 'rule of reason' that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice" (State CEQA Guidelines Section 15126.6(f)).

Based on the primary purpose and objectives associated with the proposed Project, the three alternatives analyzed in the Draft EIR constitute a reasonable range of alternatives, which permits the decision makers to make a reasoned choice regarding proposed Project approval (or approval of one of its alternatives), approval with modifications, or disapproval. Furthermore, CEQA does not require an EIR to consider multiple variations of the alternatives analyzed in the Draft EIR. Similarly, "[a]bsolute perfection is not required; what is required is the production of information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned" (*Village*

Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County (1982) 134 Cal.App.3d 1022, 1029).

4.2 Alternatives Considered in the Draft EIR

Under CEQA, the analysis of alternatives need not be as in-depth as the analysis for the proposed Project but should be at a level that allows the decision-makers to make an informed determination regarding the differences in impacts between the proposed Project and each of its alternatives. The three alternatives analyzed in Chapter 7 of the Draft EIR are summarized below.

4.2.1 Alternative 1 – No Project Alternative

The No Project/No Development Alternative would result in continuation of the existing uses within the Project site, and development would not occur. This alternative consists of the proposed Project not being approved and the Project site remaining vacant and undeveloped (Draft EIR at p. 7-3).

4.2.2 Alternative 2 – No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative

This alternative consists of the proposed Project not being approved, and the Project site being fully developed based on the existing underlying POLA PMP Land Use designation of Open Space for APNs 7440-016-002 and 7440-016-003. Thus, Alternative 2 would include development of 13.03 acres into an open space recreation area inclusive of walking paths, grass areas for active recreation, on-site parking lot with 30 parking spaces, a restroom, and landscaping. APN 7440-016-001 would be left vacant and undeveloped. Thus, 13.03 acres of the 18.41-acre Project site would be developed with an open space recreation area (Draft EIR at p. 7-3).

4.2.3 Alternative 3 – Reduced Project Alternative

The Reduced Project Alternative consists of development of the Project site in a manner similar to the proposed Project, but with less paved acreage and parking spaces and reduced operational intensity. This alternative would develop 10 acres of the Project site with 196 parking spaces accommodating trucks and chassis with shipping containers up to 40 feet long. This alternative would require the same number of employees on site and same on-site operational equipment as the proposed Project but would result in 830 fewer trips per day. The reduced development acreage would cause the remaining 8.63 acres of the Project site to remain in its existing vacant and undeveloped condition. This alternative would also include intersection modifications, including installation of a northbound left turn pocket and signals to provide full access to the site. This alternative would still require a PMP Amendment to amend the designation of the site from Open Space to Maritime Support; however, this alternative would not require a CDP from the City of Los Angeles as no development would occur within the City of Los Angeles parcel (Draft EIR at p. 7-3).

4.3 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Environmentally Superior Alternative for the Project would be the No Project/No Development Alternative. Pursuant to State CEQA Guidelines Section 15126.6(e)(2), an additional alternative needs to be selected alongside the No Project/Development Alternative. The second Environmentally Superior Alternative for the Project is the No Project/Buildout of POLA Master Plan Designation.

The No Project/No Development Alternative would avoid the less than significant impacts of the Project and would not require implementation of the mitigation measures that are identified in Draft EIR Chapter 5.0 that are related to biological resources, cultural resources, geology and soils, and hazards and hazardous materials. The No Project/Buildout of POLA Master Plan Designation Alternative would reduce impacts to 8 of the 20 environmental topics analyzed in the Draft EIR. However, this alternative would be required to implement applicable mitigation measures regarding biological resources, cultural resources, geology and soils, and hazardous materials. Thus, although environmentally superior, mitigation measures would continue to be required (Draft EIR p. 7-19).

CEQA does not require the lead agency (the LAHD) to choose the environmentally superior alternative. Instead, CEQA requires the LAHD to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Based on the considerations described herein, the LAHD finds that the No Project/No Development Alternative and No Project/Buildout of POLA Master Plan Designation are infeasible based on failure to meet Project objectives, as further discussed below.

4.4 CEQA Findings for the Alternatives Analyzed

4.4.1 Alternative 1 – No Project Alternative

The No Project Alternative (Alternative 1) is required under State CEQA Guidelines Section 15126.6(e) and would not result in any physical improvements to the existing site.

Finding

The Board hereby finds that the No Project/No Development Alternative would not necessitate mitigation measures related to biological resources, cultural resources, and hazards and hazardous materials. However, the potential benefits of the proposed Project would also not be realized, such as disposing of contaminated on-site soil through a remediation plan. This alternative would also not meet any of the Project objectives.

Facts in Support of the Finding

The No Project/No Development Alternative would result in the Project site remaining in its existing undeveloped condition, and development would not occur. This alternative would result in fewer impacts and would not require mitigation for biological resources, cultural resources, and hazards and hazardous materials. As a result, the mitigation measures that are identified in Draft EIR Chapter 5.0 would not be required. However, the environmental benefits of the proposed Project would also not be realized, such as disposing of contaminated on-site soil through a remediation plan.

Implementation of the No Project/No Development Alternative would not meet any of the proposed Project objectives. This alternative would not increase the efficiency of goods movement as it would not develop the Project site. Additionally, a facility would not be provided that could increase the efficiency of terminal operations or alleviate truck traffic congestion. Furthermore, an underutilized property would not be developed to accommodate the growing need for goods movement within Southern California. The No Project/No Development Alternative comparison to the Project objectives is listed in Table 7-5 of the Draft EIR (Draft EIR at p. 7-8).

4.4.2 Alternative 2 – No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative

Under the Reduced Project Alternative (Alternative 2), the Project site would be fully built out based on the existing underlying POLA PMP Land Use designation of Open Space for APNs 7440-016-002 and 7440-016-003 (approximately 13.03 acres). However, APN 7440-016-001 would be left vacant and undeveloped.

Finding

The Board hereby finds that the No Project/Buildout of the POLA Master Plan Designation Alternative would result in reduced impacts to 8 of the 16 environmental topics. However, this alternative would require the same mitigation measures as the proposed Project. This alternative would not meet any of the objectives of the proposed Project.

Facts in Support of the Finding

The No Project/Buildout of the Port of Los Angeles Master Plan Designation Alternative would develop 13.03-acres into a recreation area with walking paths, grass areas for active recreation, an on-site parking lot with 30 parking spaces, a restroom, and landscaping. APN 7440-016-001 would be left vacant and undeveloped. Thus, 13.03 acres of the 18.41-acre Project site would be developed with an open space recreation area. This alternative would decrease impacts related to air quality, energy, greenhouse gas emissions, hazards, noise, public services, transportation, and utilities and service systems. In addition, this alternative would require the same mitigation measures as the proposed Project.

As shown in Table 7-5 of the Draft EIR, the No Project/Buildout of Port of Los Angeles Master Plan Designation Alternative would not meet any of the proposed Project objectives. This alternative would develop an underutilized property with areas for active recreation, walking paths, and landscaping. This alternative would not increase the efficiency of goods movement as it would not develop a truck and chassis parking lot on the Project site. Additionally, this alternative would not provide a facility that could increase efficiency of terminal operations or alleviate truck traffic congestion. Furthermore, an underutilized property would not be developed to accommodate the growing need for goods movement within Southern California.

4.4.3 Alternative 3 – Reduced Project Alternative

Development of the Project site under this alternative would be similar to the proposed Project, but with a substantial reduction in square footage of the parking lot and operational intensity. Additionally, development under this alternative would result in a maximum of six employees during peak construction and a maximum of two employees on site at any given time during operations. The Reduced Project Alternative would reduce the proposed Project footprint by approximately 54 percent. The remaining 8.63 acres of the developable portion of the Project site would be left in its existing vacant and undeveloped condition.

Finding

The Board hereby finds that the Reduced Project Alternative could reduce the Project footprint by approximately 54 percent. It could also result in decreased impacts to 8 of the 16 environmental topics. However, this alternative would not eliminate the need for mitigation. The Reduced Project Alternative would meet the proposed Project objectives but would not be able to help meet the demands of current and anticipated containerized cargo to the same degree as the proposed Project.

Facts in Support of the Finding

The Reduced Project Alternative would result in development of a 10-acre truck and chassis parking lot with 196 parking spaces accommodating chassis with shipping containers up to 40 feet long and landscaping. Consistent with the proposed Project, development of this alternative would include 39 percent landscaping coverage. Thus, 3.9 acres of the Project site would consist of landscaping. Development of the Project site under this alternative would be similar to the proposed Project, but with a substantial reduction in square footage of the parking lot and operational intensity. Additionally, development under this alternative would result in a maximum of six employees during peak construction and a maximum of two employees on site at any given time during operations. The Reduced Project Alternative would reduce the proposed Project footprint by approximately 54 percent. This alternative would reduce impacts to air quality, energy, geology, greenhouse gas emissions, noise, public services, transportation, and utilities and service systems. However, mitigation measures would still be

required for biological resources, cultural resources, paleontological resources, and hazards and hazardous materials.

As shown in Draft EIR Table 7-5, the Reduced Project Alternative would meet the proposed Project objectives, but to a lesser extent compared to the proposed Project. This alternative would develop an underutilized property by adding employment-generating uses and would attract new businesses and employment. Furthermore, the Reduced Alternative would reduce the need for the local workforce to commute outside of the Project vicinity. This alternative would develop a parking lot with landscaping in the Port of Los Angeles near port activities with close proximity to I-110. This alternative would meet the proposed Project objectives but would not be to help meet the demands of current and anticipated containerized cargo to the same degree as the proposed Project, because this alternative would reduce the number of parking stalls to 196 (Draft EIR p. 7-19).

Chapter 5
Findings Regarding Irreversible Environmental Changes

Irreversible and irretrievable environmental changes caused by a project include long-term uses of non-renewable and non-recoverable resources during construction and operation (State CEQA Guidelines Section 15126.2(c)).

Finding and Rationale

The proposed Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to truck, chassis, and trailer parking once the proposed parking lot is constructed. Secondary effects associated with this irreversible commitment of land resources include:
    - Changes in views associated with construction of the new parking and associated development, including a retaining wall (Draft EIR Section 5.1, Aesthetics).
    - Increased local traffic on John S. Gibson Boulevard from re-routed trips already accessing Port of Los Angeles (Draft EIR Section 5.11, Transportation).
    - Emissions of air pollutants and GHGs associated with proposed Project construction and operation (Draft EIR Section 5.2, Air Quality, and Section 5.7, Greenhouse Gases).
    - Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, trucks, lighting, etc. (Draft EIR Section 5.5, Energy).
    - Increased ambient noise associated with an increase in activities and traffic from the proposed Project (Draft EIR Section 5.9, Noise).
- Construction of the proposed Project as described in Draft EIR Section 3.0, Project Description, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the proposed Project, as demonstrated in the analysis contained in Draft EIR Section 5.5, Energy, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. As listed in Draft EIR Section 5.5, Energy, the proposed development would incorporate sustainability features and energy-conserving Project design features, including those required by the CBC, California Energy Code Title 24, which specify green building standards for new developments. Project specific information related to energy consumption is provided in Section 5.5, Energy, of the Draft EIR.

Chapter 6
Changes to the Draft EIR and February 2026 Final EIR

Changes were made to the Draft EIR following the public review period. Actual changes to the text can be found in Chapter 3, Revisions to the Draft EIR, of the Final EIR. Changes made to the Draft EIR, as shown in Chapter 3, are identified in strikeout text to indicate deletions and in bold and double underlined text to indicate additions. Changes to the Draft EIR include:

- Revisions to the Executive Summary to reflect minor clarifications to proposed mitigation measures for Biological Resources, Cultural Resources, and Geology and Soils and revisions to the Project Description to specify the configuration of the entrance gate;
- Revisions to Section 5.2, Air Quality, to incorporate additional regional regulations applicable to the Project;
- Revisions to Table 5-1 in Section 5, Environmental Impact Analysis, to update project status information for cumulative projects and add two additional cumulative projects;

Furthermore, revisions were made to the February 2026 Final EIR after its original publication. As discussed within Section 1.1 of the May 2026 Final EIR, in response to comments received regarding the Wilmington Interim Control Ordinance, the Proposed Project has been revised to exclude APN 7412-024-007 from the Project.

Finding and Rationale

Although Chapter 3 of the Final EIR includes minor amounts of new information and clarification, generated in response to comments received on the Draft EIR, the information is not significant new information that would require recirculation per State CEQA Guidelines Section 15088.5. For instance, no new information was included that would result in: (1) A new significant environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; (2) A substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the

impact to a level of insignificance; and/or (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed were added that would clearly lessen the environmental impacts of the project (State CEQA Guidelines Section 15088.5(a).) All information included in the Final EIR merely clarifies or amplifies or makes insignificant modifications to the EIR (see *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1992) 6 Cal.4th 112, 1129–1130). Consequently, the changes and clarifications presented in Chapter 3 of the Final EIR were reviewed by the Board to determine whether they constitute "significant new information" requiring recirculation prior to certification of the EIR. The information contained in Chapter 3 of the Final EIR was found to merely clarify or amplify the information presented in the Draft EIR. No new feasible alternatives or mitigation measures that are considerably different from others previously analyzed were identified that would clearly or substantively lessen the significant effects of the proposed Project.

Further, as discussed in Chapter 3, revisions to mitigation measures (MM BIO-1, MM BIO-2, MM CUL-1, MM PAL-1) would not reduce their effectiveness in reducing significant impacts. As a result, all clarifying information included in the Final EIR does not constitute significant new information requiring recirculation because the EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the proposed Project. The information presented in Chapter 3 does not result in or disclose any new significant impacts or a substantial increase in the severity of any impact already identified in the EIR.

Therefore, recirculation of the Draft and the May 2026 Final EIR is not required, and the EIR can be certified without additional public review, consistent with PRC Section 21092.1 and State CEQA Guidelines Section 15088.5.

The Board finds that all information added to the Final EIR after public notice of the availability of the Draft EIR for public review but before certification merely clarifies or makes insignificant modifications to an adequate Draft EIR that does not require recirculation.

In addition, changes to the February 2026 Final EIR after its original publication but before certification were provided in order to address the removal of APN 7412-024-007 and make insignificant modifications to an adequate Draft EIR that does not require recirculation. Because the Draft EIR analyzed the larger Project site, which included APN 7412-024-007, and because only landscaping was proposed on that parcel, the removal of the parcel does not result in a new significant environmental impact, a substantial increase in the severity of a previously identified impact, or a feasible mitigation measure or alternative that the Project proponent has declined to adopt. The public had the opportunity to review and comment on the larger Project site footprint analyzed in the Draft EIR, and the revised Project site represents a reduction in that footprint.

Chapter 7
Findings on Suggested Project Revisions in Comments on the Draft EIR

The Final EIR includes the comments received on the Draft EIR and responses to those comments. The focus of the responses to comments is on the disposition of environmental issues as raised in the comments, as specified by State CEQA Guidelines Section15088(b). The EIR also includes minor clarifications and modifications. The Board has reviewed and considered the Final EIR and this information. The Board finds that responses to comments made on the Draft EIR and revisions made in the Final EIR merely clarify, amplify, or make insignificant modifications to the analysis presented in the document and do not trigger the need to recirculate per State CEQA Guidelines Section15088.5. State CEQA Guidelines Section 15088.5 provides: (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification…. "Information" can include changes in the project or environmental setting as well as additional data or other information…. "Significant new information" requiring recirculation includes, for example… (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it. (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The new information added to the EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure considerably different from others previously analyzed and that would clearly lessen the significant environmental impacts of the proposed Project.

Comment letters were received on the Draft EIR suggesting mitigation modifications, mitigation additions, and impact determination revisions. Where the suggestions (1) requested minor modifications in adequate mitigation

measures, (2) requested mitigation for impacts that the Draft EIR determined were less than significant, or (3) requested mitigation for impacts for which the Draft EIR already identified measures that would reduce the impact to less than significant, these requests were declined as unnecessary or not appropriate. LAHD has identified and proposes to incorporate all feasible mitigation measures, including feasible revisions to the existing mitigation measures recommended by commenters, or otherwise initiated by the Port. No additional mitigation measures to reduce significant impacts disclosed in the EIR have been determined to be feasible.

The suggested mitigation measures and revisions and the reasons supporting why the recommendations were accepted or rejected are summarized below. Additional detail can be found in the comments and responses to comments chapter of the Final EIR (Chapter 2). The Board adopts and incorporates by reference the specific reasons for declining such measures contained in the responses to comments in the Final EIR as its grounds for rejecting those measures.

Air Quality

A comment from the Los Angeles School District suggested that the proposed Project coordinate construction activity with the District and provide measures to avoid construction impacts on school operations. The Draft EIR considered the potential impacts of air quality impacts to sensitive receptors and concluded impacts were less than significant; therefore, the response to comment concluded that additional measures are unnecessary.

Additionally, a comment from SCAQMD also suggested that the proposed Project implement Tier 4 equipment and other measures within the SCAQMD's CEQA Air Quality Handbook in order to reduce construction emissions. As described in the Draft EIR, construction emissions would not exceed SCAQMD regional thresholds for criteria pollutants (VOCs, NOx, CO, SOx, PM_{10}, and $PM_{2.5}$) and would not exceed localized significance thresholds. Therefore, air quality impacts would be less than significant, and no mitigation is required for construction-related air emissions.

The SCAQMD also provided a list of additional resources with project design features and mitigation measures to help reduce air quality and GHG impacts and eliminate significant and unavoidable impacts. However, as described in the Draft EIR, the proposed Project would result in less than significant air quality and GHG impacts, therefore, no mitigation is required.

The Wilmington Neighborhood Council suggested that the proposed Project should have considered: SCAQMD MATES V data in the Health Risk Assessment; Volunteers of America Pre-School and Field of Dreams Park/Recreation as sensitive receptors; the SCAQMD Clean Port Initiative Workplan, which included implementation of a Federal Implementation Plan (FIP) with NOx-related mitigation; and should adequately analyze diesel particulate matter (DPM) emissions.

As described in the Draft EIR, cancer risk thresholds are based on SCAQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. Based on existing SCAQMD recommendations for Mobile Source Health Risk Assessments, the operational impacts of the proposed Project at the closest affected receptor are estimated at 7.84 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than 0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would result in emissions that are far below existing SCAQMD thresholds. Therefore, based on SCAQMD guidance, the proposed Project's impacts on human health risks, including DPM emissions, would not be cumulatively considerable and would be less than significant. While the SCAQMD MATES V data shows that that the existing condition of the area is already cumulatively significant, pursuant to SCAQMD guidelines, the proposed Project would not contribute to the already impacted existing condition.

Further, based on SCAQMD's definition of sensitive receptors, the Field of Dreams Park/Recreation is not considered a sensitive receptor for air quality because people do not typically remain on site for an extended period, such as an 8-hour shift or school day, or the full 24 hours of a residential receptor; but rather are present for shorter periods of time. Therefore, people visiting the Field of Dreams Park/Recreation would have a lower exposure than people living and working near the Project site. Also, the Volunteers of America Pre-School is located more than 500 feet farther away from the proposed Project than the identified sensitive MEI. In addition, trucks accessing the site would utilize I-110 and would not pass by the school. Therefore, health risk at the Volunteers of America Pre-School would be lower than the risks identified for the sensitive MEI and would also be below thresholds. Therefore, no significant health risk would occur from proposed Project construction and operational emissions at Volunteers of America Pre-School.

As described in the Draft EIR, construction and operation of the proposed Project would not result in air emissions, including NO_x emissions, that exceed the thresholds established by the SCAQMD and utilized by the LAHD, and air quality impacts would be less than significant. Thus, there is no nexus for additional mitigation measures. The analysis of Project-generated air emissions determines whether the proposed Project would result in a cumulatively considerable net increase of any criteria pollutant for which the South Coast Air Basin (SCAB) is in non-attainment under applicable National Ambient Air Quality Standards and California Ambient Air Quality Standards. The thresholds were set intentionally low by SCAQMD in order to get the SCAB into attainment. These thresholds are health-protective and are based on Clean Air Act standards and recommendations by the U.S. Environmental Protection Agency. Therefore, the proposed Project would not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan.

Biological Resources

A comment from the California Coastal Commission recommended that any amendment of the certified PMP is enhanced to include the addition of policies to make certain the land use conversion is compliant with sections 30708(a) and 30708(d) of the California Coastal Act, which require all port-related development to be located, designed, and constructed to minimize environmental impacts and provide for uses consistent with the public trust like recreation and wildlife. As discussed throughout the Draft EIR, the proposed Project would not result in any significant and unavoidable environmental impacts. The Project site is within an urban and developed area and is surrounded by developed areas that include roadways and port-related uses. With implementation of Mitigation Measure BIO-1, construction and operation of the proposed Project would not result in a substantial adverse effect, either directly or through habitat modification, on any animal species identified as a threatened, endangered, or candidate species in local or regional plans, policies, regulations, or by the CDFW or USFWS. Thus, potential impacts to sensitive animal species or their habitat would be less than significant with mitigation. Further, Section 30708 states to "[g]ive highest priority to the use of existing land space within harbors for port purposes," thus the proposed Project should be given the highest priority as a maritime support use, and would not conflict with Sections 30708(a) and 30708(d) of the California Coastal Act. Additional mitigation is not warranted.

A comment from the Wilmington Neighborhood Council suggested that the proposed Project consider impacts to the Bixby Slough/Lake Machado which is a natural wetland with many native birds, fish, and insect species present. As described in the Final EIR, Bixby Slough/Lake Machado is located approximately 0.81-mile north of the Project site with I-110, industrial uses, and the Philips 66 Los Angeles Refinery located between the Project site and the Bixby Slough/Lake Machado site. Furthermore, Bixby Slough/Lake Machado is not federally-designated critical habitat. Additionally, given the distance between the Project site and Bixby Slough/Lake Machado as well as the intervening urban and industrial development, the proposed Project would not impact habitat within Bixby Slough/Lake Machado or any species.

Greenhouse Gas Emissions

The SCAQMD provided a list of additional resources with project design features and mitigation measures to help reduce air quality and GHG impacts and eliminate significant and unavoidable impacts. However, as described in the Draft EIR, the proposed Project would result in less than significant air quality and GHG impacts; therefore, no mitigation is required.

A comment from the California Coastal Commission recommended that a PMP amendment resulting in increased GHGs include policies aimed at addressing impacts to environmental justice communities. As discussed in the IS (Appendix A to the Draft EIR), the proposed Project would result in approximately 4,914.3 MTCO2e/yr, which would be below the SCAQMD Threshold of 10,000 MT CO2e/yr. Therefore, operation of the proposed Project would not generate significant GHG emissions that would have a significant effect on the environment, and mitigation is not required.

Hazards and Hazardous Materials

A comment from the Los Angeles School District suggested that the proposed Project implement mitigation for the transportation of hazards and hazardous materials to be away from District school sites. The Draft EIR determined that the trucks would not pass by the closest school in the proximity of the Project Thus, the addition of mitigation would not be required.

A comment from the California Coastal Commission expressed concerns that landform alterations could result in substantial hazards including spreading hazardously contaminated soils and materials present on the site from abandoned petroleum pipelines. As described in the Draft EIR, identified contaminated soils in areas of Project ground disturbance would be removed and disposed of during construction of the proposed Project. Additionally, pursuant to SCAQMD Rule 1166, a mitigation plan would be prepared to be used during earthwork and grading to manage VOC emissions. A Soil Management Plan and a Health and Safety Plan would also be prepared for the proper management and disposal of waste and to minimize worker and public exposure to hazardous materials consistent with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719).

Land Use

A comment from the California Coastal Commission suggested that any PMP amendment prepared for the Project include specific policies that ensure the Project (and any future Project with a Maritime Support use) avoids environmental impacts and, if avoidance is not feasible, minimizes and mitigates for such impacts, as well as provides for public trust uses if at all feasible. As described previously, no significant and unavoidable impacts would occur from implementation of the Project and the proposed PMP amendment, therefore no additional mitigation beyond what was included in the Draft EIR is warranted.

Members of the Northwest San Pedro Neighborhood Council committee and the Wilmington Neighborhood Council expressed concerns that the proposed Project violates City Ordinance No. 188287 and undermines decades of POLA buffer zone policies protecting residential communities from industrial activities in the Harbor. In response to these concerns, the Proposed Project has been revised to exclude APN 7412-024-007 from the Project, as described in the May 2026 Final EIR Chapter 3.0, *Modifications to the Draft EIR*. Because only landscaping was proposed within APN 7412-024-007 as part of the Project analyzed within the Draft EIR, this revision to the Project description does not result in any new or substantially more severe environmental impacts beyond those analyzed in the Draft EIR. Further, although the proposed Project would require a PMP amendment to change the ~~o~~Open ~~s~~Space land use designation for APNs 7440-016-002 and 7440-016-003 to Maritime Support, it would be consistent with the City of Los Angeles's General Plan land use designation and zoning for the site. Thus, the proposed PMP amendment is necessary in order to render the PMP land use consistent with City of Los Angeles land use and zoning designations.

As evidenced by the site's current land use and zoning designations, urbanization of the site has been anticipated and accounted for since the adoption of the City of Los Angeles General Plan.

Noise

A comment from the Los Angeles School District suggested that the proposed Project implement mitigation that will comply with the District's exterior noise standard of 67 A-weighted decibels (dBA) and interior noise standard of 45 dBA. The Draft EIR determined that the Project would not result in reasonably foreseeable significant adverse noise impacts on sensitive receptors, including schools either directly, from construction-related impacts or, indirectly, from truck haul routes. Thus, no mitigation is required.

Transportation

A comment from the Los Angeles School District suggested mitigation related to construction and operation related transportation impacts on District sites. As described in Section 2 of the Final EIR, the proposed Project would connect to the existing curb lines and circulation system and would implement the City's traffic engineering design standards. Further, the driveway would be signal-controlled at John S. Gibson Boulevard and would allow for all turning movements with right-on-red restrictions from the proposed Project driveway onto John S. Gibson Boulevard, as well as would configure the entrance gate to provide adequate queueing capacity, thereby reducing any potential safety hazards between trucks and other vehicles. The Project would be conditioned to provide three gates if, in the future, it were to be operated with chassis only or chassis with wheeled containers. The proposed Project does not include any additional offsite roadway improvements that would impact traffic near schools that would warrant mitigation.

Additionally, the Los Angeles School District suggested mitigation related to pedestrian safety impacts on District sites during construction and operation. However, as described previously, the Draft EIR determined that trucks would not pass by the closest school to the Project site. Thus, the addition of mitigation is not required.

A comment from the California Coastal Commission recommended that a PMP amendment resulting in increased VMT include policies aimed at addressing impacts to environmental justice communities. As discussed in the IS (Appendix A to the Draft EIR), VMT impacts were determined to be less than significant; therefore, the Project would not result in significant impacts that would warrant mitigation.

Members of the Northwest San Pedro Neighborhood Council committee as well as members of the public expressed concerns suggesting the Draft EIR does not provide adequate traffic analysis and design and suggests additional intersections the Project should consider. The quantified traffic analysis (including VMT) is based upon a more conservative trip generation with the site operating only as a chassis storage facility. As described in the VMT Screening Memo (Appendix K

to the Draft EIR), the proposed Project would not result in new trips and is less than the established threshold of 250 trips; therefore, impacts related to VMT would be less than significant. In addition, level of service (LOS) or automobile delay at intersections is no longer considered an impact under CEQA. Therefore, the Draft EIR is not required to discuss congestion related to trucks. Pursuant to LADOT's Transportation Assessment Guidelines' project access, safety and circulation evaluation non-CEQA transportation analysis requirement, a site ingress/egress and LOS analysis was conducted at three locations (Appendix J to the Draft EIR). Given the estimated number of hourly Project site trips, the LOS of all adjacent intersections cited in the comment would be minimally degraded.

Additionally, as described in the Draft EIR, the Project accounted for the size and nature of the vehicles by applying the appropriate truck percentages for each movement at all study intersections. Further, truck turning templates were thoroughly reviewed by LADOT and LAHD staff to ensure that the proposed Project would not result in any unsafe turning movements from John S. Gibson Boulevard onto the site.

Tribal Cultural Resources

A comment from the California Coastal Commission recommended that further engagement with Tribal communities should occur to ensure full consideration for the site's tribal cultural resources. As described in the NOP/IS (Appendix A to the Draft EIR), the LAHD did not receive any requests for consultation under Assembly Bill 52 from any of the seven tribes traditionally and culturally affiliated with the Project vicinity. LAHD received a request for information from the Gabrieleño Band of Mission Indians - Kizh Nation; however, the Tribe did not request consultation. In addition, a Sacred Lands File search of the Project site yielded negative results. Therefore, no further consultation or mitigation is required.