

# **Addendum to the Innovative Barracuda Chassis Depot Final Initial Study and Negative Declaration**

APP No. 201123-180, 210130-016, & 210223-032

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SCH No. 2020080336

**Prepared By:**

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

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## 1. Introduction

The Innovative Barracuda Final Initial Study/Negative Declaration (Final IS/ND) was adopted by the Los Angeles Board of Harbor Commissioners (Board) on October 15, 2020 (SCH# 2020080336 and APP No. 190327-046). This Project included permitting and expanding property operated as a chassis yard that provides storage, maintenance, and repair of chassis, and modification of existing operations to include stop/start hire of chassis (i.e., rental and return operations). As part of the Project, construction would occur at the southern expansion area which included paving of approximately 1.5 acres, spot fill slurry seal of approximately 1.2 acres, removal of an existing wall, and 500 linear feet of new fencing and a gate. The Project included issuance of a Term Permit for the operations of the proposed chassis maintenance yard and depot for up to 10 years.

The Final IS/ND evaluated use of the premises for storage, maintenance, repair, and stop/start functions of chassis. In December 2020, however, a new request for entitlement was requested for cargo handling support, which includes the previously proposed use as a chassis depot facility and adds the storage and handling of shipping containers. This new use is being added to the previously proposed use as a chassis depot yard for the entire approximately 13.55 acre site (the original IS/ND had stated the area was approximately 13.2 acres, but due to rounding errors, the correct size should be approximately 13.55 acres). The new activities would operate in conjunction with the chassis depot operations evaluated in the Final IS/ND. Additionally, an approximately 2.65 acre expansion has been requested for as-needed entitlement of streets, Barracuda and Bass. Both streets are currently closed off from thoroughfare and have been for at least a decade. Barracuda and Bass Streets would be entitled as needed and would be terminated when street access needs to be restored. These areas would be used as private ingress/egress to reduce congestion and as-needed storage. All current entitlements (2 Revocable Permits [RPs] and 4 Space Assignments [SAs]) would be terminated upon execution of the new proposed entitlement(s). The Revised Proposed Project is assessing the new cargo handling support use for entitlement of up to ten years.

Additionally, the Final IS/ND evaluated construction for development of the southern parcel. This development and entitlement of the area would still occur, but in a phased manner with grading and laying of crushed aggregate base or gravel to be utilized for chassis depot and cargo handling support use for the duration of a short-term SA. This SA would not exceed 12 months and includes incorporation of Best Management Practices (BMPs). While on the SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution. This minor construction component would result in negligible emissions, similar to those disclosed during the peak daily emission activities in the IS/ND.

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

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

## **2. Background**

### **2.1.1 Facility Overview**

The Barracuda Chassis Depot Facility is located at 915 Earle St. on the western portion of Terminal Island, with Fish Harbor to the west. It is bound by Cannery Street to the north, Barracuda Street to the west, Bass Street to the south, and Earle Street to the east (Figures 1-2). This site has been operated by Innovative since 2015 as a chassis storage, maintenance, and repair facility (chassis yard). The Project site is comprised of six parcels that support chassis yard operations, including the storage, maintenance, and repair of chassis and three previously evaluated expansion parcels (Figure 1). The parcels are currently entitled under two RPs (approximately 1.6 acres) and four SAs (approximately 8.8 acres). The evaluated expansion parcels are approximately 6.2 acres and includes approximately 1.5 acres of unpaved land. The facility serves Direct ChassisLink Inc., TRAC, FlexiVan, and American Intermodal Management, LLC. Chassis yard operations currently occur year-round, Monday through Friday, 7:00 AM to 4:00 PM.

### **2.1.2 Previously Assessed and Approved Project Footprint**

The Board adopted the Final IS/ND and certified the proposed Project on October 15, 2020 (SCH# 2020080336 and APP No. 190327-046). The approved proposed Project evaluated the following components at 915 Earle St.:

- Expansion of the existing approximately 7-acre property by an additional approximately 6.2 acres, to a total of approximately 13.2 acres (the original IS/ND had stated the area was approximately 13.2 acres, but due to rounding errors, the correct size should be approximately 13.55 acres).
- Increased storage of approximately 2,480 additional chassis.
- Addition of stop/start functionality to operate the facility as a full-service chassis depot. The new stop/start function would allow truckers to pick up and return chassis to the site, renting and returning chassis on a regular basis. As a result of the new stop/start functionality and expansion, truck traffic would increase by an estimated 258 truck trips per day (round trips), hours of operation would increase to 7 AM -3 AM, and 9 employees would be added (for a total of 20 employees per day).
- Issuance of a Term Permit for up to 10 years, combining all Innovative-operated parcels.
- Construction at the southern expansion area (Parcel G – see Figure 1) which includes paving of approximately 1.5 acres, spot fill slurry seal of approximately 1.2 acres, removal of an existing wall, and 500 linear feet of new fencing and a gate. This construction was estimated to occur over approximately 15 working days in March 2021.

As of March 2021, two SAs were issued to Innovative Terminal Services for chassis storage. SA 21-10 was issued for the northern expansion area that was evaluated in the Final IS/ND (Figure 1-Parcel F). SA 21-11 was issued for the same footprint as SA 19-44 for chassis depot uses (Figure 1- Parcel C). SA 19-44 was terminated after the issuance of SA 21-11. Both SAs (21-10 and 21-11) would be terminated upon execution of the new entitlement(s). No construction at the site has occurred.

The Final IS/ND evaluated the use of the premises for storage, maintenance, repair, and stop/start functions of chassis. The proposed use of cargo handling support and a 2.65 acre expansion is now requested, which would add the storage and handling of shipping containers to the chassis depot operation evaluated in the Final IS/ND, as well as private ingress/egress and as-needed storage areas to the site (Figure 2). Construction assessed in the Final IS/ND at the southern expansion parcel would remain a component of the Revised Proposed Project, with the addition of a phased component which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. While on the SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution.



Figure 1 – Previously Assessed Parcel Areas

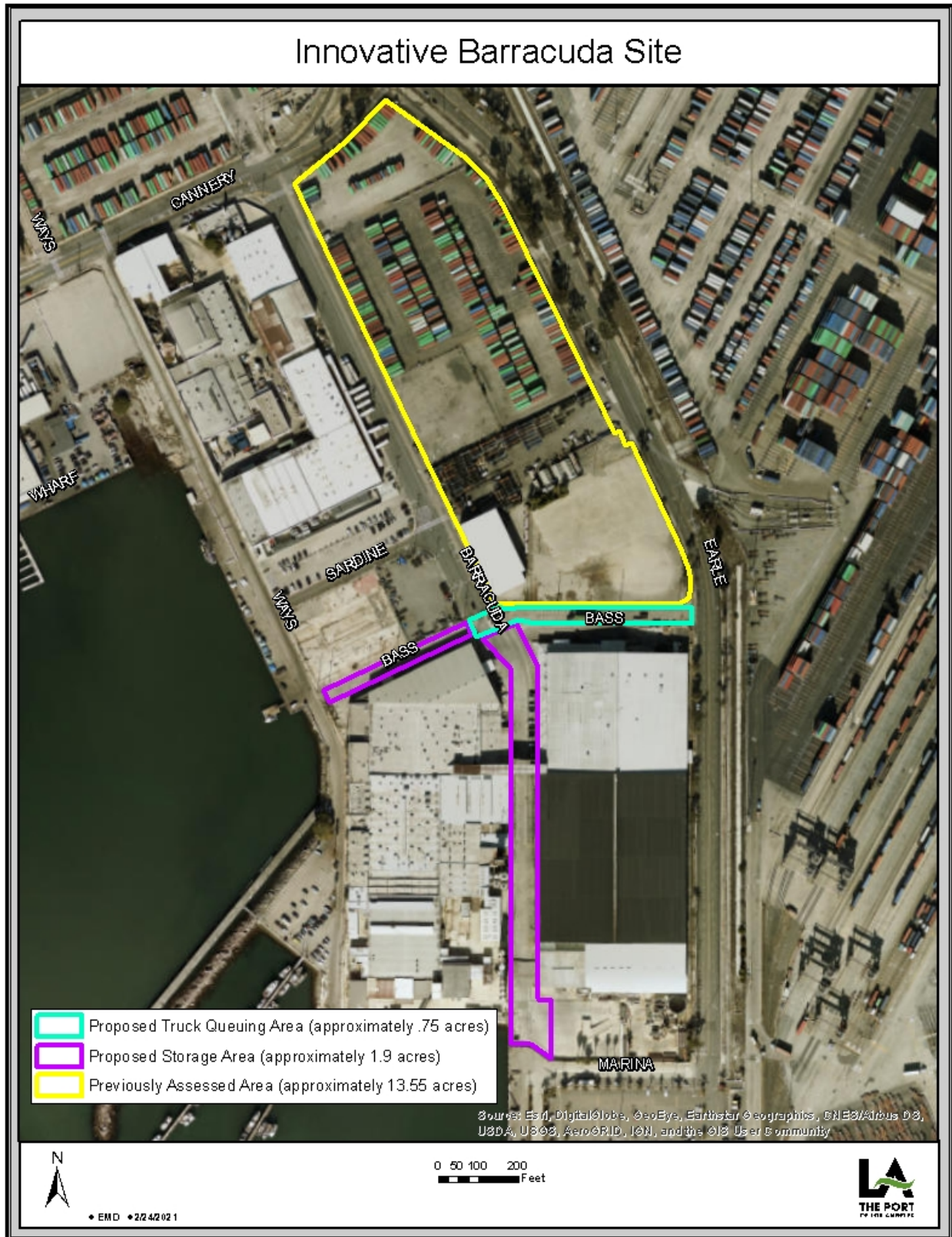


Figure 2 – Proposed Entitlement Area

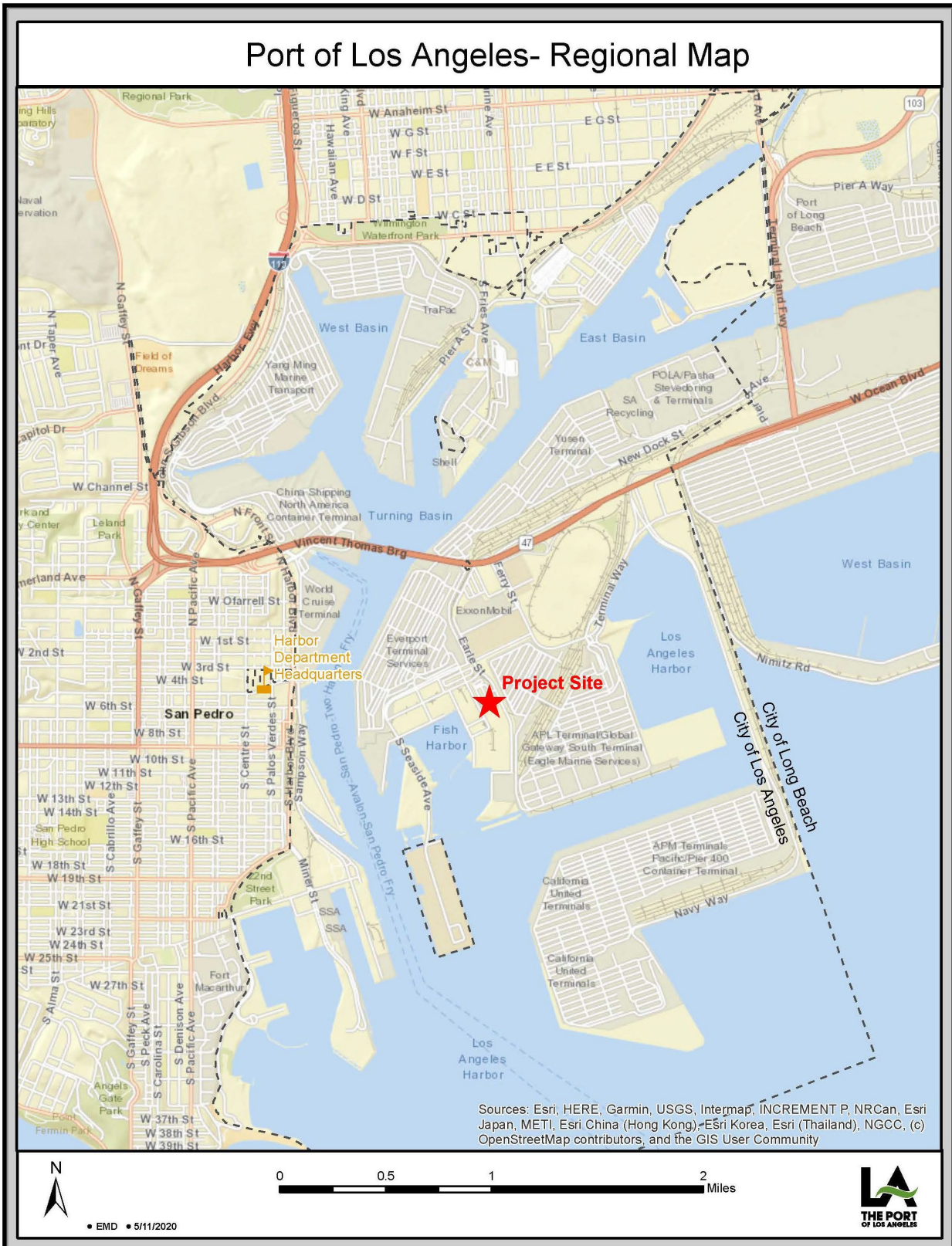


Figure 3 - Regional Location of the Revised Proposed Project

### **3. Revised Proposed Project**

The Final IS/ND assessed a Project footprint totaling approximately 13.55 acres at 915 Earle Street entitled under a Term Permit for up to 10 years, combining all Innovative-operated parcels and three expansion areas (Figure 1). Innovative currently occupies approximately 10.4 acres of the premises under two RPs (approximately 1.6 acres) and four SAs (approximately 8.8 acres) (Figure 1). As of March 2021, entitlement has been requested for the new use of cargo handling support, which includes the previously proposed use as a chassis depot yard and adds the storage and handling of shipping containers. This new use is being added to the previously proposed use as a chassis depot yard for the entire approximately 13.55 acre site. Additionally, an approximately 2.65 expansion area has been requested for as-needed entitlement of Barracuda and Bass streets which are currently closed off from thoroughfare and have been for at least a decade. These streets would be entitled as needed and would be terminated when street access needs to be restored. These areas would be used as private ingress/egress to reduce congestion and as-needed storage areas. All current entitlements (2 RPs [15-09 and 16-39] and 4 SAs [20-05, 20-09, 21-10, and 21-11]) would be terminated upon execution of the new entitlement(s) (Figure 1). Assessed development would still occur at the site with the addition of a phased component which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. While on the SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution. The Revised Proposed Project is the new cargo handling support use for entitlement of up to ten years.

Both empty and full shipping containers would be stored at the site, and handling of the containers would consist of mounting/dismounting from chassis for transport. These activities would operate in conjunction with the chassis depot operations evaluated in the Final IS/ND. Additionally, the Final IS/ND evaluated associated construction for development of the southern parcel estimated for March 2021 (Parcel G in Figure 1). This development would still occur as part of the Revised Proposed Project.

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

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

The approximately 2.65 expansion area would increase the total Revised Proposed Project area to approximately 16.40 acres (Figure 2). Barracuda and Bass streets are currently closed off from thoroughfare and have not been used as public circulation for at least a decade. A portion of Bass street would be entitled for private ingress/egress to reduce congestion by queuing trucks already travelling to the site (light blue area - Figure 2). Barracuda Street and a different portion of Bass Street would both be used for as-needed storage (purple area - Figure 2). Street areas would be terminated when street access would need to be restored. No additional truck trips are anticipated due to the expansion since the area would be used solely for queuing of existing truck trips to the site and as-needed storage would not be utilized for the stop/start hire of chassis. Due to the negligible expansion of streets currently and historically closed off from public use, the as-needed nature of the entitlement until street access is



restored, and no additional truck trips, no significant impacts are anticipated due to the approximately 2.65 acre expansion of storage.

Construction from development and entitlement assessed in the Final IS/ND for the southern portion of the property (Parcel G – Figure 1) would still occur. However, as a part of the Revised Proposed Project, this development would now occur in a phased manner with grading and laying of permeable crushed aggregate base or gravel. This minor construction component would result in negligible emissions, similar to those disclosed during the peak daily emission activities in the Final IS/ND. After crushed aggregate base or gravel is placed, the area would be utilized for chassis depot and cargo handling support use for the duration of a short-term SA. This SA would not exceed 12 months and includes incorporation of BMPs. While on the SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution.

The Revised Proposed Project would require one additional Hyster top pick to mount and dismount the storage containers. The addition of a single top pick is considered a negligible increase and would not create substantial increase to impacts previously disclosed in the Final IS/ND. There would be no additional employees beyond the number evaluated in the Final IS/ND. It is anticipated that no new truck trips would occur as part of this project since containers would be secured to a chassis that was already scheduled to be rented or returned and the approximately 2.65 acre expansion area would only be used for queuing of existing trucks trips and as-needed storage not utilized for stop/start hire of chassis. Due to a negligible increase in equipment, negligible emissions from minor construction, no new employees beyond those previously evaluated, and no additional truck trips, no new significant impacts are anticipated for this Revised Proposed Project.

## 4. Purpose

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

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

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

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

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

## 5. Scope and Content

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

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

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

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

## 6. Previous Environmental Documents Incorporated by Reference

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

- **Innovative Barracuda Chassis Depot Final Initial Study/Negative Declaration** (SCH No. 2020080336 and APP No. 190327-046). This document addressed all potential environmental impact areas from the original project and included the full project description, existing setting, and the environmental checklist. This document determined that all areas were considered less than significant. This document is incorporated by reference, as all environmental analyses contained therein are being utilized for a comparison against the Revised Proposed Project change to ensure that no new impact is created. This document was circulated for a 30-day public review and comment period. This document can be accessed via the LAHD website (<https://www.portoflosangeles.org>) under the Environmental Documents tab.

## 7. Required Permits and Approvals

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

- LAHD Entitlement(s) (examples include: Term Permit, Revocable Permit, Space Assignment, etc.)
- LAHD Harbor Engineer Permit(s) (includes compliance with the City of Los Angeles Low Impact Development ordinance)
- LAHD Coastal Development Permit
- State Water Resources Control Board (SWRCB) Industrial General Permit Order No. 2014-0057-DWQ – Coverage Expansion
- Regional Water Quality Control Board (RWQCB) Construction General Permit
- Stormwater Pollution Prevention Plan (LAHD SWPPP) – update existing site-specific SWPPP

## **8. Environmental Analysis**

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

### **8.1 Aesthetics**

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

### **8.2 Agriculture and Forestry Resources**

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

### **8.3 Air Quality**

The Final IS/ND assessed an increase in facility size for chassis storage and the addition of the stop/start function, which allows truckers to pick up and return chassis to the site, for an approximately 13.55 acre premises. The Revised Proposed Project includes the additional use of shipping container handling and storage. To support this new use, the Revised Proposed Project would require one additional Hyster top pick. This single piece of equipment would create a negligible effect on Air Quality due to a de minimis amount of emissions. Additionally, it is anticipated that no new truck trips would occur as part of this project since containers would be secured to chassis already scheduled to be rented or returned. Additionally, no new truck trips are anticipated due to the approximately 2.65 acre expansion since the streets would be used solely for queuing of existing truck trips and as-needed storage would not be utilized as a part of the stop/start hire of chassis. As such, no additional emissions would result. Additionally, a phased component is now included in the Revised Proposed Project, which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. This minor construction component would result in negligible air quality emissions, similar to those disclosed during the peak daily emission activities in the Final IS/ND. Due to a negligible increase in equipment, no new truck trips, and negligible emissions from minor construction, the Revised Proposed Project would continue to have a less-than-significant impact to air quality.

### **8.4 Biological Resources**

The Revised Proposed Project would not cause any change in impact determinations from the Final IS/ND. Interaction with threatened or endangered species as a result of this project is highly unlikely, and foraging, resting, and breeding habitat is unlikely to be present at the project site due to lack of trees or brush. As part of the proposed Project, to comply with state and federal laws protecting nesting birds, the Port would conduct preconstruction surveys of adjacent vegetation on Earle Street for nesting birds if construction activities are conducted between January 1 and September 15. Therefore, there would continue to be a less-than-significant impact to biological resources.

### **8.5 Cultural Resources**

No eligible or listed historic resources have been recorded within the Revised Proposed Project area. Additionally, the premises is highly disturbed and located on the northern portion of Terminal Island, which is an artificial landform composed of construction fill. Because the site is comprised of fill and is extensively disturbed, there is low potential for discovering archaeological or ethnographic cultural resources. Due to ineligibility and low potential, there would continue to be no impact to cultural resources.

### **8.6 Energy**

The Revised Proposed Project now includes a new phased development component, which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. This minor construction component would result in a negligible increase in energy, similar to those disclosed in the Final IS/ND. Also, although there would be an additional diesel-powered top pick needed for operations, this single piece of equipment would only create a negligible increase in energy due to a small amount of diesel usage. Therefore, there would continue to be a less-than-significant impact to energy.

### **8.7 Geology and Soils**

The Revised Proposed Project does not change the impacts previously assessed in the Final IS/ND. There would now be a new phased development component, which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. However, this SA would not exceed 12 months and includes incorporation of BMPs. While on the SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution. Additionally, the Revised Proposed Project would not be located on a geological unit that is unstable or would become unstable. Therefore, there would continue to be a less-than-significant impact to geology and soils.

### **8.8 Greenhouse Gas Emissions**

As discussed in Section 8.3, the Revised Proposed Project would not create air emissions greater than what was previously evaluated in the Final IS/ND. A phased component is now included in the Revised Proposed Project, which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. This minor construction component would result in negligible greenhouse gas (GHG) emissions, similar to those disclosed during the peak daily emission activities in the Final IS/ND. Additionally, to support container storage, the Revised Proposed Project would require one additional Hyster top pick. This single piece of equipment would create a negligible increase to GHG due to a de minimis amount of emissions. Therefore, there would continue to be a less-than-significant impact to GHG.

### **8.9 Hazards and Hazardous Materials**

The Revised Proposed Project does not change the impacts previously assessed in the Final IS/ND. There would now be a brief period of storage activity on permeable land due to the addition of a phased in approach with laying of crushed aggregate base or gravel for the duration of a short-term SA. However, this SA would not exceed 12 months and includes incorporation of BMPs. While on the SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution. Accordingly, there would continue to be a less-than-significant impact to hazards and hazardous materials.

### **8.10 Hydrology and Water Quality**

The Revised Proposed Project would not violate any water quality standards or waste discharge requirements. There would now be a brief period of storage activity on permeable land due to the addition of a phased in approach with laying of crushed aggregate base or gravel for the duration of a short-term SA. However, this SA would not exceed 12 months and includes incorporation of BMPs. While on the

SA, Innovative will design and take the necessary steps to prepare for site pavement as assessed in the Final IS/ND, which will be completed within approximately 6 months of Permit execution. Therefore, impacts to hydrology and water quality would continue to be less than significant.

### **8.11 Land Use and Planning**

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

### **8.12 Mineral Resources**

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

### **8.13 Noise**

Although the Revised Proposed Project would include the addition of a single top pick for shipping container storage and handling operations, it is not anticipated to create impacts to noise since the environmental setting includes sources of noise typical of an industrialized port environment. Also, there is equipment currently on-site, including four forklifts, one utility tractor rig, and a mobile fuel service truck. Within this context, the addition of a single top pick is consistent with the existing noise portfolio and would not result in any new impacts to noise that were not previously disclosed in the Final IS/ND. Additionally, a phased component is now included in the Revised Proposed Project, which includes grading and laying of crushed aggregate base or gravel for the duration of a short-term SA. This minor construction component would result in noise increases similar to those disclosed in the Final IS/ND. Also, the nearest potential residential receptors are located approximately 1,200 feet southwest of the Project site, with many intervening structures between the residential receptor and the project site. Accordingly, no increase in noise at the nearest sensitive receptors would occur due to distance from the noise receptors and consistency with the existing noise portfolio. Therefore, noise generated as a result of the Revised Proposed Project would continue to be less than significant.

### **8.14 Population and Housing**

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

### **8.15 Public Services**

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

### **8.16 Recreation**

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

### **8.17 Transportation**

The Revised Proposed Project would not require any additional employees than previously analyzed in the Final IS/ND. The Los Angeles Department of Transportation's (LADOT's) guidelines state that a Vehicle Miles Travelled (VMT) analysis is not required if a project generates less than 250 daily trips. Additionally, the Revised Proposed Project does not anticipate an increase in passenger vehicle trips to the site. Accordingly, the Revised Proposed Project would continue to be less than significant.

### **8.18 Tribal Cultural Resources**

See discussion under Section 8.5, Cultural Resources. Because the site is comprised of fill and is extensively disturbed, there is low potential for discovering archaeological or ethnographic cultural resources. Therefore, the potential to encounter tribal cultural resources as a result of the Revised Proposed Project is unlikely, and there would continue to be no impact to tribal cultural resources.

### **8.19 Utilities and Service Systems**

The Revised Proposed Project would not have any impact on the current wastewater treatment facilities nor would it require the construction of an additional wastewater facility. No new demands on water supply are anticipated. Therefore, utilities and service systems impacts would continue to be less than significant.

### **8.20 Wildfire**

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

## **9. Conclusions**

The Revised Proposed Project would modify entitlement(s), add one additional top pick, include minor construction, add the proposed use of cargo handling support, and expand the premises by approximately 2.65 acres, increasing the total acreage to approximately 16.40 acres. Due to a negligible increase in equipment, negligible emissions from minor construction, no increase in employees beyond the number evaluated in the Final IS/ND, and no additional truck trips, no new significant impacts are anticipated for this Revised Proposed Project. None of the conditions as described under Section 15162 of the State CEQA Guidelines requiring a subsequent EIR or ND have occurred under the Revised Proposed Project. No substantial changes to impact areas previously analyzed in the Final IS/ND would occur as a result of the Revised Proposed Project. For these reasons, the proposed modifications would create no potential adverse impacts or substantial changes to impact areas previously analyzed in the Final IS/ND.



## 10. References

LAHD. 2020. Final Initial Study/Negative Declaration Innovative Barracuda Chassis Depot. October.  
[https://kenticoportoflosangeles.org/getmedia/f5e84dc4-a8a3-453d-8730-3461fa071a84/Barracuda-Final-IS-ND\\_October-2020](https://kenticoportoflosangeles.org/getmedia/f5e84dc4-a8a3-453d-8730-3461fa071a84/Barracuda-Final-IS-ND_October-2020)