

# Final Initial Study/Negative Declaration

# Innovative Barracuda Chassis Depot

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APP No. 190327-046  
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## FINAL INITIAL STUDY/NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (Division 13, Public Resources Code)

### PROPOSED PROJECT

The City of Los Angeles Harbor Department (LAHD) has prepared this Initial Study/Negative Declaration (IS/ND) to address potential environmental impacts of the proposed Barracuda Chassis Depot (proposed Project), located at 915 Earle St., San Pedro, in the Port of Los Angeles (Port). LAHD is the lead agency under the California Environmental Quality Act (CEQA).

The proposed Project would permit and expand property currently operated as a chassis (i.e. a trailer or undercarriage portion of a truck used to transport ocean containers over roadways) 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). Innovative Terminal Services, Inc. (Innovative) proposes to expand the existing approximately 7-acre property by an additional approximately 6.2 acres, to a total of approximately 13.2 acres. The parcels are part of Port property located on the western portion of Terminal Island (POLA, 2019). The objectives of the proposed Project are the following: issue a Term Permit for the operations of the proposed chassis maintenance yard and depot for up to 10 years in order to combine all Innovative-operated parcels under one permit; optimize the use of existing land that supports chassis storage at the Project site; provide a full-service depot that would increase the efficiency of terminal operations by providing storage, maintenance, repair, and stop/start functions of chassis on Terminal Island in the Port; and increase the efficiency of goods movement in the Port by providing off-terminal maritime support to help meet the demands of Port marine terminals now and in the future.

### DETERMINATION

Based on the analysis provided in this Final IS/ND, LAHD finds that the proposed Project would not have a significant effect on the environment.

### FINAL IS/ND ORGANIZATION

This Final IS/ND has been prepared in accordance with the requirements of CEQA (California Public Resources Code [PCR] 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] 15000 et seq.) The Final IS/ND includes the following discussion including a response to one comment on the Draft IS/ND.

**Responses to Comments:** This section describes the distribution of the Draft IS/ND for public review, the one comment letter received on the Draft IS/ND by LAHD, and LAHD's response to this comment.

**Clarifications and Modifications:** There were several modifications to the document in Section 2.2.1 (Construction) in the Project Description and Section 4.4. (Biological Resources) to clarify Project activity compliance with the Migratory Bird Treaty Act. These modifications do not constitute a significant change or significant new information. Therefore, no recirculation is required.

The following sections were included in the Draft IS/ND and are included in this final document:

**Section 1. Introduction.** This section provides an overview of the proposed Project and the CEQA environmental documentation process.

**Section 2. Project Description.** This section provides a detailed description of the proposed Project's objectives and components.

**Section 3. Initial Study Checklist.** This section presents the CEQA checklist for all impact areas and mandatory findings of significance.

**Section 4. Environmental Analysis and Discussion of Impacts.** This section presents the environmental analysis for each issue area identified on the environmental checklist. If the proposed Project does not have the potential to significantly impact a given issue area, the relevant section provides a brief discussion of the reasons why no impacts are expected.

**Section 5. Proposed Finding.** This section presents the proposed finding regarding environmental impacts.

**Section 6. Preparers and Contributors.** This section provides a list of key personnel involved in the preparation of the IS/ND.

**Section 7. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used throughout the IS/ND.

**Section 8. References.** This section provides a list of reference materials used during the preparation of the IS/ND.

## **RESPONSE TO COMMENTS**

### **DISTRIBUTION OF THE DRAFT IS/ND**

In accordance with the CEQA statutes and Guidelines, the Draft IS/ND was circulated for a period of 30 days for public review and comment. The public review period for the Draft IS/ND began on August 20, 2020 and concluded on September 18, 2020.

The Draft IS/ND was distributed to approximately 90 interested and/or involved public agencies, organizations, and commercial entities for review and was also made available for public review online on the Port's website at <http://www.portoflosangeles.org>. A copy of the document was also available for public review at the Harbor Department Environmental Management Division (EMD) located at 222 West 6th Street, 9th Floor, San Pedro. In addition, the Draft IS/ND was filed with the Los Angeles County Clerk and the State Clearinghouse.

### **COMMENTS ON THE DRAFT IS/ND**

During the 30-day public review period, Responsible Agencies and the public had an opportunity to provide written comments on the information contained within the Draft IS/ND. These comments and responses are included in the record and shall be considered by LAHD during deliberation as to whether or not necessary approvals should be granted for the proposed Project. As stated in Section 21064.5 of the State CEQA Guidelines, a project would only be approved when LAHD "finds that there is no substantial evidence that the Project will have a significant effect on the environment and that the IS/ND reflects the Lead Agency's independent judgement and analysis." LAHD received one comment letter during the review period as presented on the following pages. This comment letter has been noted and will be before the decisionmakers for their consideration prior to taking any action on the proposed Project.

Comment Letter #1: California Department of Fish and Wildlife

State of California – Natural Resources Agency  
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South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



September 9, 2020

Ms. Leah Kohler  
Port of Los Angeles  
425 S. Palos Verdes St.  
San Pedro, CA 90731  
[lkohler@portla.org](mailto:lkohler@portla.org)

**Subject: Negative Declaration for the Innovative Barracuda Chassis Depot,  
SCH #2020080336, Port of Los Angeles, Los Angeles County**

Dear Ms. Kohler:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Negative Declaration (ND) for the Innovative Barracuda Chassis Depot (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take," as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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### Project Description and Summary

**Objective:** The Port of Los Angeles is the Lead Agency for the Project. Activities include the expansion of the Innovative Barracuda Chassis Depot (Depot) by acquiring additional acreage on Terminal Island. The existing 7-acre Depot has been operated by Innovative Terminal Services, Inc. (Innovative, Project Applicant) since 2015 as a chassis storage, maintenance, and repair facility under Los Angeles Harbor Department Revocable Permits (RPs) and Space Assignments (SAs). The 7-acre Depot is comprised of six paved parcels, Parcels A through E, of approximately 1.6 acres of RPs and 5.4 acres of SAs. A metal building near the center of the Project site is used for chassis maintenance and repair, storage, and office space. No other buildings are located on these 7 acres.

The Project proposes to acquire three parcels, Parcels F, G, and H (approximately 6.2 acres combined) south of the six existing parcels, expanding the Depot to approximately 13.2 acres. The 6.2-acre area was previously developed and contained a now demolished building. The three parcels are currently vacant and consists of paved and unpaved surfaces. Construction would only occur in Parcel G and would include soil compaction, grading, paving, and removal of existing walls and fences.

The Project would optimize the use of existing land to support terminal operations by providing storage, maintenance, report, and stop/start functions of chassis on Terminal Island in the Port of Los Angeles. The Project also includes the issuance of a Term Permit for the Depot to operate for up to 10 years, which will combine all Innovative-operated parcels under one permit.

**Location:** The Project is located on 915 Earle Street, San Pedro, on Terminal Island at the Port of Los Angeles, which is 20 miles south of downtown Los Angeles. The Project is bounded by Cannery Street to the north; Barracuda Street to the west; Bass Street to the south; and Earle Street to the East.

### COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

#### Comment: Potential Impacts to Nesting Birds

**Issue:** Table 2-2 on page 12 of the Initial Study/Negative Declaration (IS/ND) shows Project construction to occur from March 1 through March 19, 2021. Page 42 of the IS/ND states, "There is no suitable nesting habitat at the Project site due to lack of trees or brush [...] Due to the heavily disturbed nature of the Project site and similarity between existing operations and construction (i.e., use of a grader to compact the approximately 1.5 acres of unimproved dirt in Parcel G versus use of forklifts to stack chassis), impacts to nesting birds would be less than significant."

Google Imagery shows there are eucalyptus trees near Parcel G along Earle Street. The availability of eucalyptus trees around the Parcel G may attract water birds and raptors, especially because of the site's proximity to open water foraging habitat. CDFW is concerned

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that any birds and raptors potentially nesting in these trees could be impacted by construction scheduled for March 2021.

**Specific Impacts:** Project activities during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment in trees adjacent to Parcel G.

**Why impacts would occur:** Eucalyptus trees near Parcel G along Earle Street could provide nesting sites for some bird and raptor species.

Table 4.4-1 on page 42 of the IS/ND lists 18 sensitive and special-status bird species observed in the Port of Los Angeles, as well as additional species such as great blue heron (*Ardea herodias*) and snowy egret (*Egretta thula*). Of these 18 species, nine species nests in trees, four of which may nest in eucalyptus trees (*Eucalyptus* spp.). These nine species are black-crowned night heron (*Nycticorax nycticorax*); brown pelican (*Pelecanus occidentalis*); double-crested cormorant (*Phalacrocorax auratus*); loggerhead shrike (*Lanius ludovicianus*); merlin (*Falco columbarius*); osprey (*Pandion haliaetus*); peregrine falcon (*Falco peregrinus*); snowy egret; and great blue heron. The species that could nest in eucalyptus trees are black-crowned night heron, double-crested cormorant, snowy egret, and great blue heron (Crouch et al. 2002; Kelly et al. 1993; Rauzon et al. 2019). Red-shouldered and red-tailed hawks may also nest in eucalyptus trees (Moore and Coulson 2020; Rottenborn 2000; Wiley 1973; Wolf and DiTomaso 2016). Moreover, the Audubon Society identifies the waters off the Port of Los Angeles ("Palos Verdes", site ID 4685) as an [Important Bird Area](#) (National Audubon Society 2020). Accordingly, additional birds and raptor species not identified on Table 4.4-1 could transit over the Project site and may be attracted to the eucalyptus trees.

The IS/ND describes the Project site as "heavily disturbed" in nature and therefore not considered to be suitable for nesting birds. However, birds and raptors could use the eucalyptus trees as nesting sites. Some birds and raptors have adapted well to urban settings (some species thrive in urban settings) and may use non-native ornamental trees as nest sites (Cooper et al. 2020; Kettel et al. 2018; Poppleton 2016).

Impacts to nesting birds could result from activities such as soil compaction, grading, and paving at Parcel G. The IS/ND states that impacts to nesting birds would be less than significant because of the similarity between "existing operations and construction (i.e., use of a grader to compact the approximately 1.5 acres of unimproved dirt in Parcel G versus use of forklifts to stack chassis." However, Project-related increases in noise, dust, vehicles, and human presence and activity occurring near or under eucalyptus trees in March, if breeding and nesting birds are present, could lead to nest abandonment or otherwise result in the incidental loss of breeding success.

**Evidence impacts would be significant:** There has been a steady decline of nearly three billion North American birds since 1970, primarily as a result of habitat loss caused by human development. Because of this precipitous decline, State and Federal laws and regulations have been enacted to protect avian species. Nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of 1918 (Code of Federal Regulations, Title 50, § 10.13) is prohibited under Fish and Game

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Code section 3513. Fully Protected status precludes CDFW from authorizing any amount of incidental take or intentional take to meet any project mitigation requirement (Fish & G. Code, § 3511). The loss of occupied habitat or reductions in the number of sensitive and special-status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation.

#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** To protect nesting birds that may occur adjacent to the Project site, CDFW recommends that a qualified biologist survey eucalyptus trees for nesting bird activity. Eucalyptus trees adjacent to Parcel G on both sides of Earle Street should be surveyed, and any additional trees or structures that could be a potential nesting site to be determined by a qualified biologist. CDFW recommends the Port of Los Angeles require surveys be conducted no more than 7 days prior to the beginning of construction.

**Mitigation Measure #2:** If nesting birds or raptors are identified during the survey, CDFW recommends the Port of Los Angeles/Innovative avoid construction from January 1 to September 15 to avoid impacts to breeding and nesting birds.

**Mitigation Measure #3:** If nesting birds or raptors are not observed during the survey, CDFW recommends that if construction is delayed or suspended for more than 7 days between March 1 through March 19, or until construction is completed, surveys should be repeated before work can resume.

Per CEQA Guidelines, section 21081.6(a)(1), CDFW has provided the Port of Los Angeles with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

#### **Filing Fees**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Port of Los Angeles and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

#### **Conclusion**

We appreciate the opportunity to comment on the Project to assist the Port of Los Angeles in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the Port of Los Angeles has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist, at [Ruby.Kwan-Davis@wildlife.ca.gov](mailto:Ruby.Kwan-Davis@wildlife.ca.gov).

CDFW-1,  
cont.

Ms. Leah Kohler  
Port of Los Angeles  
September 9, 2020  
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Sincerely,

DocuSigned by:  
*Erinn Wilson-Olgin*

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Erinn Wilson  
Environmental Program Manager I

cc: CDFW

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State Clearinghouse – [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

#### References:

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Wolf, K.M. and J. DiTomaso. 2016. Management of blue gum eucalyptus in California requires region-specific consideration. *California Agriculture* 70(1): 39-47.



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GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director

**Attachment A: Draft Mitigation and Monitoring Reporting Plan**

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)		
	Mitigation Measure (MM)	Responsible Party
<b>MM-BIO-1- Avoiding potential impacts to breeding and nesting birds</b>	A qualified biologist shall survey eucalyptus trees for nesting bird activity adjacent to Parcel G on both sides of Earle Street and any additional trees or structures that could be a potential nesting site. Surveys shall be conducted no more than 7 days prior to the beginning of construction.	Port of Los Angeles/ Innovative Terminal Services, Inc.
<b>MM-BIO-2- Avoiding potential impacts to breeding and nesting birds</b>	If nesting birds or raptors are identified during the survey, the Port of Los Angeles/Innovative shall avoid construction from January 1 to September 15 to avoid impacts to breeding and nesting birds.	Port of Los Angeles/ Innovative Terminal Services, Inc.
<b>MM-BIO-3- Avoiding potential impacts to breeding and nesting birds</b>	If nesting birds or raptors are not observed during the survey, and construction is delayed or suspended for more than 7 days between March 1 through March 19, or until construction is completed, surveys shall be repeated before work can resume.	Port of Los Angeles/ Innovative Terminal Services, Inc.

Response to Comment Letter #1: California Department of Fish and Wildlife

CDFW – 1 Thank you for your comment. The California Department of Fish and Wildlife (CDFW) is concerned that the presence of eucalyptus trees along the adjacent street near Parcel G may support nesting birds. Based on baseline conditions at the proposed Project site, the Port does not consider the site to have a high potential to support nesting birds. The area is barren, and the street trees are located along a heavily used street (Earle Street). Current baseline conditions at the Project site include heavy traffic from bobtail trucks and other vehicles that routinely use the street and often park beneath the trees. Current baseline conditions also include the use of heavy equipment such as four large forklifts and a utility tractor rig (UTR), as well as mobile fuel service trucks providing diesel and propane for on-site equipment. Birds could nest in adjacent vegetation including non-native ornamental species that occur along the existing roadway. Based on current baseline conditions at the Project site, however, should birds nest in these trees it is unlikely that construction activities would disturb the birds because construction would involve the use of similar equipment, such as a flatbed truck, front loader, grader, excavator, and backhoe over the course of 15 days.

As part of the project description and in compliance with state and federal laws protecting nesting birds, the Port has added language to clarify implementation of pre-construction surveys and monitoring for construction activities conducted between January 1 and September 15. Specifically, Project Description Section 2.2.1 (Construction) has been revised to read “To comply with state and federal laws protecting nesting birds, the Port would conduct pre-construction surveys for nesting birds if construction activities are conducted between January 1 and September 15. If nesting birds are detected, the Port would implement no-disturbance buffers until the nests have fledged. The size of the buffers would be based on the judgement of a qualified biologist. The biologist would determine the buffer based on the species’ ecology, its tolerance to disturbance, and the type of construction activity that is occurring. Periodic monitoring would be conducted to ensure the nest is not disturbed.”

In addition, Section 4.4 (Biological Resources) has been revised to read “The federal Migratory Bird Treaty Act (MBTA) prohibits take of any migratory bird, including active nests, except as permitted by regulation (e.g., waterfowl or upland game bird hunting). California Fish and Game Code Section 3503.5 prohibits take or possession of birds of prey or their eggs; and Section 3513 prohibits take or possession of any migratory nongame bird. “Take” means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. There is no suitable habitat (for nesting, loafing, foraging, etc.) at the Project site due to lack of trees or brush. Therefore, no take would occur as a result of the proposed Project. Birds could potentially nest in adjacent vegetation including non-native ornamental species that occur along the existing roadway (Earle Street). These trees are located along a roadway used by trucks and other vehicles. Should birds nest in these trees,

it is unlikely that construction activities would disturb the birds based on current baseline conditions. However, as part of the proposed Project in compliance with state and federal laws protecting nesting birds, the Port would conduct pre-construction surveys for nesting birds if construction activities are conducted between January 1 and September 15. If nesting birds are detected, the Port would implement no-disturbance buffers until the nests have fledged. The size of the buffers would be based on the judgement of a qualified biologist. The biologist would determine the buffer based on the species' ecology, its tolerance to disturbance, and the type of construction activity that is occurring. Periodic monitoring would be conducted to ensure the nest is not disturbed. Due to the heavily disturbed nature of the Project area and similarity between existing operations and construction (i.e., use of existing on-site forklifts and UTR), impacts to nesting birds would be less than significant, and no mitigation is required."

Based on the revisions above that clarify the activities that would occur as part of the proposed Project, and in consideration of the comments provided by CDFW, additional mitigation measures are not warranted. Compliance with existing laws that protect nesting birds would be implemented through standard operating procedures that are now identified in the Project Description.

## 1.0 INTRODUCTION

The City of Los Angeles Harbor Department (LAHD) has prepared this Initial Study/Negative Declaration (IS/ND) to address potential environmental impacts of the proposed Barracuda Chassis Depot (proposed Project), located at 915 Earle St., San Pedro, in the Port of Los Angeles (Port). LAHD is the lead agency under the California Environmental Quality Act (CEQA).

The proposed Project would permit and expand property currently operated as a chassis (i.e. a trailer or undercarriage portion of a truck used to transport ocean containers over roadways) 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). Innovative Terminal Services, Inc. (Innovative) proposes to expand the existing approximately 7-acre property by an additional approximately 6.2 acres, to a total of approximately 13.2 acres. The parcels are part of Port property located on the western portion of Terminal Island (POLA, 2019). The objectives of the proposed Project are the following: issue a Term Permit for the operations of the proposed chassis maintenance yard and depot for up to 10 years in order to combine all Innovative-operated parcels under one permit; optimize the use of existing land that supports chassis storage at the Project site; provide a full-service depot that would increase the efficiency of terminal operations by providing storage, maintenance, repair, and stop/start functions of chassis on Terminal Island in the Port; and increase the efficiency of goods movement in the Port by providing off-terminal maritime support to help meet the demands of Port marine terminals now and in the future.

### 1.1 CEQA PROCESS

This document has been prepared in accordance with CEQA, California Public Resources Code Section 21000 *et seq.*, the CEQA Guidelines (14 California Code of Regulations [CCR] 15000 *et seq.*), and City of Los Angeles CEQA Thresholds Guide (2006). One of the main objectives of CEQA is to disclose the potential environmental effects of proposed activities to the public and decision-makers. CEQA requires that the potential environmental effects of a project be evaluated prior to the project's implementation. This IS/ND includes a discussion of the proposed Project's potential impacts on the existing environment. LAHD has determined that an IS/ND is the appropriate CEQA document for the proposed Project because potential environmental impacts resulting from proposed Project implementation would be below significance thresholds without mitigation.

Under CEQA, the lead agency is the public agency with primary responsibility over approval of a proposed Project. Pursuant to Section 15367 of the CEQA Guidelines (14 CCR 15000 *et seq.*), LAHD is the lead agency for the proposed Project and has prepared an environmental document that complies with CEQA. LAHD Board of Harbor Commissioners will consider the information in this document when determining whether to approve the proposed Project.

The preparation of an IS is guided by Section 15063 of the State CEQA Guidelines, whereas Sections 15070-15075 guide the process for the preparation of a ND or Mitigated ND (14 CCR 15000, *et seq.*). Where appropriate and supportive to an understanding of the issues, reference

will be made to the statute, the State CEQA Guidelines, City of Los Angeles Guidance, or appropriate case law.

This IS/ND meets CEQA content requirements by including a project description; a description of the environmental setting and project location, a finding that the proposed Project will not have a significant effect on the environment, and inclusion of any feasible mitigation measures, if necessary, to avoid potentially significant effects. This document did not require inclusion of mitigation measures, as all impact areas were found to result in no impact or less-than-significant impact.

In accordance with the CEQA statutes and Guidelines, this IS/ND will be circulated for a period of 30 days for public review and comment. The public review period is scheduled to begin on August 20, 2020 and conclude on September 18, 2020. This IS/ND will be distributed to responsible public agencies, other interested or involved agencies, organizations, and private individuals for review and will be made available for general public review online on the Port's website at <http://www.portoflosangeles.org>. A copy of the document is also available for public review at the Harbor Department Environmental Management Division (EMD) located at 222 West 6th Street, 9th Floor, San Pedro. Due to COVID-19, please call EMD in advance to schedule an appointment for document viewing at (310) 732-3675.

During the 30-day public review period, the public has an opportunity to provide written comments on the information contained within this IS/ND. The public comments on the IS/ND and responses to public comments will be included in the record and considered by LAHD during deliberation as to whether or not necessary approvals should be granted for the proposed Project. A project will be approved only if LAHD finds that there is no substantial evidence that the proposed Project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis (14 CCR 15070). Responses to all public comments on the Draft IS/ND will be included in the Final IS/ND.

In reviewing the IS/ND, affected public agencies and interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential project impacts on the environment. Comments on the IS/ND should be submitted in writing either through mail or email prior to the end of the 30-day public review period and must be postmarked by September 18, 2020.

Please submit written comments to:

Christopher Cannon, Director  
City of Los Angeles Harbor Department  
Environmental Management Division  
425 S. Palos Verdes St.  
San Pedro, California 90731

Written comments may also be sent via email to [ceqacomments@portla.org](mailto:ceqacomments@portla.org). All correspondence, through mail or email, should include the project title “Innovative Barracuda Chassis Depot” in the subject line.

For additional information, please contact LAHD Environmental Management Division at (310) 732-3675.

## 1.2 DOCUMENT FORMAT

This IS/ND contains the following sections:

**Section 1. Introduction.** This section provides an overview of the proposed Project and the CEQA environmental documentation process.

**Section 2. Project Description.** This section provides a detailed description of the proposed Project objectives and components.

**Section 3. Initial Study Checklist.** This section presents the CEQA checklist for all impact areas and mandatory findings of significance.

**Section 4. Environmental Analysis and Discussion of Impacts.** This section presents the environmental analysis for each issue area identified on the environmental checklist. If the proposed Project does not have the potential to significantly impact a given issue area, the relevant section provides a brief discussion of the reasons why no impacts are expected.

**Section 5. Proposed Finding.** This section presents the proposed finding regarding environmental impacts.

**Section 6. Preparers and Contributors.** This section provides a list of key personnel involved in the preparation of the IS/ND.

**Section 7. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used throughout the IS/ND.

**Section 8. References.** This section provides a list of reference materials used during the preparation of the IS/ND.

The environmental analyses included in Section 4 are consistent with the CEQA IS/ND format presented in Section 3. Impacts are separated into the following categories:

***Potentially Significant Impact.*** This category is applicable only if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less-than-significant level. Given that this is an IS/ND, no impacts were identified that fall into this category.

***Less-than-Significant Impact with Mitigation Incorporated.*** This category applies where the incorporation of mitigation measures would reduce an effect from a “Potentially Significant Impact”

to a “Less-than-Significant Impact.” The lead agency must describe the mitigation measure(s), and briefly explain how they would reduce the effect to a less-than-significant level (mitigation measures from earlier analyses may be cross-referenced). There were no significant adverse effects identified from the proposed Project; therefore, no mitigation measures are included.

***Less-than-Significant Impact.*** This category is identified when the proposed Project would result in impacts below the threshold of significance, and no mitigation measures are required.

***No Impact.*** This category applies when a proposed project would not create an impact in the specific environmental issue area. “No Impact” answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency that show the impact does not apply to the specific project. A “No Impact” answer should be explained when it is based on project-specific factors and general standards.

## 2.0 PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

This Initial Study/Negative Declaration (IS/ND) has been prepared to evaluate the potential environmental impacts associated with the proposed approximately 6.2-acre expansion of an existing approximately 7-acre property on Terminal Island in the Port of Los Angeles (Port). The approximately 7-acre property is currently operated as a chassis yard that provides storage, maintenance, and repair of chassis under Los Angeles Harbor Department (LAHD) Revocable Permits (RPs) 15-09 and 16-39 and Space Assignments (SAs) 19-44, 20-05, and 20-09. The facility would be operated by Innovative Terminal Services, Inc. (Innovative). Innovative proposes to acquire a Term Permit to operate and expand the property to a total of approximately 13.2 acres. Expansion of the site would allow the chassis yard to serve as a chassis depot, which would provide the same existing activities in addition to a new stop/start function. The stop/start function would allow truckers to pick up and drop off chassis. This involves renting and returning chassis on a regular basis. Due to this new stop/start function, both truck traffic and the facility's hours of operation would increase. The proposed Project site is located on 915 Earle Street, San Pedro, on Terminal Island. It is bounded by Earle Street to the east, Barracuda Street to the west, Bass Street to the south, and Cannery Street to the north.

The proposed Project consists of issuing a Term Permit for the operations of the proposed chassis maintenance yard and depot for up to 10 years. To be conservative, this IS/ND assumes 10 years of operation for the analysis.

This section discusses the location, description, background, and objectives of the proposed Project. This document has been prepared in accordance with CEQA (California PRC, Section 21000 *et seq.*) and the State CEQA Guidelines (14 CCR 15000 *et seq.*).

#### 2.1.1 Project Location

##### Regional Setting

The Port is located in San Pedro Bay, 20 miles south of downtown Los Angeles. Figure 1 shows the location of the proposed Project relative to the Port. The Port encompasses 7,500 acres of land and 43 miles of waterfront and provides a major gateway for international goods and services. The Port comprises approximately 24 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities (POLA, 2019). In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, boat repair facilities, as well as recreational, community, and educational facilities. The Port also provides slips for approximately 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous small-service crafts, and 15 charter vessels that handle sport fishing and harbor cruises. The Port has retail shops and restaurants primarily located along the west side of the Main Channel. It also accommodates recreation, community, and educational facilities, such as a public swimming beach, Cabrillo Beach Youth Waterfront Sports Center, the Cabrillo Marine Aquarium, the Los Angeles Maritime Museum, 22nd Street Park, and the Wilmington Waterfront Park.

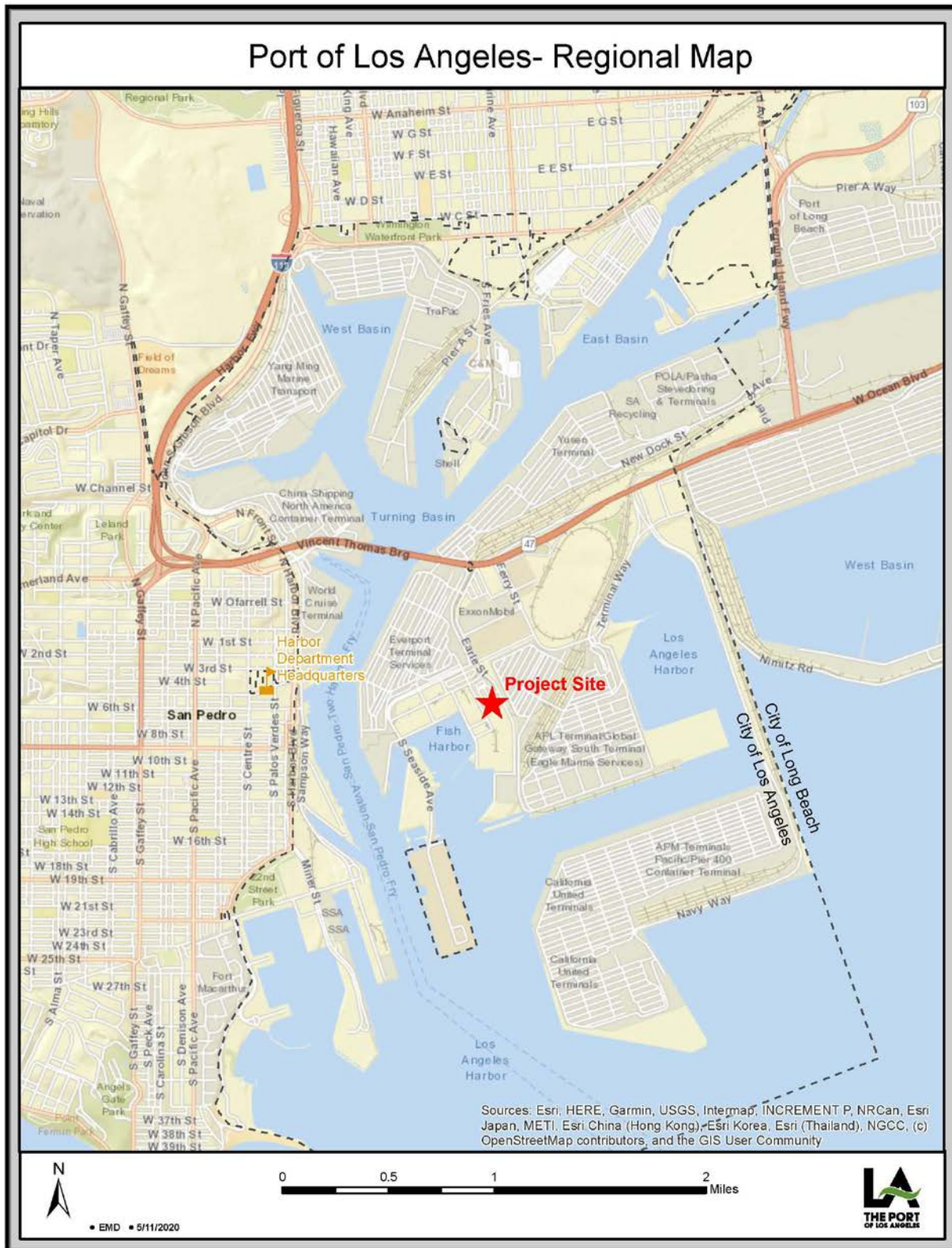


Figure 1. Regional Location of the Proposed Project

## Project Setting

The Project site is located 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 1-3). Overall access to the proposed Project (as well as the majority of the Port) is provided by State Route (SR)-47, the Harbor Freeway (Interstate [I]-110) to the west, the Long Beach Freeway (I-710) to the east, and the San Diego Freeway (I-405) to the north (Figure 1). Operations in this area include container handling, maritime support, and other mixed uses. The Project site is comprised of six parcels (Figure 2) currently operated by Innovative (approximately 1.6 acres of RPs and approximately 5.4 acres of SAs) and three vacant parcels (approximately 6.2 acres) proposed to be added (Figure 3 – Parcel F/purple, Parcel G/brown, and Parcel H/light blue areas), totalling approximately 13.2 acres, most of which are paved. A metal building is centrally located on the Project site (Figure 2 – Parcel C (South)/red area), and unpaved, unimproved land is located in the expansion area to the south (Figure 3 – Parcel G/brown area).

## Land Use and Zoning

The proposed Project is located in the Port, which is part of the City of Los Angeles General Plan. The Port Master Plan (PMP) establishes policies and guidelines to direct the future development of the Port (POLA, 2018). The PMP includes five planning areas. The proposed Project site is located in the PMP's Planning Area 3 on Terminal Island. It is the largest planning area and consists of all of Terminal Island with the exception of Fish Harbor. Six of the Port's container terminals are located in Planning Area 3. This planning area includes cargo handling, maritime support activities, and other mixed uses. The Project site is located within the Container land use as indicated in the PMP. It is on Assessor's Parcel Number (APN) 7440-029-917, which is designated General/Bulk Cargo – Non Hazardous (Industrial and Commercial) and is zoned qualified-heavy industrial ([Q]M3-1) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2020).

### **2.1.2 Existing Conditions**

The Project site is comprised of six parcels (Figure 2) that support chassis yard operations, including the storage, maintenance, and repair of chassis. These parcels are currently entitled under two RPs (approximately 1.6 acres) and three SAs (approximately 5.4 acres). 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.

The six existing parcels are currently paved. A metal building near the center of the Project site is used for the maintenance and repair of chassis, storage of parts and tools, and has additional space utilized for offices and as a lunch and break room for employees. No other buildings are located on the Project site.

The three new parcels to be acquired for expansion (Figure 3 – Parcel F/purple, Parcel G/brown, and Parcel H/light blue areas) are vacant. Parcels F and H are paved while Parcel G consists of approximately 1.5 acres of unpaved surface.

### **2.1.3 Project Background and Objectives**

#### Project Background

This site has been operated by Innovative since 2015 as a chassis storage, maintenance, and repair facility (chassis yard). The expanded parcel to the south (Figure 3 – Parcel G/brown) was previously developed and contained a now demolished building that served as a dog food manufacturing plant and an office. This plant was demolished in 2018. Innovative identified the expansion parcels (Figure 3 – Parcel F/purple, Parcel G/brown, and Parcel H/light blue) as additional property of approximately 6.2 acres to accommodate expanded operations, which would increase the total Project area to approximately 13.2 acres.

#### Project Objectives

The proposed Project objectives are as follows:

- Issue a Term Permit for the operations of the proposed chassis maintenance yard and depot for up to 10 years in order to combine all Innovative-operated parcels under one permit;
- Optimize the use of existing land that supports chassis storage at the Project site;
- Provide a full-service depot that would increase the efficiency of terminal operations by providing storage, maintenance, repair, and stop/start functions of chassis on Terminal Island in the Port; and
- Increase the efficiency of goods movement in the Port by providing off-terminal maritime support to help meet the demands of Port marine terminals now and in the future.

## **2.2 PROJECT DESCRIPTION**

### **2.2.1 Construction**

The Project site would be organized into nine parcels, with construction occurring only within Parcel G. Figures 2 and 3 depict the current and proposed parcel locations; parcel color coding/naming convention is provided in Table 2-1. The existing parcels (Parcels A through E) comprise approximately 7 acres. The additional parcels (Parcels F through H) comprise approximately 6.2 acres. Together these parcels comprise a total of approximately 13.2 acres. Table 2-1 below describes the existing and future parcel details.

**Table 2-1. Existing and Future Parcels**

Parcel ID	Map Color	Acres	Square Feet Building	Description	Current Use	LAHD RP/SA <sup>1</sup> ID
Parcel A	Dark Blue	0.8		Paved Land	Chassis Storage, Maintenance, and Repair	RP 15-09
Parcel B	Yellow	0.8		Paved Land	Chassis Storage, Maintenance, and Repair	RP 16-39
Parcel C (South)	Red	0.3		Paved Land	Chassis Storage, Maintenance, and Repair	SA 19-44
		0.4	19,345	Metal Building		
Parcel C (North)	Red	2.5		Paved Land	Chassis Storage	SA 19-44
Parcel D	Green	1		Paved Land	Chassis Storage	SA 20-05
Parcel E	Orange	1.2		Paved Land	Chassis Storage	SA 20-09
<b>Subtotal: Existing</b>		<b>7.0</b>	<b>19,345</b>			
Parcel F	Purple	3.4		Paved Land	Vacant	None
Parcel G	Brown	1.2		Paved Land	Vacant	None
		1.5		Unpaved Land	Vacant	None
Parcel H	Light Blue	.1		Paved Land	Vacant	None
<b>Subtotal: Future Expansion</b>		<b>6.2</b>				
<b>Total: Existing and Future Expansion</b>		<b>13.2</b>	<b>19,345</b>			

<sup>1</sup>RP: Revocable Permit; SA: Space Assignment; All area measurements provided are approximated

Figure 2 below identifies the existing parcels (Parcels A through E) used for current operations at the Project site. Figure 3 below identifies the proposed Term Permit boundaries, which include future expansion of the Project site.

Existing uses at Parcels A through E would remain the same during proposed Project operations and construction work would not occur for these parcels. Parcels A through E are currently operated under two RPs and three SAs. Parcels A, B, and C (South) are currently used for chassis storage, maintenance, and repair, and Parcels C (North), D, and E are used for chassis storage. Chassis are currently stored five units tall using a forklift. Parcels A, B, C (North), D, and E are paved with asphalt, fenced, and contain no permanent structures or buildings. Parcel A currently contains removable canopies to provide shade for workers. These features do not penetrate the ground, as they are non-permanent structures. Parcel C (South) is also paved with asphalt and contains a metal warehouse building with concrete interior floors and is currently being used for the maintenance and repair of chassis, as well as for storage of parts and tools. Vehicles access these parcels through three existing vehicular curb cuts and driveway access points off of Barracuda Street and one existing vehicular curb and driveway access point off of Earle Street. There are no landscaped areas, and these parcels are fenced and secure. Site improvements or modifications are not required for Parcels A through E, as they are already paved and used for ongoing operations.



Figure 2. Existing Parcels



Figure 3. Proposed Term Permit Boundaries

Parcel F and H would not undergo any construction activities. Parcel F is currently paved with asphalt, is fenced, and contains no permanent structures or buildings. Parcel H is currently a paved parking lot. Parcels F and H are identified and proposed for future expansion of chassis storage operations like Parcels C (North), D, and E. Future vehicular and pedestrian access would be provided to Parcel F through one current vehicle curb cut and driveway access point off of Barracuda Street and one current vehicle curb cut and driveway access point off of Earle Street. All access points are currently gated and secured. There are no landscaped areas and Parcel F is completely fenced and secured.

Construction would occur only at Parcel G, which is not currently occupied and contains no permanent structures or buildings. Parcel G is partially paved with asphalt, with the remaining area consisting of unimproved dirt. Parcel G would require compacting and moderate grading of unimproved dirt areas and installation of approximately 1.5 acres of asphalt and minor concrete paving. All development would comply with the City of Los Angeles Low Impact Development (LID) ordinance stormwater management strategy requirements. The remaining paved areas at Parcel G (approximately 1.2 acres) may need to be spot filled with a slurry seal. The existing wall located within Parcel G would also be removed. Existing fencing would be maintained to secure the site, and approximately 500 linear feet of new fencing and a gate would be installed adjacent to Bass Street to provide secure access from that street. Future vehicular and pedestrian access would be provided to Parcel G through one current vehicle curb cut and driveway access point off of Bass Street and through Parcel A. Parcel G would be used for future expansion of chassis storage operations like Parcels C (North), D, E, F, and H.

Table 2-2 provides the proposed Parcel G construction schedule, tasks, and anticipated number of workers for completing the proposed Project. All construction activities would occur Monday through Friday, 7:00 AM to 5:00 PM.

**Table 2-2. Parcel G Construction Schedule**

<b>Parcel G Construction</b>	<b>Start Date</b>	<b>End Date</b>	<b>Days</b>	<b>Workers</b>
Mobilization	March 1, 2021	March 2, 2021	2	2
Fence Modification <sup>1</sup>	March 3, 2021	March 3, 2021	1	2
Grading/Compaction <sup>2</sup>	March 4, 2021	March 12, 2021	7	8
Paving/Concrete	March 15, 2021	March 17, 2021	3	8
Pavement Striping	March 18, 2021	March 19, 2021	2	4
Fence Modification/Installation				

<sup>1</sup>Fence modification activities would include removal of the existing wall within Parcel G.

<sup>2</sup>LID stormwater design work would be completed in the Grading/Compaction and Paving/Concrete phases where additional equipment to complete that work and heavy truck trips to provide materials for the work were added to the construction estimates for this construction phase (see Appendix A).

Proposed equipment for construction tasks for Parcel G are shown in Table 2-3.

**Table 2-3. Equipment for Parcel G Construction**

Construction Task	Equipment Type	Hours/Day	Days per Phase
Mobilization	Flatbed Truck	na <sup>1</sup>	2
Fence Modification	Flatbed Truck	na <sup>1</sup>	1
	Welding Machine	4	
	Backhoe	6	
Grading/Compaction	Front Loader	6	7
	Grader	6	
	Roller Compactor	6	
	Hand Vibratory Compactor	3	
	Water Truck	na <sup>1</sup>	
	Excavator	8	
	Backhoe	8	
Paving/Concrete	Dump Truck (Asphalt Delivery)	na <sup>1</sup>	3
	Asphalt Paving Machine	8	
	Roller Compactor	8	
	Concrete Truck (Concrete Delivery)	na <sup>1</sup>	
	Concrete Pump	4	
	Excavator	8	
	Backhoe	8	
Pavement Striping and Fence Modification/Installation	Walk Behind Striping Machine	8 <sup>2</sup>	2
	Flatbed Truck	na <sup>1</sup>	
	Welding Machine	4	

Notes:

1 – Hours are not applicable to on-road equipment. Please see Appendix A for the estimates for on-road traffic trips and miles per trip.

2 – Striping machine is assumed to be electric-powered, so there are no engine exhaust emissions.

To comply with state and federal laws protecting nesting birds, the Port would conduct pre-construction surveys for nesting birds if construction activities are conducted between January 1 and September 15. If nesting birds are detected, the Port would implement no-disturbance buffers until the nests have fledged. The size of the buffers would be based on the judgement of a qualified biologist. The biologist would determine the buffer based on the species' ecology, its tolerance to disturbance, and the type of construction activity that is occurring. Periodic monitoring would be conducted to ensure the nest is not disturbed.

## 2.2.2 Operation

Under the proposed Project, Innovative would operate the facility as a full-service chassis depot with stop/start functionality. The existing six parcels (A through E) would continue to be used to store, maintain, and repair chassis, generating on average approximately 84 truck trips (round trips) daily. Assuming chassis are stacked a maximum of five high when stored, a total of approximately 400 chassis can be stored per acre of land. Thus, the existing 7 acres provides for storage of approximately 2,800 chassis.

Expansion of the Project site onto Parcels F, G, and H would allow for additional chassis storage space as well as the addition of new stop/start function, which allows truckers to pick up and return chassis to the site. The addition of stop/start function would allow the existing chassis yard to become a full-service chassis depot. This involves renting and returning chassis on a regular basis. Due to this new stop/start function, both truck traffic and the facility's hours of operation would increase. As an example of typical proposed operations, trucks traveling to a terminal would

stop at the proposed facility to pick up chassis and proceed to their respective container terminals to pick up their containers. In the reverse, the drivers leaving their respective container terminals would drop off the chassis at the Project site via Barracuda Street. Since these are container trucks travelling to and from the terminals, they will also be a part of the Port's Clean Truck Program. The truck trips to and from the Project site would be truck trips already traveling to the Harbor District and are considered minor diversions from their existing trips. Parcels F through H would provide land for the storage of approximately 2,480 additional chassis since the total acreage for these areas is approximately 6.2 acres.

Yard equipment to support operations would continue to include two 30,000-pound forklifts, two 10,000-pound forklifts, and one utility tractor rig (UTR). A mobile fuel service truck would provide diesel and propane for on-site equipment. No additional on-site equipment is anticipated to support the site expansion.

Chassis operations with implementation of the proposed Project would continue to occur year-round, Monday through Friday; however, the operating hours would expand from 7:00 AM to 4:00 PM to 7:00 AM to 3:00 AM because of the addition of the new stop/start function. A small amount of office space present in the existing on-site metal building (Parcel C [South]) would be used for offices and a lunch and break room for the employees.

There are currently 10 mechanics and one day-shift manager at the site, for a total of 11 employees. When fully expanded to a depot, it is anticipated additional employees would be needed to support stop/start function and increased storage, maintenance, and repair efforts. Future operations would require nine additional employees: four additional mechanics (for the night shift), four clerks to provide for the new stop/start function (2 for day shift, 2 for night shift), and one manager (for the night shift), for a total of 20 employees per day.

The metal building on Parcel C (South) is currently used to perform maintenance and repair of chassis and for storage of tools and would continue to do so as part of proposed Project operations. Current maintenance and repair protocols follow Federal inspection requirements as defined in the Federal Motor Carrier Safety Administration (FMCSA) Rules covered within 49 CFR Parts 300-399. Maintenance activities for the proposed Project would remain the same as they are currently, but the frequency of maintenance may increase incrementally solely due to more chassis being stored at the site. No new maintenance-related truck trips are anticipated.

The existing 7-acre site generates on average approximately 84 truck trips (round trips) daily. Since the site would become a chassis depot with a new stop/start function, the 13.2-acre site would add an estimated 258 trucks per day (round trips). As stated previously, the truck trips to and from the Project site would be truck trips already traveling to the Harbor District and are considered minor diversions from their existing trips.

Operations under the proposed Project would occur under a new Term Permit of up to 10 years. Ongoing maintenance occurring on the site during the duration of the permit may include other maintenance and repairs to site as required.

Construction and operation activities for the proposed Project are summarized in Table 2-4 below.

**Table 2-4. Construction and Operation Activities**

Parcels	Construction Activities	Existing Operation Activities	Future Operation Activities
A, B, C (South), C (North) D, E	None	Chassis storage, maintenance, and repair. Metal building on Parcel C (South) to be used for chassis maintenance and repair, offices, lunch/break room, and storage of parts. <ul style="list-style-type: none"> <li>• 11 employees per day drive separately to the site</li> <li>• 84 truck trips/day (round trips)</li> <li>• Truck activity occurs Monday through Friday, 7:00 AM to 4:00 PM</li> </ul>	Chassis storage, maintenance, and repair <ul style="list-style-type: none"> <li>• 258 truck trips/day (round trips)</li> <li>• 9 additional employees per day drive separately to the site (2 day/7 nightshift)</li> </ul>
F, G, H	Parcel F and H – None  Parcel G - Grade unimproved dirt areas, compact graded areas, install asphalt/concrete paving, modify fence and install new fence/gate	None	<ul style="list-style-type: none"> <li>• Truck activity occurs Monday through Friday, 7:00 AM to 3:00 AM</li> </ul>

### 2.3 PROJECT PERMITS AND APPROVALS

Under CEQA, the lead agency is the public agency with primary responsibility over approval of the proposed Project. Pursuant to State CEQA Guidelines Section 15367, the CEQA lead agency for the proposed Project is LAHD.

Anticipated permits and approvals issued by the lead agency required to implement the proposed Project are listed below.

- LAHD Term Permit
- LAHD Harbor Engineer Permit (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 (SWPPP) – update existing site-specific SWPPP

### 3.0 INITIAL STUDY CHECKLIST

This Initial Study is prepared in accordance with State CEQA Guidelines Section 15063 and State CEQA Guidelines Appendix G.

1	<b>Project Title:</b>	Innovative Barracuda Chassis Depot
2	<b>Lead Agency Name and Address:</b>	LAHD 425 S. Palos Verdes St., San Pedro, CA 90731
3	<b>Contact Person and Phone Number:</b>	Leah Kohler, Project Manager, Environmental Management Division, LAHD, (310) 732-7673
4	<b>Project Location:</b>	915 Earle Street (west of Earle Street, south of Cannery Street, east of Barracuda street, and north of Bass Street)
5	<b>Project Sponsor:</b>	Kent Phillips, Innovative Terminal Services, 211 N Marine Ave, Wilmington, CA 90744
6	<b>Port Master Plan Designation:</b>	Planning Area 3, Port of Los Angeles
7	<b>Zoning:</b>	Qualified Heavy Industrial Zone ([Q]M3-1) (APN #7440-029-917)
8	<b>Description of Project:</b>	Expansion of a chassis yard to a total of approximately 13.2 acres to accommodate chassis depot operations.
9	<b>Surrounding Land Uses/Setting</b>	The Project site is located within Port property in Planning Area 3, which is bordered by maritime support and container terminal facilities including Everport Terminal Services (Berths 226-236) to the north, Pier 300 to the east, American Marine Corporation (Berths 270-271) to the south, and Fish Harbor to the west. The proposed Project is comprised of six existing parcels and three additional parcels for expanded activities to accommodate additional storage, maintenance, repair, and stop/start activities. Landside access to the Project site is provided by a network of arterial routes and freeways, including Harbor Freeway (I-110), the long Beach Freeway (I-710), the San Diego Freeway (I-405), and the Seaside Freeway (SR-47).
10	<b>Other Public Agencies Whose Approval is Required</b>	None.
11	<b>Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21808.3.1?</b>	None.

### 3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology and Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards and Hazardous Materials
<input type="checkbox"/> Hydrology and Water Quality	<input type="checkbox"/> Land Use and Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population and Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities and Service Systems	<input type="checkbox"/> Wildfire	<input type="checkbox"/> Mandatory Findings of Significance

### 3.2 Determination

On the basis of this initial evaluation:

- I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. I find that the Proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.



Signature

Christopher Cannon, Director  
Environmental Management Division  
City of Los Angeles Harbor Department

8/10/2020

Date

## Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except “no impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “no impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “no impact” answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off site as well as on site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially significant impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “potentially significant impact” entries when the determination is made, an EIR is required.
4. “Negative declaration: less than significant with mitigation incorporated” applies when the incorporation of mitigation measures has reduced an effect from a “potentially significant impact” to a “less-than-significant impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level.
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063[c][3][D]). In this case, a brief discussion should identify the following:
  - (a) Earlier analysis used. Identify and state where earlier analyses are available for review.
  - (b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - (c) Mitigation measures. For effects that are “less than significant with mitigation incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting information sources. A source list should be attached and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:

- (a) the significance criteria or threshold, if any, used to evaluate each question, and
  - (b) the mitigation measure identified, if any, to reduce the impact to a less-than-significant level.
10. The evaluations with this Initial Study assume compliance with all applicable federal, state, and local laws, regulations, rules, and codes. In addition, the evaluation assumes that all conditions in applicable agency permits are complied with, including but not limited to local permits, air quality district permits, water quality permits and certifications, United States Army Corps of Engineers permits, and other agency permits, as applicable.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>1. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, <b>would the project:</b>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. <b>Would the project:</b>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>3. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <b>Would the project:</b>				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>4. BIOLOGICAL RESOURCES.</b> <b>Would the project:</b>				
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>5. CULTURAL RESOURCES. Would the project:</b>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>6. ENERGY. Would the project:</b>				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7. GEOLOGY AND SOILS. Would the project:</b>				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. 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?*	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8. GREENHOUSE GAS EMISSIONS. Would the project:</b>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>10. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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:				
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) 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; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11. LAND USE PLANNING. Would the project:</b>				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>12. MINERAL RESOURCES. Would the project:</b>				
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>13. NOISE. Would the project result in:</b>				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>14. POPULATION AND HOUSING. Would the project:</b>				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>15. PUBLIC SERVICES. Would the project 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 any of the public services:</b>				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>16. RECREATION</b>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>17. TRANSPORTATION. Would the project:</b>				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>18. TRIBAL CULTURAL RESOURCES</b>				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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:				
(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 §5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>19. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>20. WILDFIRE. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>21. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## 4.0 ENVIRONMENTAL ANALYSIS AND DISCUSSION OF IMPACTS

### 4.1 AESTHETICS

- a. Would the project have a substantial adverse effect on a scenic vista?

**No Impact.** The Conservation Element of the City of Los Angeles General Plan defines a scenic vista as a panoramic public view with access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features (City of Los Angeles, 2001). The general Project area is highly developed and characterized by industrial and cargo uses and does not consist of any protected or designated scenic vistas. The Project site is located on Terminal Island within the working Port environment. The Project site would consist of a total of nine parcels that would be used for storage, maintenance, repair of chassis, and stop/start functions. The only major existing structure on the Project site is a metal building, which is immediately visible from Barracuda Street. The metal building is consistent with the visual characteristics of the surroundings, as other areas in and around the Port have similar buildings.

Project construction activities would be minor and include only grading, compaction, asphaltting, and installation of fencing, none of which would have any substantial adverse effects on a scenic vista. The continued storage, maintenance, and repair operations would not change the viewshed, and the new stop/start operations would result in activities consistent with those that currently exist within the Port.

There are no sensitive public viewpoints or scenic vistas in the immediate Project vicinity; however, panoramic views of the Port and Pacific Ocean are available from distant public vantages, including panoramic views from hillside residential areas of San Pedro. The increased stacking of chassis and new stop/start activities would be similar in nature to the existing visual landscape and would visually blend into the panorama of the working Port uses and activities. No impacts to a scenic vista would occur under the proposed Project and no mitigation is required.

- b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

**No Impact.** The Project site is not visible from an eligible or designated State scenic highway. The nearest designated State scenic highway is located approximately 27 miles northwest of the Project (State Highway 27 post miles 1.0-3.5). The nearest eligible State scenic highway (State Highway 1 from State Highway 19 near Long Beach to I-5 south of San Juan Capistrano) is approximately 8 miles northeast of the Project site (Caltrans, 2019). In addition to California Department of Transportation (Caltrans)-designated State scenic highways, the City of Los Angeles has city-designated scenic highways, but the Project site is not visible from any of these highways. As such, there are no scenic resources, including but not limited to trees, rock outcroppings, or historic buildings, within a State scenic highway that could be substantially damaged by the Project. No impacts would occur, and no mitigation is required.

- c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of the public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized

area, would the project conflict with applicable zoning and other regulations governing scenic quality?

**No Impact.** The proposed Project is located in an urbanized area and would not conflict with any applicable zoning and land use regulations governing scenic quality. The Project site is currently zoned for heavy industrial use and the proposed Project would not require any changes to the existing zoning. The proposed Project activities are minimal and do not involve the construction of any large obtrusive structures that would degrade the existing visual character or quality of the site or its surroundings. Therefore, no impacts to existing visual character or quality would result from the proposed Project, and the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur, and no mitigation is required.

- d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

**No Impact.** Current lighting on the Project site consists of limited lighting at the metal building in Parcel C (South) and throughout the chassis storage lots. The nighttime lighting environment in the Project vicinity consists mainly of ambient light produced from street lighting adjacent to the Project site, container-handling operations, and other facility lighting at the Port. The major source of illumination at the Port is the extensive system of down lights and flood lights attached to the tops of tall light poles throughout the terminals. Bright, high-intensity boom lights are attached on top of shipping cranes along the edge of terminals and channels along the harbor. The proposed Project would not introduce any new sources of light during construction or operation. Lighting conditions are expected to remain the same. Therefore, no new sources of substantial light or glare would affect day or nighttime views of the area. No impacts would occur, and no mitigation is required.

#### 4.2 AGRICULTURE AND FORESTRY RESOURCES

- a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as Shown on the Maps Prepared Pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to Non-agricultural use?

**No Impact.** The Project site does not contain any Farmland and is located within the urban setting of the Port. The proposed Project is located in a highly developed area with existing chassis storage, maintenance, and repair operations occurring at the site. Although the California Department of Conservation's Farmland Mapping and Monitoring Program has not mapped the Project site, the developed, urban character of the surrounding area suggests that the appropriate Farmland Mapping and Monitoring Program mapping designation would be Urban and Built-Up Land (DOC, 2016). Therefore, the proposed Project would not convert Farmland to non-agricultural use. No impacts would occur, and no mitigation is required.

- b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

**No Impact.** The Williamson Act, also known as the California Land Conversion Act of 1969 (14 CCR Section 51200 *et seq.*), preserves agricultural and open space lands from the conversion to urban land uses by establishing a contract between local governments and private landowners to

voluntarily restrict their land holdings to agricultural or open space use. Williamson Act contracts only apply to agricultural or related open spaces (DOC, 2020a). The Project site is not located on any lands with Williamson Act contracts. The Project site is located in a highly developed area designated as [Q]M3-2 (Qualified Heavy Industrial) and does not support any agricultural uses. As such, the proposed Project would not conflict with any lands zoned for agricultural use or a Williamson Act contract. No impacts would occur, and no mitigation is required.

- c. Would the project 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), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

**No Impact.** As discussed in Section 4.2(b) above, the Project site is currently designated as [Q]M3-2 (Qualified Heavy Industrial). The Project site does not support timberland or forest land. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impacts would occur, and no mitigation is required.

- d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

**No Impact.** As discussed in Section 4.2(c) above, 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 any loss of forest land or conversion of forest land to non-forest use. No impacts would occur, and no mitigation is required.

- e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

**No Impact.** As discussed in Sections 4.2(a) through (d) above, the Project site is developed and does not have any Farmland or forest land, nor is any Farmland or forest land located in the vicinity. Therefore, the proposed Project would not result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impacts would occur, and no mitigation is required.

### 4.3 AIR QUALITY

- a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

**Less-than-Significant Impact.** The federal Clean Air Act (CAA) of 1969 and its significant amendments (1990) form the basis for the nation's air pollution control effort. The United States Environmental Protection Agency (USEPA) is responsible for implementing most aspects of the CAA. A key element of the CAA is the national ambient air quality standards (NAAQS) for major air pollutants. The CAA delegates enforcement of the NAAQS in California to the California Air Resources Board (CARB). CARB, in turn, delegates to local air agencies the responsibility of regulating stationary emission sources.

The South Coast Air Quality Management District (SCAQMD) implements, and periodically updates, the Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB), which is comprised of portions of Los Angeles, Riverside, and San Bernardino Counties, and Orange County. The AQMP uses projections of population growth and trends in energy and transportation demand to predict future emissions and determine control strategies to eventually achieve attainment with the ambient air quality standards. The control strategies are then either codified into the SCAQMD's rules and regulations, or otherwise set forth as formal recommendations to other agencies, such as those contained in the SCAQMD CEQA Guidelines.

The SCAQMD rules and regulations include requirements for stationary equipment, certain materials used (such as paints/coatings), and for fugitive dust and nuisance control. These regulations contain both requirements and exemptions for certain types of equipment that may be used during implementation of the proposed Project. Portable equipment with small internal combustion engines (under 50 horsepower) that may be used during construction would be exempt from permitting through SCAQMD Rule 219. Compliance with the applicable SCAQMD rules, for projects that otherwise are within the growth projections for the air basin, indicates a project would not conflict with the applicable air quality plan.

Project construction would be required to comply with the applicable air quality regulations and all applicable Los Angeles Harbor Department Sustainable Construction Guidelines (LAHD, 2008). Compliance with these regulations and LAHD guidelines ensures construction practices and emissions would conform with the AQMP.

#### *Clean Air Action Plan*

LAHD, in partnership with the Port of Long Beach (POLB), adopted the Clean Air Action Plan (CAAP) in 2006 and subsequently updated the CAAP in 2010 and 2017 (POLA and POLB 2017). The CAAP is a plan designed to reduce the health risks posed by air pollution from all Port- and POLB-related emission sources, including ships, trains, trucks, terminal equipment, and harbor craft. The CAAP contains strategies to reduce emissions from sources in and around the Ports and plans for zero-emissions infrastructure. It also encourages freight efficiency and addresses energy resources.

The proposed Project is consistent with the freight efficiency strategy of the CAAP 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 associated with larger vessels. Although it is unclear if the emission reduction goals and timelines can be met due to future regulations or requirements that may be adopted, or future technologies that have not been identified or fully developed at this time, the proposed Project is not expected to conflict with any initiative that is developed to help the City and Port meet the emission reduction goals. For example, the CAAP established an initiative to implement an updated Clean Truck Program with prioritization of zero emission trucks. Such an initiative would have to apply and be implemented Port-wide across both the Ports of Los Angeles and Long Beach, and as the program develops, diverted truck trips to the proposed Project would reflect an increasingly cleaner truck mix, with corresponding reductions in pollutant emissions, as the truck fleet moves toward an increasing

zero-emission composition. Further, as other initiatives are implemented Port-wide to address the emission reduction goals in the CAAP, they would be implemented at the project level if they affect elements that extend to Project operations. Thus, the proposed Project is not expected to conflict with the CAAP's emission reduction goals and initiatives.

While the Proposed Project would have less-than-significant impacts for obstructing the implementation of applicable air quality plan or clean air programs, LAHD has included Lease Measure (LM) AQ-1 to allow for replacement of cargo handling equipment anytime new or replacement equipment is purchased. The following Lease Measure is consistent with the CAAP 2017 Update, as it would help reach its goal of zero-emission cargo-handling equipment by 2030.

**LM AQ-1: Cleanest Available Cargo Handling Equipment.**

Tenant shall notify LAHD prior to purchase of new cargo handling equipment. Tenant shall replace cargo handling equipment with the cleanest available equipment anytime new or replacement equipment is purchased, with a first preference for zero-emission equipment, a second preference for near-zero equipment, and third for the cleanest available if zero or near-zero equipment is not feasible, provided that LAHD shall conduct engineering assessments to confirm that such equipment is capable of installation at the facility. Starting one year after the effective date of a new entitlement between the Tenant and the LAHD, tenant shall submit to the Port an equipment inventory and 5-year procurement plan for new cargo-handling equipment, and infrastructure, and will update the procurement plan annually in order to assist with planning for transition of equipment to zero emissions in accordance with the foregoing paragraph.

The proposed Project includes the increase in facility size for chassis storage and the addition of new stop/start function which allows truckers to pick up and return chassis to the site. These new activities would not be subject to SCAQMD permitting and would comply with all SCAQMD regulations. Additionally, as discussed above, the proposed Project is not expected to be in conflict with the CAAP's emission reduction goals and initiatives. The proposed Project, which is designed to support container shipping operations at the Port, would not cause direct or indirect substantial growth within the air basin since the project would comply with the applicable SCAQMD rules. Therefore, the proposed Project's operation would not conflict with the AQMP or the CAAP. Impacts would be less than significant, and no mitigation is required.

- b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?

**Less-than-Significant Impact.** The SCAB is designated as a federal nonattainment area for ozone and fine particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>), and a state nonattainment area for ozone, particulate matter 10 microns or less in diameter (PM<sub>10</sub>), and PM<sub>2.5</sub>. The Los Angeles County area of the SCAB, which includes the Port, is also in federal nonattainment for lead. SCAQMD has developed maximum daily emissions significance thresholds for all criteria pollutants (see Table 4.3-1) for both the assessment of construction and operation impacts. The proposed Project would not produce substantial lead emissions; therefore, lead is not a pollutant of concern for the proposed Project.

**Table 4.3-1. SCAQMD Air Quality Significance Thresholds**

<b>Mass Daily Thresholds <sup>a</sup></b>		
<b>Pollutant</b>	<b>Construction <sup>b</sup></b>	<b>Operation <sup>c</sup></b>
NO <sub>x</sub>	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM <sub>10</sub>	150 lbs/day	150 lbs/day
PM <sub>2.5</sub>	55 lbs/day	55 lbs/day
SO <sub>x</sub>	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
<b>Toxic Air Contaminants (TACs), Odor, and GHG Thresholds</b>		
TACs (includes carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2eq</sub> for industrial facilities	
<b>Ambient Air Quality Standards for Criteria Pollutants <sup>d</sup></b>		
NO <sub>2</sub> 1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM <sub>10</sub> 24-hour average annual average	10.4 µg/m <sup>3</sup> (construction) <sup>e</sup> & 2.5 µg/m <sup>3</sup> (operation) 1.0 µg/m <sup>3</sup>	
PM <sub>2.5</sub> 24-hour average	10.4 µg/m <sup>3</sup> (construction) <sup>e</sup> & 2.5 µg/m <sup>3</sup> (operation)	
SO <sub>2</sub> 1-hour average 24-hour average	0.25 ppm (state) and 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m <sup>3</sup> (state)	
CO  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month average	1.5 µg/m <sup>3</sup> (state) 0.15 µg/m <sup>3</sup> (federal)	
<sup>a</sup> Source: SCAQMD CEQA Handbook (South Coast AQMD, 2019)		
<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).		
<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.		
<sup>d</sup> Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.		
<sup>e</sup> Ambient air quality threshold based on SCAQMD Rule 403		
KEY: lbs/day – pounds per day	ppm – parts per million	µg/m <sup>3</sup> – microgram per cubic meter
MT/yr CO <sub>2eq</sub> – metric tons per year of CO <sub>2</sub> equivalents	≥ - greater than or equal to	> greater than

### Construction

Construction of the proposed Project would only take a few weeks and would be limited to construction activities on one 2.8-acre portion of the post-project's 13.2 acres. The construction emissions were estimated using the SCAQMD approved California Emissions Estimator Model (CalEEMod version 2016.3.2). The CalEEMod output is provided in Appendix A. CalEEMod inputs were obtained from Innovative. Key assumptions include:

- Innovative would use construction equipment with USEPA/CARB Tier 4 engines to comply with LAHD's Sustainable Construction Guidelines (LAHD, 2008).
- Construction would occur during the daytime, one shift on weekdays over a total of 15 days.
- Additional construction work, beyond that provided by the applicant, was assumed to address City of Los Angeles required Low Impact Development (LID) stormwater management design requirements. This additional work, anticipated to be completed during the grading/compaction and paving/concrete work phases, was captured by adding an excavator and backhoe to the off-road equipment list and adding haul truck trips to both of these work phases to address required material import/exports.

Table 4.3-2 shows the peak daily emissions associated with proposed Project construction. The table shows that all pollutant emissions would be below the significance thresholds without mitigation. Therefore, construction activities would not result in a cumulatively considerable contribution to the existing pollution burden in the SCAB. Impacts would be less than significant, and no mitigation is required.

**Table 4.3-2. Construction Emissions (Pounds per Day)**

Criteria Air Pollutants	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	CO	SO <sub>x</sub>
Maximum Daily Emissions	16.31	1.46	0.45	31.44	18.42	0.07
SCAQMD Significance Thresholds	100	150	55	75	550	150
Significant?	NO	NO	NO	NO	NO	NO

Source: Appendix A, SCAQMD, 2019

Acronyms: NO<sub>x</sub> = nitrogen oxides, PM<sub>10</sub> = particulate matter 10 microns or less in diameter, PM<sub>2.5</sub> = fine particulate matter 2.5 microns or less, VOC = volatile organic compounds, CO = carbon monoxide, SO<sub>x</sub> = sulfur oxides.

### Operation

The proposed Project would expand the existing chassis storage area for this facility that currently provides chassis storage and repair services to support container terminals on Terminal Island. Expanded operations under the proposed Project would increase daily truck round trips to and from the Project site from a baseline of 84 to an estimated 342. The cause of this increase is the addition of the stop/start function.

The additional truck trips from the stop/start function would cause an increase in employees and working hours. The number of employees working at the site, 11 employees per day over two shifts, is proposed to increase to 20 employees per day. The facility work schedule, Monday through Friday 7:00 AM to 4:00 PM would increase to 7:00 AM to 3:00 AM.

No changes to the existing facility yard equipment would occur as part of the proposed Project. However, existing yard equipment use would increase due to the addition of the stop/start function. The rise in daily truck trips would increase the number of chassis stored and repaired and the additional work to move and stack/unstack chassis over a larger site. This increased yard equipment use would also cause additional deliveries of diesel and propane, where the equipment fuel tanks are refueled directly from the fuel delivery trucks.

This facility currently has five existing pieces of yard equipment as follows:

- Two 30,000 lb capacity forklifts one with a Tier 3 diesel engine and the other with a Tier 4 final diesel engine
- UTR with a Tier 4 diesel engine
- Two 10,000 lb capacity forklifts with a propane engines

Criteria air pollutant emissions from proposed operation activities would primarily result from the truck and yard equipment exhausts, with additional particulate matter (PM10 and PM2.5) emissions from truck tire wear, brake wear, and paved road dust.

For information regarding the operation emission calculations and emissions factors, refer to Appendix A.

Other key assumptions used in the operation emission calculations include:

- The average distance associated with the diverted truck trips, which consists of a short detour for the trucks on their way to and from the container terminals, is 4.63 miles per round trip.
- The additional 258 daily diverted truck trips would generate 1,196 additional vehicle-miles travelled per day.
- The CEQA baseline emissions were determined using the baseline number of truck trips and on-site equipment fuel use provided by Innovative.

Table 4.3-3 provides the estimated daily baseline and post-Project operation emissions. The operation emission calculations are provided in Appendix A. The table shows that all pollutant emissions would be below the significance thresholds without mitigation. Therefore, operation activities would not result in a cumulatively considerable contribution to the existing pollution burden in the SCAB. Impacts would be less than significant, and no mitigation is required.

**Table 4.3-3. Operation Emissions (Pounds per Day)**

Criteria Air Pollutants	NO <sub>x</sub>	PM10	PM2.5	VOC	CO	SO <sub>x</sub>
CEQA Baseline Emissions	11.70	0.85	0.40	2.53	15.30	0.04
Proposed Project Emissions	56.93	3.18	1.78	13.45	80.90	0.19
Proposed Project Minus CEQA Baseline	45.27	2.35	1.39	10.92	65.61	0.15
SCAQMD Significance Threshold	55	150	55	55	550	150
Significant?	NO	NO	NO	NO	NO	NO

Source: Appendix A, SCAQMD, 2019

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

**Less-than-Significant Impact.** SCAQMD has developed sensitive receptor significance thresholds for both localized ambient criteria pollutant emissions impacts and for health risks (cancer, chronic and acute) from Toxic Air Contaminant (TAC) emissions. These thresholds address the localized direct impacts to sensitive receptors from project emissions.

#### **Localized Significance Threshold Analysis for Criteria Pollutants**

SCAQMD has developed a screening methodology that can be used to assess project local criteria pollutant impacts without the need for dispersion modeling. This Localized Significance Thresholds (LSTs) methodology is based on determined tabulated thresholds for peak daily on-site emissions for given site area sizes (1-acre, 2-acre, and 5-acre) at given distances from receptors (25 meters, 50 meters, 100 meters, 200 meters, and 500 meters). The LSTs are provided in a series of look-up tables for emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> (SCAQMD, 2009). If a project's on-site emissions are below the LST look-up table emission levels, then the project is considered not to violate or substantially contribute to a violation of an ambient air quality standard.

The following assumptions were used in the LST analysis for the proposed Project:

- The Project site is in SCAQMD's defined Source-Receptor Area 4 (South Coastal Los Angeles County)
- The distance to the nearest sensitive receptors, liveaboards at the Al Larson Marina, is approximately 600 meters, so the LST values for sensitive receptors were determined using the SCAQMD LST table values for 500-meter receptor distances.
- The LST impact analysis for the two LST pollutants with short-term ambient air quality standards, NO<sub>x</sub> and CO that have 1-hour standards, also includes the evaluation of impacts on the nearest off-site workers that could encounter the downwind effects of Project emissions for an hour. The nearest off-site workers are assumed to be 40 meters southwest of the facility for the construction and operation analysis.
- The construction area is 2.8 acres, so for the SCAQMD LST tables 2-acres was used.
- For operation, the largest project area size in the SCAQMD LST tables, 5-acres, was used. This should be conservative for the post-Project facility, which would be over 10 acres in size.

#### *Construction*

Table 4.3-4 presents the peak daily on-site emissions and corresponding LST analysis for proposed Project construction. The table shows that all pollutant emissions would be below the LST significance thresholds without mitigation. Therefore, criteria pollutant emissions from proposed Project construction would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation is required.

**Table 4.3-4. Localized Construction Emissions (Pounds per Day)**

Criteria Air Pollutants	NOx	PM10	PM2.5	CO
Construction Emissions <sup>1</sup>	16.31	1.46	0.45	18.42
Sensitive Receptor SCAQMD Localized Significance Threshold <sup>2</sup>	151	167	101	8,253
Worker Localized SCAQMD Significance Threshold <sup>3</sup>	80	NA	NA	1,095
Significant?	NO	NO	NO	NO

Source: Appendix A, SCAQMD, 2009

1 – All construction emissions, not just the on-site emissions which related to the LSTs are presented in this table.

2 – Determined for a 2-acre construction site located 500 meters from the nearest sensitive receptor.

3 – Determined for a 2-acre construction site located 40 meters from the nearest off-site worker (interpolated SCAQMD LST Table Value).

### Operation

Table 4.3-5 presents the peak daily on-site emissions and corresponding LST analysis for proposed Project operation. The table shows that all pollutant emissions increases would be below the LST significance thresholds without mitigation. Therefore, criteria pollutant emissions from proposed Project operation would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation is required.

**Table 4.3-5. Localized Operation Emissions (Pounds per Day)**

Criteria Air Pollutants	NOx	PM10	PM2.5	CO
Proposed Project Minus CEQA Baseline	45.27	2.35	1.39	65.61
Sensitive Receptor SCAQMD Localized Significance Threshold <sup>1</sup>	179	46	29	10,198
Worker Localized SCAQMD Significance Threshold <sup>2</sup>	119	NA	NA	1,892
Significant?	NO	NO	NO	NO

Source: Appendix A, SCAQMD, 2009

1 – Determined for a 5-acre site located 500 meters from the nearest sensitive receptor (interpolated SCAQMD LST Table Value).

2 – Determined for a 5-acre site located 40 meters from the nearest off-site worker (interpolated SCAQMD LST Table Value).

### Health Risk Assessment for TAC Concentrations

The health risk impacts of TAC concentrations on sensitive receptors can be evaluated in accordance with the 2015 Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Risk Assessment Guidelines (OEHHA, 2015) and SCAQMD risk assessment guidance (SCAQMD, 2017) to determine the worst-case cancer, chronic, and acute health impacts to sensitive receptors. Additionally, worst-case off-site worker health risk analysis was performed. Health risk assessments (HRAs) can be completed using more conservative screening level methods to more sophisticated refined modeling methods that include air dispersion modeling techniques.

A screening level HRA of the Project's diesel particulate matter (DPM) emissions increase was completed. The on-site DPM emissions would increase during construction and operation. The construction DPM emissions are small and would occur over a short period (approximately 15 days); however, to be conservative these emissions were added to the increase in operation DPM emissions for the HRA. An initial screening level approach from SCAQMD risk assessment guidance (SCAQMD, 2017) was completed by determining a conservative worst-case concentration based on the annualized on-site DPM emissions increase of 136.4 pounds per year and distance to sensitive residential receptor of 500 meters and distance to nearest off-site worker of 50 meters. The details of this screening level HRA are provided in Appendix A. The results of

the HRA determined a worst-case cancer risk of 5.31 in a million and 8.77 in a million for the maximum exposed residents and workers, respectively, which are below the SCAQMD significance threshold of 10 in a million (SCAQMD, 2019). The worst-case chronic hazard index risks were determined to be 0.00123 and 0.0281 for the maximum exposed residents and workers, respectively, which are below the SCAQMD significance criteria of a hazard index risk of 1. DPM emissions do not have acute health risk reference exposure levels, so acute impacts are not evaluated.

The on-site propane fueled forklifts also have TAC emissions. However, the TACs that have California approved risk assessment cancer slope or reference exposure level factors for chronic and/or acute health risks have factors that are comparably lower than that for DPM, or in the case of acute exposure have acute reference exposure levels that are too high to be of concern. Therefore, the health risks from the increase propane equipment use is minimal and would not be of concern in relation to the SCAQMD health risk significance thresholds.

Therefore, proposed Project construction and operation activities would not expose sensitive receptors to substantial TAC concentrations. Impacts would be less than significant, and no mitigation is required.

- d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

**Less-than-Significant Impact.** Construction and operation activities of the proposed Project would increase air pollutant emissions due to the increased diesel, gasoline, and propane fuel combustion. Some individuals might find such emissions to be objectionable in nature, if encountered in high concentrations. However, the distance between proposed Project emission sources and the nearest sensitive receptor (600 meters) is far enough to allow for adequate dispersion of these emissions to below objectionable odor levels. Furthermore, the existing industrial setting of the proposed Project represents an already complex odor environment. For example, existing nearby container terminals include freight and goods movement activities that use diesel trucks and diesel cargo-handling equipment that generate similar diesel exhaust odors as the proposed Project. Within this context, the proposed Project would not likely result in changes to the overall odor environment in the vicinity. Therefore, the proposed Project would not create objectionable odors affecting a substantial number of people. Additionally, the on-site and off-site emissions sources are all mobile which serves to better disperse the emissions. The proposed Project would create a small amount of fugitive dust during construction and no substantial amounts of other types of nuisance emissions during construction and operation that could affect offsite receptors. Therefore, the proposed Project would not create objectionable odors or other emissions affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

#### 4.4 BIOLOGICAL RESOURCES

- a. Would the project 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?

**Less-than-Significant Impact.** The proposed Project involves an approximately 6.2-acre expansion of the existing 7-acre chassis yard along the northern and southern edges of the property (Figures 2 and 3). Expansion of the property would involve grading and paving over approximately 1.5 acres of unimproved dirt along the southern edge of the property. Site visits were not conducted in order to comply with existing COVID-19 pandemic requirements. A records search of the California Natural Diversity Database (CNDDDB) was conducted on May 18, 2020 (CDFW, 2020).

Most of the terrestrial area within the Port contains facilities and infrastructure associated with highly disturbed lots (POLA, 2018). The Project area is similar, and most of the property consists of paved parcels used for maintenance and repair of chassis, storage of parts and tools, and office space for workers. The property is surrounded by paved roads in a heavily industrial area containing many surrounding commercial and private businesses and other Port-related facilities.

##### Special-Status Plants

The proposed Project would not directly or indirectly impact plants identified as special-status species by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS). Due to the highly disturbed nature of the property and ongoing disturbance from Port activities, vegetation is limited to sparse patches of nonnative grasses and herbaceous weeds. There are several ornamental trees and shrubs along the eastern edge of the Project area, but outside of the Project footprint. These trees and shrubs are unlikely to be impacted by Project construction activities and are not within the proposed Project boundary. There is no suitable habitat within or adjacent to the Project area that could support special-status plant species. Therefore, no impacts would occur to special-status plants.

##### Special-Status Wildlife

Due to the highly developed nature of the property, wildlife use within the vicinity of the Project area is limited. The Project area lacks suitable foraging habitat for most species and any activity is expected to be limited to disturbance-tolerant species. Some species may transit over the site briefly (such as the Caspian tern, *Hydroprogne caspia*) but are unlikely to stay or forage within the Project vicinity. The California least tern is considered endangered, and a designated nesting site is located on the southernmost portion of Pier 400, approximately 1 mile south of the Project area (MBC and Merkel & Associates, 2016; POLA, 2018). This species also uses the Seaplane Lagoon (approximately 0.75 mile east of the Project site within the POLA) to forage for fish. The Project area does not contain any suitable nesting or foraging habitats for California least tern, and this species would not be impacted by Project activities. Therefore, impacts to special-status wildlife would be less than significant. For a list of other Special Status Bird Species observed in the Port area, see the table below.

**Table 4.4-1. Special Status Bird Species (Designated by CDFW and USFWS) Observed in the Port Area**

Species	Status/Designation
Black-Crowned Night Heron	CDFW – SA
Black Oystercatcher	USFWS – BCC
Black Skimmer	CDFW – SSC, USFWS – BCC
Brant	CDFW – SSC
Burrowing Owl	CDFW – SSC, USFWS – BCC
California Brown Pelican	CDFW – FP
California Least Tern	USFWS – FE
Caspian Tern	USFWS – BCC
Common Loon	CDFW – SSC
Double-crested Cormorant	CDFW – Watch List
Elegant Tern	CDFW – Watch List
Great Blue Heron	CDFW – SA
Loggerhead Shrike	CDFW – SSC, USFWS – BCC
Long-billed Curlew	CDFW – Watch List, USFWS – BCC
Merlin	CDFW – Watch List
Osprey	CDFW – Watch List
Peregrine Falcon	CDFW – FP, USFWS – BCC
Scripps's Murrelet	USFWS – BCC

Notes: USFWS BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, CDFW – California Dept. of Fish and Wildlife; SA= Special Animal; SSC = Species of Special Concern; FP = Fully Protected; FE: Federally Endangered.

Other wildlife species known to occur in the immediate Project area include, but are not limited to barn swallow (*Hirundo rustica*), house finch (*Haemorrhous mexicanus*), Western gull (*Larus occidentalis*), great blue heron (*Ardea herodias*), and snowy egret (*Egretta thula*) (POLA and POLB, 2016).

The federal Migratory Bird Treaty Act (MBTA) prohibits take of any migratory bird, including active nests, except as permitted by regulation (e.g., waterfowl or upland game bird hunting). California Fish and Game Code Section 3503.5 prohibits take or possession of birds of prey or their eggs; and Section 3513 prohibits take or possession of any migratory nongame bird. “Take” means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. There is no suitable nesting habitat (for nesting, loafing, foraging, etc.) at the Project site due to lack of trees or brush. The area consists of small areas of sparse weeds and compacted disturbed ground. Therefore, no take would occur as a result of the proposed Project. Birds could potentially nest in adjacent vegetation including non-native ornamental species that occur along the existing roadway (Earle Street). These trees are located along a roadway used by trucks and other vehicles. Should birds nest in these trees, it is unlikely that construction activities would disturb the birds based on current baseline conditions. However, as part of the proposed Project in compliance with state and federal laws protecting nesting birds, the Port would conduct pre-construction surveys for nesting birds if construction activities are conducted between January 1

and September 15. If nesting birds are detected, the Port would implement no-disturbance buffers until the nests have fledged. The size of the buffers would be based on the judgement of a qualified biologist. The biologist would determine the buffer based on the species' ecology, its tolerance to disturbance, and the type of construction activity that is occurring. Periodic monitoring would be conducted to ensure the nest is not disturbed. Due to the heavily disturbed nature of the Project area and similarity between existing operations and construction (i.e., use of existing on-site forklifts and UTR~~use of a grader to compact the approximately 1.5 acres of unimproved dirt in Parcel G vs. use of forklifts to stack chassis~~), impacts to nesting birds would be less than significant, and no mitigation is required.

- b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

**No Impact.** The Project site does not contain riparian habitat, or any sensitive natural community identified in local or regional plans, policies, or regulations by the CDFW or the USFWS (USFWS, 2020). The proposed Project is entirely terrestrial and would not impact any marine species that may be present (MBC and Merkel & Associates, 2016). As a result, the proposed Project would not result in impacts to any sensitive natural community, and no mitigation is required.

- c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) either individually or in combination with the known or probable impacts of other activities through direct removal, filling, hydrological interruption, or other means?

**No Impact.** There are no state or federally protected wetlands on the Project area. The nearest wetland is the Salinas de San Pedro (also referred to as Cabrillo Marsh), located approximately 2.25 miles southwest of the Project site (POLA, 2018; USFWS, 2020). The proposed Project would not have a substantial adverse effect on any state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts would occur, and no mitigation is required.

- d. Would the project 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 wildlife nursery sites?

**No Impact.** The Project area is located in a dense, highly developed industrial area and does not overlap with an established migratory wildlife corridor or nursery. In addition, the few ornamental trees outside of the Project area along the eastern edge likely support only periodic nesting birds due to existing development activities. The proposed Project is entirely terrestrial and would not impact any marine species that may be present (MBC and Merkel & Associates, 2016). Due to the lack of suitable habitat, the proposed 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. Therefore, no impacts would occur, and no mitigation is required.

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

**No Impact.** The proposed Project involves an approximately 6.2-acre expansion of the existing 7-acre chassis yard in an already heavily developed area. The only biological resources protected by the City ordinance (Ordinance No. 177404) pertain to specific tree species. There are multiple ornamental trees adjacent to the eastern edge of the Project site but are outside of the Project footprint. None of these tree species are protected by City Ordinance. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, no impacts would occur, and no mitigation is required.

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or State habitat conservation plan?

**No Impact.** There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans that overlap with the Project area in the POLA (USFWS, 2019a; 2019b). The nearest conservation plan area is the Rancho Palos Verdes Natural Community Conservation Plan area, which is located approximately 4 miles west of the Project area (City of Rancho Palos Verdes, 2018). The County of Los Angeles (County) has established official, designated areas, referred to as Significant Ecological Areas (SEAs), within the County that contain rare or unique biological resources. The Terminal Island (Pier 400) California least tern nesting site is the only SEA in the Port. Because the proposed Project is not in the vicinity of any existing or proposed SEAs, no impacts would occur, and no mitigation is required.

#### 4.5 CULTURAL RESOURCES

- a. Would the project cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5 [§15064.5 generally defines historical resource under CEQA]?

**No Impact.** The proposed Project would not cause a substantial adverse change or effect to a historical resource. The Project area is located on the northern portion of Terminal Island, which is an artificial landform composed of construction fill. The Project area is disturbed and encompasses approximately 1.6 acres under RP 15-09 and 16-39 which is currently operated by Innovative Terminal Services, Inc. as a chassis refurbishment, storage, and maintenance facility. In addition to the RPs, approximately 5.4 acres are entitled through SA 19-44, 20-05, and 20-09. The goal of this project is to expand its operations by extending a fence line, which would be accomplished by installing fencing on top of K-rails. No ground disturbance is necessary for the installation of the fencing. A small, approximately 1.5-acre area within the southern portion of the site would be graded flat and paved. Please refer to Section 2 of this document for more detail on the Project location and description.

No eligible or listed historic resources have been recorded within the Project area (ICF, 2019 and Jones and Stokes, 2008). One previous report, ICF (2019), mentions two buildings located within the Project area; the Empty Can Warehouse (formerly Green Warehouse) and the Food Testing

and Animal Nutrition Building, which were both found ineligible for listing as a historic resource. Both buildings are part of Star-Kist Plant No.4 and were originally evaluated in 2008 by Jones and Stokes. The Empty Can Warehouse, built in 1970, was found ineligible for listing under the California Register of Historical Resources (CRHR) or Los Angeles Historic-Cultural Monuments (LAHCM) in 2008 and ICF (2019) re-evaluated the building and concurred with the original finding. The Food Testing and Animal Nutrition Building, built in 1972, was found ineligible in 2008 for listing under CRHR or LAHCM and has since been demolished.

Since there are no significant historical resources located within the Project area, the proposed Project would not cause a substantial adverse change in the significance of an historical resource. Therefore, no impacts would occur, and no mitigation is required.

- b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

**No Impact.** The proposed Project would not cause a substantial adverse change or effect to an archaeological resource. As discussed above, the Project area is located on the northern portion of Terminal Island, which is an artificial landform composed of construction fill.

There are no significant archaeological resources within the Project area (ICF, 2019; Jones and Stokes, 2008). A state eligible archaeological site, referred to as "POLA-SWCA-1" is approximately 950 feet away from the project site (SWCA, 2015). Since there are no significant archaeological resources located within the Project area, and minimal ground disturbance is planned, the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource. No impacts would occur, and no mitigation is required.

- c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

**No Impact.** The proposed Project would not disturb any human remains. As discussed above, the Project area is within an already disturbed and developed context and the soil within the Project area is artificial fill. The proposed Project has minimal ground disturbance planned and background archival research failed to find any potential for human remains (e.g., the existence of formal cemeteries). Therefore, the proposed Project would have no impacts and no mitigation is required.

#### 4.6 ENERGY

- a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

**Less-than-Significant Impact.** The proposed Project would require the use of non-renewable energy resources in the form of fossil fuels used to operate equipment and to fuel vehicle trips during construction and operation.

Construction would require the use diesel and gasoline. Operation would include an increased use of diesel, gasoline, and propane. Electricity use is not forecasted to be necessary during the

limited Project construction activities, in part due to construction being completed during daylight hours. However, given the increase in operating hours to include nighttime operation through 3:00 AM, some increase in electricity use for on-site lighting is anticipated.

During the proposed Project's 15 working day construction period, a small amount of diesel and gasoline would be used to fuel the on-site construction equipment, off-site hauling vehicles, and worker automobiles. Construction of the proposed Project would consume an estimated 1,757 gallons of diesel and 206 gallons of gasoline (see Appendix A).

The Project site expansion is forecasted to increase the truck traffic to the project site, as well as increase the on-site equipment use related to the increased movement and storage of truck chassis. The current annual on-site fuel use is estimated to be 19,500 gallons of diesel fuel and 5,187 gallons of propane; and the increase in on-site fuel use is conservatively estimated to be 89,523 gallons of diesel and 23,813 gallons of propane (see Appendix A). The current annual off-site fuel use, including employee commuting and the truck trips to and from the site to deliver and pickup chassis, is estimated to be 17,788 gallons of diesel per year and 3,078 gallons of gasoline per year. The increase in off-site fuel use is estimated to be 54,290 gallons of diesel per year due to the increase in truck trips, and 2,519 gallons of gasoline due to an increase in site staffing (see Appendix A).

Implementation of the State of California's Low Carbon Fuel Standard regulations and the State's long-term goal for carbon neutrality will cause motor vehicle fuels used in California to transition to renewable fuel sources. Therefore, while Innovative is not currently committing to the use of renewable fuels, such as biodiesel, over time some or perhaps all of the Project's on-site and off-site fuel use would be in the form of renewable fuels that would decrease the Project's use of non-renewable fuels.

The proposed Project would not use non-renewable energy resources in a wasteful or inefficient manner during construction or operation. The construction and operation energy use does not constitute wasteful, inefficient, or unnecessary consumption; therefore, impacts are less than significant, and no mitigation is required.

- b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**Less-than-Significant Impact.** The proposed Project would not conflict with adopted state or local renewable energy or energy plans. Additionally, the proposed Project would not conflict with any Port's energy plans, including the Energy Management Action Plan. The proposed Project would not require the removal of any existing renewable energy infrastructure, such as solar panels or wind turbines. The proposed Project does not propose the construction of new or modified buildings or the addition of new or modified equipment, so energy efficiency requirements under the California Green Building Code and Appliance Efficiency Regulations (Title 24 and Title 20 of the California Code of Regulations, respectively) would not apply. The POLA Development Bureau (Construction and Engineering Divisions) is responsible for design, inspection, management, and oversight of construction projects to ensure projects comply with energy efficiency requirements. Energy consumption during construction activities would be used

efficiently and would represent a negligible portion of state-wide energy consumption. Therefore, these uses do not conflict with energy plans and impact would be less than significant, and no mitigation is required.

#### 4.7 GEOLOGY AND SOILS

- a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - (i) 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? Refer to Division of Mines and Geology Special Publication 42.

**Less-than-Significant Impact.** The Project site is located within a seismically active region with several active fault lines. The Palos Verdes Fault Zone traverses the Port in a general northwest to southeast orientation from the West Turning Basin to Pier 400 and runs through the Project site (POLA, 2018). The Project site is not located within an Alquist-Priolo Earthquake Fault Zone (City of Los Angeles, 1996). The proposed fence installation, grading, compacting, and asphaltting would not create any habitable or large permanent structures that would increase the risk of loss, injury, or death in the event of surface rupture. Therefore, impacts associated with the risk of surface rupture due to faulting would be less than significant, and no mitigation is required.

- (ii) Strong seismic ground shaking?

**Less-than-Significant Impact.** As discussed in Section 4.7(a)(i) above, the Project site is located in a region with several active fault lines and lies directly within the Palos Verdes Fault Zone. The Project site is susceptible to potential strong seismic ground shaking. However, the proposed Project would not include the construction of any new habitable structures. Development would be minimal. Therefore, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation is required.

- (iii) Seismic-related ground failure, including liquefaction?

**Less-than-Significant Impact.** Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during strong ground-shaking activity and is typically associated with loose, granular, and saturated soils. According to the California Department of Conservation, the Port is located within a liquefaction zone (DOC, 2019). The Project site is included within this area and may be subject to potential liquefaction hazards. However, the proposed fence installation, grading, compaction, and asphaltting are anticipated to be minor and would not cause any substantial adverse risks to public safety relating to ground failure during a liquefaction event. No other substantial structures are proposed to be added to the Project site. Operation activities include the expanded storage space and renting of chassis. In the event of a seismic-related ground failure, no major structures would experience failure that would pose any danger to people on-site. Impacts would be less than significant, and no mitigation is required.

(iv) Landslides?

**No Impact.** According to the California Department of Conservation, the Port is not located within a landslide zone (DOC, 2019). The Project site is relatively flat with no significant natural or graded slopes that could be susceptible to landslides. Therefore, the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts would occur, and no mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

**Less-than-Significant Impact.** The majority of the Project site and surroundings are paved with concrete and asphalt, which would not be removed under the proposed Project. The proposed Project would involve grading and compacting of unimproved surfaces in Parcel G, which may disturb surface soils. Erosion and sediment controls would be used during construction to reduce the amount of soils disturbed and prevent disturbed soils from entering storm drains as runoff. Construction projects resulting in the disturbance of one acre or more are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit issued by the RWQCB to control soil erosion due to stormwater. Construction activities would be conducted in accordance with the Construction General Permit requirements for construction projects. Compliance with the existing site-specific Storm Water Pollution Prevention Plan (SWPPP) that specifies logistics and schedule for construction activities would minimize potential for erosion and sedimentation. It would implement best management practices (BMPs) for the installation, monitoring, and maintenance of control measures. The existing SWPPP's control measures would be installed at the construction sites prior to ground disturbance. As described in Section 2, installation of the LID components would follow the guidance outlined in the *Environmental Guidance for Industrial Fill Material*, which would prevent inadvertent placement or reuse of contaminated soil/fill material on Port property (LAHD, 2019). Thus, the potential for contaminated soils and erosion would be minimized to the greatest extent possible. After completion of construction, all unimproved areas would be covered by pavement and no large areas of soil that could be exposed to erosion would remain. Therefore, the proposed Project would not result in substantial soil erosion or the loss of topsoil. The impact would be less than significant, and no mitigation is required.

c. Would the project 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?

**Less-than-Significant Impact.** As discussed in Sections 4.7(a)(iii) and (a)(iv) above, the Project site is not located within a landslide zone, but is located within a liquefaction zone (DOC, 2019). Project activities would have a low likelihood of causing a landslide, lateral spreading, subsidence, liquefaction, or collapse due to unstable soils. No large permanent structures would be constructed, and only temporary movable structures such as K-rail type fencing and removable canopies and trailers would be added to the site during operations. The Project features would not cause or accelerate geologic hazards and would be constructed in accordance with design and engineering criteria and applicable building and safety requirements. Therefore, impacts associated with the risk of unstable soil would be less than significant, and no mitigation is required.

- d. Would the project 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?

**Less-than-Significant Impact.** Expansive soils are characterized by their potential shrink-swell characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in certain fine-grained clay sediments from the process of wetting and drying. Clay minerals are known to expand with changes in moisture content. The higher the percentage of expansive minerals present in near surface soils, the higher the potential for substantial expansion. Clay minerals in geologic deposits within the Project area could be expansive, and previously imported fill soils could be expansive as well.

Although the proposed Project could be located on expansive soil, it would not involve construction of any new habitable structures. Fencing, grading, compacting, and asphaltting would not pose any direct or indirect risks to life or property as a result of expansive soil. Therefore, no substantial risk to life or property would be present. Impacts associated with the risk of expansive soil would be less than significant, and no mitigation is required.

- e. Would the project 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?

**No Impact.** The proposed Project would not require a septic or alternative wastewater disposal system. Existing sewers would be used for the disposal of any wastewater. Therefore, no impacts associated with the ability of soils to support septic tanks would occur, and no mitigation is required.

- f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**No Impact.** The proposed Project would not destroy a unique paleontological site. The Project site is located in a highly developed area with existing chassis storage, maintenance, and repair operations occurring at the site. The proposed Project is located on Terminal Island, an artificially elevated landform of constructed fill, created between approximately 1915-1929 and 1947-1967 and is a previously graded, highly disturbed site. The previous disturbance and presence of constructed fill reduces the chance of encountering intact paleontological resources. The site possesses no unique geologic features. Further, no paleontological resources are known to exist in or around the Project site. For these reasons, no impacts would occur, and no mitigation is required.

#### 4.8 GREENHOUSE GAS EMISSIONS

- a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Less-than-Significant Impact.** The proposed Project would increase the storage area for an existing chassis depot, which currently provides chassis storage and repair services to support existing container terminals on Terminal Island. Greenhouse gas (GHG) emissions would occur from the construction activities, improving one of the new parcels being added to the Project site,

and from increased chassis repair and storage throughput at the site. This increased chassis throughput includes an increase in the trucks diverting to drop off and pick up chassis for the new stop/start function and the increase in the work required by the on-site off-road equipment (forklifts and UTR) to move, stack, and unstack chassis over the larger chassis storage area. The proposed Project would not substantially increase the use of indirect sources of GHG emissions such as electricity or water, nor would the Project substantially reduce CO<sub>2</sub> (carbon dioxide) uptake through a change in land use (i.e. reducing vegetative CO<sub>2</sub> intake).

### *CEQA Significance Thresholds*

State CEQA Guidelines Section 15064.4(b) sets forth the factors that should be considered by a lead agency when assessing the significance of impacts from GHG emissions on the environment. These factors include:

- The extent to which a project may increase or reduce GHG emissions compared with the existing environmental setting;
- Whether project emissions exceed a threshold of significance that the lead agency determines applicable to a project; and
- The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.

The guidelines do not specify significance thresholds. They allow the lead agencies discretion in how to address and evaluate significance based on these criteria.

The SCAQMD has adopted a CEQA significance threshold of 10,000 metric tons per year (MT/yr) of carbon dioxide equivalent (CO<sub>2</sub>e) for industrial projects where SCAQMD is the lead agency (SCAQMD 2008b). This IS/ND used this threshold to evaluate the proposed Project's GHG emissions under CEQA. Estimated GHG emissions below this threshold would be considered to produce less-than-significant impacts to GHG levels. LAHD has determined the SCAQMD-adopted industrial threshold of 10,000 MT/yr CO<sub>2</sub>e to be suitable for the proposed Project for the following reasons:

- The SCAQMD used Governor Schwarzenegger's June 1, 2005 Executive Order S-3-05 as the basis for its development. EO S-3-05 set targets of reducing GHG emissions to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050 (SCAQMD 2008b). The 2020 target is the core of the California Global Warming Solutions Act of 2006, widely known as Assembly Bill (AB) 32 (SCAQMD 2008).
- The SCAQMD industrial source threshold is appropriate for projects with mobile emission sources, such as the proposed Project. CAPCOA guidance considers industrial projects

to include substantial GHG emissions associated with mobile sources (CAPCOA 2008). SCAQMD, on industrial projects for which it is the lead agency, uses the 10,000 MT/yr threshold to determine CEQA significance by combining a project's stationary source and mobile source emissions. Although the threshold was originally developed for stationary sources, SCAQMD staff views the threshold as conservative for projects with both stationary and mobile sources because it is applied to a larger set of emissions and therefore captures a greater percentage of projects than would be captured if the threshold was only used for stationary sources (SCAQMD 2008).

- The SCAQMD industrial source threshold is appropriate for projects with sources that use primarily diesel fuel. Although most of the sources that were considered by the SCAQMD in the development of the 10,000 MT/yr threshold are natural gas-fueled, both natural gas and diesel combustion produce CO<sub>2</sub> as the dominant GHG (The Climate Registry, 2019). Furthermore, the conversion of all GHGs to CO<sub>2</sub>e ensures that all GHG emissions are weighted accurately.
- The proposed Project is at an existing industrial facility.

The proposed Project would create a significant GHG impact if the GHG emissions increase exceeds this significance threshold.

#### *Project GHG Emissions*

The proposed Project's GHG emissions were calculated using the same construction and operation assumptions used to estimate the Projects' air pollutant emissions. These assumptions are listed in the Section 4.3, Air Quality, and the air quality emissions appendix (Appendix A).

Table 4.8-1 shows the proposed Project's estimated GHG emissions. The table shows that total estimated annual GHG emissions increase would be 1,665 MT/yr CO<sub>2</sub>e, which is well below the SCAQMD significance threshold of 10,000 MT/yr CO<sub>2</sub>e. Increases in emissions of GHGs associated with the proposed Project would be less than significant and no mitigation is required.

**Table 4.8-1. Proposed Project GHG Emissions**

<b>Emissions Source</b>	<b>MT/yr CO<sub>2</sub>e</b>
Construction Emissions (total)	20.4
Construction Emissions (Amortized) <sup>1</sup>	0.7
Proposed Project Minus CEQA Baseline Operations Emissions	1,664.3
Total Annualized Emissions	1,665.0
SCAQMD Significance Threshold MT/yr CO <sub>2</sub> e	10,000
Significant?	NO

Source: Appendix A, SCAQMD, 2019

1 - The construction emissions are amortized over the 30-year project life.

- b. Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

**Less-than-Significant Impact.** The State of California is leading the way in the United States with respect to GHG reductions. Several legislative and municipal targets for reducing GHG emissions below 1990 levels have been established. Key examples include, but are not limited to:

- Senate Bill 32 (SB 32)
  - 1990 GHG emissions levels by 2020
  - 40 percent below 1990 GHG emissions levels by 2030
- Assembly Bill 32 (AB 32)
  - 80 percent below 1990 GHG emissions levels by 2050
- San Pedro Bay Ports Clean Air Action Plan
  - 40 percent below 1990 GHG emissions levels by 2030
  - 80 percent below 1990 GHG emissions levels by 2050
- City of Los Angeles' Green New Deal (4-Year Update to the Sustainable City pLAN)
  - Reduce Port-related GHG emissions by 80 percent by 2050

Several state, regional, and local plans have been developed which set goals for the reduction of GHG emissions over the next few years and decades, but no regulations or requirements have been adopted by relevant public agencies to implement those plans for specific projects, within the meaning of CEQA Guidelines Section 15064.4(b)(3)<sup>1</sup>. However, there are GHG emissions reduction measures contained in state and local plans, strategies, policies, and regulations that directly or indirectly affect the proposed Project's construction and operation emissions source sectors or specific types. A summary of Project compliance with all potentially applicable GHG emissions reductions measures is provided in Table 4.8-2.

**Table 4.8-2. Applicable GHG Emissions Reduction Strategies**

Strategy	Compliance with Strategy
<b>State AB 32 Plan Strategies (CARB, 2017)</b>	
Vehicle Climate Change Standards	These are CARB enforced standards; vehicles that access the project site and are required to comply with the standards and would comply with these strategies.
Limit Idling Time for Commercial Vehicles (13 CCR § 2485) and Off-Road Equipment (13 CCR § 2449)	The construction contractors and the drayage truck operators would be required to comply with applicable idling regulations for on-road vehicles during project construction and operation. Certain vehicle types, such as concrete mixer trucks that would be used during construction are exempt from these idling restriction regulations. These vehicle types are exempt since idling would be necessary to complete the vehicle function.  Additionally, the construction contractor and Innovative would be required to comply with applicable off-road equipment idling regulations during project construction and operation.

<sup>1</sup> Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife [Newhall Ranch] [2015] 62 Cal.4th 204, 223

**Table 4.8-2. Applicable GHG Emissions Reduction Strategies**

<b>Strategy</b>	<b>Compliance with Strategy</b>
Use of Low Carbon or Alternative Fuels (Low Carbon Fuel Standard)	The Project's primary source of GHG emissions is from transportation fuel use. The facility and facility users would use California fuels that are subject to the Low Carbon Fuel Standard regulations. While these regulations are new and have not yet caused a large penetration of low carbon/renewable fuels, over the Project life the project's GHG emissions from transportation and onsite equipment would be reduced as low carbon fuel availability use increases statewide.
Waste Reduction/Increase Recycling (including construction and demolition waste reduction)	Solid waste generated during construction of the proposed Project would be disposed of in accordance with the City of Los Angeles requirements discussed below under the Construction and Demolition (C and D) Waste Recycling Ordinance.
Increase Water Use Efficiency	Not directly applicable to the proposed Project, as the majority of the water used by the Project is required by regulation for fugitive dust control or for concrete production during project construction, and there would be little or no increase in water use for future operation requirements at the Project site.
Electricity Use/Renewables Performance Standard	The Project's electricity would come from Los Angeles Department of Water and Power, a California publicly owned utility that is subject to the Renewables Performance Standard that requires increasing renewable energy procurement targets over time and so reduces GHG emissions from electricity generation. Therefore, the electricity used at the site would comply with state electricity sector GHG reduction strategies.
<b>Port of Los Angeles and City of Los Angeles Plans and Strategies</b>	
LA's Green New Deal Sustainable City pLAN (City of Los Angeles, 2019a)	<p>The City of Los Angeles' Sustainable City pLAN is intended to guide operational, policy, and financial decisions to create a more sustainable Los Angeles. Although the Plan is mostly focused on city property, buildings, and public transportation, the plan includes the 80 percent from baseline emissions reduction goal and notes three primary GHG emissions reduction initiatives, two of which would apply to facility emissions sources:</p> <ol style="list-style-type: none"> <li>1) 100% zero emissions cargo handling equipment (CHE) by 2030</li> <li>2) 100% zero emissions on-road drayage trucks by 2035</li> </ol> <p>The facility does not have control of the drayage trucks that access the site; however, as this initiative is implemented Port-wide the facilities truck trip related emissions would also be reduced.</p> <p>The proposed Project does not require new CHE and Innovative is not proposing changes to the existing diesel and propane fueled CHE (see Section 4.2, Air Quality, for a list of the existing CHE). LAHD will address the implementation of this port-wide cargo handling equipment emissions reduction initiative for all affected tenants. Implementation will include the replacement of existing fossil fuel powered CHE with electrically powered CHE and the use of renewable fuels to replace fossil fuel use. A goal for the facility would be compliance with this emissions reduction initiative by 2030.</p>
San Pedro Bay Ports Clean Air Action Plan (CAAP) (POLA and POLB, 2017)	The CAAP has several policy initiatives related to GHG emissions reductions. The policy initiatives that apply to the project's GHG emissions sources are the same as those listed above for the Sustainable City pLAN.
City of Los Angeles Construction and Demolition (C and D) Waste Recycling Ordinance	The City of Los Angeles approved a Citywide construction and demolition waste recycling ordinance in 2010. This ordinance that requires ALL mixed C&D waste generated within city limits be taken to City-certified C&D waste processors. LA Sanitation (LASAN) is responsible for the C&D waste recycling policy. All haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D

**Table 4.8-2. Applicable GHG Emissions Reduction Strategies**

Strategy	Compliance with Strategy
City of Los Angeles General Plan – Mobility Element (City of Los Angeles, 2016)	waste, and C&D waste can only be taken to City certified C&D processing facilities.  The City of Los Angeles General Plan, Mobility Element was developed to improve the way people, goods, and resources are moved in Los Angeles. The proposed Project would be consistent with this General Plan Element.

In summary, the proposed Project would conform to state and local GHG emissions/climate change regulations, policies, and strategies; therefore, the proposed Project would have less-than-significant GHG impacts and no mitigation is required.

#### 4.9 HAZARDS AND HAZARDOUS MATERIALS

- a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Less-than-Significant Impact.** There is an extremely low likelihood that Project activities would involve the use of significant quantities of hazardous materials. The only source of hazardous materials would be from equipment and vehicles at the site during construction and operation. During operations of chassis storage, maintenance, and stop/start operations, small quantities of hazardous materials, including containerized propane, gasoline, lubricating oils and grease, and welding gases (compressed acetylene and oxygen) may be used. These hazardous materials would be managed safely in accordance with local, state, and federal regulations. Fuel associated with refueling of trucks and equipment during construction would only be present on site during refueling periods and would not be stored on site. Additionally, construction activities would be conducted using BMPs in accordance with City guidelines, as detailed in the Los Angeles Municipal Code (LAMC) regulations (Chapter 5, Section 57, Division 4 and 5; Chapter 6, Article 4). Federal and state regulations that govern the storage of hazardous materials in containers (i.e., the types of materials and the size of packages containing hazardous materials), secondary confinement requirements, and the separation of containers holding hazardous materials, would limit the potential adverse impacts of contamination to a relatively small area. Project activities would comply with the State General Permit for Storm Water Discharges Associated with Construction Activity and an existing site-specific SWPPP through implementation of standard BMPs, which would minimize runoff of contaminants and require clean-up of any spills. Applicable BMPs include but are not limited to conducting an inventory of products used; implementing proper storage and containment; properly cleaning all leaks from equipment and vehicles; implementing spill prevention and control practices; properly managing solid and hazardous waste; and properly managing contaminated soil (SWRCB, 2013). Therefore, implementation of construction standards would minimize the potential for an accidental release of petroleum products and hazardous materials during construction activities at the Project site.

The proposed Project would expand chassis sorting and storage and add stop/start operations on a paved site. Operation of the proposed Project would require compliance with all existing hazardous material and waste laws and regulations, including but not limited to regulations and requirements under LAHD, Los Angeles Fire Department (LAFD), California Department of Toxic

Substances Control (DTSC), Caltrans, U.S. Department of Transportation, Los Angeles Regional Water Quality Control Board (LARWQCB), and Environmental Protection Agency (EPA). The proposed Project would comply with these laws and regulations, ensuring potential hazardous materials handling occurs in an acceptable manner. Implementation of these safety regulations that govern the shipping, transport, and handling of hazardous materials would limit the severity and frequency of potential releases of hazardous materials thereby reducing the potential to expose people to health hazards.

The proposed Project would expand existing operations with the addition of the stop/start functions of chassis and implementation of both day and night shifts. The use of small amounts of hazardous materials such as petroleum products, solvents, paints, and cleaners may increase with the expanded operations. However, use and storage of such materials would comply with applicable regulations governing use, storage, transport, and disposal, which would limit the potential for exposure to health hazards. Limited quantities of hazardous materials are anticipated to be used at the Project site similar to other storage, maintenance, and stop/start operations at the Port, and are therefore anticipated to be below the thresholds of California Health and Safety Code Chapter 6.95, which would otherwise require a Release Response Plan (RRP) and a Hazardous Materials Inventory (HMI) (California Legislative Information, 2019). Use and storage of hazardous materials for expanded operations and additional stop/start function are not expected to result in a substantial spill into the environment due to compliance with applicable regulations governing the safe handling and management of hazardous materials.

Construction and operation of the proposed Project would comply with applicable regulations, and therefore would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As such, impacts would be less than significant, and no mitigation is required.

- b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

**Less-than-Significant Impact.** The proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Installation of K-rail fencing to expand the existing site and installation of asphalt on Parcel G would have limited potential to release small amounts of hazardous materials associated with the use of motorized equipment during construction. The limited quantities of hazardous materials associated with construction and maintenance operations would not represent a significant hazard to the public or environment in the event of an accidental release. All storage, handling, and disposal of these materials are regulated by the DTSC, EPA, Occupational Safety and Health Administration, and the Los Angeles City and County Fire Departments. Mandatory compliance with all federal, state, and local regulations on the transport, use, and disposal of hazardous materials would reduce the likelihood of an accidental release of hazardous materials into the environment.

~~There are no records of any known leaks, spills, or contaminated soil within the Project site associated with current operations. Several assessments were previously conducted at the site~~

to determine the presence of any harmful substances, Recognized Environmental Conditions (RECs), and underground storage tanks (USTs) associated with former tenants and uses. In July 2016, a soil investigation of the site formerly located on Parcel B reported concentrations of arsenic, cadmium, copper, lead, and zinc. Volatile organic compounds and total petroleum hydrocarbons in gasoline range were not detected in any of the samples. Some traces of diesel were found (Eco & Associates, 2016). The proposed Project would not have any ground-disturbing activities in Parcel B that would expose people or the environment to these substances.

Three assessments were previously conducted on Parcel G to determine the presence of RECs (i.e. hazardous substances or petroleum products) and USTs. No evidence of any RECs was found in the Project area according to the two assessments conducted in June and October 2015 (Brown and Caldwell, 2015) (TRC, 2015). The third assessment in March 2017 found no evidence of underground storage tanks or associated underground piping (TRC, 2017).

In June 2020, Wood Environment and Infrastructure Solutions, Inc. conducted soil boring tests on the Innovative Barracuda site to develop baseline soil and groundwater conditions. The soil boring results indicate that soil in Parcel G contains total petroleum hydrocarbons in the diesel and motor oil ranges, VOCs (benzene and carbon disulfide), polynuclear aromatic hydrocarbons, and metals that were detected in concentrations below screening levels (Wood, 2020). However, the soil boring results revealed that soil in Parcel G contains levels of arsenic that exceed the USEPA Industrial Regional Screening Level (RSL) but are below the naturally occurring background level of 12 milligrams per kilogram established in Southern California (Wood, 2020). Ground disturbing activities in Parcel G such as compacting, grading, and paving may expose people to arsenic. Construction activities in Parcel G would be short-term and are anticipated to be completed within one month. Specifically, ground disturbing activities (i.e., grading, compaction, and paving) are anticipated to occur for a period of approximately 10 days. As such, exposure to contaminated soil on site would be temporary and occur only during ground disturbing activities in Parcel G. After grading, the ground surface would be paved with asphalt and concrete, which would effectively cover the exposed soil and limit long-term exposure. Short-term exposure to arsenic would not be a substantial risk to human health, as large, long-term doses of arsenic are typically more hazardous (CDC, 2017). Impacts would be less than significant, and no mitigation is required.

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**No Impact.** The Project site is not located within one-quarter mile of an existing or proposed school, and hazardous emissions and handling of hazardous or acutely hazardous materials is not anticipated within one-quarter mile of an existing or proposed school. The nearest school is Port of Los Angeles High School located on 250 West 5th Street, San Pedro, which is approximately one mile west of the Project site. No schools are located close to the Project site, so no impacts would occur, and no mitigation is required.

- d. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**No Impact.** The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., “Cortese List”), which is maintained by the California DTSC (DTSC, 2020). The proposed Project would not create a significant hazard to the public or environment related to the disturbance of a Cortese Listed Site. No impacts would occur, and no mitigation is required.

- e. 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

**No Impact.** The Project site is not located within an airport land use plan or within 2 miles of an airport. The nearest public airports are Torrance Municipal Airport – Zamperini Field Airport – approximately 6 miles to the northwest, and Long Beach Airport, approximately 8 miles to the northeast. Therefore, the proposed Project would not be within the vicinity of a public airport and safety hazard and noise impacts would not occur. No impacts would occur, and no mitigation is required.

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

**No Impact.** The Project site would be located within a previously developed site, not containing any public roadways. No road closures or any work involving adjacent streets are proposed that would interfere with emergency response. No impacts would occur, and no mitigation is required.

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

**No Impact.** The proposed Project is located within a highly developed port with no wildland areas that are susceptible to wildland fires. According to the City of Los Angeles General Plan’s Safety Element, the Project site is not located within a designated Wildland Fire Hazards zone (City of Los Angeles, 1996). Therefore, no wildland fires would threaten the safety of the Project site. The Project would not expose people or structures to a significant risk of loss injury, or death involving wildland fires. No impacts would occur, and no mitigation is required.

#### 4.10 HYDROLOGY AND WATER QUALITY

- a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Less-than-Significant Impact.** The proposed Project would not violate any water quality standards or waste discharge requirements during construction or operations. According to the Baseline Soil and Groundwater Investigation by Wood Environment and Infrastructure Solutions, Inc., the groundwater sample from the soil boring tests conducted in Parcel G reveal concentrations of total petroleum hydrocarbons in the diesel range exceeding the USEPA Industrial RSL (Wood, 2020). Although this finding indicates the presence of contaminated

groundwater, the environmental screening level is based on the direct human health exposure for drinking water. The shallow groundwater beneath the site is not currently used for potable water purposes, and the proposed Project would not convert the use of the groundwater for potable purposes. Furthermore, groundwater was encountered in the soil borings across the site at depths between 10.5 and 13.2 feet below ground surface (Wood, 2020). Ground disturbing activities would not reach these depths, and therefore, no contact with groundwater or dewatering would occur.

The proposed Project involves installing fencing and grading, compacting, and asphaltting unimproved land. Construction activities would be conducted in accordance with the Construction General Permit requirements for construction projects, which include application of BMPs. BMP requirements that would be implemented include erosion and sediment controls, non-stormwater management, and waste management. Construction activities would also comply with the existing facility's SWPPP and BMPs to prevent pollutants in stormwater discharge from causing or contributing to violations of water quality objectives. Operations will be conducted in accordance with SWRCB Industrial General Permit Order No. 2014-0057-DWQ. By following the Best Management Practices and the iterative process outlined in the Industrial General Permit, potential pollutants would be managed in accordance with SWRCB regulations. Therefore, impacts related to water quality standards and waste discharge requirements would be less than significant, and no mitigation is required.

- b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

**Less-than-Significant Impact.** The proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Groundwater in the harbor area is located south of the Dominguez Gap Barrier and experiences seawater intrusion from San Pedro Bay, rendering it unsuitable for potable uses. Further, the Project site is not used or designated for groundwater recharge. A portion of Parcel G would be paved with an impervious surface, which is not anticipated to substantially interfere with groundwater recharge. Water would not be withdrawn from the local groundwater supply. The Project would have less-than-significant impacts, and no mitigation is required.

- c. Would the project 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:
  - (i) result in substantial erosion or siltation on- or off-site;

**No Impact.** There are no streams or rivers located nearby that would be affected by the proposed Project. The proposed Project would not alter the existing drainage pattern of the site in a manner that would cause substantial erosion. The additional asphaltting of the southern portion of the site (Parcel G) would follow existing drainage patterns and utilize existing drains. Because more than 500 square feet of paving would occur, the proposed Project would also comply with applicable LID requirements that would minimize off-site erosion and siltation. As required by the Construction General Permit requirements for construction projects, BMPs such as erosion and

sediment controls would be implemented to avoid substantial erosion and siltation during construction. Runoff from the Project site enters the local storm drain system for conveyance and discharge to the nearby Harbor, and there are no downstream rivers that could be adversely affected. No impacts would occur, and no mitigation is required.

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

**Less-than-Significant Impact.** The proposed Project would not substantially increase the rate or amount of surface runoff that would result in flooding on- or off-site. Of the Project site's total area of approximately 13.2 acres, approximately 1.5 acres within Parcel G are proposed to be graded, compacted, and paved with asphalt. Although the unimproved dirt surface would be paved over with an impervious surface, the proposed amount of asphalt paving would be consistent with the rest of the area that is already paved. On- or off-site flooding would not increase substantially with this additional asphalt, as paving would tie in with the existing storm drain system. Therefore, impacts would be less than significant. No mitigation measures are necessary.

- (iii) 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;

**Less-than-Significant Impact.** The majority of the Project site is currently paved and used for chassis storage, maintenance, and repairs. Implementation of the proposed Project includes paving the unimproved portion of Parcel G (1.5 acres). As such, the proposed Project would increase the area of impervious surfaces by approximately 10 percent. The asphalt pavement in Parcel G would connect to existing drainage. This area was impermeable in the past since two buildings were formerly at this location. Before the buildings were removed, there were no stormwater drainage system impacts. Therefore, no impacts are anticipated after paving occurs.

Construction of the proposed Project would require a Construction General Permit and would comply with an existing SWPPP and LID requirements as part of its management of stormwater runoff during construction and operations. Therefore, the proposed Project would not have any components that would create any amount of runoff water that would exceed the capacity of stormwater drainage systems. Implementation of the existing site-specific SWPPP and BMPs would minimize substantial amounts of pollutants in runoff. The proposed Project would have less-than-significant impacts related to runoff water, and no mitigation is required.

- (iv) or impede or redirect flood flows?

**Less-than-Significant Impact.** Portions of Parcels A, G, and H are within the Federal Emergency Management Agency (FEMA) Zone AE, which presents a one percent annual chance of flooding (i.e., 100-year flood zone) (FEMA, 2008). The proposed Project would not construct and place any new substantial structures that would impede or redirect flood flows. The installation of fencing and grading of the unimproved surface in Parcel G would not substantially affect flood flows. As discussed in Section 4.10(c)(ii), new pavement would connect to the existing storm drainage system, maintaining existing drainage patterns of the site. During operations, the

expanded storage capacity of chassis and stop/start operations would also not substantially impede or redirect flood flows as there would be no new large permanent structures. Therefore, there would be a less-than-significant impact on flood flows, and no mitigation is required.

- d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

**Less-than-Significant Impact.** Due to the absence of an adjacent lake or other enclosed water body, the Project site would not be susceptible to seiche. The lack of nearby topographical features typically associated with mudflow (e.g., hillside, riverbanks) would result in a very low probability for mudflow to affect the Project site. According to the California Department of Conservation, the Project site is located within a tsunami inundation area (DOC, 2009). Portions of Parcels A, G, and H are within the FEMA Zone AE. The only components proposed to be constructed are fencing and an asphalted surface in Parcel G. Project operation would involve the storage of chassis and stop/start operations, which would not involve the use or storage of any substantial amounts of hazardous pollutants. The only substances that may be released would be lubricants and grease, which are expected to be negligible. Therefore, the proposed Project would not result in any major release of pollutants due to inundation by a seiche, tsunami, or flood. Impacts would be less than significant, and no mitigation is required.

- e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

**No Impact.** Responsibility for the protection of surface water and groundwater quality in California rests with the SWRCB and nine RWQCBs. According to regulatory requirements and as part of its management of stormwater runoff, construction of the proposed Project would require a RWQCB Construction General Permit, operations would require coverage expansion under SWRCB Industrial General Permit Order No. 2014-0057-DWQ and an existing SWPPP, and LID requirements would be implemented as required, all of which would minimize pollutant loading. Therefore, the proposed Project would not interfere with any water quality or groundwater management plan. No impacts would occur, and no mitigation is required.

#### 4.11 LAND USE AND PLANNING

- a. Would the project physically divide an established community?

**No Impact.** The proposed Project is located in a heavy industrial area that does not contain any established communities. The physical division of an established community typically refers to the construction of a linear feature, such as a major highway or railroad tracks or removal of a means of access, such as a local road or bridge, that would impair mobility within an existing community or between a community and outlying area. Under the existing conditions, the Project site is not used as a connection between established communities. Instead, connectivity in the surrounding area is facilitated via local roadways, such as SR-47. The proposed Project would occur on an established parcel and include operation activities that remain consistent with the surrounding uses. The proposed Project would not physically divide an established community or any existing uses. Therefore, no impacts would occur, and no mitigation is required.

- b. Would the project 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?

**No Impact.** The Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Project parcel is zoned [Q]M3-2 (Qualified Heavy Industrial) under the City of Los Angeles Zoning Ordinance and would continue to have the same land uses as existing conditions (City of Los Angeles, 2020). The proposed Project site is located in the PMP's Planning Area 3 on Terminal Island. This planning area includes cargo handling, maritime support activities, and other mixed uses. The Project site is located within the Container land use as indicated in the PMP (POLA, 2018). Operations associated with expanding into Parcels F, G, and H would be consistent with the use of the current facility's operations. The existing parcels are currently used to maintain, repair, and store chassis and would continue to do so with the proposed expansion along with additional stop/start operations. These activities would be consistent with the permitted activities described in the PMP. The proposed Project would not alter the land use of the site or its surroundings and would not conflict with the PMP (POLA, 2018) or any applicable land use plans. Therefore, no impacts would occur, and no mitigation is required.

#### 4.12 MINERAL RESOURCES

- a. Would the project 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?

**No Impact.** According to the California Department of Conservation Geologic Energy Management Division (CALGEM), the Project site is not within an oil field and no oil and gas wells are located within its boundaries. The proposed Project would neither result in a land use conflict with any existing oil extraction nor would it preclude future oil extraction on underlying deposits. The Wilmington Oil Field is located approximately 3,000 feet northeast of the Project site (DOC, 2020b). According to the City of Los Angeles General Plan Conservation Element, the Project site is not located in a Mineral Resource Zone (City of Los Angeles, 2001). Therefore, the proposed 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. No impacts would occur, and no mitigation is required.

- b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

**No Impact.** As described in Section 4.12(a), the Project site is not located within a Mineral Resource Zone (City of Los Angeles, 2001). Further, the Project site is not located within an oil field and does not contain any oil or gas wells within its boundaries. The proposed Project would neither result in a land use conflict with the existing oil extraction nor would it preclude future oil extraction on underlying deposits. Therefore, the proposed Project would not result in the loss of availability of any locally important mineral resource recovery sites and would have no impact on the availability of mineral resources. No impacts would occur, and no mitigation is required.

#### 4.13 NOISE

- a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Less-than-Significant Impact.** The City of Los Angeles adopted a Noise Element as part of the General Plan (City of Los Angeles, 1998). The Noise Element provides an overview of various noise sources (current and anticipated) along with standards and policies. The following policies are applicable to the proposed Project:

- Policy 2.2: Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.
- Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

Section 41.40 of the Los Angeles Municipal Code limits construction activities to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday (no work is allowed on Sundays or national holidays) (City of Los Angeles, 2019b). Construction activities at the Project site would comply, as they would be conducted Monday through Friday 7:00 AM to 5:00 PM.

The Los Angeles Municipal Code Section 112.05, Maximum Noise Level of Powered Equipment or Powered Hand Tools, details that the maximum noise level from construction, industrial, and agricultural machinery (e.g., crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment) as well as powered equipment of 20 horsepower (HP) or less intended for infrequent use (e.g., chain saws, log chippers and powered hand tools) may produce in or within a distance of 500 feet from a City residential zone is 75 A-weighted decibels (dBA) at a distance of 50 feet, unless compliance is technically infeasible. Technically infeasible means that the noise limitations cannot be attained during use of the equipment even with the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques.

The City's CEQA Thresholds Guide (City of Los Angeles, 2006) provides screening criteria if construction activities occur within 500 feet of a noise sensitive land use and if construction occurs during the hours specified in LAMC, Section 41.40. The CEQA Threshold Guide also specifies that construction activities that last more than 10 days in a three-month period are less than significant if the existing ambient exterior noise levels at a noise sensitive use do not exceed 5 dBA during construction. Furthermore, the CEQA Threshold Guide states that Project operations would normally be significant if the ambient noise level measured at the property line of affected uses increases by 3 dBA in the Community Noise Equivalent Level (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" category (generally over 70 decibels), or any increase in CNEL by 5 dBA or greater.

Project construction activities are estimated to be completed within approximately 15 working days. Construction activities could result in temporary increases in ambient noise levels in the Project area on a short-term basis, resulting from use of various equipment, such as a trucks (flatbed, water, dump), welding machine, front-end loader, grader, roller compactor, hand vibratory compactor, asphalt paving machine, concrete truck and pump as described in the Project Description. Maximum noise from these types of equipment range from 74 to 85 dBA at 50 feet from the source (FHWA, 2006). The nearest potential residential receptors are liveaboard tenants at the Al Larson Marina (Berth 258) approximately 2,000 feet southwest of the Project site. This area is zoned [Q]M3-1 (Qualified Heavy Industrial) (City of Los Angeles, 2020) with presumed ambient noise levels (day/night) of 65 dBA (City of Los Angeles, 2006, Exhibit I.1-3). Construction noise levels at the closest sensitive receptors is estimated to be approximately 51 dBA during Phase 3 (see Appendix B), which is well below the presumed ambient noise levels at the identified sensitive receptors. As such, construction noise would not result in a substantial temporary increase in ambient noise levels and construction noise impacts would be less than significant.

The Barracuda site would continue to operate as a chassis storage and maintenance yard, but maintenance and repair efforts are anticipated to increase due to expanded inventory of chassis to be stored (and associated stacking activities) and from the increase in site acreage. Additionally, implementation of the proposed Project stop/start operations would now occur at the site which would increase truck traffic. Operation activities would occur Monday through Friday 7:00 AM to 3:00 AM, as opposed to current operations which occur 7:00 AM to 4:00 PM.

Operation impacts would consist of an increase of approximately 258 truck round trips per day and approximately nine additional employee round trips per day. All truck trips are assumed to be vehicle trips already traveling to the Harbor District and are considered to be minor diversions of their existing trips. No new on-site equipment is anticipated; therefore, on-site equipment use would continue to include operation of four forklifts, one UTR, and a mobile fuel service truck. On-site equipment use would increase in frequency to stack an additional approximately 2,480 chassis within the expanded 6.2 acres on Parcels F through H. These operations are consistent with chassis storage operations currently occurring at the existing site and would utilize existing equipment. Therefore, the intensity of noise levels would not increase. Furthermore, there would be a minimal increase in staff/employee trips, and no increase in truck trips to the Harbor District. As such, an increase in noise at the nearest sensitive receptors would not occur. Thus, a substantial temporary or permanent increase in ambient noise levels would not occur. Operational noise impacts would be less than significant, and no mitigation is required.

- b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

**Less-than-Significant Impact.** Vibration-sensitive land uses include high-precision manufacturing facilities or research facilities with optical and electron microscopes. None of these occur in the project area. Therefore, the significance threshold for “excessive ground-borne vibration” depends on whether a nuisance, annoyance, or physical damage to any buildings could occur. The City of Los Angeles does not specify a significance criterion of vibration, but Caltrans

developed guidelines for construction activities and estimates that vibration levels exceeding 0.3 inches per second (in/sec) can damage older residential structures and cause substantial annoyance to humans (Caltrans, 2013). As shown in Appendix B, vibration levels would be substantially under this threshold at the closest sensitive receptors and impacts would be less than significant and no mitigation is required.

- c. 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, would the project expose people residing or working in the project area to excessive noise levels?

**No Impact.** The Project site is not located within an airport land use plan. The nearest public airports are Torrance Municipal Airport – Zamperini Field Airport – located over 5 miles to the northwest, and Long Beach Airport, located approximately 8 miles to the northeast. Although not considered a private airstrip, a private heliport, Catalina Sea and Air Terminal Heliport, is located at Berth 95, approximately 0.80 miles northwest of the Project site. The helicopters fly primarily north-south over the Main Channel to Catalina Island. Given the distance between the Project site and the identified airports and heliport, workers at the Project site would not be exposed to excessive noise levels from airplanes or helicopters. No impacts would occur, and no mitigation is required.

#### 4.14 POPULATION AND HOUSING

- a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**No Impact.** The proposed Project would expand the site of an existing chassis yard, which includes storage, maintenance, and repair of chassis on Terminal Island. Operations would expand to accommodate increased storage and stop/start operations. No residential uses or other land uses typically associated with directly inducing population growth (e.g., homes and businesses) are included as part of the proposed Project. The proposed Project would result in a nominal increase of approximately nine employees, and given the proposed Project's location within a well-established urban community with a large population base and existing housing stock and established infrastructure, it would not induce population growth in the area. Due to the short duration of construction (approximately 15 working days), it is unlikely that any construction worker would relocate to the area. Furthermore, there is an adequate supply of workers in the Project vicinity given the developed urban nature of the surroundings. The expanded facility area would result in an increase in storage and repair activities and would not substantially increase the number of workers. Therefore, no impacts would occur, and no mitigation is required.

- b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** As discussed in Section 4.14(a) above, the proposed Project would involve the expansion of an existing chassis yard, which includes storage, maintenance, and repair of chassis on Terminal Island. There is no housing within the Project site boundaries that would be displaced as a result of the proposed Project. There is no formal housing within the Port, although there are

liveaboard boat residents in some marinas within the Port. The proposed Project would not displace liveaboards located at these marinas. No replacement housing would be needed or required with implementation of the proposed Project. As such, the proposed Project would not displace existing housing and would not necessitate the construction of replacement housing elsewhere. No impacts would occur, and no mitigation is required.

#### 4.15 PUBLIC SERVICES

Would the project 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 any of the public services:

a) Fire Protection?

**Less-than-Significant Impact.** The LAFD provides fire protection and paramedic services to the Project site. The closest station is LAFD Fire Station 40 (330 Ferry Street), which is located approximately 0.5-miles northeast of the Project site (LAFD, 2020). The Project site is already within the service area of the LAFD. During construction, emergency access to the Project site vicinity would be maintained for emergency service vehicles. Following the completion of the proposed Project, there would be no substantial adverse impacts for new or altered fire protection services. Once operational, the proposed Project would continue to be served by the LAFD. Additionally, as previously discussed in Section 4.14(a), the proposed Project would not directly or indirectly induce population growth in the City. Although the proposed Project could potentially result in a slight increase in demand for emergency service associated with the expanded operations, this increase is expected to be nominal because the proposed use is similar to the current use of the property. The proposed Project's minimal construction activities and expansion of operations would not result in the need for new or physically altered governmental facilities that would cause significant environmental impacts. It is anticipated that the proposed Project would be adequately served by existing LAFD facilities, equipment, and personnel. Therefore, impacts would be less than significant, and no mitigation is required.

b) Police Protection?

**No Impact.** The Los Angeles Port Police (Port Police) is the primary law enforcement agency providing law enforcement and security for the Port. The Port Police is comprised of more than 300 sworn officers and provides security operations along its jurisdiction of approximately 12 square miles of landside property and 43 miles of waterfront (POLA, 2020). The Port Police headquarters is located at 330 S. Centre Street (between 3rd and 5th Streets), which is approximately 1.1 miles west of the Project site. The Port Police Dive Unit facility boats and offices/lockers are located on 954 South Seaside Avenue, which is approximately 0.4 miles southwest of the Project site on Terminal Island. The Los Angeles Police Department (LAPD) provides service to an area encompassing 468 square miles and 21 community areas including San Pedro (LAPD, 2020a). The Project site is located within the LAPD Harbor Division Area, which encompasses approximately 27 square miles and including San Pedro, Wilmington, Harbor City, and the Harbor Gateway (LAPD, 2020b).

Similar to fire protection services, the Project site is already within the service area of the Port Police and LAPD, and once operational, it would continue to be served. The Project would not increase demand for new police protection services, as it would not directly or indirectly induce population growth in the City. The proposed Project operation would be similar to that of the current use, with the addition of stop/start functions. The proposed Project would not increase the demand for police services and would require neither the expansion of existing police facilities nor the construction of new police facilities. No impacts would occur, and no mitigation is required.

c) Schools?

**No Impact.** Public kindergarten through high school education in the City is provided by the Los Angeles Unified School District. As previously discussed in Section 4.14(a), the proposed Project would not directly or indirectly induce population growth in the area. The nine additional employees hired for operation of the proposed Project would likely come from the region. It is not anticipated that employees would relocate as a result of the proposed Project. As such, an increase in school-age children requiring public education is not expected to occur as a result of the proposed Project. Therefore, no impacts associated with the construction or expansion of Los Angeles Unified School District facilities would occur, and no mitigation is required.

d) Parks?

**No Impact.** As discussed in Section 4.14(a), the proposed Project does not include development of residential uses that would create increased demand for new parks. Therefore, there would be no increase in residential use, and an increase in patronage at park facilities is not expected to result. No impacts associated with the construction or expansion of park facilities would occur, and no mitigation is required.

e) Other Public Facilities?

**No Impact.** As previously discussed in Section 4.14(a), the proposed Project does not include development of uses that would cause a substantial population growth that would increase the use of libraries, community centers, or other public facilities. A substantial increase in patronage at these public facilities is not expected. Therefore, no impacts associated with the construction or expansion of public facilities would occur, and no mitigation is required.

#### 4.16 RECREATION

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**No Impact.** Demand for neighborhood or regional parks or other recreational facilities is primarily generated by an increase in the number of permanent residents. No residential buildings or features would be constructed as part of the proposed Project that would increase the number of residents or visitors to existing recreational facilities. As such, no increase in the use of existing parks or recreational facilities is anticipated. No impacts would occur to recreational facilities, and no mitigation is required.

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

**No Impact.** As discussed in Section 4.16(a), the Project site does not operate as a recreational facility, and the proposed Project does not include recreational facilities or require the construction or expansion of any recreational facilities. No impacts would occur, and no mitigation is required.

#### 4.17 TRANSPORTATION

- a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

**Less-than-Significant Impact.** Based on the 2019 update to the City of Los Angeles Thresholds Guidance Document, the following question contains three sub-questions that dictate final determination. If the answer is no to all of the following questions, a no impact determination can be made (City of Los Angeles, 2019c). Due to the Office of Planning and Research (OPR) oral guidance, heavy duty truck trips are not included in this transportation analysis and are analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, and Noise (OPR, 2020).

- (1) Would the project generate a net increase of 250 or more daily vehicle trips?

Construction for the proposed Project includes paving Parcel G, which would include a peak daily trip of 38 trips during the approximately 3 weeks of construction. During operation of the proposed Project, there is an estimated net increase of nine employees, resulting in a peak daily trip of approximately 18 trips. Therefore, the project would not generate a net increase of 250 or more daily vehicle trips during either construction or operation.

- (2) Is the project proposing to, or required to make any voluntary or required modifications to the public right-of-way?

The proposed Project does not include any modifications to existing roadways on Terminal Island that support current or future bike lanes or bus stops and is not required to make any voluntary or required modifications to the public right-of-way. The proposed Project does not propose to include dedications or physical modifications to the public right-of-way, nor is it required.

- (3) Is the project on a lot that is ½ acre or more in total gross area, or is the project's frontage along a street classified as an Avenue or Boulevard 250 feet or more, or is the project's frontage encompassing an entire block along an Avenue or Boulevard?

The Los Angeles Mobility Plan 2035, which is the City's General Plan Transportation Element, includes numerous functional classifications to define standard roadway dimensions (Los Angeles Department of City Planning, 2016). The Project site is bounded by Cannery Street to the north, Barracuda Street to the east, Bass Street to the south, and Earle Street to the west. None of the streets are considered an Avenue or a Boulevard. Overall access to the proposed Project is provided by Seaside Freeway (SR-47). The Seaside Freeway is designated as Boulevard II. The Boulevard II designation corresponds to 110 feet of right-of-way width and 80 feet of roadway width. All other adjacent roadways are designated as Private under the Mobility Plan 2035 and

the Bureau of Engineering web-based mapping application, NavigateLA (Los Angeles Department of City Planning, 2016; Los Angeles Department of Public Works, Bureau of Engineering, 2020). The proposed Project would not require any modifications or closures to the public right-of-way. There would be no in-street construction activities.

The proposed Project site is not located along a street classified as an Avenue or Boulevard but is located on a lot that is greater than ½ acre in total gross area. However, the proposed Project is within an industrialized area and there are no bicycle or pedestrian facilities within Terminal Island (Metro, 2014). With no bicycle or pedestrian facilities within the area, no effect to such facilities is possible. Additionally, there are no bus stops, transit stations, or transit facilities within a 0.25-mile radius of the Project site (LADOT, 2020). Therefore, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

- b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

**No Impact.** The CEQA Guidelines, Section 15064.3, subdivision (b), provide criteria for analyzing transportation impacts. The guidelines state that a significant impact may occur if vehicle miles traveled (VMT) exceed an applicable threshold of significance. The analysis below is based on the screening criteria provided by the Los Angeles Department of Transportation (LADOT) in the Transportation Assessment Guidelines (LADOT, 2019). The LADOT Transportation Assessment Guidelines state that if a land use project does not generate a net increase totaling 250 or more daily vehicle trips or does not generate a net increase in daily VMT, then no further analysis for that project is required and no impacts would occur if the answer is “no” to the following two questions:

- (1) Would the Project or Plan located within one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?
- (2) If the project includes retail uses, does a portion of the project that contains retail uses exceed a net 50,000 square feet?

As discussed above in Section 4.17(a), construction for the proposed Project includes paving Parcel G, which would include a peak daily trip of 38 trips during the approximately three weeks of construction. During operation of the proposed Project, there is an estimated net increase of nine employees, resulting in a peak daily trip of 18 trips (for more information about the employee net increase, see Section 2.2.2, Operation). Therefore, the proposed Project would not generate a net increase totaling 250 or more daily vehicle trips for either construction or operation purposes.

The Los Angeles City Council approved the LADOT Transportation Assessment Guidelines for CEQA projects in July 2019 (LADOT, 2019). These guidelines state that a VMT analysis is not required if a project generates less than 250 daily trips. The LADOT threshold is proposed for automobiles (as CEQA does not require VMT analysis of commercial trucks) and due to OPR oral

guidance, heavy duty truck trips are not included in this transportation analysis and are analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, and Noise (OPR, 2020).

Additionally, the proposed Project is not located within one-half mile of fixed-rail or fixed-guideway transit station, does not replace an existing number of residential units with a smaller number of residential units, and does not include retail uses. Based upon the LADOT Transportation Assessment Guidelines criteria discussed above, no further analysis is required, and no impacts would occur. No mitigation is required.

- c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

**No Impact.** Based on the 2019 update to the City of Los Angeles Thresholds Guidance Document, if the answer is no to both questions below a no impact determination can be made:

- (1) Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?
- (2) Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way?

The project is not proposing new driveways or introducing new vehicle access to the property from the public right-of-way. Also, as previously discussed, the project is not proposing or required to make any voluntary or required modifications to the public right-of-way. Therefore, there are no impacts, and no mitigation is required.

- d. Would the project result in inadequate emergency access?

**No Impact.** The proposed Project would not alter or close existing roadways or emergency access ways. Because existing emergency access features and procedures would not be altered and the proposed Project would not increase traffic or alter traffic patterns, emergency access would remain adequate. Therefore, the proposed Project would have no impacts on emergency access and no mitigation is required.

#### 4.18 TRIBAL CULTURAL RESOURCES

This section evaluates impacts to tribal cultural resources associated with the implementation of the proposed Project. Pursuant to Assembly Bill (AB) 52, a lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Project if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area. As part of Native American consultation associated with the proposed Project, the Native American Heritage Commission (NAHC) was contacted and a consultation list received of tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project.

The Port sent an email to the NAHC requesting an updated search of the Sacred Lands File and a current AB 52 Tribal Consultation List identifying any tribal groups or persons who have

expressed an interest in receiving notification about projects being undertaken or applications being reviewed by the Port. On February 20, 2019, the NAHC responded that the Sacred Lands File search was negative and provided a list of five tribal organizations identified as potentially having an interest in the proposed Project. These tribes included: Gabrieleño Band of Mission Indians-Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, and Gabrielino-Tongva Tribe. Pursuant to AB 52 and Public Resources Code Section 21080.3.1(d), on April 16, 2019, the Port mailed certified AB 52 letters to representatives of tribes identified by the NAHC and that had previously submitted a written request to the Port to receive notification of proposed projects. A second round of certified AB 52 letters were mailed on September 23, 2019, to the same tribal representative notifying them of a change in the proposed Project and allowing for another opportunity to consult if requested. The letters included a brief description of the proposed Project, information on how to contact the lead agency, and a Project location map. The letters noted that requests for consultation needed to be received within 30 days of the date of receipt of the notification letter. The formally notified tribes include the following:

- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe

As of August 2020, the Port did not receive any formal requests for consultation on the proposed Project.

- a. Would the project 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, 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)?

**No Impact.** As discussed in Section 4.5, Cultural Resources, the potential to discover an unknown tribal cultural resource within the Project site is very low, since the site is previously disturbed and underlain by artificial fill, and only minimal ground disturbance is planned. The record search and literature information for the Port and did not indicate the presence of any eligible or listed historic resources within the Project area (ICF, 2019 and Jones and Stokes, 2008). Since there are no significant historical resources located within the Project area, and only minimal ground disturbance is planned, the proposed Project would have no impacts on tribal cultural resources and no mitigation is required.

- (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. In applying the criteria set forth in subdivision (c) of

Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

**No Impact.** As discussed previously, the proposed Project would have very low potential to discover an unknown or buried tribal resource because the Project area is previously disturbed, is located on artificial fill, and only minimal ground disturbance is planned. Furthermore, there are no known tribal cultural resources within the Project area, therefore, the proposed Project would have no impacts on such resources and no mitigation is required.

#### 4.19 UTILITIES AND SERVICE SYSTEMS

- a. Would the project 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?

**Less-than-Significant Impact.** The proposed Project would not require any new or expanded wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities. The Project site is located in a developed area that is served by existing utilities. Grading would occur within Parcel G and is not expected to disturb any existing utility lines. Site drainage within the proposed paved area would connect to the existing storm drain system. As discussed in Section 4.10(c)(iii), the proposed Project would not substantially increase the rate or volume of stormwater runoff that would adversely affect the storm flow system. As such, no new or expanded stormwater runoff systems would be necessary. Operations of the proposed Project would be similar with the addition of stop/start operations, and an additional nine employees mainly to support the night shift. Existing utilities would be adequate to serve the proposed uses and nominal increase in employees. Therefore, the proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Impacts would be less than significant, and no mitigation is required.

- b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

**Less-than-Significant Impact.** The proposed Project would have sufficient water supplies for the foreseeable future. The proposed Project would not construct any major facilities that would require excessive water consumption. A small amount of water would be used for compaction, grading, and dust suppression, and would only occur temporarily during construction. Water use during operations would consist of typical municipal water use in the existing building used for offices and a break area. The nominal addition of nine employees would not substantially increase demand for water. Therefore, the Project would have a less-than-significant impact on water supplies given its minimal water consumption, and no mitigation is required.

- c. Would the project 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?

**Less-than-Significant Impact.** The Project site is serviced by the City of Los Angeles Bureau of Sanitation's Terminal Island Water Reclamation Plant (TIWRP). The proposed Project does not involve any industrial process that may require an Industrial Waste Permit from the Bureau of Sanitation. The proposed Project would not substantially alter the current discharge from TIWRP and would not exceed wastewater treatment requirement, as wastewater from the site would be related to employees, not industrial processes. Therefore, the proposed Project would not exceed or substantially alter wastewater treatment requirements of the LARWQCB. A maximum of eight workers are anticipated on any given day during construction, and an increase of approximately nine workers is anticipated per day during both day and night shifts during operations. No substantial increases in wastewater production or need for treatment are anticipated due to the small number of employees expected to work during construction and operations. Additionally, as previously discussed in Section 4.14(a), the proposed Project would not directly or indirectly induce population growth in the area. The proposed Project would not result in a determination by the wastewater treatment provider that it has adequate capacity to serve the proposed Project's projected demand. Impacts would be less than significant, and no mitigation is required.

- d. Would the project 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?

**Less-than-Significant Impact.** The proposed Project would not generate solid waste in excess of State or local standards or impair solid waste reduction goals. The proposed Project would temporarily generate a maximum of approximately 8 cubic yards of waste associated with fence modifications and grading, which is not substantial and would only occur during construction. Waste generated during operations is expected to be approximately the same as that of current operations. The proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the proposed Project's waste during construction and operation. Impacts would be less than significant, and no mitigation is required.

- e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

**Less-than-Significant Impact.** The proposed Project would be required to conform to the policies and programs of the Solid Waste Integrated Resource Plan (SWIRP). Compliance with the SWIRP would ensure sufficient permitted capacity to service the proposed Project (City of Los Angeles, 2013). Further, there is minimal solid waste associated with construction activities. The proposed Project would comply with federal, state, and local statutes and regulations related to solid waste. More specifically, the proposed Project would be compliant with all applicable codes pertaining to solid waste disposal. These codes include Chapter VI Article 6 Garbage, Refuse Collection of the LAMC, Part 13 Title 42 - Public Health and Welfare of the California Health and Safety Code, and Chapter 39 Solid Waste Disposal - of the United States Code. The proposed Project would also be compliant with AB 939, the California Solid Waste Management Act, which requires each city in the state to divert at least 50 percent of their solid waste from landfill disposal

through source reduction, recycling, and composting. AB 341 builds upon AB 939 and requires jurisdictions to implement mandatory commercial recycling with a statewide 75 percent diversion rate (from landfill disposal) by 2020. The proposed Project would implement and be consistent with the procedures and policies detailed in these codes, the City's recycling and solid waste diversion efforts, and related laws pertaining to solid waste disposal. Therefore, the impact would be less than significant, and no mitigation is required.

#### 4.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?
- c. 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?
- d. 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?

**No Impact.** PRC Sections 4201-4204 direct the California Department of Forestry and Fire Protection to map fire hazard based on relevant factors such as fuels, terrain, and weather. The Port is not located in or near a state responsibility area or lands classified as a Very High Fire Severity Zone within its Local Responsibility Area (California Department of Forestry and Fire Protection, 2020; LAFD, 2019). Therefore, the Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. No impacts would occur, and no mitigation is required.

#### 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

**Less-than-Significant Impact.** As described in Section 4.4, Biological Resources, the Project area is paved, highly disturbed, and is surrounded by a heavily industrial area. No natural suitable habitat occurs within or in the vicinity of the Project area that supports native, rare, or endangered plant or animal species. Therefore, the proposed Project would not reduce the habitat of a fish or wildlife species. Vegetation within the Project site consists of non-native grasses and herbaceous weeds. Wildlife within and in the vicinity of the Project site include common bird species, some of which are considered migratory. Construction activities would comply with the MBTA to avoid

disturbing any active nests on site. As such, the proposed Project would not cause the population of any species to drop below self-sustaining levels or reduce the population or range of special-status species.

The proposed Project would grade and pave approximately 1.5 acres on top of land underlain by artificial construction fill. Two buildings, the Empty Can Warehouse and the Food Testing and Animal Nutrition Building, were both found ineligible for listing under the CRHR and LAHCM in 2008 and 2019. No significant historical resources are located within the Project area, and as such, no impacts would occur to major examples of California history or prehistory.

Overall, the proposed Project would have less-than-significant impacts regarding the potential to degrade the quality of the environment, reduce habitat and wildlife populations, eliminate plant or animal communities, reduce the range of special-status species, and eliminate California historical resources. No mitigation is required.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, effects of other current projects, and the effects of probable future projects.)

**Less-than-Significant Impact.** As discussed in each issue area in Section 4, Environmental Analysis and Discussion of Impacts, the proposed Project would have either no impacts or less-than-significant impacts to all issue areas. In the absence of significant Project-level impacts and a relatively small area of impact, the incremental contribution of the proposed Project would not be cumulatively considerable. Generally, contributions to air quality and greenhouse gas emissions impacts are cumulative due to the regional and global nature of air pollution and climate change, respectively. As described in Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, the proposed Project would have less-than-significant impacts to all issue areas. All projects in the region would comply with applicable laws, further reducing their cumulative impacts to air quality and greenhouse gas emissions. Therefore, the proposed Project would not have a cumulatively considerable impact regarding these issues. Impacts are less than significant, and no mitigation is required.

- c. Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

**Less-than-Significant Impact.** Based on the issue area analyses in Section 4, Environmental Analysis and Discussion of Impacts, the proposed Project is not anticipated to have significant impacts that would cause substantial adverse effects on human beings, either directly or indirectly. All impacts related to the proposed Project are less than significant, and no mitigation is required.

## 5.0 PROPOSED FINDING

LAHD has prepared this IS/ND to address the environmental impacts of the proposed Project. Based on the analysis provided in this IS/ND, LAHD finds that the proposed Project would not have a significant impact on the environment.

## 6.0 PREPARERS AND CONTRIBUTORS

This IS/ND was prepared by City of Los Angeles Harbor Department with assistance by Aspen Environmental Group. Members of the professional staff are listed below.

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## 7.0 ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BMP	best management practices
C&D	construction and demolition
CAAP	Clean Air Action Plan
CALGEM	Department of Conservation Geologic Energy Management Division
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHE	cargo handling equipment
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2e</sub>	carbon dioxide equivalent
CRHR	California Register of Historical Resources
dBA	A-weighted decibels
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
ECOS	Environmental Conservation Online System
EIR	environmental impact report
EMFAC	emissions factor
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
GHG	greenhouse gas
HMI	Hazardous Materials Inventory
HP	horsepower
HRA	health risk assessment
in	inch
IS	Initial Study
IS/ND	Initial Study/Negative Declaration
LA	Los Angeles
LADOT	Los Angeles Department of Transportation
LAFD	Los Angeles Fire Department
LAHCM	Los Angeles Historic-Cultural Monuments
LAHD	Los Angeles Harbor Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Sanitation
lb	pounds
LID	low impact development
LRA	Local Responsibility Area
LST	Localized Significance Thresholds

m <sup>3</sup>	cubic meter
MBTA	Migratory Bird Treaty Act
µg	microgram
MT	metric tons
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
PM	particulate matter
PM10	particulate matter 10 microns or less in diameter
PM2.5	fine particulate matter 2.5 microns or less in diameter
PMP	Port Master Plan
POLA	Port of Los Angeles
POLB	Port of Long Beach
PPV	peak particle velocity
PRC	Public Resources Code
REC	Recognized Environmental Conditions
RRP	Release Response Plan
RSL	Regional Screening Level
RP	Revocable Permits
RWQCB	Regional Water Quality Control Board
SA	Space Assignment
SB	Senate Bill
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SEA	Significant Ecological Areas
sec	second
SO <sub>x</sub>	sulfur oxides
SR	State Route
SWIRP	Solid Waste Integrated Resource Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TIWRP	Terminal Island Water Reclamation Plant
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UTR	utility tractor rig
VMT	vehicle miles traveled
VOC	volatile organic compound
WRAP	Water Resources Action Plan
yr	year
ZIMAS	Zoning Information Map Access System

## 8.0 REFERENCES

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# **Appendices**

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Appendix A. Air Quality Calculations

Appendix B. Noise and Vibration Calculations



# **Appendix A**

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## Air Quality Calculations



Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

## Innovative Barracuda Chassis Depot Project South Coast Air Basin, Summer

### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	13.22	Acre	13.22	575,863.20	0

#### 1.2 Other Project Characteristics

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	31
<b>Climate Zone</b>	11	<b>Operational Year</b>	2022		

**Utility Company** Los Angeles Department of Water & Power

<b>CO2 Intensity (lb/MW/hr)</b>	1227.89	<b>CH4 Intensity (lb/MW/hr)</b>	0.029	<b>N2O Intensity (lb/MW/hr)</b>	0.006
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#### 1.3 User Entered Comments & Non-Default Data

Project Characteristics - Phase 3 Construction per Applicant with additional Low Impact Development (LID) design/construction needs assumptions.

Construction Phase - Per Applicant and addition of 600 sf concrete block wall removal during demolition day and LID work during grading and paving phases.

Off-road Equipment - Per applicant and added backhoe for 600 sf concrete block wall removal

Off-road Equipment - Per Applicant, with excavator and backhoe added for additional LID components.

Off-road Equipment - Per Applicant...assuming striping machine is battery operated

Off-road Equipment - Per Applicant, with excavator and backhoe added for LID work.

Trips and VMT - Per Applicant, with additions for current site conditions. Hauling trips include equipment delivery removal, LID materials during grading/compaction, and 980 cy asphalt for paving.

Demolition - Per two-4 cy dumpsters and block wall removal addition

Grading - Per Applicant - balanced cut and fill, no import or export

Architectural Coating - Estimate - 50 Percent of new area = 270,470 square feet x 0.05 = 13,524 square feet to be coated.

Construction Off-road Equipment Mitigation - Tier 4 equipment required by LAHD. Fugitive Dust Control is limited to exposed area watering as there is no unpaved travel for on-road vehicles and no fine bulk material transportation.



Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Mobilization	Site Preparation	3/1/2021	3/2/2021	5	2	
2	Fence Modification/Demolition	Demolition	3/3/2021	3/3/2021	5	1	
3	Grading/Compaction	Grading	3/4/2021	3/12/2021	5	7	Grading with LID
4	Paving/Concrete	Paving	3/15/2021	3/17/2021	5	3	With LID work
5	Pavement Striping/Fence Installation	Architectural Coating	3/18/2021	3/19/2021	5	2	

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 13.22**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 13,524 (Architectural Coating – sqft)**

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Fence Modification/Demolition	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Fence Modification/Demolition	Welders	1	4.00	46	0.45
Grading/Compaction	Excavators	1	8.00	158	0.38
Grading/Compaction	Graders	1	6.00	187	0.41
Grading/Compaction	Plate Compactors	1	3.00	8	0.43
Grading/Compaction	Rollers	1	6.00	80	0.38
Grading/Compaction	Rubber Tired Loaders	1	6.00	203	0.36
Grading/Compaction	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Paving/Concrete	Pavers	1	8.00	130	0.42
Paving/Concrete	Pumps	1	4.00	84	0.74
Paving/Concrete	Rollers	1	8.00	80	0.38
Pavement Striping/Fence Installation	Welders	1	4.00	46	0.45
Paving/Concrete	Excavators	1	8.00	158	0.38
Paving/Concrete	Tractors/Loaders/Backhoes	1	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Mobilization	0	8.00	2.00	12.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Fence Modification/Demolition	2	8.00	4.00	20.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading/Compaction	6	32.00	2.00	40.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving/Concrete	5	32.00	4.00	172.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Pavement Striping/Fence Installation	1	16.00	4.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.1 Mitigation Measures Construction**

Use Cleaner Engines for Construction Equipment  
Water Exposed Area

**3.2 Mobilization - 2021**

**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0456	1.5557	0.3436	4.6000e-003	0.1048	4.8500e-003	0.1097	0.0287	4.6400e-003	0.0334		499.9581	499.9581	0.0352		500.8390
Vendor	5.6300e-003	0.1915	0.0465	5.1000e-004	0.0128	3.9000e-004	0.0132	3.6800e-003	3.7000e-004	4.0600e-003		54.1488	54.1488	3.3500e-003		54.2325
Worker	0.0335	0.0218	0.3004	8.9000e-004	0.0894	6.6000e-004	0.0901	0.0237	6.1000e-004	0.0243		88.5519	88.5519	2.3900e-003		88.6115
<b>Total</b>	<b>0.0847</b>	<b>1.7691</b>	<b>0.6905</b>	<b>6.0000e-003</b>	<b>0.2070</b>	<b>5.9000e-003</b>	<b>0.2129</b>	<b>0.0561</b>	<b>5.6200e-003</b>	<b>0.0617</b>		<b>642.6587</b>	<b>642.6587</b>	<b>0.0410</b>		<b>643.6830</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.2 Mobilization - 2021**

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0456	1.5557	0.3436	4.6000e-003	0.1048	4.8500e-003	0.1097	0.0287	4.6400e-003	0.0334		499.9581	499.9581	0.0352		500.8390
Vendor	5.6300e-003	0.1915	0.0465	5.1000e-004	0.0128	3.9000e-004	0.0132	3.6800e-003	3.7000e-004	4.0600e-003		54.1488	54.1488	3.3500e-003		54.2325
Worker	0.0335	0.0218	0.3004	8.9000e-004	0.0894	6.6000e-004	0.0901	0.0237	6.1000e-004	0.0243		88.5519	88.5519	2.3900e-003		88.6115
<b>Total</b>	<b>0.0847</b>	<b>1.7691</b>	<b>0.6905</b>	<b>6.0000e-003</b>	<b>0.2070</b>	<b>5.9000e-003</b>	<b>0.2129</b>	<b>0.0561</b>	<b>5.6200e-003</b>	<b>0.0617</b>		<b>642.6587</b>	<b>642.6587</b>	<b>0.0410</b>		<b>643.6830</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.3 Fence Modification/Demolition - 2021  
Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					0.4280	0.0000	0.4280	0.0648	0.0000	0.0648			0.0000			0.0000
Off-Road	0.2918	2.1763	2.5546	3.6100e-003	0.1209	0.1209	0.1209	0.1142	0.1142	0.1142		329.4139	329.4139	0.0865		331.5763
<b>Total</b>	<b>0.2918</b>	<b>2.1763</b>	<b>2.5546</b>	<b>3.6100e-003</b>	<b>0.4280</b>	<b>0.1209</b>	<b>0.5489</b>	<b>0.0648</b>	<b>0.1142</b>	<b>0.1790</b>		<b>329.4139</b>	<b>329.4139</b>	<b>0.0865</b>		<b>331.5763</b>

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1520	5.1856	1.1455	0.0153	0.3493	0.0162	0.3655	0.0957	0.0155	0.1112		1,666.5271	1,666.5271	0.1175		1,669.4634
Vendor	0.0113	0.3831	0.0930	1.0100e-003	0.0256	7.8000e-004	0.0264	7.3700e-003	7.5000e-004	8.1200e-003		108.2975	108.2975	6.7000e-003		108.4649
Worker	0.0335	0.0218	0.3004	8.9000e-004	0.0894	6.6000e-004	0.0901	0.0237	6.1000e-004	0.0243		88.5519	88.5519	2.3900e-003		88.6115
<b>Total</b>	<b>0.1967</b>	<b>5.5905</b>	<b>1.5389</b>	<b>0.0172</b>	<b>0.4643</b>	<b>0.0176</b>	<b>0.4820</b>	<b>0.1268</b>	<b>0.0168</b>	<b>0.1436</b>		<b>1,863.3765</b>	<b>1,863.3765</b>	<b>0.1265</b>		<b>1,866.5398</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.3 Fence Modification/Demolition - 2021**

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					0.1669	0.0000	0.1669	0.0253	0.0000	0.0253			0.0000			0.0000
Off-Road	0.0504	0.6254	2.5050	3.6100e-003	5.2600e-003	5.2600e-003	5.2600e-003	5.2600e-003	5.2600e-003	5.2600e-003	0.0000	329.4139	329.4139	0.0865		331.5763
<b>Total</b>	<b>0.0504</b>	<b>0.6254</b>	<b>2.5050</b>	<b>3.6100e-003</b>	<b>0.1669</b>	<b>5.2600e-003</b>	<b>0.1722</b>	<b>0.0253</b>	<b>5.2600e-003</b>	<b>0.0305</b>	<b>0.0000</b>	<b>329.4139</b>	<b>329.4139</b>	<b>0.0865</b>		<b>331.5763</b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.1520	5.1856	1.1455	0.0153	0.3493	0.0162	0.3655	0.0957	0.0155	0.1112		1.666.527 <sup>1</sup>	1.666.527 <sup>1</sup>	0.1175		1.669.463 <sup>4</sup>
Vendor	0.0113	0.3831	0.0930	1.0100e-003	0.0256	7.8000e-004	0.0264	7.3700e-003	7.5000e-004	8.1200e-003		108.2975	108.2975	6.7000e-003		108.4649
Worker	0.0335	0.0218	0.3004	8.9000e-004	0.0894	6.6000e-004	0.0901	0.0237	6.1000e-004	0.0243		88.5519	88.5519	2.3900e-003		88.6115
<b>Total</b>	<b>0.1967</b>	<b>5.5905</b>	<b>1.5389</b>	<b>0.0172</b>	<b>0.4643</b>	<b>0.0176</b>	<b>0.4820</b>	<b>0.1268</b>	<b>0.0168</b>	<b>0.1436</b>		<b>1,863.376<sup>5</sup></b>	<b>1,863.376<sup>5</sup></b>	<b>0.1265</b>		<b>1,866.539<sup>8</sup></b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.4 Grading/Compaction - 2021  
Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					0.2121	0.0000	0.2121	0.0229	0.0000	0.0229			0.0000			0.0000
Off-Road	1.1706	12.9279	9.5457	0.0201	0.5455	0.5455	0.5455	0.5022	0.5022	0.5022	1,939.771 2	1,939.771 2	1,939.771 2	0.6245		1,955.384 3
<b>Total</b>	<b>1.1706</b>	<b>12.9279</b>	<b>9.5457</b>	<b>0.0201</b>	<b>0.2121</b>	<b>0.5455</b>	<b>0.7576</b>	<b>0.0229</b>	<b>0.5022</b>	<b>0.5251</b>			<b>1,939.771 2</b>	<b>0.6245</b>		<b>1,955.384 3</b>

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0434	1.4816	0.3273	4.3800e-003	0.0998	4.6200e-003	0.1044	0.0274	4.4200e-003	0.0318			476.1506	0.0336		476.9895
Vendor	5.6300e-003	0.1915	0.0465	5.1000e-004	0.0128	3.9000e-004	0.0132	3.6800e-003	3.7000e-004	4.0600e-003			54.1488	3.3500e-003		54.2325
Worker	0.1339	0.0874	1.2015	3.5500e-003	0.3577	2.6500e-003	0.3603	0.0949	2.4400e-003	0.0973			354.2075	9.5500e-003		354.4461
<b>Total</b>	<b>0.1830</b>	<b>1.7605</b>	<b>1.5753</b>	<b>8.4400e-003</b>	<b>0.4703</b>	<b>7.6600e-003</b>	<b>0.4779</b>	<b>0.1259</b>	<b>7.2300e-003</b>	<b>0.1331</b>			<b>884.5068</b>	<b>0.0465</b>		<b>885.6681</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.4 Grading/Compaction - 2021**

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					0.0827	0.0000	0.0827	8.9300e-003	0.0000	8.9300e-003			0.0000			0.0000
Off-Road	0.2445	1.0595	12.1058	0.0201	0.0326	0.0326	0.0326	0.0326	0.0326	0.0326	0.0000	1,939.771 <sub>2</sub>	1,939.771 <sub>2</sub>	0.6245		1,955.384 <sub>3</sub>
<b>Total</b>	<b>0.2445</b>	<b>1.0595</b>	<b>12.1058</b>	<b>0.0201</b>	<b>0.0827</b>	<b>0.0326</b>	<b>0.1153</b>	<b>8.9300e-003</b>	<b>0.0326</b>	<b>0.0415</b>	<b>0.0000</b>	<b>1,939.771<sub>2</sub></b>	<b>1,939.771<sub>2</sub></b>	<b>0.6245</b>		<b>1,955.384<sub>3</sub></b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0434	1.4816	0.3273	4.3800e-003	0.0998	4.6200e-003	0.1044	0.0274	4.4200e-003	0.0318		476.1506	476.1506	0.0336		476.9895
Vendor	5.6300e-003	0.1915	0.0465	5.1000e-004	0.0128	3.9000e-004	0.0132	3.6800e-003	3.7000e-004	4.0600e-003		54.1488	54.1488	3.3500e-003		54.2325
Worker	0.1339	0.0874	1.2015	3.5500e-003	0.3577	2.6500e-003	0.3603	0.0949	2.4400e-003	0.0973		354.2075	354.2075	9.5500e-003		354.4461
<b>Total</b>	<b>0.1830</b>	<b>1.7605</b>	<b>1.5753</b>	<b>8.4400e-003</b>	<b>0.4703</b>	<b>7.6600e-003</b>	<b>0.4779</b>	<b>0.1259</b>	<b>7.2300e-003</b>	<b>0.1331</b>		<b>884.5068</b>	<b>884.5068</b>	<b>0.0465</b>		<b>885.6681</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.5 Paving/Concrete - 2021  
Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Off-Road	1.0428	10.1766	12.1948	0.0189	0.5481	0.5481	0.5481	0.5114	0.5114	0.5114		1,823.0407	1,823.0407	0.5059		1,835.6870
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>1.0428</b>	<b>10.1766</b>	<b>12.1948</b>	<b>0.0189</b>	<b>0.5481</b>	<b>0.5481</b>	<b>0.5481</b>	<b>0.5114</b>	<b>0.5114</b>	<b>0.5114</b>		<b>1,823.0407</b>	<b>1,823.0407</b>	<b>0.5059</b>		<b>1,835.6870</b>

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.4357	14.8665	3.2837	0.0440	1.0014	0.0463	1.0477	0.2744	0.0443	0.3187		4,777.3777	4,777.3777	0.3367		4,785.7950
Vendor	0.0113	0.3831	0.0930	1.0100e-003	0.0256	7.8000e-004	0.0264	7.3700e-003	7.5000e-004	8.1200e-003		108.2975	108.2975	6.7000e-003		108.4649
Worker	0.1339	0.0874	1.2015	3.5500e-003	0.3577	2.6500e-003	0.3603	0.0949	2.4400e-003	0.0973		354.2075	354.2075	9.5500e-003		354.4461
<b>Total</b>	<b>0.5809</b>	<b>15.3359</b>	<b>4.5782</b>	<b>0.0485</b>	<b>1.3847</b>	<b>0.0498</b>	<b>1.4344</b>	<b>0.3766</b>	<b>0.0475</b>	<b>0.4242</b>		<b>5,239.8827</b>	<b>5,239.8827</b>	<b>0.3529</b>		<b>5,248.7060</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.5 Paving/Concrete - 2021**

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	0.2245	0.9729	13.8452	0.0189		0.0299	0.0299		0.0299	0.0299	0.0000	1.823.0407	1.823.0407	0.5059		1.835.6870
Paving	0.0000				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.2245</b>	<b>0.9729</b>	<b>13.8452</b>	<b>0.0189</b>		<b>0.0299</b>	<b>0.0299</b>		<b>0.0299</b>	<b>0.0299</b>	<b>0.0000</b>	<b>1.823.0407</b>	<b>1.823.0407</b>	<b>0.5059</b>		<b>1.835.6870</b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.4357	14.8655	3.2837	0.0440	1.0014	0.0463	1.0477	0.2744	0.0443	0.3187		4.777.3777	4.777.3777	0.3367		4.785.7950
Vendor	0.0113	0.3831	0.0930	1.0100e-003	0.0256	7.8000e-004	0.0264	7.3700e-003	7.5000e-004	8.1200e-003		108.2975	108.2975	6.7000e-003		108.4649
Worker	0.1339	0.0874	1.2015	3.5500e-003	0.3577	2.6500e-003	0.3603	0.0949	2.4400e-003	0.0973		354.2075	354.2075	9.5500e-003		354.4461
<b>Total</b>	<b>0.5809</b>	<b>15.3359</b>	<b>4.5782</b>	<b>0.0485</b>	<b>1.3847</b>	<b>0.0498</b>	<b>1.4344</b>	<b>0.3766</b>	<b>0.0475</b>	<b>0.4242</b>		<b>5.239.8827</b>	<b>5.239.8827</b>	<b>0.3529</b>		<b>5.248.7060</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.6 Pavement Striping/Fence Installation - 2021**  
**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	31.3419					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1513	0.7545	0.8594	1.2800e-003		0.0371	0.0371		0.0371	0.0371		103.7389	103.7389	0.0135		104.0766
<b>Total</b>	<b>31.4932</b>	<b>0.7545</b>	<b>0.8594</b>	<b>1.2800e-003</b>		<b>0.0371</b>	<b>0.0371</b>		<b>0.0371</b>	<b>0.0371</b>		<b>103.7389</b>	<b>103.7389</b>	<b>0.0135</b>		<b>104.0766</b>

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000			0.0000	0.0000		0.0000
Vendor	0.0113	0.3831	0.0930	1.0100e-003	0.0256	7.8000e-004	0.0264	7.3700e-003	7.5000e-004	8.1200e-003		108.2975	108.2975	6.7000e-003		108.4649
Worker	0.0670	0.0437	0.6008	1.7800e-003	0.1788	1.3200e-003	0.1802	0.0474	1.2200e-003	0.0487		177.1037	177.1037	4.7700e-003		177.2231
<b>Total</b>	<b>0.0782</b>	<b>0.4268</b>	<b>0.6938</b>	<b>2.7900e-003</b>	<b>0.2044</b>	<b>2.1000e-003</b>	<b>0.2066</b>	<b>0.0548</b>	<b>1.9700e-003</b>	<b>0.0568</b>		<b>285.4012</b>	<b>285.4012</b>	<b>0.0115</b>		<b>285.6880</b>

Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Summer

**3.6 Pavement Striping/Fence Installation - 2021**

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Archit. Coating	31.3419					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0219	0.5020	0.7484	1.2800e-003		1.4600e-003	1.4600e-003		1.4600e-003	1.4600e-003	0.0000	103.7389	103.7389	0.0135		104.0766
<b>Total</b>	<b>31.3638</b>	<b>0.5020</b>	<b>0.7484</b>	<b>1.2800e-003</b>		<b>1.4600e-003</b>	<b>1.4600e-003</b>		<b>1.4600e-003</b>	<b>1.4600e-003</b>	<b>0.0000</b>	<b>103.7389</b>	<b>103.7389</b>	<b>0.0135</b>		<b>104.0766</b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Vendor	0.0113	0.3831	0.0930	1.0100e-003	0.0256	7.8000e-004	0.0264	7.3700e-003	7.5000e-004	8.1200e-003		108.2975	108.2975	6.7000e-003		108.4649
Worker	0.0670	0.0437	0.6008	1.7800e-003	0.1788	1.3200e-003	0.1802	0.0474	1.2200e-003	0.0487	177.1037	177.1037	177.1037	4.7700e-003		177.2231
<b>Total</b>	<b>0.0782</b>	<b>0.4268</b>	<b>0.6938</b>	<b>2.7900e-003</b>	<b>0.2044</b>	<b>2.1000e-003</b>	<b>0.2066</b>	<b>0.0548</b>	<b>1.9700e-003</b>	<b>0.0568</b>		<b>285.4012</b>	<b>285.4012</b>	<b>0.0115</b>		<b>285.6880</b>



Innovative Barracuda Chassis Depot Project - South Coast Air Basin, Annual

**3.2 Mobilization - 2021**

**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	5.0000e-005	1.6000e-003	3.5000e-004	0.0000	1.0000e-004	0.0000	1.1000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.4503	0.4503	3.0000e-005	0.0000	0.4511
Vendor	1.0000e-005	1.9000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0486	0.0486	0.0000	0.0000	0.0486
Worker	3.0000e-005	2.0000e-005	2.8000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0765	0.0765	0.0000	0.0000	0.0766
<b>Total</b>	<b>9.0000e-005</b>	<b>1.8100e-003</b>	<b>6.8000e-004</b>	<b>0.0000</b>	<b>2.0000e-004</b>	<b>0.0000</b>	<b>2.1000e-004</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>0.5754</b>	<b>0.5754</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.5763</b>

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**3.2 Mobilization - 2021**

**Mitigated Construction On-Site**

Category	tons/yr										MT/yr				CO2e	
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4		N2O
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction Off-Site**

Category	tons/yr										MT/yr				CO2e	
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4		N2O
Hauling	5.0000e-005	1.6000e-003	3.5000e-004	0.0000	1.0000e-004	0.0000	1.1000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.4503	0.4503	3.0000e-005	0.0000	0.4511
Vendor	1.0000e-005	1.9000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0486	0.0486	0.0000	0.0000	0.0486
Worker	3.0000e-005	2.0000e-005	2.8000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0765	0.0765	0.0000	0.0000	0.0766
<b>Total</b>	<b>9.0000e-005</b>	<b>1.8100e-003</b>	<b>6.8000e-004</b>	<b>0.0000</b>	<b>2.0000e-004</b>	<b>0.0000</b>	<b>2.1000e-004</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>0.5754</b>	<b>0.5754</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.5763</b>

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**3.3 Fence Modification/Demolition - 2021  
Unmitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					2.1000e-004	0.0000	2.1000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.5000e-004	1.0900e-003	1.2800e-003	0.0000	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	6.0000e-005	0.0000	0.1494	0.1494	4.0000e-005	0.0000	0.1504
<b>Total</b>	<b>1.5000e-004</b>	<b>1.0900e-003</b>	<b>1.2800e-003</b>	<b>0.0000</b>	<b>2.1000e-004</b>	<b>6.0000e-005</b>	<b>2.7000e-004</b>	<b>3.0000e-005</b>	<b>6.0000e-005</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>0.1494</b>	<b>0.1494</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.1504</b>

**Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	8.0000e-005	2.6700e-003	5.9000e-004	1.0000e-005	1.7000e-004	1.0000e-005	1.8000e-004	5.0000e-005	1.0000e-005	5.0000e-005	0.0000	0.7505	0.7505	5.0000e-005	0.0000	0.7518
Vendor	1.0000e-005	1.9000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0486	0.0486	0.0000	0.0000	0.0486
Worker	2.0000e-005	1.0000e-005	1.4000e-004	0.0000	4.0000e-005	0.0000	4.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0383	0.0383	0.0000	0.0000	0.0383
<b>Total</b>	<b>1.1000e-004</b>	<b>2.8700e-003</b>	<b>7.8000e-004</b>	<b>1.0000e-005</b>	<b>2.2000e-004</b>	<b>1.0000e-005</b>	<b>2.3000e-004</b>	<b>6.0000e-005</b>	<b>1.0000e-005</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.8373</b>	<b>0.8373</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>0.8388</b>

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**3.3 Fence Modification/Demolition - 2021**

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
	tons/yr																
	MT/yr																
Fugitive Dust					8.0000e-005	0.0000	8.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.0000e-005	3.1000e-004	1.2500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.1494	0.1494	4.0000e-005	0.0000	0.0000	0.1504
<b>Total</b>	<b>3.0000e-005</b>	<b>3.1000e-004</b>	<b>1.2500e-003</b>	<b>0.0000</b>	<b>8.0000e-005</b>	<b>0.0000</b>	<b>8.0000e-005</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>0.1494</b>	<b>0.1494</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.1504</b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
	tons/yr																
	MT/yr																
Hauling	8.0000e-005	2.6700e-003	5.9000e-004	1.0000e-005	1.7000e-004	1.0000e-005	1.8000e-004	5.0000e-005	1.0000e-005	5.0000e-005	0.0000	0.7505	0.7505	5.0000e-005	0.0000	0.0000	0.7518
Vendor	1.0000e-005	1.9000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0486	0.0486	0.0000	0.0000	0.0000	0.0486
Worker	2.0000e-005	1.0000e-005	1.4000e-004	0.0000	4.0000e-005	0.0000	4.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0383	0.0383	0.0000	0.0000	0.0000	0.0383
<b>Total</b>	<b>1.1000e-004</b>	<b>2.8700e-003</b>	<b>7.8000e-004</b>	<b>1.0000e-005</b>	<b>2.2000e-004</b>	<b>1.0000e-005</b>	<b>2.3000e-004</b>	<b>6.0000e-005</b>	<b>1.0000e-005</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.8373</b>	<b>0.8373</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.8388</b>

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**3.4 Grading/Compaction - 2021  
Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
tons/yr																	
MT/yr																	
Fugitive Dust					7.4000e-004	0.0000	7.4000e-004	8.0000e-005	0.0000	8.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.1000e-003	0.0453	0.0334	7.0000e-005	1.9100e-003	1.9100e-003	1.9100e-003	1.7600e-003	1.7600e-003	1.7600e-003	0.0000	6.1591	6.1591	1.9800e-003	0.0000	6.2086	
<b>Total</b>	<b>4.1000e-003</b>	<b>0.0453</b>	<b>0.0334</b>	<b>7.0000e-005</b>	<b>7.4000e-004</b>	<b>1.9100e-003</b>	<b>2.6500e-003</b>	<b>8.0000e-005</b>	<b>1.7600e-003</b>	<b>1.8400e-003</b>	<b>0.0000</b>	<b>6.1591</b>	<b>6.1591</b>	<b>1.9800e-003</b>	<b>0.0000</b>	<b>6.2086</b>	

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
MT/yr																
Hauling	1.5000e-004	5.3500e-003	1.1800e-003	2.0000e-005	3.4000e-004	2.0000e-005	3.6000e-004	9.0000e-005	2.0000e-005	1.1000e-004	0.0000	1.5010	1.5010	1.1000e-004	0.0000	1.5037
Vendor	2.0000e-005	6.8000e-004	1.7000e-004	0.0000	4.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.1700	0.1700	1.0000e-005	0.0000	0.1702
Worker	4.7000e-004	3.5000e-004	3.9100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.3000e-004	0.0000	1.0715	1.0715	3.0000e-005	0.0000	1.0722
<b>Total</b>	<b>6.4000e-004</b>	<b>6.3500e-003</b>	<b>5.2600e-003</b>	<b>3.0000e-005</b>	<b>1.6100e-003</b>	<b>3.0000e-005</b>	<b>1.6500e-003</b>	<b>4.3000e-004</b>	<b>3.0000e-005</b>	<b>4.5000e-004</b>	<b>0.0000</b>	<b>2.7424</b>	<b>2.7424</b>	<b>1.5000e-004</b>	<b>0.0000</b>	<b>2.7461</b>

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**3.4 Grading/Compaction - 2021**

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					2.9000e-004	0.0000	2.9000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.6000e-004	3.7100e-003	0.0424	7.0000e-005	1.1000e-004	1.1000e-004	1.1000e-004	1.1000e-004	1.1000e-004	1.1000e-004	0.0000	6.1591	6.1591	1.9800e-003	0.0000	6.2086
<b>Total</b>	<b>8.6000e-004</b>	<b>3.7100e-003</b>	<b>0.0424</b>	<b>7.0000e-005</b>	<b>2.9000e-004</b>	<b>1.1000e-004</b>	<b>4.0000e-004</b>	<b>3.0000e-005</b>	<b>1.1000e-004</b>	<b>1.4000e-004</b>	<b>0.0000</b>	<b>6.1591</b>	<b>6.1591</b>	<b>1.9800e-003</b>	<b>0.0000</b>	<b>6.2086</b>

**Mitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	1.5000e-004	5.3500e-003	1.1800e-003	2.0000e-005	3.4000e-004	2.0000e-005	3.6000e-004	9.0000e-005	2.0000e-005	1.1000e-004	0.0000	1.5010	1.5010	1.1000e-004	0.0000	1.5037
Vendor	2.0000e-005	6.8000e-004	1.7000e-004	0.0000	4.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.1700	0.1700	1.0000e-005	0.0000	0.1702
Worker	4.7000e-004	3.5000e-004	3.9100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.3000e-004	0.0000	1.0715	1.0715	3.0000e-005	0.0000	1.0722
<b>Total</b>	<b>6.4000e-004</b>	<b>6.3800e-003</b>	<b>5.2600e-003</b>	<b>3.0000e-005</b>	<b>1.6100e-003</b>	<b>3.0000e-005</b>	<b>1.6500e-003</b>	<b>4.3000e-004</b>	<b>3.0000e-005</b>	<b>4.5000e-004</b>	<b>0.0000</b>	<b>2.7424</b>	<b>2.7424</b>	<b>1.5000e-004</b>	<b>0.0000</b>	<b>2.7461</b>

# Innovative Barracuda Chassis Depot

## Operations Criteria Air Pollutant Emissions Summary

Baseline	Daily Emissions lbs/day					
	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	5.36	0.63	0.20	0.29	1.70	0.02
Off-Road Emissions	6.34	0.21	0.20	2.23	13.60	0.02
Total	11.70	0.85	0.40	2.53	15.30	0.04

Proposed Project	Daily Emissions lbs/day					
	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	21.51	1.99	0.64	0.96	4.88	0.06
Off-Road Emissions	35.43	1.19	1.14	12.49	76.02	0.13
Total	56.93	3.18	1.78	13.45	80.90	0.19

Incremental Increase	Daily Emissions lbs/day					
	NOx	PM10	PM2.5	ROG	CO	SOx
Onroad Emissions	16.18	1.37	0.45	0.66	3.19	0.05
Off-Road Emissions	29.09	0.98	0.94	10.26	62.42	0.10
Total	45.27	2.35	1.39	10.92	65.61	0.15

## Operations GHG Emissions Summary

Baseline	CO2e MT
Onroad Emissions	214.10
Off-Road Emissions	232.39
Total	446.49

Proposed Project	CO2e MT
Onroad Emissions	811.49
Off-Road Emissions	1,299.26
Total	2,110.75

Incremental Increase	CO2e MT
Onroad Emissions	597.39
Off-Road Emissions	1,066.88
Total	1,664.26

Annualized Emissions Increase	CO2e MT
Construction Emissions From CalEEMod	20.43
Amortized Construction Emissions (30-years)	0.68
Incremental Operations Increase	1,664.26
Total Increase	1,664.94

## Innovative Barracuda Chassis Depot

### Operation - Off-Road Emissions

#### Axxumptions

- 1) Emissions factors based on the specific equipment at the site, which is not proposed to change.
- 2) Baseline fuel use is 19,500 gallons of diesel per year and 5,187 gallons of propane for year per the project owner.
- 3) The increase in equipment use is assumed proportional to the increase in the size of the storage area multiplied by the increase in truck trips delivering/picking up chassis. The increase in size is related to the average linear distance that needs to be covered, not the area and so is related to the square root of the difference in the area.
- 4) This proportional increase estimate is considered conservative as there are likely more chassis movement operations during maintenance than just for stop/go activity.
- 5) The following yard equipment list was provided by the project owner:

Barracuda Chassis Yard Equipment List									
ID	Description	Manufacturer	Model	Year	Fuel Type	Engine Tier	Engine HP		
1	UTR	Capacity	TJ5000	2014	Diesel	4	225		
2	Fork Lift	Hyster	H210HD	2010	Diesel	3	155		
3	Fork Lift	Hoist	P360	2013	Diesel	4	160		
4	Fork Lift	Mitsubishi	FG30K	1994	Propane	N.A.	66		
5	Fork Lift	Hyster	H135XL	1992	Propane	N.A.	101		

Where: Tier 4 is assumed to mean interim Tier 4 given the model year dates preceed requirements for full Tier 4.

- 6) The increase in number of daily trips is 342 round trips/day post-project minus 84 round trips/day baseline, or an increase of 258 round trips/day.
- 7) Fuel use is assumed to be proportional to equipment horsepower for each piece of equipment.
- 8) Emissions factors for Diesel fuel equipment determined using CARB OFFROAD program.
- 9) Emissions factors for Propane fuel equipment determined per CARB Factors published by SDAPCD.

**Emissions Factors**

Item	Emissions Factors lbs/gallon									
	Hp	NOx	PM10	PM2.5	ROG	CO	SOx	CO2e		
Utility Tractor Rig (UTR)	225	0.01379	0.00038	0.00035	0.00429	0.15156	0.00021	22.79		
ForkLift	155	0.11921	0.00409	0.00377	0.01192	0.14882	0.00021	22.79		
ForkLift	160	0.02627	0.00064	0.00059	0.00872	0.14040	0.00021	22.79		
ForkLift (Propane)	66	0.13900	0.00500	0.00500	0.08300	0.12900	0.00035	13.09		
ForkLift (Propane)	101	0.13900	0.00500	0.00500	0.08300	0.12900	0.00035	13.09		

Note: PM=PM10/PM2.5

	Offroad Equipment	HP	gallyr	gal/day	Daily Emissions lbs						GHG MTCO2e/Yr
					NOx	PM10	PM2.5	ROG	CO	SOx	
Baseline	Utility Tractor Rig (UTR)	225	8,125	31	0.43	0.01	0.01	0.13	4.72	0.01	83.99
	ForkLift	155	5,597	21	2.56	0.09	0.08	0.26	3.19	0.00	57.86
	ForkLift	160	5,778	22	0.58	0.01	0.01	0.19	3.11	0.00	59.73
	ForkLift (Propane)	66	2,050	8	1.09	0.04	0.04	0.65	1.01	0.00	12.17
	ForkLift (Propane)	101	3,137	12	1.67	0.06	0.06	1.00	1.55	0.00	18.63
	Totals				6.34	0.21	0.20	2.23	13.60	0.02	232.39

	Offroad Equipment	HP	gallyr	gal/day	Daily Emissions lbs						GHG MTCO2e/Yr
					NOx	PM10	PM2.5	ROG	CO	SOx	
Proposed Project	Utility Tractor Rig (UTR)	225	45426	174	2.40	0.07	0.06	0.75	26.41	0.04	469.61
	ForkLift	155	31294	120	14.31	0.49	0.45	1.43	17.86	0.02	323.51
	ForkLift	160	32303	124	3.25	0.08	0.07	1.08	17.40	0.03	333.95
	ForkLift (Propane)	66	11461	44	6.11	0.22	0.22	3.65	5.67	0.02	68.05
	ForkLift (Propane)	101	17539	67	9.35	0.34	0.34	5.58	8.68	0.02	104.14
	Totals				35.43	1.19	1.14	12.49	76.02	0.13	1,299.26

	Offroad Equipment	HP	gallyr	gal/day	Daily Emissions lbs						GHG MTCO2e/Yr
					NOx	PM10	PM2.5	ROG	CO	SOx	
Incremental Increase	Utility Tractor Rig (UTR)	225	37301	143	1.97	0.05	0.05	0.61	21.68	0.03	385.62
	ForkLift	155	25697	99	11.75	0.40	0.37	1.17	14.67	0.02	265.65
	ForkLift	160	26525	102	2.67	0.07	0.06	0.89	14.28	0.02	274.22
	ForkLift (Propane)	66	9411	36	5.02	0.18	0.18	3.00	4.66	0.01	55.88
	ForkLift (Propane)	101	14402	55	7.68	0.28	0.28	4.58	7.13	0.02	85.52
	Totals				29.09	0.98	0.94	10.26	62.42	0.10	1,066.88

# Innovative Barracuda Chassis Depot

## Operation - On-Road Emissions

### Assumptions

- 1) Emissions factors developed from CARB EMFAC2017 output. Paved road dust included using AP-42 and CalEEMod input defaults.
- 2) Passenger vehicle class is a miles weighted average of the EMFAC LDA, LDT1, LDT2, LHD1, LHD2, and MCY vehicle types, all fuel types.
- 3) Vendor vehicle class is the diesel fueled MHDT vehicle type. Fuel trips would be more frequent so one vendor trips is assumed on maximum day.
- 4) Heavy Duty Truck is the diesel fueled HHDT vehicle type meeting POLA's Clean Trucks Program designated as T7 POLA in EMFAC2017.
- 5) Daily chassis delivery truck trips are 84 round trips/day for baseline operations, and estimated to be 342 round trips/day post project.
- 6) The distance for each chassis delivery/pickup trip is estimated by the LAHD to be 4.6345 miles per round trip
- 7) Passenger vehicle round trips increase from 11 per day for baseline to 20 per day for the proposed Project.
- 8) Trip VMT for passenger and delivery vehicles are based on the values in CalEEMod for the South Coast Air Basin.

	Emissions Factors lbs/mile						
	NOx	PM10	PM2.5	ROG	CO	SOx	CO2e
Passenger Vehicle	2.85E-04	7.68E-04	2.08E-04	3.21E-04	2.78E-03	6.87E-06	0.70252184
Delivery Vehicle	5.67E-03	1.11E-03	4.18E-04	2.26E-04	8.30E-04	1.96E-05	2.16649057
Heavy Duty Truck	1.34E-02	9.66E-04	3.26E-04	4.83E-04	2.05E-03	3.68E-05	4.05905772

	Vehicle Type	Daily VMT	Daily Emissions - Lbs					GHG MTCO2e/Yr	
			NOx	PM10	PM2.5	ROG	CO		SOx
Baseline	Passenger	323	0.092	0.248	0.067	0.104	0.898	0.002	27
	Delivery	7	0.039	0.008	0.003	0.002	0.006	0.000	0
	Heavy Truck	389	5.232	0.376	0.127	0.188	0.797	0.014	187
	<b>Total</b>		<b>5.363</b>	<b>0.632</b>	<b>0.197</b>	<b>0.293</b>	<b>1.701</b>	<b>0.017</b>	<b>214</b>

	Vehicle Type	Daily VMT	Daily Emissions					GHG MTCO2e/Yr	
			NOx	PM10	PM2.5	ROG	CO		SOx
Proposed Project	Passenger	588	0.168	0.452	0.122	0.189	1.632	0.004	49
	Delivery	7	0.039	0.008	0.003	0.002	0.006	0.000	2
	Heavy Truck	1,585	21.300	1.531	0.517	0.765	3.245	0.058	761
	<b>Total</b>		<b>21.507</b>	<b>1.991</b>	<b>0.642</b>	<b>0.955</b>	<b>4.883</b>	<b>0.063</b>	<b>811</b>

	Vehicle Type	Daily VMT	Daily Emissions					GHG MTCO2e/Yr	
			NOx	PM10	PM2.5	ROG	CO		SOx
Incremental Increase	Passenger	265	0.075	0.203	0.055	0.085	0.735	0.002	22
	Delivery	7	0.039	0.008	0.003	0.002	0.006	0.000	1
	Heavy Truck	1,196	16.069	1.155	0.390	0.577	2.448	0.044	574
	<b>Total</b>		<b>16.183</b>	<b>1.366</b>	<b>0.448</b>	<b>0.664</b>	<b>3.188</b>	<b>0.046</b>	<b>597</b>

# Innovative Barracuda Chassis Depot

## Screening Level Health Risk Assessment

Assumptions:

- 1) The HRA is based on the increase in onsite DPM emissions. The increase in TACs from the propane engines and the offsite DPM emissions will create minimal risks in comparison to the onsite emissions.
- 2) The nearest sensitive receptors are located more than 500 meters from the site, liveaboards at the Al Larson Marina approximately 600 meters southwest of the project site.
- 3) The initial screening level risk assessment X/Q value is based on SCAQMD Rule 1401 Package "N" Version 8.1 Table 10.4B.
- 4) Risk value is calculated using the ARB/OEHHA AB2588 Risk Assessment Standalone Tool (RAST).

### Screening Level Risk Calculation

X/Q	0.09 Long Beach Airport with 500 meters to residential receptor
	2.06 Long Beach Airport with 50 meters to off-site worker receptor
Emissions	0.19 lb for Construction (onsite exhaust emissions from CalEEMod)
	136.42 lb/yr increase for Operation

Concentration in ug/m<sup>3</sup> = X/Q x ton/year

Residential annual concentration = 0.00614755

Residential annual concentration = 0.14071055

Using RAST for 30 year exposure the Cancer Risk =

	5.31E-06 Residential Risk
	8.77E-06 Worker Risk
Chronic Risk =	1.23E-03 Residential Risk
	2.81E-02 Worker Risk

# Innovative Barracuda Chassis Depot

## Fuel Use Operation and Construction

### Assumptions

- 1) Operation off-road fuel use per off-road emissions sheet
- 2) On-road fuel use per following calculated average MPG
  - 27.39 Passenger vehicles
  - 10.79 Delivery vehicles
  - 5.76 POLA Heavy Trucks
- 3) Construction fuel use per operation fuel CO2e factors

### Operations

	Fuel Totals (gallons)		
	Baseline	Project	Increase
Offroad			
Diesel	19,500	109,023	89,523
Propane	5,187	29,000	23,813
Onroad			
Diesel	17,788	71,911	54,290
Gasoline	3,078	5,597	2,519

### Operation Totals

Diesel	37,288	180,934	143,813
Propane	5,187	29,000	23,813
Gasoline	3,078	5,597	2,519

### Construction from CalEEMod

	Fuel Totals		
	MTCO2e	Gals/MTCO2e	Gallons
Diesel	18.634	94.29	1757
Gasoline	1.8	114.56	206



# **Appendix B**

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## Noise and Vibration Calculations



**APPENDIX B: Innovative Barracuda Chassis Depot Project Noise and Vibration Calculations**

**NOISE CALCULATIONS**

<b>Construction Equipment</b>	<b>Lmax Ref dBA</b>	<b>Useage Per Hour</b>	<b>Quantity</b>	<b>Distance to Receptor</b>	<b>Equip Leq(h)</b>
<i>Phase 3 (Grading/Compaction)</i>	@ 50 ft	(%)		feet	dBA
Front Loader (front-end loader)	79	40	1	2000	43.0
Grader	85	40	1	2000	49.0
Roller Compactor (roller)	80	20	1	2000	41.0
<b>Total Quantity of Equipment:</b>			<b>3</b>		
<b>Peak Unmitigated Composite Leq(h):</b>			<b>50.5</b>		

**Source:** FHWA, 2006

**VIBRATION CALCULATIONS**

			Distance to:	Source	Receptor
			(feet)	25	2,000
Construction Phase	Equipment Description	Equivalent Equipment	Number of Equipment	PPV (in/sec)	PPV (in/sec)
<i>Mobilization</i>	Flatbed Truck	Loaded Truck	1	0.076	0.000106
<b>Mobilization Total</b>				<b>N/A</b>	<b>0.000106</b>
<i>Fence Modification</i>	Flatbed Truck	Loaded Truck	1	0.076	0.000106
	Welding Machine	N/A	1	0	0.000000
	Backhoe	Large Bulldozer	1	0.089	0.000124
<b>Fence Modification Total</b>				<b>N/A</b>	<b>0.000231</b>
<i>Grading/Compaction</i>	Front Loader	Large Bulldozer	1	0.089	0.000124
	Grader	Large Bulldozer	1	0.089	0.000124
	Roller Compactor	Vibratory Roller	1	0.210	0.000293
	Hand Vibratory Compactor	Vibratory Roller	1	0.210	0.000293
	Water Truck	Loaded Truck	1	0.076	0.000106
	Excavator	Large Bulldozer	1	0.089	0.000124
	Backhoe	Large Bulldozer	1	0.089	0.000124
<b>Grading/Compaction Total</b>				<b>N/A</b>	<b>0.001191</b>
<i>Paving/Concrete</i>	Dump Truck	Loaded Truck	1	0.076	0.000106
	Asphalt Paving Machine	Large Bulldozer	1	0.089	0.000124
	Roller Compactor	Vibratory Roller	1	0.210	0.000293
	Concrete Truck	Loaded Truck	1	0.076	0.000106
	Concrete Pump	N/A	1	0	0.000000
	Excavator	Large Bulldozer	1	0.089	0.000124
	Backhoe	Large Bulldozer	1	0.089	0.000124
<b>Paving/Concrete Total</b>				<b>N/A</b>	<b>0.000879</b>
<i>Pavement Striping and Fence Mods/Install</i>	Striping Machine	N/A	1	0	0.000000
	Flatbed Truck	Loaded Truck	1	0.076	0.000106
	Welding Machine	N/A	1	0	0.000000
<b>Pavement Striping and Fence Mods/Install Total</b>				<b>N/A</b>	<b>0.000106</b>
<b>MAXIMUM</b>				<b>N/A</b>	<b>0.001191</b>
<b>SIGNIFICANT?</b>				<b>N/A</b>	<b>NO</b>

**Significance Threshold: 0.3 in/sec can damage older residential structures and cause substantial annoyance to humans.**

**Source:** Caltrans, 2013 - Table 18, 19, and 20; Equation 12

**Notes:** N/A = Not Applicable/Available. Calculations conservatively assume all pieces of construction equipment are in operation simultaneously. Equivalent equipment has been conservatively assigned based on limited available information on vibration source levels from general construction equipment (Caltrans, 2013 - Table 18).