

## 6. Other CEQA Considerations

### 6.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(c) requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” As described in detail in Section 5.0 of this EIR, implementation of the Proposed Project would not result in environmental impacts that cannot be reduced to a level below significance after implementation of Project design features; regulatory requirements; plans, programs, policies; and feasible mitigation measures.

### 6.2 GROWTH INDUCEMENT

State CEQA Guidelines Section 15126.2(e), Growth-Inducing Impact of the Proposed Project, requires that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

1. Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;
2. Remove obstacles to population growth;
3. Require the construction of new or expanded facilities that could cause significant environmental effects; or
4. Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

#### **1. Does the Project directly or indirectly foster economic or population growth, or the construction of additional housing?**

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as the Southern California Association of Governments (SCAG). The Proposed Project would contribute to the economic growth in the City of Los Angeles and the surrounding areas. However, the growth would not be unexpected or constitute substantial unplanned growth. According to regional population projections included in SCAG’s 2020 RTP/SCS, the City of Los Angeles is projected to increase its population by 21 percent and its housing stock by 31 percent between 2016 and 2045 (SCAG, 2020). Over this same time period, employment in the City is expected to increase by 16 percent. While the Project site has been planned for open space under the Port of Los Angeles Port Master Plan (POLA PMP), the Project site is designated for General/Bulk Cargo – Non-Hazardous Industrial and Commercial uses by the City of Los Angeles General Plan, and the Proposed Project would only result in approximately six operational employees. Thus, the resulting increase in jobs would be marginal and would not result in substantial unplanned growth.

In addition, the Proposed Project would create jobs that would likely be filled by residents of San Pedro, City of Los Angeles, or the surrounding areas. Employees would live in housing either already built or housing planned for development in the City of Los Angeles. Because it is anticipated that most of the future employees of the Proposed Project would already be living in the City of Los Angeles or surrounding areas,

the Proposed Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing.

The Proposed Project may cause indirect economic growth as it would generate tax revenue for the City. Additionally, employees (short-term construction and long-term operational employees) of the Project site would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers. The Proposed Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, that are available in areas near the Project site. As such, it is highly unlikely that additional commercial or retail services would be required to meet Proposed Project demands.

## **2. Does the Project remove obstacles to population growth?**

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The Proposed Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

As described in Section 3.0, *Project Description*, the Project does not propose roadway extensions into new undeveloped areas that would allow for additional growth and development. The Proposed Project would include installation of a signal at the intersection of the proposed driveway and John S. Gibson Boulevard, but this signal would not remove obstacles to population growth. The Proposed Project would connect to the existing water, sewer, and electric infrastructure within John S. Gibson Boulevard to serve operations. In addition, an on-site storm drain system consisting of ten belowground capture and use cisterns would be constructed. Stormwater captured within the drainage system would be utilized for on-site landscaping irrigation. The proposed infrastructure improvements have been designed to serve only the demands of the Proposed Project. In addition, the Proposed Project would not require the expansion of existing public facilities to serve the Project site.

While the Proposed Project would require a POLA PMP amendment to change the site's designation from Open Space to Maritime Support, the site has already been planned for industrial uses by the City of Los Angeles General Plan and zoning map. Therefore, the Proposed Project would not result in significant growth inducing impacts.

## **3. Does the proposed Project require the construction of new or expanded facilities that could cause significant environmental effects?**

Growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide necessary public services that requires the construction of new public service facilities, or if it can be demonstrated that the potential growth significantly affects the environment. The Proposed Project would not substantially increase the demand for fire protection, emergency response, and police protection, due to the lack of permanent proposed structures and minimal number of employees required on site. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the Proposed Project would not occur. The Proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

#### 4. Does the Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Under the POLA PMP, the POLA has been planned for the expansion of cargo handling facilities, along with continued support of various commercial and recreational uses. Areas to the north of the Project site are developed with industrial warehouses. Areas southeast of the Project site are developed with container storage and terminal storage. Areas to the west of the Project site are developed with a vehicle storage facility and the Western Fuel Oil Company. Development of the Proposed Project would be intended to service existing goods movement within the POLA. As described, the Project vicinity is currently built out consistent to the POLA PMP. Further, the proposed on-site infrastructure is only sized to serve the Proposed Project and would not have capacity to serve additional development projects in the area. Therefore, the Proposed Project would not individually or cumulatively encourage or facilitate substantial growth.

Based on the foregoing analysis, the Proposed Project would not directly or indirectly result in substantial, adverse growth-inducing impacts.

### 6.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.... Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.” (CEQA Guidelines Section 15126.2(d)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

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

- Lands in the Project site would be committed to truck, chassis, and trailer parking once the proposed parking lot is constructed. Secondary effects associated with this irreversible commitment of land resources include:
  - Changes in views associated with construction of the new parking and associated development, including a retaining wall (Section 5.1, *Aesthetics*)
  - Increased traffic on John S. Gibson Boulevard (see Section 5.11, *Transportation*).
  - Emissions of air pollutants and greenhouse gases associated with Proposed Project construction and operation (see Section 5.2, *Air Quality* and Section 5.7, *Greenhouse Gases*).
  - Consumption of non-renewable energy associated with construction and operation of the Proposed Project due to the use of automobiles, trucks, lighting, etc. (see Section 5.5, *Energy*).
  - Increased ambient noise associated with an increase in activities and traffic from the Proposed Project (see Section 5.9, *Noise*).

- Construction of the Proposed Project as described in Section 3.0, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

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

## 6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

State CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The following environmental issue areas would not be potentially impacted by the Proposed Project as detailed below and determined by the Initial Study (included as EIR Appendix A).

### **Agricultural and Forestry Resources**

A majority of the Project site has a Port of Los Angeles Master Plan Land Use designation of Open Space. Small portions of the site are within the jurisdiction of the City of Los Angeles, with a General Plan land use designation of General/Bulk Cargo – Non-Hazardous Industrial and Commercial. The parcels within the City of Los Angeles are zoned as Heavy Industrial and Light Industrial. Therefore, the Project site is not intended for agricultural use. The Project site is identified by the California Department of Conservation Important Farmland Map as “Urban and Built-Up Land” (DOC, 2018). Therefore, the Proposed Project would result in no impacts related to conversion of agricultural land.

None of the parcels within the Project site are currently zoned as forest land, timberland, or Timberland Production, and the Proposed Project would not result in the conversion of farmland to non-agricultural or forest land to non-forest land, either directly or indirectly. As such, the Proposed Project would not involve other changes in the existing environment that could result in conversion of farmland to non-agricultural use or forest land to non-forest land.

### **Hydrology and Water Quality**

Development of the Proposed Project would require the implementation of a construction Storm Water Pollution Prevention Plan and operational Water Quality Management Plan, which would minimize adverse changes in surface runoff volume and water quality. As a result, the potential for erosion and on-site flooding would be limited with the implementation of construction and operational best management practices (BMPs). Therefore, impacts related to water quality standards, stormwater runoff volume, and erosion would be less than significant.

The Proposed Project is not within a special flood and seiche zone. Although the Project site is within a tsunami zone, operation of the Proposed Project would not introduce hazardous materials besides diesel or gas from potential minor truck and automobile leaks, which would be immediately cleaned up in compliance with regulatory requirements. Tsunami impacts to the Project site are similar to those of the existing uses within the vicinity of the Project site. Therefore, the Proposed Project would not exacerbate risk of release of pollutants due to inundation.

Operation of the Proposed Project would not require groundwater pumping. In addition, the Proposed Project would not develop any structures that require the use of potable water. The Project is not used or designated for groundwater recharge. Therefore, the Proposed Project would not result in the substantial decrease of groundwater supplies. In addition, compliance with the Los Angeles Regional Water Quality Control Board Basin Plan would ensure that water quality standards would not be violated. Therefore, the Proposed Project would not interfere with any water quality or groundwater management plan.

### **Mineral Resources**

The Project site is adjacent to the Wilmington Oil Field. However, no active mining or oil operations exist on the Project site (CALGem, 2023). Additionally, the Project site is in MRZ Zone 3, defined as a mineral resource zone of undetermined significance (CGS, 1994). As described above, the land use designations on site do not allow for mining. Therefore, implementation of the Proposed Project would not cause the loss of availability of mineral resources valuable to the region or state, and no impact would occur.

### **Population and Housing**

The Project proposes to develop a truck, chassis, and trailer parking lot on an undeveloped site. Operation of the parking lot would not directly result in unplanned population growth since it does not propose any residential dwelling units and a maximum of two employees would be required on site at any given time. The Proposed Project would not displace existing housing as the existing lot is vacant. In addition, there are no residential zones immediately adjacent to the Project site. Therefore, the Proposed Project would not result in substantial unplanned population growth nor a displacement of existing people.

### **Public Services**

Development of the Proposed Project is not anticipated to result in any substantial increase in demand for public services such that new facilities would be required. The Project does not propose to develop any flammable habitable structures. Security would be provided by on-site employees and security lighting; therefore, demand for police services would not substantially increase. With the lack of residential development and minimal number of employees required for operation, the Proposed Project would not induce population growth such that demand for public services would increase. Therefore, impacts related to fire and police services, schools, parks, and other facilities would not occur.

### **Recreation**

The Proposed Project does not propose any type of residential use or other land use that may induce population growth that would increase the use of existing neighborhood and regional parks or other recreational facilities. Consequently, Project implementation would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park. Additionally, development of the Proposed Project would not include construction of recreational facilities, and no impact would occur.

### **Tribal Cultural Resources**

The LAHD did not receive any requests for consultation under Assembly Bill 52 from any of the seven tribes traditionally and culturally affiliated with the Project vicinity. LAHD received a request for information from Gabrieleno Band of Mission Indians - Kizh Nation; however, the Tribe did not request additional consultation. A Sacred Lands File search of the Project site yielded negative results. In addition, the Project site is highly disturbed and undeveloped, but was previously developed, with the surrounding vicinity fully developed. Therefore, there are no known tribal cultural resources on site. No impacts to tribal cultural resources would occur as a result of the Proposed Project.

### **Utilities and Service Systems**

The Proposed Project would connect to existing water, sewer, and electric infrastructure. The new on-site private service lines would only serve the Proposed Project. Therefore, no significant environmental impacts related to the construction of utility infrastructure would occur as a result of Proposed Project development.

Operation of the Proposed Project would result in a negligible increase in water demand, attributed to the on-site restrooms and landscape irrigation. The proposed drought-tolerant landscaping would primarily rely on reclaimed rainwater. Therefore, the Proposed Project would have sufficient water supplies to serve the Project under all climatic conditions. In addition, the operation of the proposed truck trailer lot is not anticipated to generate excess solid waste or wastewater. Implementation of the Proposed Project would be required to be consistent with all mandatory federal, state, and City regulations related to solid waste generated during construction and operations. Based on the City of Los Angeles Bureau of Engineering's wastewater generation rates for parking lots, the Proposed Project would result in approximately 0.016 mgd of wastewater per day (LABOE, 2012), which is within the 15 million gallons per day (mgd) treatment capacity of the Terminal Island Water Reclamation Plant.

Therefore, no impacts to utilities and service systems would occur as a result of the Project.

### **Wildfire**

According to the CAL FIRE Fire Hazard Severity Zones, the Project site is not within a Very High Fire Hazard Severity Zone (CAL FIRE, 2023). The Proposed Project does not propose to develop flammable structures. Additionally, site access would be subject to plan check review by the City Planning Division and the Los Angeles Fire Department to ensure compliance with fire protection standards. Therefore, the Proposed Project would not result in any impacts related to wildfire.

## 6.5 REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE). (2023). *Fire Hazard Severity Zone Viewer*. Accessed April 2023 from:

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California Geological Survey (CGS). (1994). *Generalized Mineral Land Classification Map of Los Angeles County – South Half*. Accessed April 2023 from:

<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

Department of Conservation (DOC). (2018). *California Important Farmland Finder*. Accessed April 2023 from: <https://maps.conservation.ca.gov/DLRP/CIFF/>

Los Angeles Bureau of Engineering (LABOE). (2012). *Sewerage Facilities Charge Sewerage Generation Factor for Residential and Commercial Categories*. Accessed August 18, 2023, from:

<https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf>

Southern California Association of Governments (SCAG). (2020). *The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of The Southern California Association of Governments*. Accessed August 2023 from: <https://scag.ca.gov/post/connect-social-2020>

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